EGYPT

TIME RELEASE STUDY II

SEA PORTS

ALEXANDRIA, EL DEKHALIA AND DAMIETTA



1 Executive Summary

The 2024 Time Release Study (TRS) reveals a significant decrease in the time needed to complete import clearance procedures for sea cargo at key ports nationwide. Building on the groundwork laid by the initial Time Release Study (TRS) undertaken at the Port of Alexandria in 2021, this second study evaluated the time required for sea cargo clearance processes at multiple ports[1]. It also assessed the impact of business process reforms implemented between 2021 and 2024 and offers real-time insights into the operations of public and private entities involved in the release and clearance procedures for imported sea cargo. The results of the study show a reassuring and significant reduction in clearance time, underscoring the effectiveness of the trade facilitations reforms.

The Government, in close collaboration with supply chain stakeholders and businesses, has played a pivotal role in enhancing cross-border trading conditions in Egypt. Their strategic investments have successfully addressed key issues such as expanding port terminals, establishing the first inland dry port, the 6th of October Dry Port, improving road and rail access, automating trade document processing through the 'Nafeza' – the National Single Window system, and implementing the Advance Cargo Information (ACI) Declaration. These trade facilitation reform measures have led to a significant reduction in cargo release time, from sixteen (16) days in the 2021 TRS to eight (8) days in the 2024 TRS, demonstrating the positive impact of these changes on the overall performance of the import supply chain.

The digitalisation and automation of trade documents, the phased implementation of system-based risk management, and the collaborative investment in supply chain integration have all contributed to a reduction in the processing time for sea freight declarations. Furthermore, the Nafeza National Single Window has been enhanced to electronically receive cargo manifests, customs declarations, and associated trade documents, facilitating seamless data exchange among stakeholders and delivering significant improvements in end-to-end regulatory performance. Planned reforms, including expanding the availability of payment options for duties and taxes and strengthening Nafeza's resilience to prevent unplanned outages[2], are expected to further bolster trader confidence in business reforms.

These activities are reinforced by the ongoing joint efforts between the Egyptian Customs Authority, the General Organization for Export and Import Control (GOEIC), and the National Food Safety Authority (NFSA) to develop and execute more streamlined and cost-efficient processes for importing goods through accredited pathways.

For the future, a more comprehensive range of commonly agreed benefits for highly compliant trusted traders and Authorised Operator (AO) businesses will deliver greater tangible benefits.

The 2024 TRS collected for analysis comprehensive data from multiple ports to create a consistent and reliable method for measuring performance over time. The study's results are crucial for assessing the impact of new policies, practices, protocols, and technological advancements. In the future, TRS studies will gather data from customs, port authorities, regulatory agencies, and private sector stakeholders at various entry points nationwide. This will allow for regular, multi-year assessments of the cost-effectiveness of trade facilitation reforms at seaports and pave the way for more effective and efficient policy decisions.

[1] The Average Release Time for TRS#1 (2021) was measured at the Port of Alexandria only. The Average Release Time for TRS#2 (2024) has been measured across the following seaports: Port of Alexandria, El Dekhalia in Alexandria and Damietta Port. In Section 8 of the report, the specific average times, as well as the overall average time for all ports, are presented for each port for the readers with specific interest in a break-down of the data.

[2] Unplanned outages and digital resilience are captured in the findings and recommendations section of this report.

2 2024 TRS - Results

The Time Release Study (TRS) is a recognised global tool of the World Customs Organisation (WCO) that accurately measures the time taken to clear goods at borders. This method comprehensively evaluates the duration from when goods arrive at the port until their physical release for free circulation. Article 7.6 of the World Trade Organisation (WTO) Trade Facilitation Agreement (TFA) highlights the TRS as a method for countries to assess and disclose their average time for goods to be released, promoting good practice, transparency and accountability in trade facilitation.

Egypt conducted its first TRS at the Port of Alexandria in 2021, focusing on measuring the release and clearance time for imported sea cargo. The initial TRS study summary results are available on the Egyptian Customs Authority website.

The second TRS Study undertaken in 2024, covers a broader scope, including a re-evaluation of the Port of Alexandria and new studies of El Dekhalia, Damietta, and the 6th of October Dry Port (ODP). Unfortunately, the survey group was unable to easily obtain the data for consignments transferred to the ODP during the data collection time and therefore the decision was taken to exclude this from TRS 2024. The data collection for the three (3) seaports was carried out simultaneously for seven (7) days, coinciding with regular shipping traffic between 21—27 April 2024.

The TRS findings are based on detailed time-stamp data from the Nafeza National Single Window system, a key component in modernising the clearance process. The data includes the exact times when import sea cargo declarations and related documents were submitted and the corresponding clearance procedures completed.

By consolidating data from the three (3) seaport locations chosen for the study, the TRS provides a comparative national average of the time required to obtain customs and regulatory authority clearances and releases for imported sea cargo arriving in Egypt. This valuable information will contribute to more informed decision-making and continued efforts to enhance trade efficiency in Egypt and the wider region.

2.1 Risk-Management

Applying informed risk management to categorise and segment traders and products based on risk has been a key activity led by the NTFC Risk Management Working Group since the first TRS 2021.

TRS 2024 has noted the following:

- 19% increase in low-risk Green Channel processing for identified lower risk traders and/or goods
- 19% reduction in physical inspections undertaken at the three (3) surveyed ports of entry
- The average elapsed time for Green Channel processing is less than the average elapsed time for Red Channel processing, which is to be expected as red channel processing includes physical inspection of goods
- Confirmation the trade facilitation practice of approved consignments being released from the port under agreed provisions, pending the results of diagnostic tests of samples is occurring.

2.2 Reduction in the Average Release Time



The average release time is:

Table 1: TRS2024 Imports Average Release Time

Place	Average Release Time	2021 Average Release Time
Overall – 3 Ports	8d 17h 34m (8.73 days)	
Port of Alexandria	8d 15h 11m (8.64 days)	16d 1h 51m (16.08 days)
Port of El Dekhalia	9d 9h 41m (9.40 days)	
Port of Damietta	8d 2h 15m (8.09 days)	
6th October Dry Port	No survey consignments for TRS were transferred to the ODP	

The change in Average Release Time between TRS#1 (2021) and TRS#2 (2024), noting the increase in geographical scope in TRS#2, is
-7days 8 hours 17 minutes (a reduction of 45.6%)

The change in the Average release Time for Port of Alexandria between TRS #1 of and TRS#2 is
-7 days 10 hours and 11 minutes (a reduction of 46.1%)

This time includes the average time from the vessel's alongside until the final release for free circulation in the domestic marketplace. The study does not count the time to request licenses or permits before importation.

This average release time can be further broken down to show:

The average elapsed time from the end of unloading to the exit from the port – 7 days 19 hours 38 minutes (7.82 days), and

The actual physical regulatory clearance processes for commercial goods take on average – 2 days 18 hours 14 minutes (2.76 days)

3 Table of Contents:

1 EXECUTIVE SUMMARY 2

2 2024 TRS - RESULTS 3

2.1 Risk-Management 3

2.2 Reduction in the Average Release Time 4

3 TABLE OF CONTENTS: 5

4 ACKNOWLEDGEMENTS 6

5 FINDINGS 7

5.1 Key Findings 2024 TRS 7

5.2 Additional Outcomes from the Recommendations from the 2021 TRS Study 8

6 RECOMMENDATIONS – 2024 TRS 9

7 METHODOLOGY, SCOPE & COVERAGE 10

7.1 Methodology 10

7.2 Scope & Coverage 10

7.3 TRS Survey Period 11

7.4 Sample Size 11

7.5 Vessels and Importers 11

7.6 TRS Surveys by Day 12

7.7 Types of Cargo 12

7.8 Limitations 13

8 ANALYSIS AND OBSERVATIONS OF TRS MEASURED EVENTS 14

8.1 Snapshot of TRS Measured Events 14

9 TRS RISK MANAGEMENT 20

9.1 Risk Channel Selectivity 20

9.2 Survey Insight: Risk Assessment Opportunity 22

9.3 TRS Regulatory & Compliance 22

9.4 TRS Technical Agencies 23

9.5 TRS Payment, Release and Exit 24

7.0 CONCLUSION 25

10 APPENDICES: 26

10.1 Appendix 1: Process Map 27

10.2 Appendix 2: TRS#2 2024 Data Collection Form 30

10.3 Appendix 3: TRS Interval/Event Description 33

4 Acknowledgements

This Imports Time Release Study (TRS) was developed under the Increasing Egypt Accessibility to Regional & Global Markets Project, developed by International Finance Corporation (IFC). The project is led by Marwa Mahgoub, Senior Operations Officer and & Nora El Gazzar, Operations Analyst and supported by the global WBG Trade Facilitation team Alina Antoci, William Gain, Allen Bruford & Theresa Morrissey.

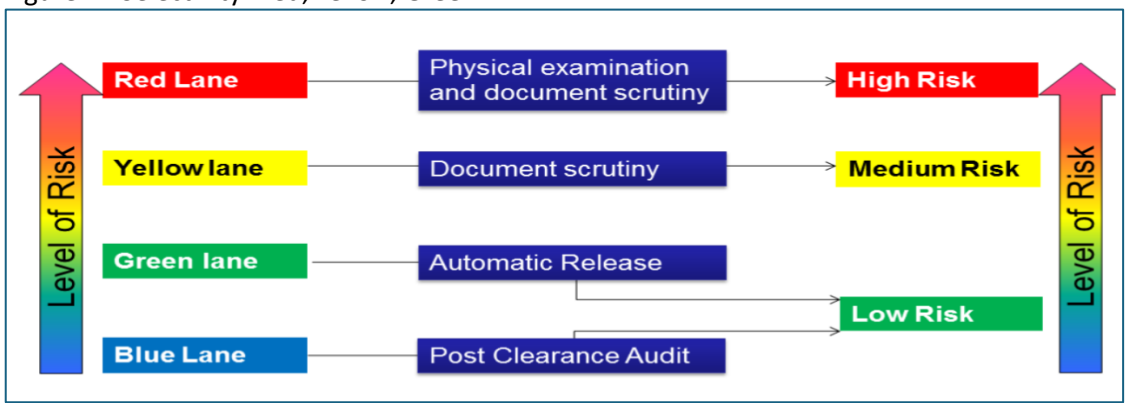
This second TRS Study undertaken in 2024 was implemented under the unwavering support and leadership of the Egyptian Customs Administration and covers a broader scope than the first TRS conducted in 2021. The results of this study attest to the dedication and diligence of the TRS Working Group team members. It also, reflects the ongoing support and collaboration of all the members of the National Trade Facilitation Committee (NTFC) and most importantly: the Customs Administration (ECA), the General Organization for Export and Import Controls (GOEIC), the National Food Safety Authority (NFSA), The Port Authorities, Plant Quarantine Central Directorate, Veterinary Quarantine Central Directorate and the Technical Secretariat of the National Trade Facilitation Committee (NTFC).

