# **Business and Trade Connection**

# **Country Update Note 2: “Challenges Faced by S&SEA e-Commerce Providers”**

**Setting the Scene**

The term “E-commerce” refers to the production, distribution, marketing, sale or delivery of goods and services through electronic means.[[1]](#footnote-1) E-commerce is vital in the economic development of a country as it increases accessibility of products to customers from a wide array of sellers all of whom are spread across a wide geography. Lately, e-commerce has taken the world by surprise and now Pakistan is also catching up e-commerce market with leaps and bounds. Owing to the development of IT industry in Pakistan, people are now exploring various ways of expanding their businesses. Numerous retailers are now using websites to sell goods to the customers. The statistics of State Bank of Pakistan reveal the size of the e-commerce industry to be Rs. 99.3 billion as of 2018 with a year-on-year growth of 92 percent.[[2]](#footnote-2) The e-commerce sales are projected to exceed $1 billion[[3]](#footnote-3) by 2020 due to increasing internet penetration and expanding economic activity.

Despite the commendable growth, e-commerce providers in Pakistan continue to face numerous challenges. These challenges remain more arduous for those engaged in cross-border trade. In this context, the randomly selected respondents of our survey (e-commerce providers/e-exporters)[[4]](#footnote-4) reported a variety of issues pertaining to policy, rules and regulations in addition to internal and external capacity constraints. Results of survey reveal 50 percent of the respondents export goods and services digitally to European markets (Germany, Italy, Denmark, France, Britain, Spain, Switzerland, Austria, Ireland etc.) while 33 percent export to North America (US and Canada). On the other hand, 17 percent export to Africa (Kenya & Uganda), Australia and some Asian markets (Afghanistan, Cambodia, Philippines and Uzbekistan).

**Internal & External Challenges facing E-Exporters**

This section explores the constraints facing e-exporters in Pakistan. These constraints, according to the consensus of our respondents, are a mix of internal and external constraints. Internal constraints are those that originate from organizational resources i.e. barriers that are informational, functional or marketing related. They are differentiated from external constraints that a firm faces during the process of exports i.e. procedural, governmental or environmental.

Based on our survey, it can be concluded that both categories of capacity constraints are common among the e-exporters. Table 1 summarizes the challenges facing e-exporters in Pakistan.

**Table 1: Challenges facing E-Exporters**

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| **Internal Constraints** | **External Constraints** |
| Human resource capacity constraints | Lack of trust in electronic payment culture |
| Outdated business processes | Absence of international payment system providers |
| Poor market information | Weak protection of intellectual property rights |
| Lack of awareness regarding national and international rules and policies | Poor internet services (slow speed, frequent disconnections etc.) |
| Poor online visibility | Stringent national rules and regulations for business start-up and operations |
| Language barrier between the firm and international clients | Consumer privacy protection policies |
| **-** | Lack of coordinated support from institutions responsible for digital export promotion |
| **-** | High taxes & input prices |
| **-** | Product delivery delays |
| **-** | High shipping costs |
| **-** | Poor international perception of Pakistan’s e-readiness status |
| **-** | Access to new technology |

It is pertinent to note that majority of the respondents cited unavailability of international payment system providers such as PayPal as a significant challenge to their e-exports. Alternate payment options are deemed as expensive and time-consuming. As far as policies and programmes are concerned, most of the respondents are not aware of any such national/regional programmes/policies designed to foster exports of e-commerce sector. Moreover, few are aware of the online data protection policies in their respective export markets. Those who are aware, are able to meet those regulations and claim that it does not discourage them from exporting. On the other hand, those who are not aware claim that *“Although we do not know of any such regulations; we have our own online data privacy policies to make sure that our customers' personal information is kept safe.”[[5]](#footnote-5)* Further,when physical goods sold online are shipped across borders, the exporters still confront the traditional hurdles to trade, such as market access barriers to trade in goods, and trade compliance costs.

The respondents highlighted following aspects which could be adopted or improved to facilitate the e-exporters in Pakistan:

* Introduction of an international payment system such as PayPal to make the receiving of payments timely, cheaper and easier.
* Improving infrastructure required for the e-commerce trade including internet speed and connectivity issues.
* Reducing taxes on the equipments/hardwares used in the e-commerce such as computers, laptops etc.
* Introducing programs aimed at skill development of SMEs for digital presence.
* Devising a favorable tax regime to attract domestic and foreign investment for making Pakistan a competitive e-commerce player.
* Formulation of a sole organization/ministry to deal with e-commerce.
* Improving ease of doing business through reduction in the time and cost of business registration.
* Improved access to finance for e-commerce activities.

