# DOES TIME MATTER FOR FRONT LINE OFFICER IN CARGO ASSESSMENT TO DETERMINE THE PRESENCE OF NUCLEAR AND OTHER RADIOACTIVE MATERIAL OUT OF REGULATORY CONTROL? TRADE FACILITATION VS NUCLEAR SECURITY

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**Abstract**

Bureaucratic delays, excessive border procedure and inspection, pose a burden for moving goods across borders for traders. Trade facilitation, which requires simplification, modernization and harmonization of export and import processes, has therefore emerged as an essential issue for the world trading system. Trade facilitation plays a vital role in promoting import, export, foreign direct investment and e-commerce, to ensure the economic growth of a country. Front line officer (FLO) such as Customs, plays an essential role in facilitating cross-border trade while maintaining an appropriate level of control and security. Various international legal instruments provide the framework on trade facilitation and security, such as The World Trade Organization (WTO) Trade Facilitation Agreement (TFA). Other inter-governmental organizations such as The World Customs Organization (WCO) provide a framework of standards such as the SAFE Framework of Standard in combating illicit trafficking, including nuclear or radioactive material. To detect cargo that may or may not related to nuclear and other radioactive material out of regulatory control (MORC) is becoming challenging due to complexity of trade, and the assessment of commodity-related to these materials. The detection system and measures are essential in filtering and detecting high-risk goods such as illicit trafficking of nuclear and other radioactive materials at the international borders. However, dedicated resources specifically deployed in monitoring the Central Alarm System (CAS) may no longer be feasible in this context of trade facilitation. Furthermore, the assessment of alarms, secondary inspections and response from technical experts added to the pressure for timely border clearance. The paper highlights the Time Release Study (TRS) conducted by the Royal Malaysian Customs Department (RMCD) at Port of Klang, 12th busiest port in the world which handles more than 11million containers (TEUs) per year. This study measures the time of cargo release at the border, which includes the element of assessment and physical inspection of cargo related to nuclear and other radioactive material. The results show that the communication and movement of the shipment added to the time for border clearance. The paper calls for reform for nuclear security detection operation at the border, to emphasise on the element of clearance time by focusing on high-risk cargo by using risk management approach as recommended by the WTO and WCO. Policymaker and international partners that support the implementation of nuclear security such as US-NSDD, European Commission, IAEA and other relevant international partners. They also need to consider the approach by the deployment of a combination of Radiation Portal Monitor (RPM) and X-Ray instrument to optimise the FLO resources not only for nuclear security detection but also for contraband commodities. Concept centralises and dedicated CAS need to be reconsidered by merging the system and measure with existing Non-Intrusive Inspection (NII) control centre to optimise the decision making to expedite and facilitate legitimate good for border clearance. Finally, the study also demonstrates that TRS is a useful performance tool to measure the time between the interface from detection, assessment and response from relevant authorities for the improvement of process flow and standard operating procedure (SOP).

## INTRODUCTION

Cross-border trade is a driver of economic growth and development, and the national government governs it through various regional and multilateral trade agreements. This factor is what causes many industries to grow as the standard of living in developed and developing countries increases. Some of the drivers in developments of global business are rapid information and communication technology, advances in transportation and trade liberalization.

World Customs administrations leaders recognize their responsibility to develop new strategic perspectives and policies that will create a bolder, more proactive and innovative role in line with the ever-expanding cross-border trade of the 21st century. Action plans for trade and border management and the role of Customs should be able to overcome the challenges that may arise, such as globalization of business; international terrorism; and increased trans-national threats. Taking advantage of these opportunities is evidence that Customs administrations are always responsible for facilitating legitimate trade to support the global trade system. Customs has created a playing field for businesses to enhance the country's competitiveness, not only to protect the country's economic and financial interests but also to protect the public from various threats. According to the WCO, there are three Strategic Objectives to explain the definition of Customs Role in today's world, namely Facilitation, Revenue Collection and Protection of Society.

The WCO Safe Framework emphasized Customs administrations must work co-operatively with common standards to maximize the security and facilitation of the international trade supply. It encourages members to optimize the use of advance electronic cargo information in profiling for risk management and to maximize the use of technologies such as non-intrusive equipment in the detection of high-risk cargo which includes the radioactive material.