5 Findings

5.1 Key Findings 2024 TRS

1. Government and private sector investments in automation, infrastructure and logistics has significantly reduced dwell time and cargo release rates by 7.82 days.
2. Physical inspection rates, a significant source of costs and clearance delays, were reduced from 93% to 74% of the total consignments available for inspection during the survey period being a reduction of 19% primarily due to Customs' ongoing adoption of risk management and the introduction of an automated risk management application for profiling and targeting risky cargo within the Nafeza single-window system.
3. The current Customs Risk Management channel selectivity model must align better with international guidelines, to provide better clarity and transparency to domestic and international traders. The Green Channel should mean Green, i.e. automatic release with no intervention. Below is a simple best practice selectivity model:

Figure 1: Selectivity: Red, Yellow, Green[3]



Source: Adapted from UNCTAD ASYCUDA selectivity

4. Anecdotal feedback from traders, during the TRS planning phase, brought to the attention of the TRS Working Group a concern with unplanned outages of the Nafeza system. The TRS did not collect any data on outages.
5. Manual business procedures operating in parallel with electronic processing and the ongoing requirement for manual interventions within the Nafeza system should be reviewed for necessity, including the ongoing need for repetitive document checks and sign-offs as a prerequisite for goods clearance and release.

[3] Taken from Liberia Time Release Study last accessed 12 September 2024 https://revenue.lra.gov.lr/wp-content/uploads/2022/08/TRS-REPORT-August-22-2022.pdf

5.2 Additional Outcomes from the Recommendations from the 2021 TRS Study

Table 2: Implementation Progress from TRS 2021 Recommended Actions

TRS 2021 Recommendations	TRS 2024 Observations
TRS 2021 Further simplification of border clearance procedures, acceptance of electronic documents by all border agencies, full operationalisation of the NSW and ACI, reduced duplication of documents	**TRS 2024** confirmed implementation of • Acceptance of electronic documents by Customs, GOEIC and NFSA, • ACI operationalised, and • Direct Trader Input (DTI) of declarations by the brokers into the Nafeza system (no longer need to visit the Logistics Centre and have the declaration data entered).
TRS 2021 Further enhance engagement with clients and provide transparency through conducting a Client Survey to gauge stakeholder expectations in terms of future clearance and release times and e-commerce	**TRS 2024** Customs Brokers advised greater engagement with Customs at the Port of Alexandria on developments, changes to policies and procedures and being given the opportunity to comment/provide feedback
TRS 2021 Develop and enhance border risk management (ensure all transactions are subject to automated risk-based controls, establish a National Targeting Centre, implement simplified clearance procedures for approved traders),	**TRS 2024** The integrated risk management framework is in its infancy. Initiatives being implemented include • Customs is developing integrated profiles and targeting in Nafeza. • GOEIC and NFSA are developing risk management profiles and progressively aligning white-listed companies and their alert management requirements with the Customs risk system, and • Customs is growing the number of participants in their Authorised Economic Operator (AEO) programme

6 Recommendations – 2024 TRS

To date, the time saved by implementing automation initiatives has been remarkable. However, for the business community to feel confident about the overall costs and effectiveness of current trade facilitation reforms, all government authorities involved in import processing must continue to streamline the end-to-end clearance and release processes transparently, reduce reliance on paper documentation, fully embrace risk management practices, and expand equivalence, co-management, and recognition of approved third-party systems to provide tangible trade facilitation benefits for highly compliant traders.

The critical next step for the NTFC is to prioritise and plan the implementation of the recently approved National Trade Facilitation Strategy (NTFS) Action Plan and Integrated Risk Management Framework (IRMF). The NTFS serves as a roadmap for trade facilitation reforms. It outlines a systematic approach to collaboration between government authorities, the private sector, and international partners in the next 3-5 years.

The Integrated Risk Management Framework (IRMF) introduces the concepts associated with integrated risk management. It adopts a whole-of-government technique to identify and respond to high-risk shipments while facilitating low-risk ones. An integrated risk-based approach will assist Egypt in moving beyond traditional gatekeeping operating role and embracing a more efficient, effective, and adaptable operating model similar to other high-performing countries.

The following actions are recommended for priority implementation to further improve border clearance time:[4]

A. AEO membership be expanded with eligibility criteria reviewed to deliver benefits to a larger number of legitimate traders recognising compliance levels across all border agencies.

B. Given that more than 46% of all Egyptian trade transactions by value and volume require clearance from multiple authorities, Customs and regulatory authorities must collaborate to streamline the end-to-end clearance and release processes, reduce reliance on paper documentation, fully embrace integrated risk management practices, and expand equivalence, co-management, and recognition of approved third-party systems[5] to provide tangible trade facilitation benefits for highly compliant traders both off-shore and at the Egyptian border.

C. Given the reliance on automated electronic systems to manage Egypt's international trade cross border and logistics transactions, monitoring and reviewing unplanned outages along with regular review of business continuity and disaster recovery plans is necessary to identify actions that enhance digital resilience.

D. Fully implement the National Trade Facilitation Strategy (NTFS) to ensure a 'whole of Government Approach' to border clearance recognising and integrating all agency criteria.

E. Task the NTFC to monitor border agency clearance time and program regular follow up TRSs.

[4] The recommendations listed above will be used to structure an in-person Workshop with all stakeholders to develop an action plan for implementation.

[5] Refers to Equivalence as per the definition in the WTO Sanitary & Phytosanitary Agreement) and co-management of biosecurity risk by third parties under agreed arrangements

7 Methodology, Scope & Coverage

The Time Release Study (TRS) was conducted in accordance with the World Customs Organisation (WCO) Guide to Measure the Time Required for the Release of Goods (Version 3, 2018) and utilising the WCO TRS Software to store and analyse survey data.

7.1 Methodology

The TRS methodology, developed by the WCO, was used at all stages of preparation and execution of the Study. During the first stage, the methodology was adapted to the national needs, within the allowed flexibility of methodology.

The study was developed in three phases:

A. Preparation of the Study

This phase involved the establishment of the TRS Working Group chaired by the Egyptian Customs Authority (Customs) and support provided for members to design the TRS Survey (questionnaire), test, plan and prepare for the TRS data collection phase.

The TRS Working Group agreed over a series of meetings on the following elements: (i) the scope of the study; (ii) duration and time of the study; (iii) the activities to be measured, and (iv) the high-level process map of the activities to be measured.

To prepare for the TRS, Egyptian Customs Authority, requested and received access from the World Customs Organisation (WCO) Online TRS Tool. The WCO Online TRS Tool stores all TRS survey information.

A series of meetings were held to disseminate information among stakeholders and collate all the required information to be included in the questionnaire.

B. Data Collection and Recording (21 April 2024 to 27 April 2024)

Once the planning and methodology, (including the content of the questionnaire), were completed, personnel were briefed and assigned to collect and record the data. The TRS survey lasted for seven days and was carried out from 21 April 2024 to 27 April 2024. Although the survey period is undertaken for seven (7) consecutive days, data collection continues as the majority of surveyed consignments departed the Port. The final version of the questionnaire that was used for the measurement is attached in Appendix 2 of this study. The survey data collection was coordinated by a core group of Customs personnel specifically assigned to collect the required information from each data collection point.

C. Data Analysis and Findings

In the third phase, survey data was input into the WCO TRS software via direct upload of specifically formatted spreadsheet. The TRS software creates a format for entering data for analysis.

Based on available databases and field experience, their accuracy was verified. Verification resulted in rejecting 3 questionnaires containing inaccurate and/or inconsistent data. The WCO TRS Online software was used to conduct data analysis and prepare a report on the average time of goods clearance based on data obtained from the questionnaire.

7.2 Scope & Coverage

The WCO TRS methodology is primarily intended to measure the average time of customs clearance. In defining the scope of this TRS 2024 study, the TRS Working Group decided to extend the geographical scope from TRS 2021 Imports that was conducted at the Port of Alexandria only. The full scope of TRS 2024 is set out in the following table.

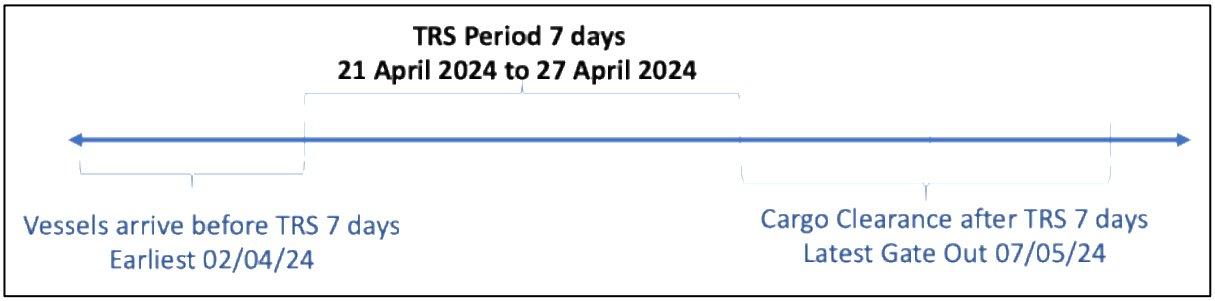
Table 3: TRS2024 Import #2 Scope

Scope Item	Inclusion	Exclusion
Geographical	Port pf Alexandria, Port of El Dekhalia, Port of Damietta, 6th October Dry Port (ODP)	All other Ports of Entry
Mode of Transport	Sea	Air, Post, Express
Customs Regime	Import	Export, Transit, Warehousing
Type of Cargo	FCL, LCL, Breakbulk, General and Other	Air, Post, Express
Category of traders	Commercial	Private
Agencies – Government	Egypt Customs Authority (ECA), Central Administration of Plant Quarantine (CAPQ) Vet Quarantine (VQ), General Organisation for Import and Export Control (GOEIC), National Food Safety Authority (NFSA), Alexandria Port Authority, El Dekhalia Terminal Operator, Damietta Port Authority	All other government agencies
Agencies – Private	Shipping Lines, Customs Brokers, Misr Technology Services (MTS)	

7.3 TRS Survey Period

This TRS was undertaken on commercial cargo imports from 21 April 2024 to 27 April 2024 inclusive. The consignments selected for the TRS survey were identified by the TRS Survey Data Collection Group from the Nafeza system. Therefore, consignments surveyed included goods that arrived at the ports before the start of the TRS (the earliest being a declaration for goods that arrived at the port on 02 April 2024). Furthermore, to ensure the majority of surveys were completed (consignments had departed the Port), the TRS continued until 07 May 2024.