It is interesting to note that all the interviewed respondents were men. Despite significant efforts to get in touch with women e-commerce service providers/e-exporters, we could not find any owing to the poor documentation record by the relevant agencies. Generally, women entrepreneurs have been involved in textiles, beauty or cosmetic industry in Pakistan. Their involvement as an entrepreneur in e-commerce is a long road ahead and requires facilitation from families and government alike.

**Rules, Policies & Programmes for E-Exporters’ Facilitation**

E-commerce is a nascent industry in Pakistan, but is taxed in line with very mature and established industries. This is holding back the growth and development potential of the sector. Presently, the value of low valued items shipped through couriers for personal use is often not captured in export data because they are categorized as samples or gifts. This is a simpler and faster way to get through customs as compared to the normal export channel where exporters have to file shipping documents that include airway bill, invoice, packing list, request letter to assistance collector of custom Air-Freight Unit (AFU) export, letter authorizing clearing agent to clear export, copy of passport, copy of airline ticket and personal presence of passenger at time of clearance and these documents are subject to checks by custom officials, making the process cumbersome, costly and time consuming, especially for small exporters with low-value shipments. There is no regulation in customs laws that permit an online marketplace to ship items on behalf of the seller. If an online marketplace facilitates the transaction on behalf of the seller and ships it out on their behalf, they will automatically be deemed the seller of this item with the associated risks and rewards transferred to the online marketplace.

The previous government initiated a project to establish an indigenous e-payment gateway but it is not yet operational. There are external pressures such as Pakistan being in the Financial Action Task Force’s (FATF) grey list, which is also an obstacle for the international e-payment gateways

to operate in Pakistan. According to a focal person from Ministry of Commerce[[6]](#footnote-6), currently there are no specific policies/programmes supporting e-exporters as there is no clear demarcation between e-exports and exports in Pakistan. Hence, there are no separate rules devised to specifically encourage e-exports in the country.

Although the Ministry of Commerce in-consultation with relevant stakeholders has developed a draft Trade Dispute Resolution Act 2016-17[[7]](#footnote-7) for effective resolution of trade disputes, the Act is lagging in certain aspects. For instance, there is lack of holistic strategy framework regarding dispute resolution, also there is non-provision of online receipt of complaints from parties in e-commerce business, and there is no mechanism or policy guidelines for dispute domain name.

**Rules & Policies governing Data Flows, Data Localization and Data Privacy**

Personal data protection is a fundamental right guaranteed under the Constitution of the Islamic Republic of Pakistan. At present there are various provisions in different laws, rules and regulations that provide for protection of personal data. Main enactments dealing with the protection of personal data include[[8]](#footnote-8):

(1) Section 41 (Confidentiality of Information) of the Prevention of Electronic Crimes Act, 2016

(2) Section 155D, the Customs Act, 1969

(3) PTA Anti-Spam Regulations

(4) SBP Regulations

In July 2018, the Ministry of Information Technology and Telecommunication (MoITT) presented a draft data protection bill for consultation. The legislative process is still on-going. Some of the provisions of the draft law on data protection are as given under:

* Chapter two of the bill relates to the data controller respecting the consent of users, and making it mandatory for companies to notify customers regarding the processing of their personal data.
* Clause eight of chapter two imposes penalties on companies that do not have sufficient security arrangements for data protection of their customers.
* The third chapter deals with rights of data subject, modelled on the GDPR, whereby users have the right of access to personal data, right to correct personal data, and the right to erasure of personal data; all finally giving users rightful control over their personal data.
* The clauses related to data retention under section 9 requires data controllers to delete data not required for longer than its purpose.

Rules and policies regarding data flows and data privacy are, to some extent, covered under this bill, but data localization has not been given adequate attention. Instead, it is being dealt under the Prevention of Electronic Crimes Act 2016[[9]](#footnote-9).

