



China Tax Alert

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China Customs Issues Important Announcement on Trade Facilitation, Getting Through the Last Mile of Customs Declaration for Various Customs Business

Regulations discussed in this issue:

- Notice of the General Administration of Customs on the opening of the Client Software and Business Data Exchange Interface for the Customs Pre-Input System (GAC Order [2016] No. 16), issued on and effective from 17 March 2016

Background

In order to improve customs clearance efficiency and reduce cost, China Customs has been committed to promoting reform and innovation empowered by information technologies. In 2015, China Customs has continuously promoted the nationwide reform of paperless customs clearance. In addition, paperless customs clearance is reinforced by other reform and innovation initiatives, such as measures to facilitate regional clearance integration, Customs and China Inspection and Quarantine (CIQ) integration, and domestic and international trade integration.

The Notice of the General Administration of Customs on Further Promoting the Steady Growth of Foreign Trade issued in 2015 has already been implemented. With the recent release of GAC Order [2016] No.16 (hereinafter referred to as Order No. 16), the GAC will loosen the nationwide restriction on direct filing from company side to Customs authority side. This is the latest action of China Customs to promote the steady growth of foreign trade and improve customs clearance efficiency for enterprises.

Pursuant to Order No. 16, the GAC released a client software and the data exchange interface for said direct filing, and released the Function List of the Customs direct filing system as well as the List of the Data Exchange Interface specification.

KPMG observations

[Why do we need an IT system to manage trade compliance and customs operation?](#)

While the import and export business has reached a certain scale, an enterprise's priority is to avoid manually inputting data and filling in documents, improve efficiency and control man-made errors, and put limited resources into the optimization of logistics and supply chain processes, as well as control over trade compliance risk.

Then an enterprise needs to set the goal of linking the entire internal system process, eliminating information silos, and ultimately enhancing the transparency of trade data and using data analytics to optimize customs management and drive its rapid development. The improvement and optimization of those management processes can never be possible without IT system solutions.

[Why do we need to connect the IT system to the customs system?](#)

Paperless customs clearance is a universal form under the global trend of trade facilitation. Customs of most of the world's major economies allow an enterprise or a third party to directly submit customs clearance data to the customs system.

Over the past years, key solution providers of global trade management have gained a deep understanding of the Chinese market to provide many manufacturing and trade enterprises with management software and system solutions for the entire process of trade compliance and customs operation. Similar services are also provided by some of China's small to medium-sized system solution providers.

However, before the release of Order No.16, no matter what kind of customs system an enterprise uses, final submission of data to customs generally needs to be completed by professional declaration companies (e.g. for the import and export declaration business) or system interface providers of certain types (e.g. for processing trade e-books).

Therefore, direct connection to the customs system for data submission is often seen as the last mile prohibiting an enterprise or a solution provider's best utilization of the customs system, which greatly limits the capabilities of system solutions. However, with the release of Order No.16, this last mile is expected to be overcome now. In addition, KPMG believes that the extent to which the system interface is opened under Order No. 16, if unchanged following tests, may push the openness of China's paperless customs clearance to match that of the Automatic Commercial Environment (ACE) Platform Project which has long been a pilot project of U.S Customs and Border Protection (CBP) (ACE is analogous to China E-Port).

[Technical details to be clarified](#)

We can learn functional modules of the customs filing system and general field names from the attachments of Order No.16. However, if we want to develop the corresponding data interface, we still need to confirm data exchange details with relevant authorities. Such details include the format of request and response data, data carriers (such as XML) and data sequence in transmission.

Market impacts

Professional declaration agencies with a good standing have long-term investments and market deployment in relation to systematic and automatic clearance processes. The implementation of this Order will not cause great impacts on them; on the contrary, it will improve their competitiveness in the market.

Domestic and international providers of customs-related IT system solutions will have a new competitive opportunity. Professionals who are not only familiar with the customs operation process within an enterprise, but also understand customs and international trade compliance, as well as IT system solutions in a technical sense will be favoured by the market. This will certainly set a higher standard for professionals in this field.