Figure 2: TRS Survey Period



7.4 Sample Size

During the TRS Period, a total of 4074[6] declarations were received in Nafeza and 989 were randomly selected for the TRS. This equates to 24.3% of all declarations received during the survey period.

Of the 989 surveys completed, three (3) were discounted as not meeting the survey criteria. Therefore, the TRS is based on a total of 986 declarations (consignments).

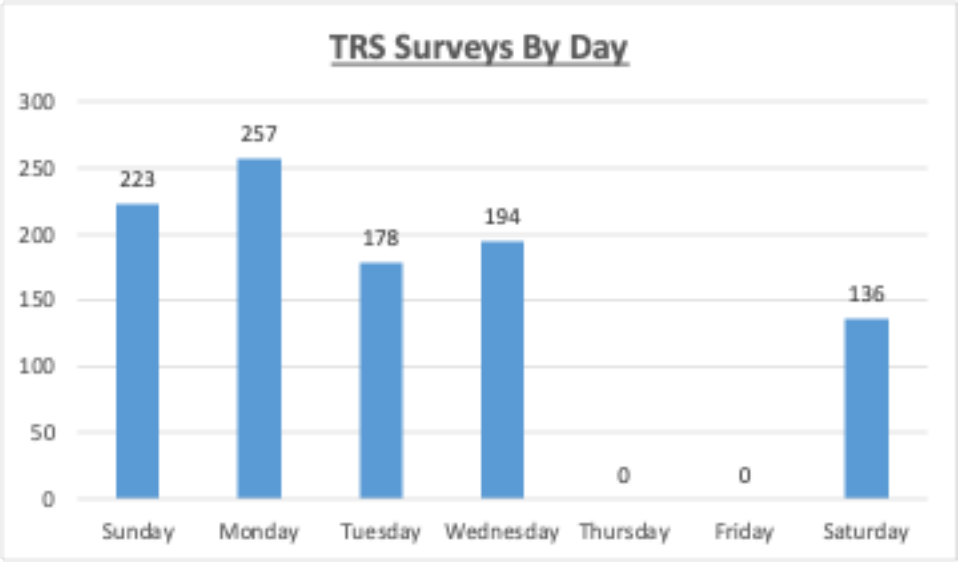
7.5 Vessels and Importers

The TRS recorded consignments from one hundred and twenty (120) different vessels with a small number of these being multiple voyages.

[6] For Alexandria total 2671 declarations 23% surveyed); El Dekhalia total 967 declarations; (23.4% surveyed) Damietta total of 436 declarations (33.7% surveyed)

7.6 TRS Surveys by Day

Graph 1: TRS Surveys by Day

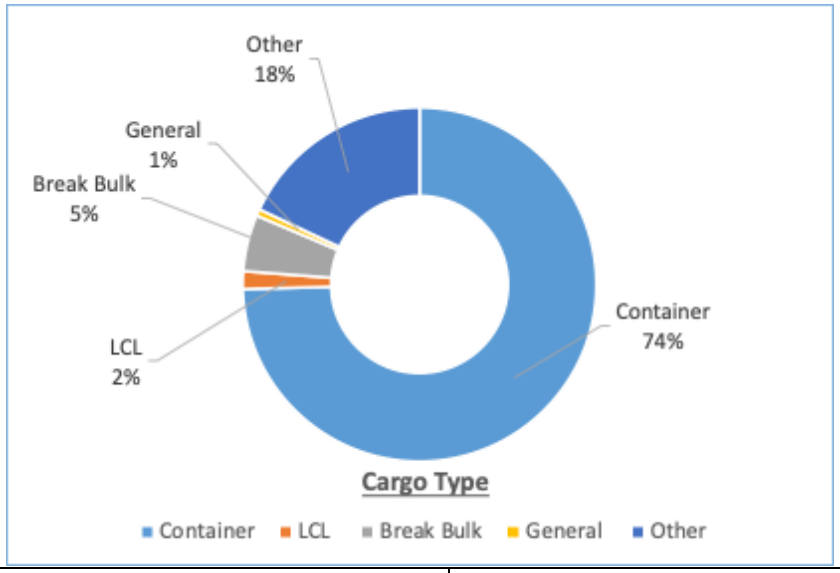


The TRS survey week included a public holiday.

7.7 Types of Cargo

The TRS categorised the cargo into five (5 categories): Full Container Loads (FCL), Less than a Container Load (LCL), Break Bulk, General and Other. The following graph depicts the breakdown between the various categories.

Graph 2: Type of Cargo Encountered in TRS



Sub-Group	Average Release Time in Days
All groups	8.73
Full Container Loads (FCL)[7]	8.52
LCL	10.86
General	11.80
Break Bulk	7.66
Other	9.61

[7] TRS survey declarations may contain a single full container load (FCL) or multiple sea containers.

7.8 Limitations

It was recommended that the Study be carried out during periods of normal traffic. Unlike TRS2021 Import #1, which was conducted during the pandemic, this study has occurred during a regular period of trade.

The Study is a snapshot of particular trade routes, given the number of vessel calls and their routing during the study period, and is not a fully comprehensive study of all trade corridors.

Data Limitations

The study covers both manual and automated procedures. Given that a few clearance procedures are conducted manually, the accuracy, reliability, and completeness of the data depended on the goodwill of all involved stakeholders.

8 Analysis and Observations of TRS Measured Events

This section presents graphs and tables derived from the survey data entered into the WCO Online TRS System. The TRS survey form with data collection (measurement points) can be found in Appendix 2 to this report. The Average Elapsed Times noted within this report is the measurement between two points, whereas the Average Release Time is measured from the time 'Vessel Alongside Wharf' to 'Gate Out' (consignments exits the Port Gate).

Whereas, TRS#1 (2021) was conducted in the Port of Alexandria only, the calculated times for TRS#2 (2023) are the average across all three (3) ports of entry – Port of Alexandria, Port of El Dekhalia and Port of Damietta.

8.1 Snapshot of TRS Measured Events

A Time Release Study (TRS) measures a snapshot of time between pre-determined 'events'[8]. For this TRS, nine (9) events were measured[9], namely:

A. Arrival
B. Offload
C. Preparation
D. Regulatory & Compliance
E. Release
F. Agency Release (by Agency) and Payment
G. Clearance
H. Wharf to Gate (Average Release Time)
I. Offload to Gate

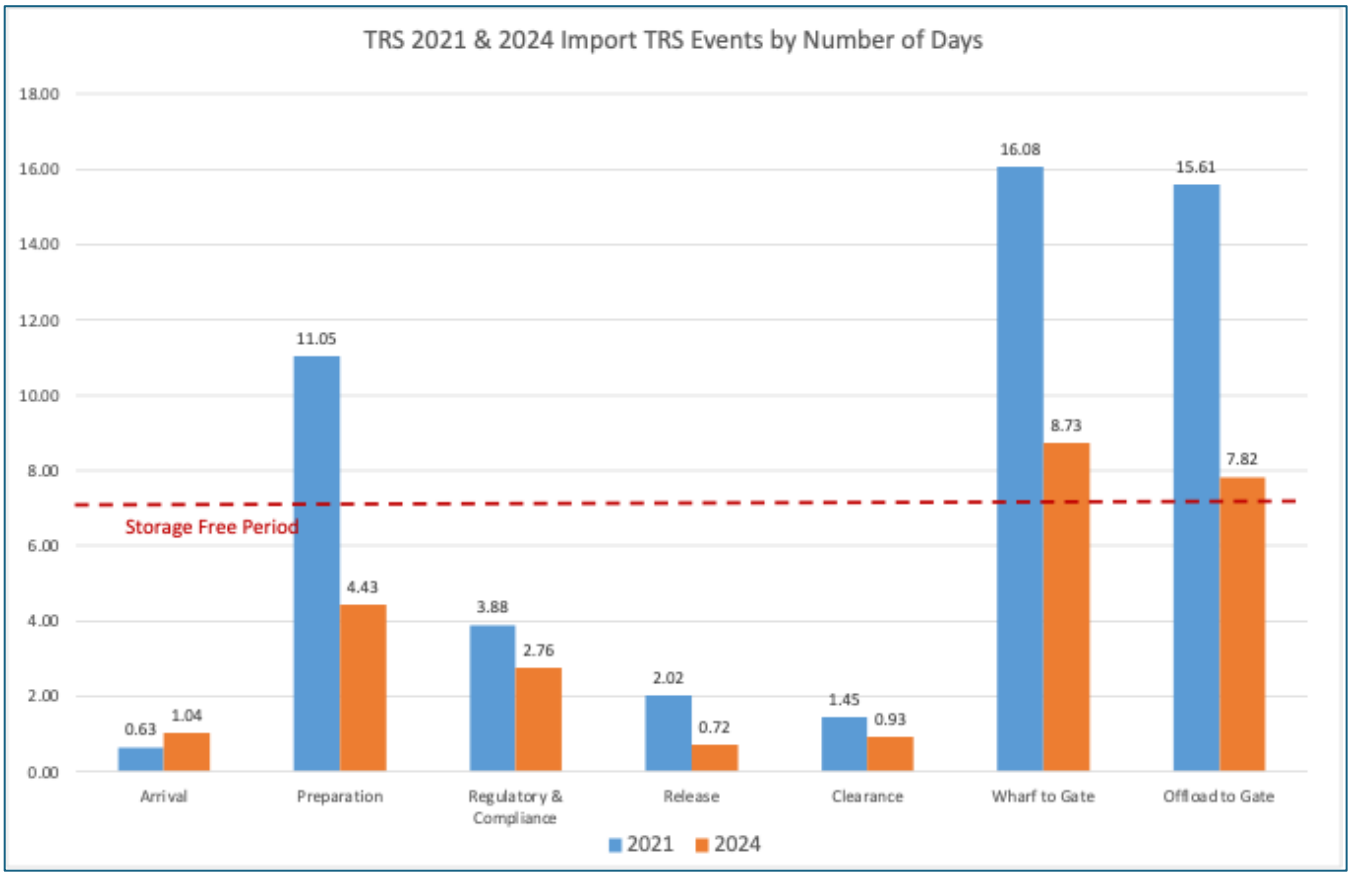
- The first two (2) events (Arrival & Offload) are the sole domain of the Port Authority.
- The further five (5) events, Regulatory and Compliance, Agency Release and Payment, Arrival to Gate and Offload to Gate] measure various elements of the cargo clearance process related to the work undertaken by the regulatory agencies, logistics operators and the Customs Brokers and Importers.
- The remaining, two (2) events (Preparation and Release) are the sole domain of the Customs Brokers and Importers and logistics operators.