As far as the data flows and data privacy policies are concerned, there is need to provide a comprehensive legal framework for dealing with the personal data protection issues. This framework may be required not only to provide adequate safeguards to the individuals as well as businesses thus helping towards achieving desired level of trust in e-commerce but also to achieve legal certainty in the matter. This legal certainty is required in order to enable the users of the e-commerce to know upfront to what extent their personal data is going to be used and on the flipside to what extent they can use the personal data of others. In this regard, there are plans to further develop and revise the current data protection policies. The new policy framework being drafted is highlighting all these aspects and the Ministry of IT is being pushed to take the lead in incorporating and implementing rules pertaining to data localization, data flows, and data privacy. Technical assistance is also deemed necessary for proper formulation of policies.

**Conclusion & the Way Forward**

It is pertinent to note that Pakistan ranked 120th out of 144 countries on the UNCTAD’s B2C E-Commerce Index in 2017[[10]](#footnote-10), which measures the keenness to engross in online commerce. Position of Pakistan has dropped as compared to rank of 105 in 2016 owing to certain issues plaguing the sector. In this regard, our survey revealed various internal and external challenges facing the e-exporters in Pakistan. Firstly, international payment system providers such as PayPal do not operate in Pakistan which adds to the difficulties of the e-exporters. Secondly, poor internet services (slow speed, frequent disconnections etc.) tend to act as a hurdle in the smooth operation of e-businesses. Thirdly, majority of the e-exporters face human resource capacity constraints such as inadequate technical knowledge, low level of marketing skills, poor networking skills etc. Fourthly, there is a lack of coordinated support from institutions responsible for digital export promotion thus adding to the challenges of e-exporters. Lastly, when physical goods sold online are shipped across borders, the exporters still confront the traditional hurdles to trade, such as market access barriers to trade in goods, and trade compliance costs.

In terms of policy and rules governing the e-commerce sector, there is a general lack of awareness among the e-exporters. Nonetheless, majority are aware of the consumer data protection law and undertake necessary measures to ensure consumer’s privacy remains protected. Rules and policies regarding data flows and data privacy are, to some extent, covered under the draft data protection bill prepared by the Ministry of Information Technology and Telecommunication (MoITT) in July 2018 however, data localization has not been given adequate attention. As far as the policies and

initiatives for e-exporters’ facilitation are concerned, presently there are no specific policies or initiatives to foster e-exports. This is partially because of the absence of a clear demarcation between e-exports and exports in Pakistan.

Corresponding to the nature of barriers flagged in the preceding section, recommendations to foster e-exports focus around the following:

* Improving payment procedures by attracting international payment service providers such as PayPal, Google Pay, and Samsung Pay etc.
* Enhancing internet access and quality.
* Establishing a platform that provides technical and vocational training to the e-exporters so as to equip them with necessary marketing and technical skills.
* Investing in R&D and IT sector to bring forward IT experts which can assist in formulation of policies governing e-commerce sector.
* Launching campaigns and public-private partnerships to raise awareness regarding laws, rules and regulations governing the e-commerce sector
* Improving ease of doing business and providing micro-finance to facilitate MSMEs engaged in digital service exports.
* Strengthening the tracking and tracing channel.
* Digitization of the registration and profiling process of e-export businesses.
* Linking Pakistani e-exporters with multinational corporations like eBay and Amazon in order to ease and broaden the market access.
* Providing a number of tax reliefs to allow the industry to establish itself.
* Adjusting legislation to allow online marketplaces to ship items on behalf of the seller that is listed on its platform. An online marketplace owing to its expertise in digital ecommerce, may be able to generate multiple export orders for a particular seller listed on its platform as opposed to the seller attempting to find these customers on his own.
* Trade Dispute Resolution (TDR) Law needs to have a parallel system for handling of online dispute resolution for trade disputes which cannot be handled under the proposed TDR Law.

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**Annexure: Responses of Small Scale Ecommerce Exporters in Pakistan**

**Part 1: Focusing on private sector: Identifying key export markets and specific export challenges faced by e-exporters in your country**

***Note: All 12 Respondents chose to remain anonymous.***

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| **Questions** | **1) What are the main markets for exports for your enterprise? What are the main challenges you face when exporting to these markets through electronic means? Please list the challenges in order of priority.** | **2) Are you aware of any specific legislation(s)/programmes supporting/promoting export in the domain of e-commerce enacted by your country? If yes, how has that helped you?** | **3) Are you aware of any policies or regulations regarding online data privacy in your export markets? If yes, are you able to meet these regulations, or do they prevent you in exporting?** | **4) Are there any regulations (at national, regional or international level) that do not exist yet that would support your enterprise in exporting through e-commerce?** |
| **Agency Name** |  |  | **Responses** |  |