KPMG assistance

The KPMG Trade and Customs Team is committed to helping clients with the investigation, experiment, implementation and management of paperless customs clearance processes and their derivative customs administration processes. Our professionals are involved in almost all non-duty-related and non-OGA certificate-related, as well as duty-related and OGA certificate-related pilot work, whether under integrated customs clearance processes or paperless customs clearance processes.

In addition, KPMG maintains a good relationship with various well-known domestic and international solution providers of trade compliance and customs operation. We hosted or co-participated in tendering and bidding events to provide clients with IT system solutions and services. KPMG services are mainly focused on the analysis and establishment of an enterprise's business models other than system development (current As-is Process and future To-be Process following the application of system solutions), the analysis and establishment of an enterprise's system models, the elimination of cognitive bias between an enterprise's business models and system solutions, and the execution of system plans and user training programs.

Contacts

North China:

Eric Zhou, Partner in Charge of Trade and Customs, 010-85087610, ec.zhou@KPMG.com

Central China:

Anthony Chau, Partner, 021-22123206, anthony.chau@kpmg.com

South China:

Lilly Li, Partner, 020-38138999, lilly.li@kpmg.com

Chris Chen, Senior Manager of Customs IT System Solution, 021-22123298, chris.g.chen@KPMG.com

Khoonming Ho

Head of Tax,
KPMG China
Tel. +86 (10) 8508 7082
khoonming.ho@kpmg.com

Beijing/Shenyang

David Ling
Tel. +86 (10) 8508 7083
david.ling@kpmg.com

Tianjin

Eric Zhou
Tel. +86 (10) 8508 7610
ec.zhou@kpmg.com

Qingdao

Vincent Pang
Tel. +86 (532) 8907 1728
vincent.pang@kpmg.com

Shanghai/Nanjing

Lewis Lu
Tel. +86 (21) 2212 3421
lewis.lu@kpmg.com

Chengdu

Anthony Chau
Tel. +86 (28) 8673 3916
anthony.chau@kpmg.com

Hangzhou

John Wang
Tel. +86 (571) 2803 8088
john.wang@kpmg.com

Guangzhou

Lilly Li
Tel. +86 (20) 3813 8999
lilly.li@kpmg.com

Fuzhou/Xiamen

Maria Mei
Tel. +86 (592) 2150 807
maria.mei@kpmg.com

Shenzhen

Eileen Sun
Tel. +86 (755) 2547 1188
eileen.gh.sun@kpmg.com

Hong Kong

Karmen Yeung
Tel. +852 2143 8753
karmen.yeung@kpmg.com

Northern China

David Ling

Head of Tax,
Northern Region
Tel. +86 (10) 8508 7083
david.ling@kpmg.com

Vaughn Barber

Tel. +86 (10) 8508 7071
vaughn.barber@kpmg.com

Andy Chen

Tel. +86 (10) 8508 7025
andy.m.chen@kpmg.com

Yali Chen

Tel. +86 (10) 8508 7571
yali.chen@kpmg.com

Milano Fang

Tel. +86 (532) 8907 1724
milano.fang@kpmg.com

Tony Feng

Tel. +86 (10) 8508 7531
tony.feng@kpmg.com