In Malaysia Radiation Portal Monitor (RPM) has been installed at the seaport and land border. The RPM installation at the port is a result of the cooperation of Malaysia and the United States Department of Energy (USDOE) located at Port Klang, Penang Port and Port of Tanjung Pelepas. At the same time, the RPM at the land border is the result of the cooperation of Malaysia and the IAEA installed at Malaysia-Thailand borders (Durian Burung, Bukit Kayu Hitam and Padang Besar). Through this initiative, the transfer of knowledge to the countries involved changed the way their Customs operate to facilitate the movement of legitimate goods and with appropriate measures to enhance security based on profiling and risk assessment, especially on the MORC. Concept centralises and dedicated CAS need to be reconsidered by merging the system and measure with existing NII control centre to optimise the decision making to expedite and facilitate legitimate good for border clearance.

To ensure that every action taken is appropriate in facilitating and controlling the security of cross-border trade, performance measurement needs to be conducted periodically, so that the efforts and resources used are optimized. WCO has introduced the Time Release Study as a performance measurement for cargo clearance, and it proposes a solution for each constraint or bottleneck.

Therefore, this paper discusses the efforts and time taken by the FLO in determining the authenticity of indicators in profiling and triggered alarms. It is because a significant percentage of the alarms that are triggered are false, the result of time spent and effort for a secondary inspection was pointless. Besides that, the results would also present the cause of delays and their remedies. The paper will then discuss ways to improve detection capabilities to ensure the facilitation of international trade without compromising safety.

## TRADE FACILITATION VS NUCLEAR SECURITY

### Trade Facilitation

The Customs Administrations are the authorities that are responsible for ensuring the facilitation and safety of international trades. Changes in the world trade landscape, the power of globalization, innovation and technological change continue to drive significant changes in the global supply chain which has led to rapid industrial development. The Customs Administration has always taken pro-active steps to facilitate it without neglecting security. With years of experience in implementing global Customs standards, the World Customs Organization (WCO) is an essential source of expertise and support for 183 member countries ready to face the challenges of international trade by building and enhancing a safe and convenient global trade environment.

A unique international instrument, the SAFE Standard Framework for Securing and Facilitating Global Trade was introduced to enable member countries to adopt modern supply chain security standards. The framework has four main elements, namely harmonizing advance cargo information, introducing risk management approach, customs inspection of high-risk containers and benefits program for compliant traders. It helps to submit the beginning of a new approach of end-to-end management of trade across borders while recognizing the importance of a close partnership between Customs and businesses.

The WCO standard and technical assistance support the TFA which has domestically ratified by 148 WTO Members. It is a milestone for the global trade as it contains provisions to expedite the movement, release and clearance of goods, including goods in transit.

### Nuclear Security

Many radioactive materials are safe to use in areas such as health, the environment, agriculture and industry. However, the possibility of nuclear and other radioactive material being used for terrorist acts cannot be ignored in today's global situation. To ensure the safety of all nations, various guidelines have been introduced to eradicate nuclear terrorism and illegal smuggling of nuclear and other radioactive material by the International Atomic Energy Agency (IAEA). Member States have responded to this risk by engaging in collective commitments to strengthen protection and control of such materials, and to create capabilities for the detection and response of nuclear and other radioactive material from regulatory controls.

The Customs Administration is an authorized FLO to safeguard the border against illegal trade and movement of nuclear and other radioactive material. In addition, WCO has recently published an implementation guide of Strategic Trade Control Enforcement (STCE) which are focusing on processes, procedures and training. It is a guide that covers two main sections of policy and operations in dealing with weapons of mass destruction, which includes a wide range of materials, including radioactive. It is consistent with the principles of the SAFE Framework of Standards. Heighten the security by blocking from illicit or dubious transactions while facilitating legal trade, allowing a much higher volume of lower-risk cargo to be expedited cargo clearance to encourage greater and faster legitimate trade.

The main goal of nuclear security detection is to deterring terrorists by detecting nuclear and other radioactive material. Through many initiatives by IAEA, WCO, International Criminal Police Organization (INTERPOL) and USDOE have taken a step forward by issuing various guidelines and best practices to serve as a reference to member countries. Even a series of capacity building has been conducted ever since, where the countries involved are now able to operate the related technology. With the help of these international bodies, their member countries adopting various technologies for detecting nuclear and other radioactive materials and installed at the seaports, airports and land borders such as Hand-held Equipment, Radiation Portal Monitor (RPM) and Advanced Spectroscopic Portal (ASP).

### Operational Challenges

The use of technology can help the Customs Administration carry out their responsibilities. However, there are various operational challenges to find a balance between trade facilitation and security to ensure economic growth and social well-being.