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| 1 | We export mainly to Philippines and Uganda. Due to the unavailability of PayPal, we majorly just face payment issues because the alternate payment options are expensive and time taking. | We are not aware of any such legislations or programmes. | We do not know of any such regulations at either of the levels; however, we have our own online data privacy policies and make sure that our customers' personal information is kept safe. It is necessary in order to gain the trust of our customers | The government should develop infrastructure, which is especially important for our industrial sector. Moreover, taxation should be made easier as it is extremely complex at the moment, and hence, time consuming. Similarly, the complicated export process should also be simplified and facilitated by the national government. Perhaps by devising a system with one window operation (for payments, delivery etc.), it could be made better. |
| 2 | Our major export markets are in US and Canada. We face problems with regard to online payments due to the lack of feasible options in Pakistan like PayPal. | We were associated with the Pakistan Software Export Board (PSEB) in the past but discontinued our registration with it because it was of no use. | Yes. The countries we export to, US and Canada, have their own data privacy laws and we are able to meet those regulations. Confidentiality of our customers' personal information is especially important to us because we deal with information systems. | The public private partnerships should be strengthened at the national level. In order to do that, the government should first enhance its own capacity to build these partnerships and then bridge the gap between the private and public sector. Otherwise, nothing can be done to promote e-commerce export businesses in Pakistan |
| 3 | We mainly export to Spain, Italy and UK in Europe. We mainly face problems with regard to the marketing of our products because there are limited forums where we can interact with our customers. Moreover, the inputs to our industry are very expensive, they render us uncompetitive. The prevailing high taxes also make the problem even worse. | No. | While we are not aware of any such regulations at the national, regional or international level; we have our own data privacy laws that we are able to meet. Hence, it does not prevent us from exporting. | The government should help us with the marketing of our products in international markets. It is especially difficult for us to determine our target market in Europe, for example. If that is known, it would make our products much more suited to our customers hence easy to sell. |
| 4 | Our main markets lie in Africa such as Kenya etc. First of all, there are payment related issues (including payment delays) due to the lack of payment facilities provided by the government e.g. PayPal. Next, the export process is time consuming and complex due to which there are delays in delivery sometimes, and hence, complains from foreign customers. In some cases, we even lose our customers and then have to face losses. | No, the government is not at all helpful towards us. | No, but the privacy of our customers is still respected by the company according to its own data privacy laws This factor is a prerequisite to gaining the trust of our customers and hence enhancing our customer base. | First of all, the government should introduce PayPal in Pakistan as using Western Union is too expensive. Moreover, a one window operation (for payments, delivery etc.) should exist to make the export process easier and simpler. The taxation is also too high and complex as of right now, it should be improved and small scale businesses like us should be provided some sort of subsidies. The internet access here in Pakistan is also weak, which is why the government should work on establishing strong internet connections all over the country to especially facilitate small scale e-commerce businesses. |
| 5 | We export to Germany, Austria, Italy, Switzerland, and USA. We face no issue as such; however, the inputs are expensive. With expensive raw material, we have to raise the price of our products to maintain our profits. This makes our exports uncompetitive. | We are not aware of any government programmes that support our business. | No, but we have our own policies through which we keep personal data of our customers safe. "It is our responsibility." | The government should reduce taxes and also make the taxing system simpler. Small scale businesses like ours also lack in training, specifically in case of marketing. Thus, the government should arrange for training in these areas. |
| 6 | We export to Italy, Spain and Germany in Europe. Our most major concern is the visa problem. The embassies doesn't give visas to even the frequent business travelers. This significantly limits the marketing opportunities for us as we are unable to travel for exhibitions of our products etc. Sometimes, even when we are given visas, it is for a very inadequate period of time. "I was appointed a visa for 5 days last year and had to arrange 12 meetings in that time frame." It becomes very tough or even impossible for us to carry out work like this. We have incurred significant losses because of this problem. | No. "The government officials are only there for PR, they don’t actually help us out." | We don’t need to make use of any such policies as all the payments take place bank to bank and we don’t require much personal information from our customers | The previous government was giving subsidies to our business, which was helpful. However, we don't get those subsidies anymore. We suggest that the government should initiate similar programmes again under which are given some sort of subsidies. The prices have increased significantly recently, which is affecting our competitiveness; hence the government should bring inflation under control. The exports system is also too complicated, it should thus be made simpler. Lastly, businessmen like us should either be given some leverage in regard to the visa problem or the government should arrange for the marketing of our products itself. |
