

June 2013

Dear Members of the World Trade Organization,

We, the undersigned civil society organizations, representing hundreds of millions of members across the globe, urge you to abandon the negotiations towards a binding agreement on Trade Facilitation in advance of the upcoming 9th Ministerial meeting of the World Trade Organization (WTO) in Bali. Thus, binding rules on Trade Facilitation should not be promoted either inside the WTO through the proposed Trade Facilitation (TF) agreement, nor through other avenues such as bilateral or regional Free Trade Agreements (FTAs) or Economic Partnership Agreements (EPAs). Developing countries should have the policy space to adopt, at their discretion, higher levels or standards and customs-related procedures as and when capacity exists to do so, taking into account their development context.

No empirical evidence of benefits to developing countries: Proponents of the TF negotiations have argued that developing countries would benefit even more than developed countries from an agreement on Trade Facilitation. However, there is little empirical basis for this claim. Quite the contrary, the proposed binding agreement on Trade Facilitation is a key demand of the developed countries towards the Ministerial, because it will serve the interests of their corporations.

Better call it an “import-facilitating agreement”: A binding agreement on Trade Facilitation in the WTO would require developing countries to implement a set of rules reflective of the current trade facilitation practices of the developed countries. They would not address the urgent need to expand the productive and export capacities of the developing countries. Thus, while imports into developing countries would be facilitated by the new rules, it is difficult to imagine how exports from developing countries could be similarly facilitated. In fact, Trade Facilitation rules in the WTO should be more accurately called “import-facilitating rules” for developing countries. Hence, a TF agreement would likely result in the further worsening of the trade balance in many developing countries, leading to balance of payment problems that often further increase indebtedness.

A corporate-driven model: The proposed agreement on Trade Facilitation follows a model of corporate-driven globalization focused on increasing the volume of trade, rather than achieving globally-shared development goals through rules that facilitate countries' use of trade policy for their own development needs, and in accordance with their levels of development. In fact, a Trade Facilitation agreement at the WTO would create new markets – in customs and shipment processing for multinational corporations. At the same time, it would likely lead to the further privatization of ports, customs operations, and shipment processing, which leaves little or no space for local operators, and which has already led to a loss of jobs, downward pressure on wages, and erosion of labor rights for public workers in these sectors. A TF agreement would increase trade, which is a significant source of carbon emissions that contribute to global climate change.

Costs un-accounted for: While developed countries promote the proposed agreement as a “win-win,” most of the costs of a TF agreement to developing countries are rarely included in projected impact assessments. For example, there are significant implementation, regulatory, human resources, and infrastructure costs associated with the proposed Trade Facilitation agreement, many of which are recurring, and would be siphoned from national budgets, diverting available resources from development needs.

Loss of budget support for development priorities: A potential Trade Facilitation deal is also expected to lead to irreplaceable loss of tariff revenue. Compared to developed countries, the share of customs revenue in the total tax collection is much higher in developing countries and Least Developed Countries (LDCs). Foregone tariff revenue would have serious implications for national budgetary support for key development issues such as education, health, and poverty reduction. Reducing national budget support for addressing the Millennium Development Goals can in no way be referred to as a pro-development outcome.

Encroaching upon national regulatory and policy space: In addition, the provisions of the proposed Trade Facilitation agreement, as they are being negotiated, would undermine the regulatory capacities of developing countries. The proposed rules would expand the opportunities of multinational corporations to lobby in national and local legislative processes. Furthermore, the rules that would be enforced through a TF agreement would provide ample grounds for challenging regulations, laws, and procedures in member states.

Eroding the rights of developing countries and LDCs: Further eroding any claim to benefits for developing countries is the fact that there remain significant imbalances and incoherence within the text being negotiated. The new Trade Facilitation rules, being pushed by developed countries, have advanced significantly, and are set in binding language. Negotiations on Technical Assistance and Capacity Building, which are central to the original agreed Trade Facilitation negotiations mandate (2004), have been stalled by developed countries, and are currently framed in non-binding language.

The needs-assessment exercises of developing countries are likewise being utilized as a 'compliance assessment' tool in order to pressure developing countries into accepting the Trade Facilitation agreement rather than to encourage developed countries to increase their technical, and particularly financial assistance.

A WTO Trade Facilitation Agreement differs from unilateral and voluntary processes: Developing countries can benefit from more efficient and transparent trade procedures. But unilateral voluntary implementation of non-binding customs-related guidelines, and/or the Revised Kyoto Convention of the World Customs Organization, in accordance with national priorities and needs, is of a different nature and brings different implications compared to a binding TF agreement that could be enforced through the Dispute Settlement procedures of the WTO. Worse, the latter could lead to sectoral cross-retaliation among countries, the effects of which are expected to be more pernicious to the much smaller economies of developing countries and least developed countries.