The first challenge is in terms of health, where the RPM machine itself emits radiation with additional radiation exposure from the goods. It is likely to cause more frequent rotations of the work to ensure that the FLO not exposed to continuous radiation that may affect health and fertility. Therefore, the Customs Administration should establish a comprehensive SOP to ensure the viability and sustainability of this operation. Also, unidentified nuclear material detection technology may be released through several studies by the University. There is a long learning curve for Customs officers in understanding the concept, terminology and flow of the tracking and response process.

Another challenge faced by the FLO is its reliance on existing systems and technologies in capturing consistent data. The presence of common commodities, i.e. fertilizers, foods, building materials containing radioactive sources of gamma rays that produce interfering yarns could trigger the false alarm. It causes time and effort to conduct the secondary inspection on such common commodities. Therefore, the technology acquired should be advanced and sensitive enough to detect the actual goods because some traders attempt to avoid detection. Besides, there are significant maintenance costs to ensure that all technologies are in good working condition.

Customs operates on a job rotation basis where Customs officers will be stationed in specific units/divisions for some time before being deployed elsewhere, ensuring that each Customs officer has a comprehensive experience while maintaining sound integrity. The policy will incur additional costs and time to retrain new officers on the concept and operation of nuclear security. However, such costs are under the control of the Customs Administration, so every process of identifying nuclear and other radioactive material needs to be documented to develop SOPs to ensure it's operational. Further, to ensure that the SOP is on track, its effectiveness must always be measured so that the Customs Administration is always aware of its current position and to take further action to address the issues.

## THE PERFORMANCE MEASUREMENT SYSTEM

Descriptive statistics are the basis for any measure of performance. In this case, the percentage of occupancy for portals, triggering alarms, secondary inspections and investigations can be calculated. It aims to look at the effectiveness of security screening carried out.

Time Release Study (TRS) is an important initiative introduced by the World Customs Organization (WCO) as the foundation for a performance measurement system to determine the average time taken for a specific process. It is clearly stated in the WCO Strategic Goals 1; the WCO will manage, further develop and promote the Economic Competitiveness Package, including the TRS, to achieve trade security and facilitation. The WCO clearly stated that:

“Time Release Study is a strategic and internationally recognized tool to measure the actual time required for the release and/or clearance of goods, from the time of arrival until the physical release of cargo, with a view to finding bottlenecks in the trade flow process and taking necessary measures to improve the effectiveness and efficiency of border procedures.”

International institutions and donors such as the WTO, the World Bank, the Asian Development Bank (ADB), the United States International Development (USAID), and the Japan International Cooperation Agency (JICA) have acknowledged and recognized that the performance measurement tool in the domain of trade facilitation is TRS.

World Bank stated that the purpose of TRS is to examine the procedures and agencies involved in between the arrival and release of goods the findings will be the baseline in streamlining the process and reduction of time. ADB emphasizes that it helps in assessing and resolving issues in the cargo clearance process. Meanwhile, according to USAID, it will be the basis for determining the infrastructure, policies and process improvements. The WTO highlights the importance of Establishment and Publication of Average Release Times periodically and in a consistent manner, using the Time Release Study of the World Customs Organization.

TRS is a systematic and standardized method for measuring the average time taken to release cargo and for each step or intervention in a border procedure at international borders such as seaports, airports and land borders. The TRS, therefore, measures aspects of the effectiveness of the operating procedures carried out by Customs and other regulatory authorities in the processing of import, export and transit movement. Bottlenecks can then be identified through analysis of the data collected and subsequently formulating relevant decisions into action plans to address the identified bottlenecks and continuously improve the performance of trade facilitation more effectively and efficiently.

In the context of nuclear security, it can be used to identify the average time taken for the entire nuclear and radioactive material detection process. The data obtained can be compared to the number of actual cases detected, which is intended to see the cost-effectiveness of the work being done as a result of triggered alarms as they are mostly false.

### Findings

#### Procedure

There are several stages of security screening for the detection of nuclear and other radioactive material, as shown in *FIG. 1*. It is a result of an experience in nuclear security detection at the port. In Port Klang Malaysia, there are two ports involved in the import and export of cargo, namely Westport and Northport. A total of 23 RPM and 1 SIS were installed in Westport while 19 RPM and 1 SIS for Northport. All 42 RPMs and 2 SISs are under the responsibility of the CAS to ensure that each procedure is carried out correctly. The Customs Administration manages it, and information is shared with the Atomic Energy Licensing Board (AELB). Customs is the party responsible for making sure the alarm properly works for primary inspection

All goods entering and exiting Malaysia whether import, export or transhipment is subject to primary inspection which are mandatory to go through RPM to detect the level of gamma and neutron existence before proceeding to the next procedures. Any readings that exceed the set level alarm will be triggered. Subsequently, CAS will display the goods information, including container number and shipping data information.