In the body of this report, refer Section 9, it contains a metric[10] showing how long goods take to be released relative to the risk management treatment depending on the level of assessed risk.

The following are snapshots showing the times for each TRS Measured Event (summarised in the graph below, by the sequence they take place, and by the time taken to complete)[11]:

[8] See Appendix 3 for the definition of Events
[9] The X-Ray Event included in TRS#1 (2021) was excluded from this TRS as x-ray data is not easily retrievable..
[10] See Section 7.3 of this Report
[11] Note: The sum of the individual TRS Measured Events does not equal the overall Average Release Time as some events include procedures and actions taken in parallel with others, e.g. the processes within the Agency Release includes Technical Agency clearance that occurs prior to ECA completing the Customs 'End of Documentary Check'.

Graph 3: Summary TRS Measured Events



Note: An indicative mark for the Storage Free Period of 7 days is referenced in the above graph.

Of the TRS2024 Surveyed consignments measured from the time the Vessel arrived alongside (wharf), **39.4%** exited the Port in **between 0-7days,** that is **within** the indicated storage free period.

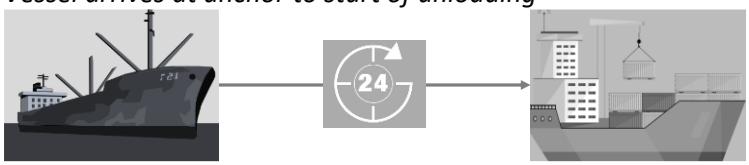
In TRS#1 2021 of the TRS Surveyed consignments, **20%** exited the Port in 6 days 14 hours 34 minutes, that is within the indicated storage free period.

The average release time from the arrival of the vessel alongside (wharf) to exit from the port (gate) is:

8 days 17 hours 34 minutes

A. Arrival – 1 days 0 hours 51 minutes

Vessel arrives at anchor to start of unloading



Average Elapsed Time in Days

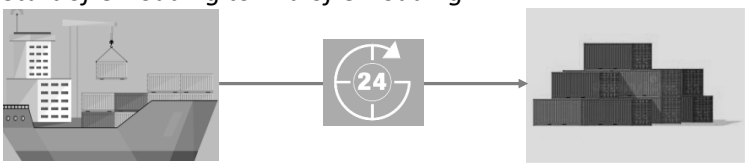
2021	TRS #2 – 2024[12]	TRS #3	TRS #4
0.63	1.04		

2024	Alexandria	El Dekhalia	Damietta
TRS #2	1.48	0.48	0.05

[12] Overall – three (3) ports surveyed

B. Offload –0 days 11hours 21 minutes

Start of Unloading to End of Unloading



Average Elapsed Time in Days

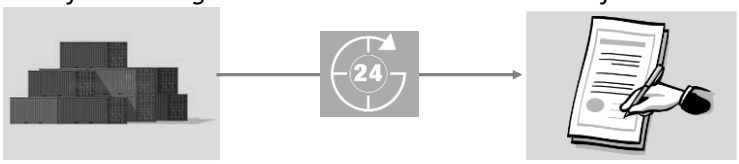
2021	TRS #2 – 2024	TRS #3	TRS #4
0.07	0.47		

2024	Alexandria	El Dekhalia	Damietta
TRS #2	0.14	0.25	2.15

The increase in the offload time was expected as TRS#2 2024 includes an increase in the number of surveyed consignments where the cargo type was either bulk, general cargo or other. TRS#1 (2021) was predominantly container cargo.

C. Preparation[13] – 4 days 10 hour 14 minutes *(** Changed Measure)*

End of Unloading to Declaration and Form 46 Certificate Received Nafeza



Average Elapsed Time in Days

2021	TRS #2	TRS #3	TRS #4
11.05	4.43		

2024	Alexandria	El Dekhalia	Damietta
TRS #2	4.08	4.86	5.16

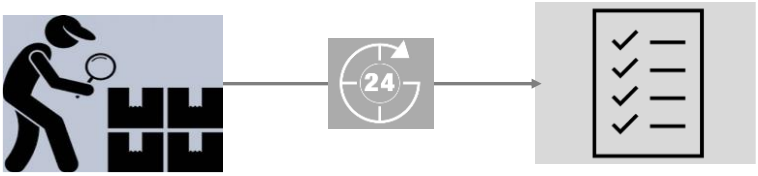
In TRS#1 – 2021, all Form 46 Certificate data was manually entered into Nafeza by MTS personnel at the Logistics Centre and the Preparation event measured the time from the End of Unloading to Declaration and support documents submitted to Logistics Centre.

For TRS#2 – 2024 all Form 46 Certificate data was entered directly into the system by the trader/customs broker from their premises.

The change in average elapsed time is - 6.02 days (reduction).

D. Regulatory and Compliance – 2 days 18 hours 14 minutes (**Changed)

Form 46 Certificate Received Nafeza and Invoice Issued



Average Elapsed Time in Days

2021	TRS #2	TRS #3	TRS #4
3.88	2.76		

2024	Alexandria	El Dekhalia	Damietta

[13] This is a specific measure of Dwell Time

TRS #2	2.99	2.66	1.95

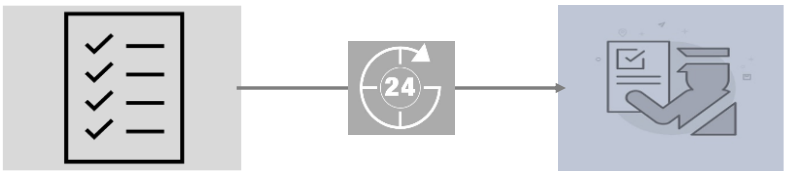
In TRS#1 – 2021 the Regulatory & Compliance event measured from Declaration and support documents submitted at Logistics Centre to End of documentary check. Both were manual procedures.

For TRS#2 – 2024 the measurement points are the closest equivalent measurement points that were taken from the Nafeza system.

The change in average elapsed time is - 1.12 days (reduction).

E. Release – 0 days 17 hours 17 minutes

Invoice Issued (includes conclusion of Technical Agencies on port procedures) and Customs Cargo Release Certificate/Notice issued



Average Elapsed Time in Days

2021	TRS #2	TRS#3	TRS#4
2.02	0.72		

2024	Alexandria	El Dekhalia	Damietta
TRS #2	0.76	0.81	0.43

The change in average elapsed time is - 1.30 days (reduction).

F. Technical Agency Release (By Agency) (** Changed)

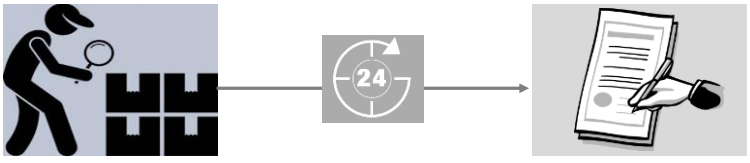
GOEIC – 2 days 8 hours 37 minutes

Quarantine – 0 days 17 hours 52 minutes

NFSA – 3days 15 hours 9 minutes

ECA – 0 days 14 hours 56minutes

Technical Agency: Document check start to Finish documentary check (inspection and testing if required occurs within this elapsed time)



Average Elapsed Time in Days

Agency	2021	TRS #2 - 2024
GOEIC	2.25	2.36
NFSA	4.94	3.63
CAPQ	1.71	0.98 *
Vet Quarantine	6.58	
ECA	3.53	0.62

*Covers Damietta and El Dekhalia only.

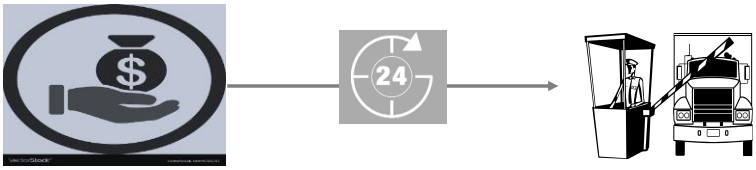
At the time of TRS #2-2024, the implementation of Nafeza at the border clearance point has significantly changed processes from being undertaken consecutively to being undertaken concurrently. The following table sets out the impact of the major changes.