John Gu

Tel. +86 (10) 8508 7095
john.gu@kpmg.com

Helen Han

Tel. +86 (10) 8508 7627
h.han@kpmg.com

Naoko Hirasawa

Tel. +86 (10) 8508 7054
naoko.hirasawa@kpmg.com

Josephine Jiang

Tel. +86 (10) 8508 7511
josephine.jiang@kpmg.com

Henry Kim

Tel. +86 (10) 8508 5000
henry.kim@kpmg.com

Li Li

Tel. +86 (10) 8508 7537
li.li@kpmg.com

Lisa Li

Tel. +86 (10) 8508 7638
lisa.h.li@kpmg.com

Thomas Li

Tel. +86 (10) 8508 7574
thomas.li@kpmg.com

Simon Liu

Tel. +86 (10) 8508 7565
simon.liu@kpmg.com

Paul Ma

Tel. +86 (10) 8508 7076
paul.ma@kpmg.com

Alan O'Connor

Tel. +86 (10) 8508 7521
alan.oconnor@kpmg.com

Vincent Pang

Tel. +86 (10) 8508 7516
+86 (532) 8907 1728
vincent.pang@kpmg.com

Shirley Shen

Tel. +86 (10) 8508 7586
yinghua.shen@kpmg.com

State Shi

Tel. +86 (10) 8508 7090
state.shi@kpmg.com

Joseph Tam

Tel. +86 (10) 8508 7605
laiyiu.tam@kpmg.com

Michael Wong

Tel. +86 (10) 8508 7085
michael.wong@kpmg.com

Jessica Xie

Tel. +86 (10) 8508 7540
jessica.xie@kpmg.com

Irene Yan

Tel. +86 (10) 8508 7508
irene.yan@kpmg.com

Jessie Zhang

Tel. +86 (10) 8508 7625
jessie.j.zhang@kpmg.com

Sheila Zhang

Tel. +86 (10) 8508 7507
sheila.zhang@kpmg.com

Tiansheng Zhang

Tel. +86 (10) 8508 7526
tiansheng.zhang@kpmg.com

Tracy Zhang

Tel. +86 (10) 8508 7509
tracy.h.zhang@kpmg.com

Eric Zhou

Tel. +86 (10) 8508 7610
ec.zhou@kpmg.com

Central China

Lewis Lu

Head of Tax,
Eastern & Western Region
Tel. +86 (21) 2212 3421
lewis.lu@kpmg.com

Anthony Chau

Tel. +86 (21) 2212 3206
anthony.chau@kpmg.com

Cheng Chi

Tel. +86 (21) 2212 3433
cheng.chi@kpmg.com

Cheng Dong

Tel. +86 (21) 2212 3410
cheng.dong@kpmg.com

Marianne Dong

Tel. +86 (21) 2212 3436
marianne.dong@kpmg.com

Alan Garcia

Tel. +86 (21) 2212 3509
alan.garcia@kpmg.com

Chris Ge

Tel. +86 (21) 2212 3083
chris.ge@kpmg.com

Chris Ho

Tel. +86 (21) 2212 3406
chris.ho@kpmg.com

Dylan Jeng

Tel. +86 (21) 2212 3080
dylan.jeng@kpmg.com

Jason Jiang

Tel. +86 (21) 2212 3527
jason.jt.jiang@kpmg.com

Flame Jin

Tel. +86 (21) 2212 3420
flame.jin@kpmg.com

Sunny Leung

Tel. +86 (21) 2212 3488
sunny.leung@kpmg.com

Michael Li

Tel. +86 (21) 2212 3463
michael.y.li@kpmg.com

Christopher Mak

Tel. +86 (21) 2212 3409
christopher.mak@kpmg.com

Henry Ngai

Tel. +86 (21) 2212 3411
henry.ngai@kpmg.com

Yasuhiko Otani

Tel. +86 (21) 2212 3360
yasuhiko.otani@kpmg.com

Ruqiang Pan

Tel. +86 (21) 2212 3118
ruqiang.pan@kpmg.com

Amy Rao

Tel. +86 (21) 2212 3208
amy.rao@kpmg.com

Wayne Tan

Tel. +86 (28) 8673 3915
wayne.tan@kpmg.com

Rachel Tao

Tel. +86 (21) 2212 3473
rachel.tao@kpmg.com

Janet Wang

Tel. +86 (21) 2212 3302
janet.z.wang@kpmg.com

John Wang

Tel. +86 (21) 2212 3438
john.wang@kpmg.com

Mimi Wang

Tel. +86 (21) 2212 3250