| 7 | We mainly export to USA, Australia, Canada, Italy and Germany. First of all, the customs procedure of some places like South Africa is quite complicated, which may be why we are unable to obtain customs clearance. Secondly, freight charges are also too high in some countries. | No. | We mostly acquire payments through a third party i.e. banks; hence, there is no demand or need of any online data privacy policies from our side or the customers' side. | We want to make a production unit for our business with which we require help from the government. We suggest that the government aids us in this task through interest free/cheap loans or subsidies. |
| 8 | The government should introduce PayPal services in Pakistan. Moreover, currently there is too much paperwork involved in various related processes, which should be reduced and computerized instead so that these procedures can become more efficient. The export procedure, as it currently stands, is also too complicated and should be simplified to allow for quick and in time deliveries of products. | Yes, we are aware of the Data Protection Bill in Pakistan and also have our own policies to protect the personal information of our clients. We are able to meet these regulations, it is a necessity in order to maintain our customer base. | No. | We mainly export to USA, Turkey, Canada and Germany. The foremost issue that we face with exporting through electronic means is the unavailability of PayPal in Pakistan. Because of this, we have to revert to more expensive payment schemes like Western Union. |
| 9 | Our main export markets are USA, UK, Canada, Netherlands and Denmark. The main problem that we face is that the government doesn’t pay export refunds, we have refunds dating back to two years and more that are still stuck with the authorities. Next, Pakistan also doesn't have convenient payment facilities like PayPal, which is why we have to resort to more expensive alternative and hence face difficulties and delays in payments sometimes. | No. | While we are not aware of any such policies at the national level, the personal information of customers is still kept private under our own policies. Additionally, some countries like USA and Canada have their own data protection laws we have to follow. However, none of these policies hinder our exports. | Electricity and gas should be made cheaper, export refunds should be given in time so that we can reinvest the money in our businesses, paperwork and taxes should be reduced and made simpler. Lastly, Pakistan should also introduce services like PayPal in the country to facilitate payments. |
| 10 | Our main export markets are in UK, France, Ireland and Germany. First of all, re-export is not allowed in Pakistan, as it is in other countries like Dubai. If the government allowed us to export products not made in Pakistan it would be very helpful. Secondly, payment facilities like PayPal are not available in Pakistan, which causes difficulties. The government has also introduced a tax on brands which significantly reduces our competitiveness in the international market. Moreover, Pakistan's negative image in the eyes of foreigners also majorly affects our exports as people don’t want to purchase from Pakistani exporters. This problem exists to the extent that we sometimes have to make use of contacts abroad to sell our products, disguising the fact that these products were manufactured in Pakistan. | No. "If the government was in any way helpful, Pakistan would not be standing where it is right now." | No. However, our company has its own policies that protects the personal information of its customers. | The government should give a freehand to the exporters/entrepreneurs of Pakistan rather than restricting them. It should balance between giving them security and ease of access. Currently, the government is more concerned about the security bit; however, its policies (meant for enhancing security) are neither enhancing security nor the ease of access. It should also allow re-export, which may even enable an ordinary man to have a business abroad. Moreover, the government should also facilitate e-commerce exporters by introducing PayPal in Pakistan. Lastly, countries like Dubai etc. give their entrepreneurs a sense of security in the business environment whereas Pakistan treats its businessmen like criminals from day one. |
| 11 | Our main export markets are in Afghanistan, Uzbekistan and Cambodia. The main problem we face with exports is due to the government control over our processes. The drug regulatory authority creates issues with the registration of our products, which causes unnecessary delays. Secondly, there are little or no intellectual property rights in Pakistan, which leaves our products and companies unprotected | We are aware of the Trade Development Authority of Pakistan. However, they do not help us in any way. They sometimes send very generalized emails about exhibitions etc. but even with those the registration forms are so complicated that we are unable to fill those. Moreover, even if we do attend one of these exhibitions, it is all on our own expenditure. | No. We do not need to such policies (neither is there any such demand from our customers) because we engage in bank to bank payments. | The different regulatory authorities, bureaucracies and ministries in Pakistan should develop one institute solely for e-commerce/direct exports. The purpose of this institute would be to make effective policies for all exporters of Pakistan and facilitate them however possible. |
| 12 | The textile industry is currently in crises, especially after the introduction of the recent sales tax. If these taxes were reduced, it would help us immensely. Moreover, the government should also give us some subsidies. | No. Since we use bank to bank transfer, we do not need to abide by such policies. Moreover, for our own security, we make use of letter of credit | No. And we don't need any such programmes either, we are doing fine on our own. | Our main markets for export are UK, Belgium and South Africa. We face no issues in our business and everything is going smoothly. We have maintained our customers from a long time back and they are still loyal to us. |