Table 4: Technical Agencies - Impact of Process Change

Process	Description	Impact
Document examination undertaken in Nafeza	TRS2021 Brokers initiated Customs and Technical Control Agency clearance procedures. In TRS 2024 NFSA and GOEIC were observed undertaking document examination on Nafeza. NFSA has implemented a policy to complete document examination within 24 hours	**TRS2021** Average elapsed time for Technical Control Agency document examination occurred on average 12hours 15mins after Customs document examination commenced. **TRS2024** – Average elapsed times from receipt of the Form 46 Certificate to start of the technical agency documentary check was - NFSA 9hours 31minutes with 70% in less than 1 hour - GOEIC 9hours 36minutes with 60% within 1 hour **Climate Change Contribution** **No travel** to and from technical agencies with hardcopy declaration documents
Physical inspection records are electronic	TRS2021 manual documents were transferred between work groups. Inspection records are electronic and once completed the declaration is available for review and the release/clearance decisions	**TRS2021** Average elapsed time between the end of physical inspection and the Issuance of the invoice by Customs for duties, taxes, fees and charges was 2days 16hours 28mins. **TRS2024** Average elapsed time from end of inspection to Issuance of the Invoice was 1 day 14hours 7 minutes.
Release of goods from the port pending final clearance (trade facilitation benefit)	No data collected in TRS#1	**TRS2024** – The data confirmed NFSA and GOEIC release approved consignments from the port under agreed provisions (reservation), pending the results of diagnostic tests of samples is occurring - NFSA 34% released - GOIEC 9% released

G. Clearance[14] – 0 day 22 hours 13 minutes

Customs Cargo Release Certificate/Notice Issued to Gate Out



Elapsed Time in Days

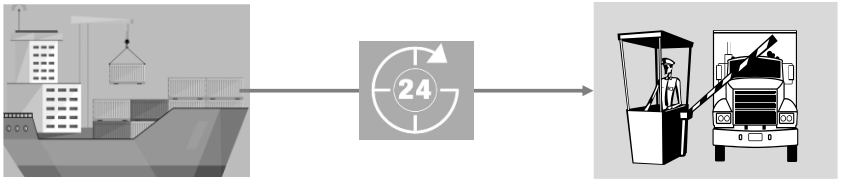
2021	TRS #2	TRS #3	TRS #4
1.45	0.93		

2024	Alexandria	El Dekhalia	Damietta
TRS #2	0.94	0.63	1.08

The change in average elapsed time is – 0.52 days (reduction).

H. Wharf to Gate – 8 days 17 hour 34 minutes

Vessel alongside to Gate Out



Average Release Time in Days

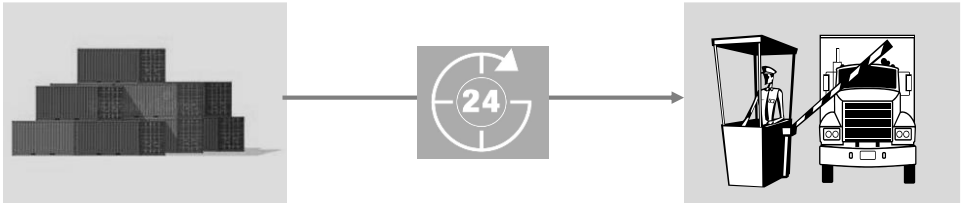
2021	TRS #2	TRS #3	TRS #4
16.08	8.73		

2024	Alexandria	El Dekhalia	Damietta
TRS #2	8.64	9.40	8.09

The change in average elapsed time is – 7.35 days (reduction).

I. Offload to Gate – 7 days 19 hours 38 minutes

End of Unloading (being the first-time cargo is available for delivery) to Gate Out



Average Elapsed Time in Days

2021	TRS #2	TRS #3	TRS #4
15.61	7.82		

2024	Alexandria	El Dekhalia	Damietta
TRS #2	7.61	8.98	6.81

[14] This is a specific measure of Dwell Time

The change in average elapsed time is - 7.79 days (reduction).

9 TRS Risk Management

Customs uses six (6) risk-based selectivity channels to inform officers of the risk-based intervention requirements. The six (6) Customs selectivity channels are depicted in the following table:

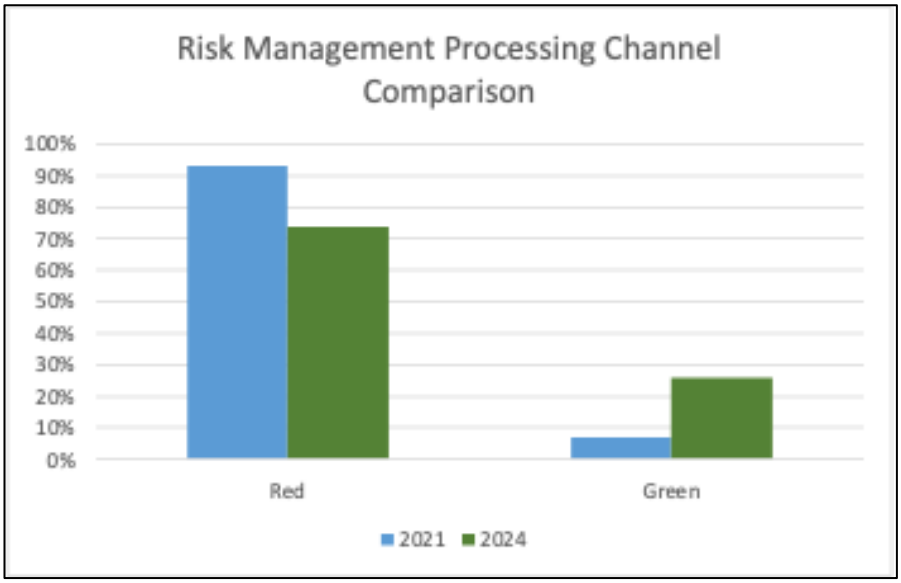
Table 5: Customs Selectivity Channels

Green-Based Risk Management Channels		Red Based risk Management Channels	
Green A	Authorised Economic Operator (TRS#1 Key Clients)	**Red A**	Inspection as per Executive Regulations is 5%
Green B	Regular (TRS#1Low Risk)	**Red B**	100% inspection – commodity based
Green C (TRS#1 2021 Green – AEO)	White List	**Red C**	Anti-Smuggling

9.1 Risk Channel Selectivity

The overall risk management processing between Green Channels and Red Channels is set out in the following graph.

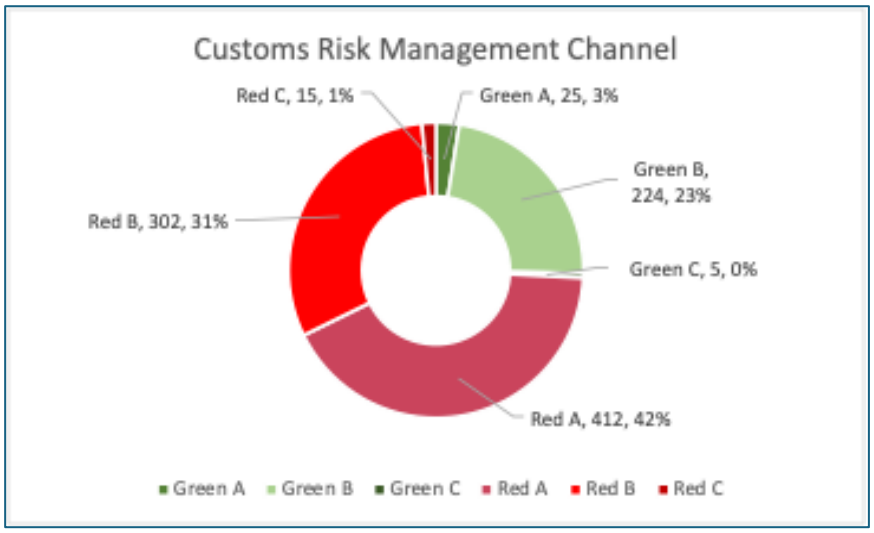
Graph 4: Risk Management Processing Channel Comparison



The graph shows that since TRS #1(2021) there has been a reduction in consignments marked for Red Channel from 93% to 74%.

Further analysis of the specific selectivity/risk management channel observed in TRS#2 (2024) is set out in the following graph.

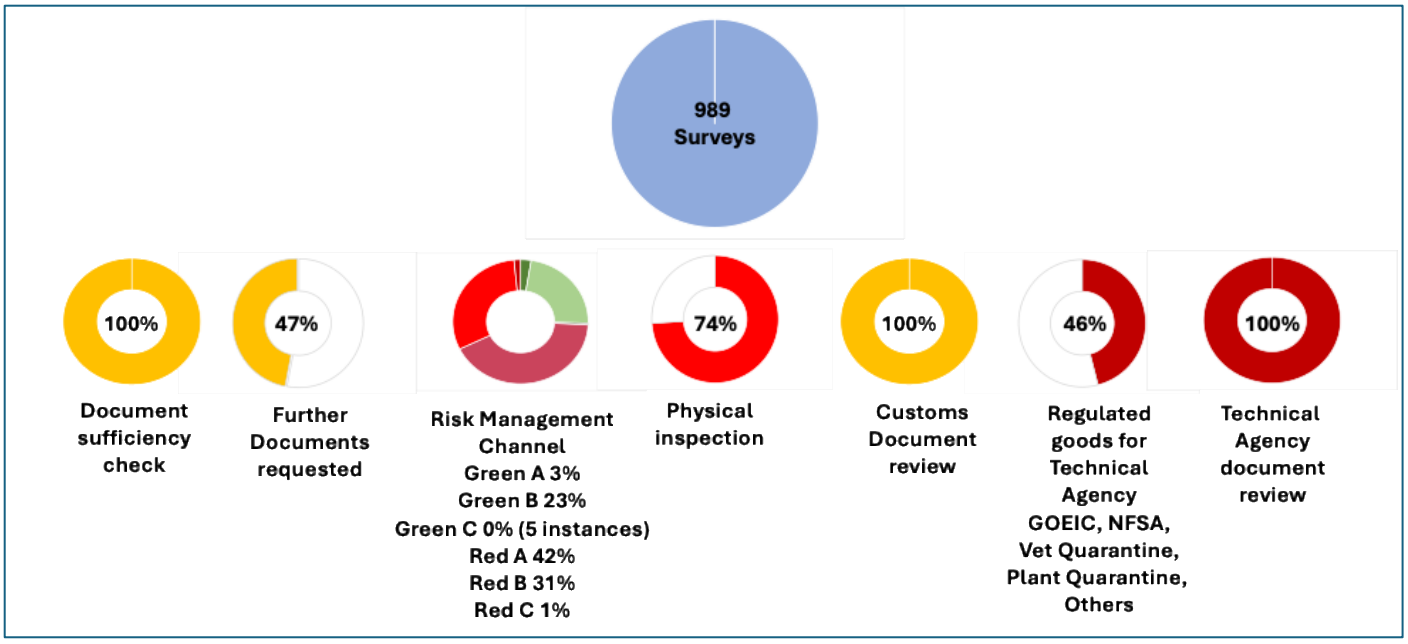
Graph 5: Customs Risk Based Selectivity Chanel for TRS Surveyed Import Declarations



From the TRS survey data there are 450 instances of Technical Agency documentary checks.

The overall regulatory interventions observed in the TRS are set out in the following graph.

Graph 6: TRS - Interventions on Survey Consignments



The average release time from Vessel alongside Wharf to Gate Out is **8 days 17 hour and 34 minutes (8.73 days)** and the breakdown of the Average Release Time by Customs risk based selectivity is set out in the following table along with the Average Elapsed Time for the Regulatory and Compliance event.