The FLO will proceed with the primary response by evaluating the detected profile and compare it to the manifest and declaration for the verification through the Customs Information System (CIS) which also includes a risk management system called the Customs Verification Initiative (CVI). The information will be analysed to determine whether it is a legitimate movement of goods where the legitimate goods will be released to the standard clearance procedure immediately. If there is any doubt about the item, the FLO will then issue an order for a second inspection to the port operator where they will make arrangements with the players involved to move the container to the Secondary Inspection Station (SIS). The FLO also need to move together to conduct the secondary inspection.



*FIG. 1. Nuclear and Other Radioactive Material Detection Process Flow*

The SIS is a Secondary Portal Monitor checkpoint on goods that have been identified to contain either nuclear or radioactive material. It aims to measure the radiation dose using Personal Radiation Devices if any neutron presence is detected or 20μSv and above of gamma reading, the FLO will forward this responsibility directly to AELB for further investigation. While anything below 20μSv of gamma reading, examination to determine the nuclear or other radioactive materials is performed using the Radiation Isotope Identification Device (RIID). The FLO will conduct an analysis of the findings and information received to determine whether it can be released or the need for further inspection. If further investigation is required, the port operator will be notified to bring the affected container through the scanner machine. The FLO will then make the final decision based on the available data either to release or detention. For containers to be detained, the information will be forwarded to the responsible agency, AELB for further action. Only AELB will perform any physical inspection that requires the container to be opened after further action is taken.

#### Descriptive Statistic

*FIG. 2.* below shows the funnel to visualize the numbers of TEUs of each process involved in the detection of nuclear and other radioactive material from 2015 to 2019 at both ports in Port Klang. The data shows that the average TEUs for the five consecutive years was 12,173,013, out of which only 26.62% was randomly selected which equivalent to 3,240,817 TEUs passing through RPM yearly, where the average number of daily TEUs passing through RPM is 8,879 TEUs. This clearly shows that there is no risk management at the Primary Inspection, where data such as the type of goods and company information, and its country of origin can be optimized.

While the average alarm triggered compared to the total number of TEUs through RPM is 1.02% which equals to 33,103 TEUs per year or 2,759 TEUs per month, this indicates that the average alarm triggered for 1 hour is only 4 TEUs. The FLO will then decide on the need for a secondary inspection based on gamma reading information and the existence of neutrons as well as the manifest and declaration information available to the CIS. This is where risk management has been optimized at Primary Response to determine if the alarm is false or authentic. Out of alarm triggered, 52.77% or 17,468 TEUs was a false alarm which makes 15,635 TEUs triggered an authentic alarm. This shows that the FLO still needs to evaluate the overall alarm triggered where 52.77% of additional effort for a false alarm is required to complete this Primary Response process.

After filtering only 151 TEUs yearly or 13 TEUs monthly are required for secondary inspection, which equivalent to 0.96% of total authentic alarm triggered. Only 0.80% or 1 TEU of the secondary inspection was found per year related to material out of regulatory control which required further investigation by AELB.



*FIG. 2. Funnel of average TEUs yearly*

#### Time Release Study

A simple TRS was conducted at Port Klang to demonstrate on how to measure performance in the border security of nuclear and other radioactive material detection procedures from the primary response, secondary inspection and investigation. The primary inspection was not included since the process flow is done automatically, and there was a limitation in obtaining the data because of some constraint in preparing this paper. *FIG. 3.* below shows the average time taken in minutes of each process.

The first stage of data is Primary Response starting with the average time taken to *acknowledge the alarm* triggered is 1 minute, followed by the FLO *reviewing the* *data* to identify gamma and neutron reading levels with an average time of 15 minutes. The *Operator Terminal will be notified* once it has identified any cargo that requires a second inspection, where the average time taken to receive feedback is on average 29 minutes. The Terminal Operator will notify importers, customs agents and hauliers, and this process takes an average of 11 hours 34 minutes until the affected cargo is transferred from *Container Yard to SIS*, this average time taken co-occurs with the FLO movement from CAS to SIS.

Next is Secondary Inspection. The FLO will carry out *Secondary Inspection* on the detected cargo that takes an average of 48 minutes. The *data obtained will be reviewed* first before deciding whether it should be the next step, the average time taken for this process is 26 minutes. *Operator Terminal will be notified* again to move the container identified for the investigation; the average time taken to receive the response from the Operator Terminal is 24 minutes. The average time taken for the *container to be transferred* to the investigation bay is 11 hours 52 minutes, and again this average time taken co-occurs with the FLO movement.