**Part II: Focusing on relevant government ministries: Identifying and strengthening rules, policies and programmes to support exports by e-exporters in your country**

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| **Questions** | **1) What are the main national policies/programmes to support the exports by the e-exporters in your country? How have these been implemented? Are there any plans to further expand/strengthen these policies/programmes?** | **2) What are the current national policies and rules dealing with the issues of date localization, data flows and data privacy? Are there any plans to develop/revise these rules and policies? Do you need any technical assistance to do that?** | | **3) What kind of regional/international rules can help your e-exporters in increasing their exports?** |
| **Agency Name:** | **Ministry of Commerce** | **Responses** |  | |

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| 13 | There are no policies/programmes currently supporting exports by e-exporters in Pakistan. However, a policy framework dealing with this area is under drafting stage. Hence, even though Pakistan’s current stance on exports by e-exporters is weak, there are indeed plans to build strong policies and programmes that will enhance the capacity of e-exporters in Pakistan. | Currently, a Personal Data Protection Bill, prepared by the Ministry of IT, exists in Pakistan. However, it has not yet been approved. Rules and policies regarding data flows and data privacy are, to some extent, covered under this, but data localization has not been given enough attention. Instead, it is being dealt under the Prevention of Electronic Crimes Act. Moreover, the policies regarding data flows and data privacy also need further work. Yes, there are plans to further develop and revise policies. As mentioned earlier, the new policy framework being drafted is highlighting all of these aspects and the Ministry of IT is being pushed to take the lead in incorporating and implementing rules regarding data localization, data flows, and data privacy. Yes, we do need some technical assistance to do this as only once we fully understand the technical aspect can appropriate policies be made. | Currently, there is no demarcation between e-exports and exports in Pakistan. Hence, there are no separate rules devised to specifically encourage e-exports in the country. However, with reference to how these exports can be increased in Pakistan, taxation should first be lowered. Moreover, the tracking and tracing channel should be strengthened, the customs clearance procedure should be made simpler and easier, and the registration and profiling process of e-export businesses should be digitized. Pakistan customs is also working on the introduction of the National Single Window (NSW) through which multiple trade related processes will be digitized and dealt with on a single platform. However, NSW is currently only for importers. Further, the SMEz should be connected with the internet, more of these businesses should be introduced to e-ecommerce. For example, a woman sitting in Bahawalpur with an embroidery business should be supported so that she can also send her embroidered products abroad. Additionally, linkages should be made between Pakistani e-exporters and multinational corporations like eBay and Amazon. Export facilitation can also be achieved by strengthening the institutions. For example, Pakistan Post offices should be more spread out in easily accessible areas. They should also be some ‘at the door facility’ for female e-exporters through which their products can be picked up from home. Both, the exporters and importers, should be able to track the order in transit. There must also be an online payment facility i.e. Pakistan’s own international payment gateway. The State Bank of Pakistan (SBP) has already worked on it, but more work is required. Lastly, some exchange and refund policy should be devised if the product exported does not meet the needs of the importer. |

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4. The selected 12 respondents are e-commerce providers/e-exporters operating in different cities of Pakistan. [↑](#footnote-ref-4)
5. Note: The respondents chose to remain confidential. [↑](#footnote-ref-5)
6. Two public agencies namely Ministry of Commerce and Trade and Development Authority of Pakistan (TDAP) were contacted. It was revealed that e-commerce does not lie in the domain of TDAP currently and therefore response could only be collated from WTO Wing of Ministry of Commerce (see Annexure). [↑](#footnote-ref-6)
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