Table 6: Average Release Time by Risk Management Channel

Sub-Group	Event- Alongside Wharf to Gate Out	Event -Regulatory & Compliance
Green A (3% surveys)	9days 1hour 12minutes (9.66 days)	1day 20hours18minutes (1.83 days)
Green B (23% surveys)	7days 22hourrs 42minutes (7.95 days)	2days 3hours 5minutes (2.13 days)
Green C (1% surveys	14days 8hours 9minutes (14.34 days)[15]	1day 16hours 53minutes (1.70 days)
Red A (42% surveys)	8days 17hours 2minutes (8.71 days)	2days 14hours 30minutes (2.60 days)

[15] The sample size is 5 survey consignments and caution is advised to use this measure as indicative of the average elapsed time of all Green C consignments.

Sub-Group	Event- Alongside Wharf to Gate Out	Event -Regulatory & Compliance
Red B (31% surveys)	9days 6hours 40minutes (9.28 days)	3days 13hours 34minutes (3.57 days)
Red C (2% surveys)	7days 4hours 33minutes (7.19 days)	2days 18hours 14minutes (2.64 days)

9.2 Survey Insight: Risk Assessment Opportunity

Timely management of risk at the border is improved when regulatory and logistics operators receive information in advance of the presentation of the goods at the border.

In particular, information enabling early identification of risk enables actions such as overseas and other enquiries to confirm the risk, early containment of a risk (e.g. plant pests) or proactive planning the risk response.

Since TRS#1 2021, the Egyptian Customs Authority has implemented the Advanced Cargo Information (ACI) for sea cargo (ocean-based shipments), to enable advance evaluation of goods destined for Egypt prior to being loaded for carriage to Egypt.

Table 7: Risk Assessment Opportunity

Category	Measurement Point	Average Elapsed Time 2021	Average Elapsed Time 2024
Cargo Dwell Time (Risk) Customs	End of Unloading to Start of Documentary Check (Customs)	11d 2h 42m (11.11 days)	End of Unloading to Form 46 Certificate Received Nafeza - 3.94 days 10% of surveyed consignment documentation was received prior to unloading
Cargo Dwell Time (Risk) Technical Agency	End of Unloading to Start of Documentary Check (Technical Agency)	11 14h 57m (11.62 days)	- NFSA 3.90 days - GOEIC 4.53 days - Quarantine 5.42 days

9.3 TRS Regulatory & Compliance

The average elapsed time from the time the declaration and supporting documents are received by the Nafeza system until the Invoice is Issued is **2 days 18 hours 14 minutes (2.76 days).**

Multiple logistics and border agency processes occur within this time and the elapsed times and key process changes are set out in the following[16] table.

Table 8: Regulatory Average Elapsed Time

Sub-Group	Measurement Point	Average Elapsed Time
Logistics Centre (redundant)	Declaration and support documents submitted to the Logistics Centre until Declaration and Support Documents Approved at Logistics Centre	TRS#1 2021 - 3h 40m (0.15 day) This process is redundant following the implementation of direct trader input (DTI) into Nafeza. **Climate Change Contribution**

[16] The TRS Process Map is presented in Appendix 1 of this report

Sub-Group	Measurement Point	Average Elapsed Time
		Reduced travel to and from Logistics Centre with hardcopy declaration documents
Customs Document Check & Sufficiency of documents	Measures the number of occurrences and the time between the official making a request for further information and that information being supplied by the customs broker.	- 47% of lodgements received required a request for further information - The Average Elapsed Time by Customs from the Form 46 received to the Request for Documents was **0d 5hours 43minutes (0.24days)** - Average Elapsed time to supply the information was **1day 21hours 46minutes (1.91days)** - Average elapsed time from the Customs Start of Documentary Check until Invoice Issued (the same time as the End of Documentary Check) is **2hours 25minutes** - For all declarations surveyed, regardless of the channel selectivity the average time in Customs procedures was **14 hours 56 minutes (0.62 day).** In TRS#1 (2021) the average elapsed time for all Customs procedures was 3.53 days.
Direct Txt to Government Agencies re Physical Inspection (new Customs initiative since TRS#1 2021)	To complement direct messaging from Nafeza with system processing update messages technical agencies are sent txts to advice inspection details	694 inspection direct txt messages were sent to 12+ government agencies

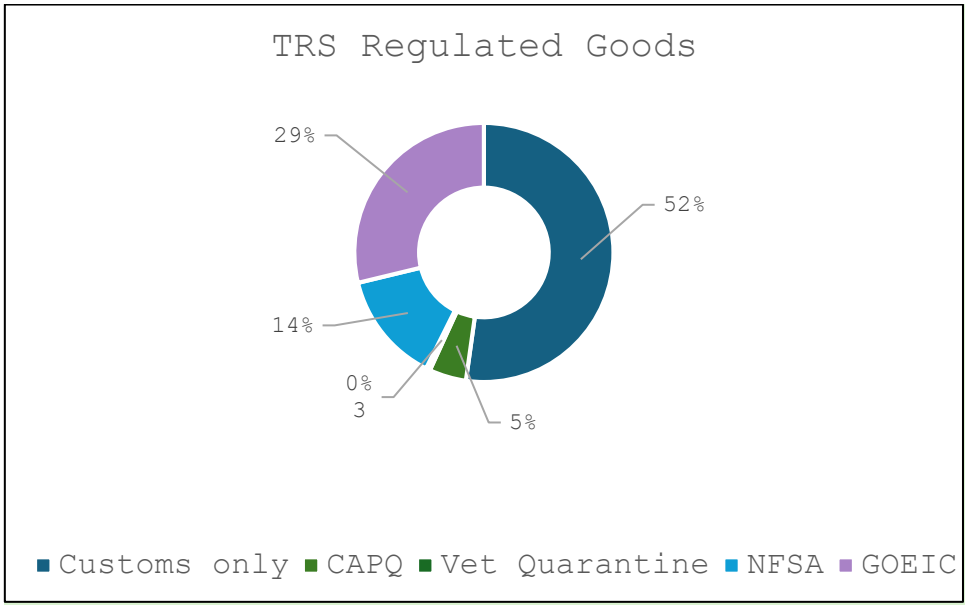
9.4 TRS Technical Agencies

Four technical agencies participated in the TRS[17], and the following diagram depicts the number of consignments (surveys) that contained regulated goods for these agencies[18].

[17] Central Administration of Plant Quarantine (CAPQ) Vet Quarantine (VQ), General Organisation for Import and Export Control (GOEIC), National Food Safety Authority (NFSA)

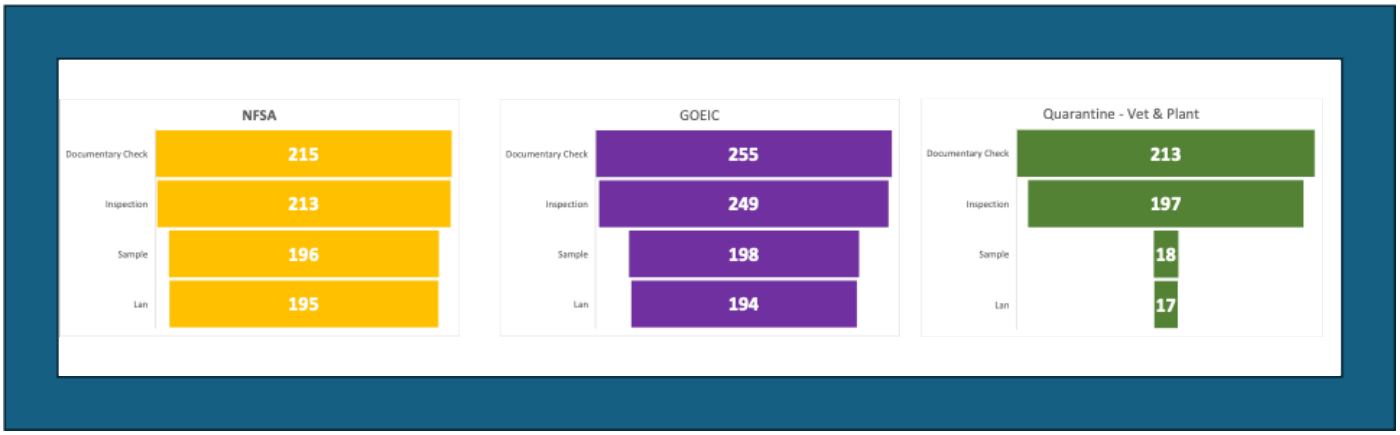
[18] Graph is derived from the Technical Agency data for Start of documentary check to end of documentary check.

Graph 7: TRS Regulated Goods



A further breakdown of the number of Technical Agency interventions are set out in the following graph.

Graph 8: Technical Agency TRS Survey Consignment Data By Agency[19]



The Average Elapsed Time for Technical Agencies processes to be completed.

Table 9: Average Elapsed Time Technical Agency Processes

Sub Group	Measurement Point	Average Elapsed Time
GOEIC	Start of Documentary Check to End of Documentary Check	2.36 days
Quarantine – Vet & Plant	Start of Documentary Check to End of Documentary Check	0.98 days
NFSA	Start of Documentary Check to End of Documentary Check	*3.63 days*

9.5 TRS Payment, Release and Exit

Issuance of the invoice followed by payment of the Consolidated invoice is initiated after the technical agencies have confirmed release and Customs has completed the document examination. For Customs, the end of the documentary

[19] The survey recorded the names of all agencies present at inspections and technical control agencies with a regulatory mandate. The time relating to the agencies other than GOEIC, Quarantine and NFSA was not part of the survey data collection.

check occurs at the same time the Invoice is issued. The average elapsed time from the Start of Customs documentary check until the Invoice Issued is **2 hours 25 minutes** and 87% of surveys were completed in this period.

The TRS Survey also identified the 'Dwell Time' between the time Customs issue the invoice (for payment of duty and taxes) and the time payment of the Consolidated Invoice was made. The average elapsed time was **16 hours 11 minutes** which is a reduction of 0.91 days.