What we need to see being advanced: Instead, any discussions at the WTO should focus on rectifying historical imbalances and asymmetries in the WTO, in order to provide more policy space for countries to implement solutions to the global economic crises. A starting point would be agreeing to the important proposal of the "G33" group of 46 developing countries to allow developing countries to promote domestic Food Security, and delivering on the LDC package at the upcoming Ministerial. In addition, a real advancement on the Special and Differential Treatment (SDT) and Implementation Agenda issues, long advocated for by developing countries, is long overdue. The WTO Turnaround Agenda of the Our World Is Not For Sale (OWINFS) network also provides an outline of such needed policy changes, which are essential to start the process of transforming the global trade system into one that works for sustainable and inclusive development for all.

Sincerely,

	International and Regional Networks	
1	ACP Civil Society Forum	The Forum is a coalition of 80 not-for-profit organisations working on issues relating to ACP-EU development cooperation. It seeks to cater for the diverse range civil society development issues within the wide geographic coverage of the ACP group.
2	Africa Europe Faith and Justice Network (AEFJN)	AEFJN is a Network present in all countries of Africa and most countries in Europe to promote fairer relations between Africa and Europe. AEFJN works on economic issues related to Africa in the European Union and International Organizations policies.
3	Africa Trade Network	The Political Economy unit (PECU) of TWN-Africa co-ordinates the Africa Trade Network which was established in 1998 by TWN-Africa, and has over 25 members from 15 countries in Africa. The ATN has observer status with the African Union, and has provided a means of increased interaction between civil society groups and African governments, including the annual Conference of African Ministers of Trade.
4	Arab NGO Network for Development (ANND)	ANND is a regional network, working in 12 Arab countries with seven national networks (with an extended membership of 200 CSOs from different backgrounds) and 23 NGO members.
5	Asia Pacific Mission for Migrants (APMM)	A regional migrant centre working in the Asia Pacific and Middle East region.
6	Asia Pacific Research Network (APRN)	APRN is a network of leading research NGOs in the Asia-Pacific. It is active in promoting exchange, coordination and capacity building support in research.
7	ASIAN PEASANT COALITION (APC)	Represent more than 15 million rural members (e.g. landless peasants, peasant women, dalits, agricultural workers, fisherfolks, pastoralists, and rural youth) from 33 organizations from Bangladesh, India, Indonesia, Malaysia, Mongolia, Nepal, Pakistan, Philippines, and Sri Lanka, struggling for genuine agrarian reform and people's food sovereignty.
8	Caribbean Dawn	A regional network of scholars and researchers who work on the issues of political economy, trade, Sustainable Development; Sexual and Reproductive Health and Rights; governance and women's equal participation in power and decision-making.

9	Civile d'Afrique Francophone (OSCAF) International	Siège Bénin - Un réseau International qui couvre plus d'une vingtaine de pays en Afrique et dont les membres travaillent sur les questions liées au commerce international, à l'investissement, à la responsabilité sociétale des entreprises et à l'efficacité du développement
10	Development Alternatives with Women for a New Era (DAWN)	Dawn is a network of feminist scholars, researchers and activists from the economic South working for economic and gender justice and sustainable and democratic development.
11	Dignity International	Dignity International's vision is of a world in which everyone enjoys human rights and lives in dignity; free from fear, poverty and discrimination. Dignity International advocates with, connects, and supports the empowerment of deprived and struggling communities in claiming their human rights, and creating social justice around the world.
12	IBON International	IBON initiates and implements international programs, develops and hosts international networks, initiates and participates in international advocacy campaigns, and establishes regional and country offices. IBON strengthens links between local campaigns and advocacies to international initiatives.
13	International Grail Justice and Trade Agreements Network	A coalition of groups working for peace and justice in 20 countries worldwide.
14	International Presentation Association	The mission of IPA is to channel our resources so that we can speak and act in partnership with others for global justice.
15	International Women's Alliance (IWA)	Global alliance of anti-imperialist grassroots-based women's organizations, institutions, alliances, networks and individuals committed to advancing national and social liberation.
16	LDC Watch	LDC Watch is a global alliance of national, regional and international civil society organisations (CSOs), networks and movements based in the LDCs.
17	Pacific Network on Globalisation (PANG)	PANG is a Pacific regional network promoting economic justice in globalisation with specific attention to accountability and transparency in economic and trade policy processes, Poverty eradication, Equitable development and sustainable livelihoods (opportunity, access, impact), Food sovereignty and environmental sustainability.