mimi.wang@kpmg.com

Jennifer Weng

Tel. +86 (21) 2212 3431
jennifer.weng@kpmg.com

Henry Wong

Tel. +86 (21) 2212 3380
henry.wong@kpmg.com

Grace Xie

Tel. +86 (21) 2212 3422
grace.xie@kpmg.com

Bruce Xu

Tel. +86 (21) 2212 3396
bruce.xu@kpmg.com

Jie Xu

Tel. +86 (21) 2212 3678
jie.xu@kpmg.com

Robert Xu

Tel. +86 (21) 2212 3124
robert.xu@kpmg.com

William Zhang

Tel. +86 (21) 2212 3415
william.zhang@kpmg.com

Hanson Zhou

Tel. +86 (21) 2212 3318
hanson.zhou@kpmg.com

Michelle Zhou

Tel. +86 (21) 2212 3458
michelle.b.zhou@kpmg.com

Southern China

Lilly Li

Head of Tax,
Southern Region
Tel. +86 (20) 3813 8999
lilly.li@kpmg.com

Penny Chen

Tel. +1 (408) 367 6086
penny.chen@kpmg.com

Vivian Chen

Tel. +86 (755) 2547 1198
vivian.w.chen@kpmg.com

Sam Fan

Tel. +86 (755) 2547 1071
sam.kh.fan@kpmg.com

Joe Fu

Tel. +86 (755) 2547 1138
joe.fu@kpmg.com

Ricky Gu

Tel. +86 (20) 3813 8620
ricky.gu@kpmg.com

Fiona He

Tel. +86 (20) 3813 8623
fiona.he@kpmg.com

Angie Ho

Tel. +86 (755) 2547 1276
angie.ho@kpmg.com

Ryan Huang

Tel. +86 (20) 3813 8621
ryan.huang@kpmg.com

Cloris Li

Tel. +86 (20) 3813 8829
cloris.li@kpmg.com

Jean Li

Tel. +86 (755) 2547 1128
jean.j.li@kpmg.com

Kelly Liao

Tel. +86 (20) 3813 8668
kelly.liao@kpmg.com

Grace Luo

Tel. +86 (20) 3813 8609
grace.luo@kpmg.com

Maria Mei

Tel. +86 (592) 2150 807
maria.mei@kpmg.com

Eileen Sun

Tel. +86 (755) 2547 1188
eileen.gh.sun@kpmg.com

Michelle Sun

Tel. +86 (20) 3813 8615
michelle.sun@kpmg.com

Bin Yang

Tel. +86 (20) 3813 8605
bin.yang@kpmg.com

Lixin Zeng

Tel. +86 (20) 3813 8812
lixin.zeng@kpmg.com

Hong Kong

Ayesha M. Lau

Head of Tax, Hong Kong
Tel. +852 2826 7165
ayasha.lau@kpmg.com

Chris Abbiss

Tel. +852 2826 7226
chris.abbiss@kpmg.com

Darren Bowdern

Tel. +852 2826 7166
darren.bowdern@kpmg.com

Yvette Chan

Tel. +852 2847 5108
yvette.chan@kpmg.com

Lu Chen

Tel. +852 2143 8777
lu.l.chen@kpmg.com

Rebecca Chin

Tel. +852 2978 8987
rebecca.chin@kpmg.com

Matthew Fenwick

Tel. +852 2143 8761
matthew.fenwick@kpmg.com

Barbara Forrest

Tel. +852 2978 8941
barbara.forrest@kpmg.com

Sandy Fung

Tel. +852 2143 8821
sandy.fung@kpmg.com

Stanley Ho

Tel. +852 2826 7296
stanley.ho@kpmg.com

Daniel Hui

Tel. +852 2685 7815
daniel.hui@kpmg.com

Charles Kinsley

Tel. +852 2826 8070
charles.kinsley@kpmg.com

John Kondos

Tel. +852 2685 7457
john.kondos@kpmg.com

Kate Lai

Tel. +852 2978 8942
kate.lai@kpmg.com

Jocelyn Lam

Tel. +852 2685 7605
jocelyn.lam@kpmg.com

Alice Leung

Tel. +852 2143 8711
alice.leung@kpmg.com

Steve Man

Tel. +852 2978 8976
steve.man@kpmg.com

Ivor Morris

Tel. +852 2847 5092
ivor.morris@kpmg.com

Curtis Ng

Tel. +852 2143 8709
curtis.ng@kpmg.com

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