Table 10: Average Elapsed Time for Payment

Sub-Group	Measurement Point	Average Elapsed Time
Payment *(Dwell Time)*	Issuance of Invoice to Customs receive payment of duties and taxes	TRS#2 - 0d 16h 11m (0.67 days) TRS #1 - 1d 13h 15m (1.55 days) **Reduction: -21 hours 4 minutes (-0.91 days)**
Customs Release	Receive payment of the invoice to Customs release given	TRS#2 – 1h 18m (0.05 days) TRS#1 - 5h 54m (0.25 days) **Reduction: -4 hours 36 minutes (-0.19 days)**

7.0 Conclusion

The 2024 Import Time Release Study (TRS) covers a broad range of cargo types, cargo sizes, importers, customs release types and technical agency regulated goods across three (3) sea ports and is assessed as providing a representative sample of consignments that passed through the Port during the TRS Survey Period. Furthermore, the TRS selected sample of 989 import declarations represents 24.3% of all import declarations received during the 7-day TRS period. Of the import declarations surveyed 986 formed the basis for data analysis.

The expanded TRS #2 2024, with the addition of the ports of El Dekhalia and Damietta, provided for a comparison in TRS Event measurements against the results of the Port of Alexandria. As a consequence of this, TRS #2 (2024) provided the opportunity to consider whether or not procedures were uniform across sea ports of entry and whether or not initiatives implemented since TRS#1 (2021) were likely to have been implemented across all sea ports of entry.

The uniformity in clearance procedures was observed during the TRS Planning Phase. With the similarities in both the average elapsed times and the average release time across all three (3) sea ports it is considered TRS#2 (2024) confirmed there is uniformity in border clearance procedures improving the alignment with the Art 10.1 TFA measure on Formalities.

Based on these factors, this expanded TRS, conducted and led by the Egyptian Customs through a multi-agency TRS Working Group, is assessed as providing sound results that provide a basis for future TRS and evidence the reduction in average release time for the import sea freight pathway.

10 Appendices:

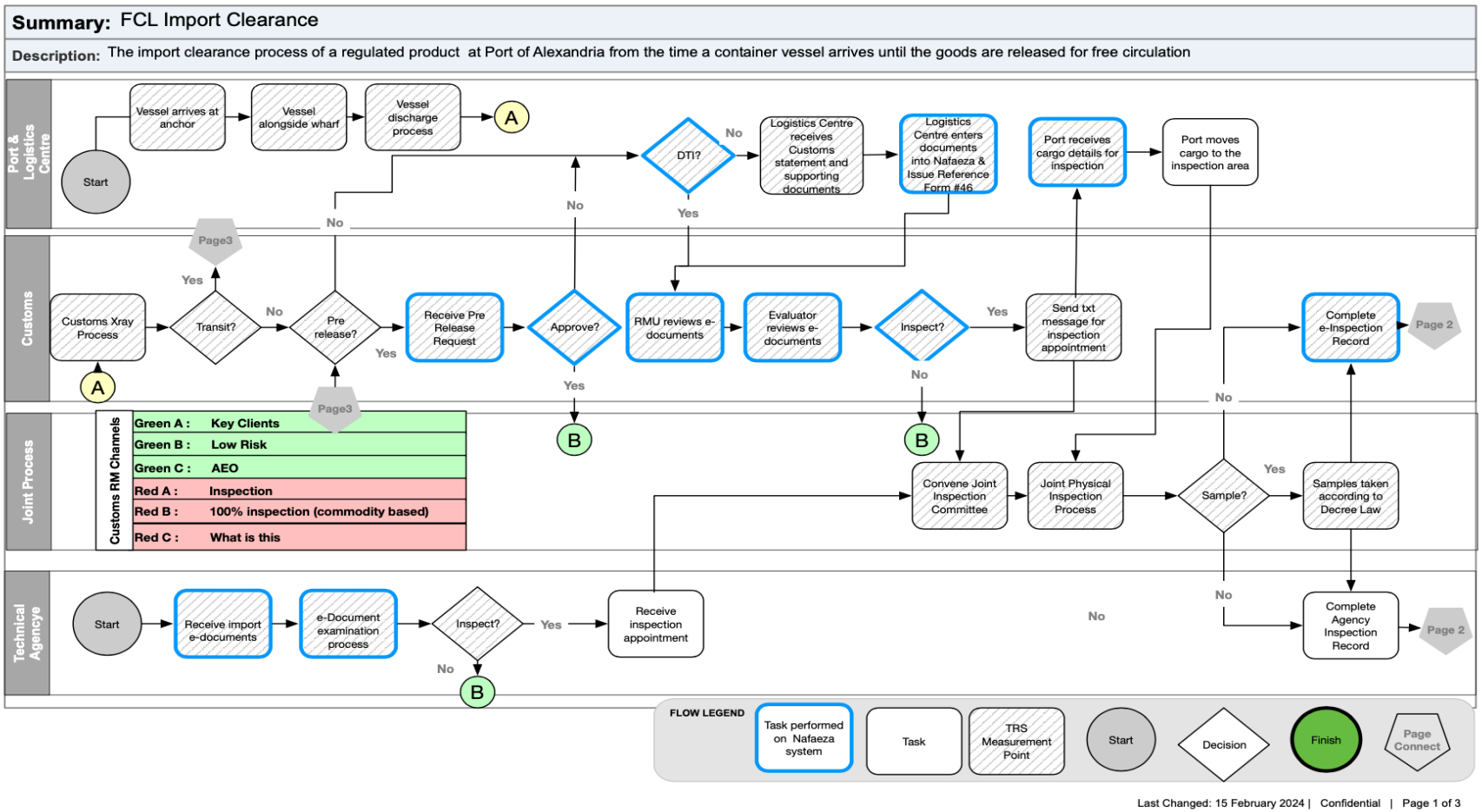
10.1 Appendix 1: Process Map

Overall Description

Port Import Clearance Process - Technical Agency Regulated Product

Summary: FCL Import Clearance

Description: The import clearance process of a regulated product at Port of Alexandria from the time a container vessel arrives until the goods are released for free circulation



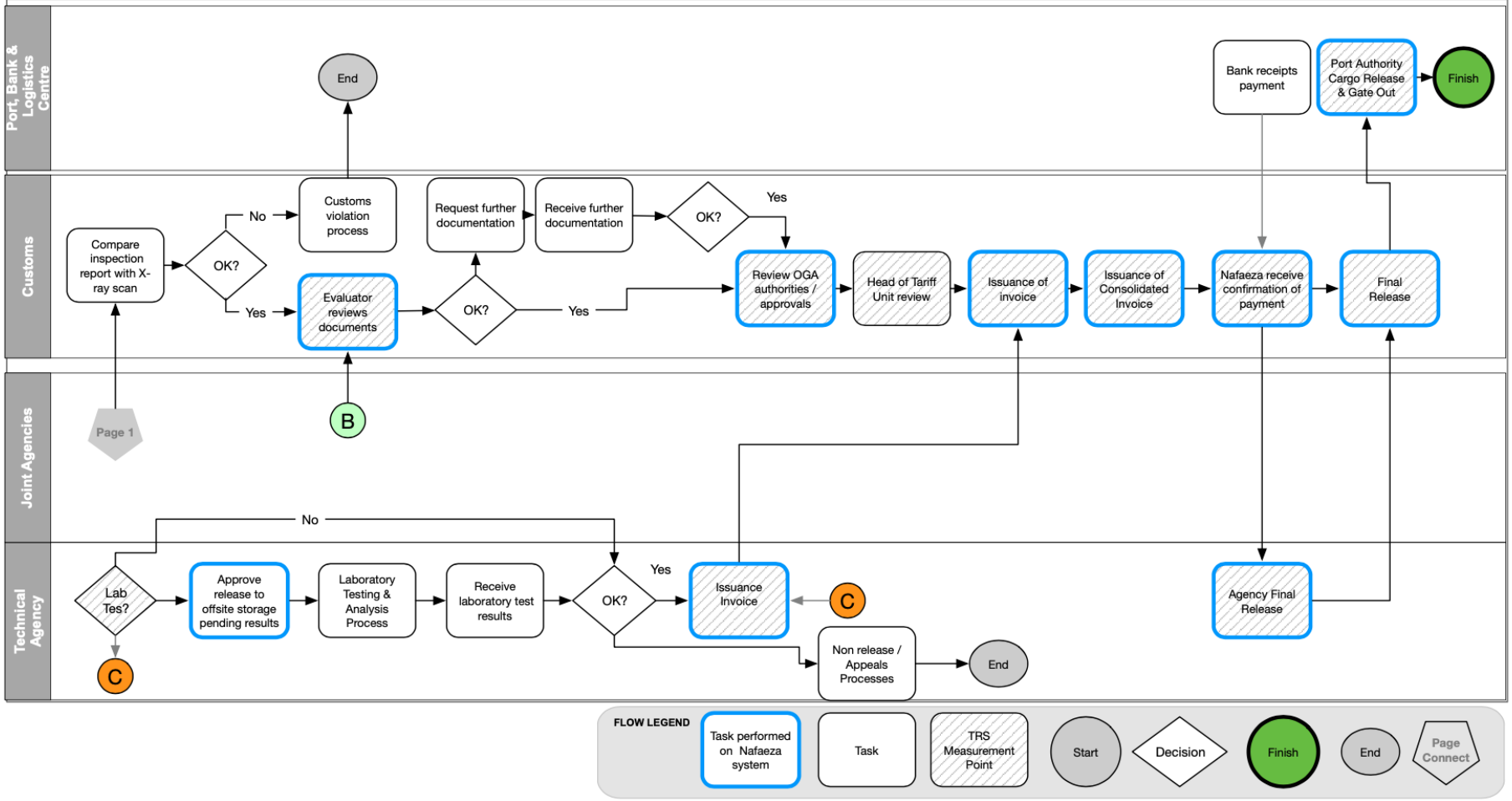
Last Changed: 15 February 2024 | Confidential | Page 1 of 3

Overall Description

Port of Alexandria Import Clearance Process - Technical Agency Regulated Product (cont.)