18	Pax Romana-The International Catholic Movement for Intellectual and Cultural Affairs (ICMICA/MIIC)	Global network of Catholic leaders committed to justice, peace and creation.
19	Plataforma Interamericana de Derechos Humanos, Democracia y Desarrollo (PIDHDD), Americas	La PIDHDD es un actor político, conformado por Capítulos Nacionales que articulan organizaciones sociales e instituciones de la sociedad civil, que promueve la plena vigencia y realización de los derechos humanos; Actualmente, se cuenta con capítulos nacionales constituidos y en funcionamiento en 16 países del continente americano: Argentina, Bolivia, Brasil, Chile, Colombia, Dominicana, Ecuador, El Salvador, Haití, Guatemala, México, Nicaragua, Paraguay, Perú, Uruguay y Venezuela.
20	Réseau des plates formes nationales des ONG des pays de l'Afrique Centrale (REPOGAC)	Sur les questions de développement et les processus d'intégration régionale ce réseau regroupe les plates-formes nationales des ONG des pays suivants: Angola, Burundi, Cameroun, République du Congo, Gabon, République Centrafricaine, la RDCONGO, RWANDA ET TCHAD.
21	The Southern Africa Development Community Council of Non Governmental Organizations (SADC-CNGO)	SADC-CNGO is the lead and membership based apex body of non-governmental organizations operating in all SADC Countries.
22	South Asia Alliance for Poverty Eradication (SAAPE)	An alliance to fight against poverty and injustice in South Asia comprising journalists, academics, trade unionists, human rights activists, NGOs and other civil society actors across the region.
23	Southern and Eastern African Trade Information and Negotiations Institute (SEATINI)	An African initiative to strengthen Africa's capacity to take a more effective part in the emerging global trading system and to better manage the process of Globalization.

	National Organizations	Country
24	11.11.11, Belgium	Belgium
25	3rd ACP Civil Society Forum	Jamaica
26	51% Coalition for Equality	Jamaica
27	Abibiman Foundation(AF)	Ghana
28	Action for Change and Progress in Africa	Kenya
29	Act Up-Paris	France
30	Agricultural Workers Union of TUC	Ghana
31	Alianza ONG	Dominican Republic
32	All Nepal Peasants Federation (ANPFa)	Nepal
33	Alliance Pour La Reconstruction Et Le Developpement Post-Confliit (ARDPC)	COTE D'IVOIRE

34	All Lanka Peasant's Front	Sri Lanka
35	Argentine Federation Of Commerce And Services Workers (FAECyS)	Argentina
36	Artisanal Mining African Network (AMAN)	Ghana
37	Association Commerciale, Agricole, Industriel et du Service - (ACAISA)	CAPE VERDE
38	Asociación de Iniciativas Populares Ditsö	Costa Rica
39	Asociación Nacional de Empresas Comercializadoras de Productores del Campo (ANEC)	Mexico
40	Asociacion Nacional De Industriales De Transformacion (ANIT)	Mexico
41	Attac	France
42	Attac Norway	Norway
43	Barbados Association of Non Governmental Organizations	Barbados
44	Belize Enterprise for Sustainable Technology	Belize
45	Berne Declaration	Switzerland
46	Bahrain Transparency Society (BTS)	Bahrain
47	Bharatiya Krishak Samaj (BKS)	India
48	Bia'lii, Consultancy and Research, AC (Mexico)	Mexico
49	Botswana Council of Non Governmental Organisations : BOCONGO	Botswana
50	Cacid-Reseau Enda Tiers Monde	Senegal
51	Campaign for a Life of Dignity for All (KAMP)	Philippines
52	Campaign for Climate Justice Nepal (CCJN)	Nepal
53	Central America Women's Network	UK
54	Central Unica de Trabajadores (CUT)	Colombia
55	Center for Encounter and active Non-Violence	Austria
56	Centre for Trade Policy and Development (CTPD)	Zambia
57	Centro de Estudios Sociales y Culturales	Mexico
58	Centre for Alternative Research and Studies (CARES)	Mauritius
59	CILONG - TCHAD	République du Tchad
60	Civil Society Bahamas	Bahamas
61	Civil Society Forum of Tonga (CSFT)	Tonga
62	Civil Society Movement of Sierra Leone	Sierra Leone
63	Civil Society Organization Network for Development (RESOCIDE) - Cadre de concertation des OSC pour le suivi du CSLP (CdC/CSLP)	BURKINA FASO
64	Civil society Plat-form "Action Développement et Intégration Régionale" "ADIR"	BURUNDI
65	Comhlámh	Ireland
66	Comité 1968 por las Libertades democráticas	Mexico
67	Comité du Forum Social Lémanique, Geneva	Switzerland
68	Comisión Nacional de Enlace (CNE)	Costa Rica
69	Concertation Nationale Des Organisations paysannes et des Producteurs (CNOP)	Gabon