The third stage is the investigation. *Additional Inspection* will be performed; Non-intrusive Inspection, which takes an average of 20 minutes, the *data then will be analysed*, and the average time taken is 9 minutes. If the FLO decided that there is a genuine case, the Response Agency *AELB would be notified* which an average time taken is 21 minutes to proceed with *invoking response protocol* that takes an average of 11 hours and 35 minutes.

The total average time taken for genuine cases detected is 38 hours and 14 minutes. Most of the time wasted is the FLO and container movement procedure between two places as it involves communication by a few players in clearance chain.



*FIG. 3. An average time taken in minutes for each process*

## discussion and CONCLUSION

Several factors determine the effectiveness of the procedure in the detection of nuclear and other radioactive material. Customs Administration is bound by policies set by Trade Facilitation Agreements by WTO. Besides, the WCO also emphasizes facilitation and security, whereby physical inspection should only be done by 5% of total transactions without neglecting security filtering such as risk management. However, data show that the number of TEUs for secondary inspection is insignificant compared to Primary Inspection as this process is a risk-based approach which is considered as appropriate.

According to the findings, risk management only takes place at the Primary Response level, where this resource can be optimized as a container selection criterion for the Primary Inspection. This will certainly help to refine further the next process of Primary Response, which is expected to reduce no less than 52.77% effort in identifying triggered alarms. These resources can be optimized to identify the other 47.33% of triggered alarms to ensures that every high-risk good based on profiling in risk management goes through RPM for the Primary Inspection process. When compared to the previous five years, it showed an increase in portal occupancy and secondary inspection but a decrease in cases identified from 2 cases to 1 case average of recent five years. This indicates that efforts to detect these nuclear and other radioactive material have increased, but the number of cases received has declined. It means that the importers/exporters are aware of the permit requirements for the goods, and even the businesses are aware that Malaysia is strict in handling this issue.

The TRS introduced by WCO is fundamental to the trade facilitation, wherein this context it is seen as an ongoing process in assessing current performance so that each relevant agency could take action on any findings that cause a bottleneck in the cargo clearance process. Based on the findings, the major part of the average time taken is communication time, cargo and FLO movement from one place to another. Its average time taken is 36 hours 15 minutes compared to the average time taken of the whole process in cargo clearance is 38 hours 14 minutes. If the communication, cargo and FLO movement are carried out more effectively, and the response of each party is almost immediately, it is expected that the average time taken will decrease significantly. The CAS position to monitor two detection locations are centralized at the Customs office, which requires additional resources and time to travel to inspection location and adjudicate the alarms or alerts. It would cause time constraint in the event of a secondary inspection or anything that requires the presence of the FLO, as it will take time to travel between the two places. It can be more effective if it can be decentralized and placed under the control of the NII monitoring centre of each particular ports. Because the location of the monitoring centre is in the Port area itself, and the issue of movement of two places can be resolved which may help to reduce the time taken for the inspection team to arrive at SIS. The next TRS can be done more extensively, for instance, the communication, cargo and FLO movement can be break up more details to identify each factor that cause the delay.

Efforts to decentralize the CAS may be costly as it results in the movement of technological assets. However, integration with other NII system will help to reduce the time and resources for the alarm adjudication process. Furthermore, acquiring new technology is often seen as a high cost, and it is usually necessary to use it for a specified period. Therefore, it is advisable every time the process of acquiring a new technology takes place, the layout or positioning of the technology for each process must be organized and reasonable so that every movement from one process to another does not take long. This trade facilitation could save costs and effort, for instance, the deployment of a combination of RPM and NII instrument to optimise the FLO resources not only for nuclear security detection but also for contraband commodities. This effort is able to identify common commodities that trigger false alarms that may take time to further data assessment, as proven by the descriptive statistic that 52.77% of triggered alarms are false. Nevertheless, the use of technology has been helping FLO to detect nuclear and other radioactive material.

Bear in mind that, in an effort to address the security issue of nuclear and other radioactive materials, the time taken for cargo clearance is vital so that the time taken is within the calculated risk. It is because the longer the cargo clearance time taken, the higher the potential risk of exposure to the gamma and neutron radiation. The findings in TRS can be used to improve the procedure by implementing the recommended actions. In this way, the meeting point between security and facilitation is balanced. It is believed that this study provides a benchmark for countries of interest to perform performance measurements to determine the status of existing procedures or work processes and their constraints for improvement purposes, particularly by using WCO tools, the Time Release Study.

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