Summary: FCL Import Clearance at Port of Alexandria

Description: The import clearance process of a regulated product at Port of Alexandria from the time a container vessel arrives until the goods are released from the Port

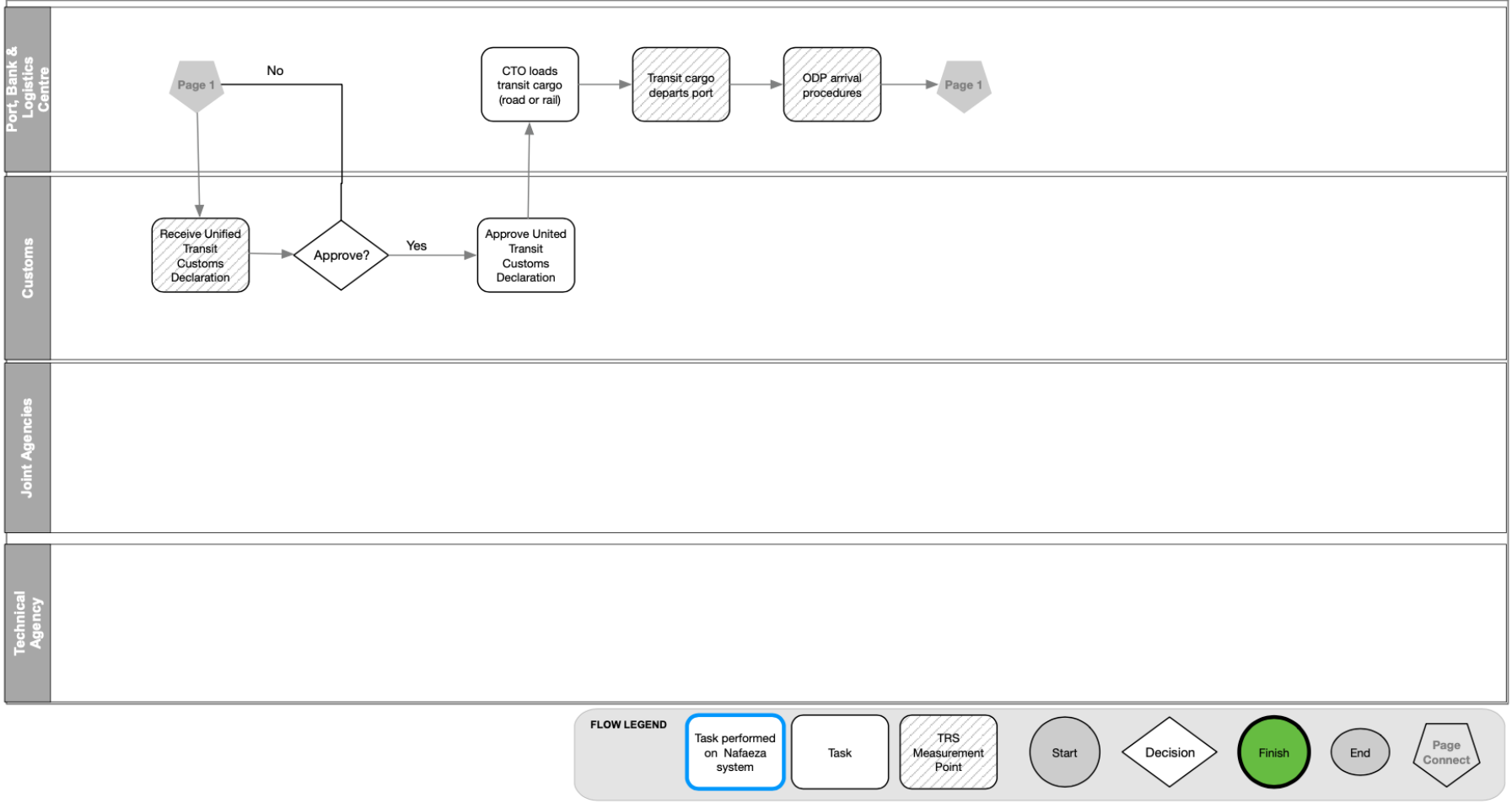


Overall Description

Port of Alexandria Import Clearance Process - Technical Agency Regulated Product (cont.)

Summary: FCL Import Clearance Egypt

Description: The import clearance process of a regulated product at Port of Alexandria from the time a container vessel arrives until the goods are released ffor domestic consumption



Last Changed: 28 February, 2024 | Confidential | Page 3 of 3

10.2 Appendix 2: TRS#2 2024 Data Collection Form

Test -

Back to previous page

Identification		
R_85	1. Office	Alexandria ☐ Damietta ☐ El Dekhalia ☐ ODP ☐
T_86	2. Customs Declaration ID.	
T_87	3. Vessel Name & Voyage	
T_88	4. Importer / Company ID	
R_92	5. Importer Status	AEO ☐ Regular ☐ White List ☐
T_89	6. Bill of Lading Number	
R_90	7. Cargo Type	Container ☐ LCL ☐ Break Bulk ☐ General ☐ Other ☐
T_91	8. Container No. (if applicable)	
Pre Arrival		
D_95	9. Electronic Cargo Manifest Received Nafaeza	___ day ___ mth - ___ hr ___ min
Arrival of Goods		
D_97	10. Vessel arrival at Anchor	___ day ___ mth - ___ hr ___ min
D_98	11. Vessel arrival alongside wharf	___ day ___ mth - ___ hr ___ min
D_99	12. Start Unloading Process	___ day ___ mth - ___ hr ___ min
D_100	13. End Unloading Process	___ day ___ mth - ___ hr ___ min
R_158	14. Direct trader input of customs certificate & documents	Yes ☐ No ☐
Pre Release & Transfer to ODP		
R_103	15. Transfer to ODP	Yes ☐ No ☐
D_104	16. Unified Transit Customs Dec submitted	___ day ___ mth - ___ hr ___ min
D_105	17. Transit Cargo Departs Port	___ day ___ mth - ___ hr ___ min
D_106	18. Transit Cargo Arrives ODP	___ day ___ mth - ___ hr ___ min
R_107	19. Pre Release	Yes ☐ No ☐
D_108	20. Pre Release Approved	___ day ___ mth - ___ hr ___ min

https://members.wcoomd.org/trs_test/PrintPreview_Survey.asp?tech=1 Page 1 o

Customs Processing		
D_110	21. Form 46 Certificate Received Nafaeza	___ day ___ mth - ___ hr ___ min
R_162	22. Sufficiency of documents	Yes ☐ No ☐
D_163	23. If insufficient, Documents requested	___ day ___ mth - ___ hr ___ min
D_164	24. If insufficient, requested documents submitted	___ day ___ mth - ___ hr ___ min
D_111	25. RMU update nafaeza with risk channel	___ day ___ mth - ___ hr ___ min
R_113	26. Customs Processing Channel	Green (A) ☐ Green (B) ☐ Red (A) ☐ Red (B) ☐ Red (C) ☐ Green (C) ☐
D_112	27. Document review by Evaluator starts	___ day ___ mth - ___ hr ___ min
R_114	28. Physical inspection required	Yes ☐ No ☐
Planning for Inspection		
D_115	29. Inspection request sent - Red	___ day ___ mth - ___ hr ___ min
T_116	30. Recipients of inspection request	
NFSA Processing		
D_119	31. NFSA Start of Documentary Check	___ day ___ mth - ___ hr ___ min
D_120	32. NFSA End of Documentary Check	___ day ___ mth - ___ hr ___ min
R_146	33. NFSA Inspection Required	Yes ☐ No ☐
R_147	34. NFSA Sample Taken	Yes ☐ No ☐
R_148	35. NFSA Lab Test	Yes ☐ No ☐
GOEIC Proessing		
D_123	36. GOEIC start of documentary check	___ day ___ mth - ___ hr ___ min
D_124	37. GOEIC Finish of documentary check	___ day ___ mth - ___ hr ___ min
R_149	38. GOEIC Inspection required	Yes ☐ No ☐
R_150	39. GOEIC Sample Taken	Yes ☐ No ☐
R_151	40. GOEIC Lab test required	Yes ☐ No ☐
Quarantine Control Agency Processing		
T_127	41. Control Agency	
D_128	42. Quarantine start of documentary check	___ day ___ mth - ___ hr ___ min
D_129	43. Quarantine finish of documentary check	___ day ___ mth - ___ hr ___ min

R_152	44. Quarantine inspection required	Yes ☐ No ☐
R_153	45. Quarantine Sample taken	Yes ☐ No ☐
R_154	46. Quarantine lab test required	Yes ☐ No ☐
Physical Inspection Process		
D_131	47. Cargo arrives at inspection area	___ day ___ mth - ___ hr ___ min
D_133	48. Start of physical inspection	___ day ___ mth - ___ hr ___ min
D_137	49. End of physical inspection	___ day ___ mth - ___ hr ___ min
T_156	50. Agencies present at the Inspection	
R_134	51. Adequacy of documents	Yes ☐ No ☐
D_135	52. In case of insufficiency of documents document request made	___ day ___ mth - ___ hr ___ min
D_136	53. In case of documents insufficiency document completion	___ day ___ mth - ___ hr ___ min
D_138	54. Inspection report entered into Nafaeza	___ day ___ mth - ___ hr ___ min
D_160	55. Start document review	___ day ___ mth - ___ hr ___ min
Payment & Release		
D_141	56. Invoice issued	___ day ___ mth - ___ hr ___ min
D_142	57. Consolidated invoice payment received	___ day ___ mth - ___ hr ___ min
D_143	58. Customs Cargo release certificate/notice issued	___ day ___ mth - ___ hr ___ min
D_144	59. Gate out	___ day ___ mth - ___ hr ___ min

10.3 Appendix 3: TRS Interval/Event Description

Event	Description
Arrival	Vessel arrives at anchor to Start of unloading
Offload	Start of unloading to unloading complete
Xray[20]	Start of Xray until the finish of Xray
Preparation	Unloading is complete until the declaration and support documents are submitted into the Nafeza system
Regulatory and Compliance	Declaration and support documents are submitted in the system until the Invoice is Issued
Customs Release	Invoice Issued (previously End of the Documentary Check) to Customs Release Given
Agency Release and Payment	Technical Agencies - Start Documentary Check to End of Documentary Check ECA –not measured in TRS#2
Clearance	Customs release given to Gate Out
Wharf to Gate (Average Release Time)	Vessel alongside to the cargo departing the Port Gate
Offload to Gate	Discharge of cargo is complete to the cargo departs the Port Gate

The event definitions for TRS#2 2024 have been updated to reflect the change in the procedures through initiatives such as digitalisation, the implementation of the Advanced Cargo Information (ACI) system and the completion of actions under the national trade facilitation strategy.

[20] The start and finish times for X-Ray were not collected during the TRS 2024 survey period.