70	Confederation of Labor and Allied Social Services (CLASS)	Philippines
71	Congress of South African Trade Unions (COSATU)	South Africa
72	Conseil de Concertation des ONGs de Développement (CCOD) du Congo Brazzaville	République du Congo Brazzaville
73	Conseil des ONG AGREES DU CAMEROUN (CONGAC)	Cameroun
74	CONSEIL INTER ONG EN CENTRAFRIQUE (CIONGCA)	Central Africa Rep.: Modeste GONDA
75	Conseil National des ONG de Développement (CNONGD)	RD Congo
76	Consumer education trust	Uganda
77	Consumers Protection Association(CPA)	Lesotho
78	Cook Islands Association of Non-Governmental Organisations (CIANGO)	Cook Islands
79	Coordination Southern Africa (KOSA e.V.)	Germany
80	Council for NGOs (CANGO)	Swaziland
81	Council of Canadians	Canada
82	Development Service Exchange (DSE)	Solomon Islands
83	Diverse Women for Diversity	India
84	Eastern and Southern Africa Small-scale Farmer's Forum (ESAFF)	Zambia
85	Economic Justice Network of FOCCISA	South Africa
86	Economic News Africa (EcoNews Africa)	Kenya
87	Ecuador Decide Adhiere	Ecuador
88	El Sindicato de trabajadores del Instituto Nacional para el Desarrollo de Capacidades del Sector Rural (STINCA)	Mexico
89	EQUATIONS	India
90	Equity BD - Equity and Justice Working Group	Bangladesh
91	Fairwatch	Italy
92	Federation de Femmes Enterpreneurs et Affairs de la CEDEAO (FEFA)	GUINEA CONAKRY
93	Federación De Trabajadores Del Agua Potable Y Alcantarillado Del Perú (FENTAP)	Peru
94	Federacion Sindical Obrero Campesina De Quintana Roo	Mexico
95	First African Bicycle Information Organization (FABIO)	Uganda
96	Foro Ciudadano de Participación por la Justicia y los Derechos Humanos (FOCO)	Argentina
97	Fórum das Organizações Não Governamentais Angolanas – (FONGA) Forum of NGOs in Angola (FONGA)	Angola
98	Forum das Ong de São Tomé e principe (FONG-STP)	Sao Tomé & Principe
99	Forum des ONG pour le Développement Durable (FONGDD)	Eq. Guinea
100	Foundation for Research in Science Technology & Ecology	India
101	Foundation pour le Developpment au Sahel (FDS)	Mali
102	Friends of the earth	Ghana
103	Fronteras Comunes A.C.	Mexico
104	FSM Alliance of NGOs - FANGO	Micronesia

105	Governance Links Tanzania	Tanzania
106	Grassroots Organisations of Trinidad & Tobago (GOTT)	Trinidad & Tobago
107	Green Ghana Initiative(GGI)	Ghana
108	Groupe d'Action et de Reflexion sur l'Environnement et le Développement (GARED)	Togo
109	Groupe de Recherche et d'Action pour la Promotion de l'Agriculture et du Développement (GRAPAD)	BENIN REPUBLIC
110	Grupo Sin Cuenta (G50)	El Salvador.
111	Initiatives for Dialogue and Empowerment through Alternative Legal Services (IDEALS)	Philippines
112	Initiative for Health & Equity in Society	India
113	Institute for Global Justice (IGJ)	Indonesia
114	Instituto Justiça Fiscal	Brazil
115	Instituto Nacional de Estudos e Pesquisa (INEI)	GUINEA BISSAU
116	Integrated Social Development Effort (ISDE)	Bangladesh
117	Inter Agency Group of Development Organizations (IAGDO)	Grenada
118	Iyanola (St.Lucia) Council for the Advancement of Rastafari Incorporated (I.C.A.R.)	St.Lucia
119	Jóvenes Frente Al G20 México	Mexico
120	Kalingo Carib Council	Dominica
121	Kenya Debt Relief Network (KENDREN)	Kenya
122	KILUSANG MAGBUBUKID NG PILIPINAS (KMP)	Philippines
123	Kiribati Association of Non-Governmental Organisation - KANGO	Kiribati
124	La Alianza Social Continental Capitulo Perú.	Peru
125	La Marcha Mundial de las Mujeres	Peru
126	Labour,Health and Human Rights Development Centre	Nigeria
127	Les Amis de la Terre-Togo	Togo
128	Lesotho Council of NGOs (LCN)	Lesotho
129	Lismore Presentation Sisters	Australia
130	Melanesian NGO Centre for Leadership (MNCL)	Papua New Guinea
131	Malawi Economic Justice Network (National NGO platform)	Malawi
132	Marshall Islands Council of NGOs (MICNGOS)	Marshall Islands
133	Mujeres para el Diálogo, AC	Mexico
134	Mauritius Council of Social Service (MACOSS)	Mauritius
135	Namibia Non-Governmental Organisations Forum Trust	Namibia
136	National Association Of Nigerian Traders (NANTS)	Nigeria
137	National Association of NGOs (NANGO)	Zimbabwe
138	National Council of NGOs	Kenya
139	National du Réseau des Ong de Développement et Associations de Défense des Droits de l'Homme et de la Démocratie (RODADDHD)	Niger
140	National Fisheries Solidarity Movement	Sri Lanka
141	National Forum for Mozambiquan NGOs and CBOs (TEIA)	Mozambique
142	Nauru Island Association of NGOs (NIANGO)	Nauru

143	Navdanya	India
144	Niue Island (Umbrella) Association of NGOs (NIUANGO)	Niue
145	Norwegian Trade Campaign	Norway
146	PANE & Cotonou Task Force	Ethiopia
147	Plateforme des Acteurs de la Société Civile au Bénin (PASCiB)	
148	Plate-forme des acteurs non étatiques pour le suivi de l'Accord de Cotonou au Sénégal	Senegal
149	Plate-Forme Nationale des Organisations de la Societe Civile de Madagascar	Madagascar
150	Policy Analysis and Research Institute of Lesotho (PARIL)	Lesotho
151	Port Louis Maritime Employees Association (PLMEA)	Mauritius
152	Presentation Congregation Queensland	Australia
153	Presentation Justice Network Ireland	Ireland
154	Programme de Plaidoyer Pour une Intégration Alternative (PPIA)	Haiti
155	Red Afrodescendientes	VENEZUELA
156	Red De Accion Ciudadana Frente Allibre Comercio E Inversion	El Salvador
157	Red Mexicana de Acción frente al Libre Comercio (RMALC)	Mexico
158	Red Nacional Género y Economía (REDGE)	Mexico
159	Resistance & Alternatives	Mauritius
160	Resistance and Alternatives to Globalization (RAG)	Indonesia
161	Roj Women's Association	UK
162	Roots for Equity	Pakistan
163	Rural Reconstruction Nepal (RRN)	Nepal
164	Rwanda Civil Society Platform	Rwanda
165	Samoa Umbrella for Non Governmental Organisation (SUNGO)	Samoa
166	Serikat Perempuan Indonesia - Indonesian Women Union	Indonesia
167	Seychelles Civil Society Organisations (Liaison Unit of the non-governmental organisations of Seychelles (LUNGOS))	Seychelles
168	Shirkat Gah	Pakistan
169	Siembra, AC	Mexico
170	SISTREN Theatre Collective	Jamaica
171	Sociedad Económica de Amigos del País. (Economic society of friends of the country)	Cuba
172	SOLIDARITÉ	France
173	South African NGO Council (SANGOCO)	South Africa
174	Stichting Projekta	Suriname
175	Tanzania Association of NGOs	Tanzania
176	Tchad Agir pour L'environnement (TCHAPE)	Chad
177	The Asia Foundation	Timor-Leste
178	The Association of Non- Governmental Organization (TANGO)	The Gambia

179	The Gilbert Agricultural and Rural Development Centre (GARDC)	Antigua and Barbuda
180	The Green Economics Initiative	Pakistan
181	Tuvalu Association of NGOs (TANGO)	Tuvalu
182	Unidad Ecológica Salvadoreña (UNES)	El Salvador
183	Vanuatu Association of NGOs (VANGO)	Vanuatu
184	Voice	Bangladesh
185	West African Women Association (WAWA)	Liberia
186	Windward Islands Farmers' Association (WINFA)	St. Vincent & the Grenadines
187	Women Across Differences (WAD)	GUYANA
188	Women's Media Watch	Jamaica
189	Working group Food Justice	The Netherlands
190	Worldview	The Gambia
191	X minus Y	The Netherlands
192	Young Women's Leadership Initiative	Jamaica
193	Zambia Council for Social Development	Zambia