

OPENING UP TRADE DATA

The Benefits to Sri Lanka

This policy note unpacks the importance of free and online access to trade data and highlights the problems of SLC's restrictive data dissemination policy. These hurdles, which must be resolved, have caused Sri Lanka to lag behind regional peers that have made considerable attempts to make their trade data free and easily accessible.

International trade data are the foundational basis when formulating trade policies and assessing their impacts. Trade data also assist stakeholders to evaluate the impact of trade policies at the national, sectoral, and individual firm level, and enhance the capacity of firms engaging in international trade to make sound business decisions. Given the importance of trade data, countries and international organisations across the world are making these statistics freely available on online platforms. In addition, countries are increasingly providing product-wise disaggregated statistics (for instance, at the Harmonized System [HS] 8-digit or 10-digit levels¹) as well as in a more easily downloadable and editable format (CSV²) that makes data analysis easier.

Unfortunately, when compared to regional and international best practice, Sri Lanka is failing to use trade data effectively for the benefit of the country. This is due to Sri Lanka Custom's (SLC) [the agency responsible for collecting trade statistics] restrictive data dissemination policy, which limits access to these types of statistics by not making them freely available on an online downloadable platform. This policy has negative spill over effects. SLC's reluctance to share trade data on Sri Lanka also restricts other government agencies attempting to make trade statistics free and accessible online. Moreover, it results in outdated statistics being featured on data platforms run by international organisations.

IMPORTANCE OF HAVING FREE ONLINE ACCESS TO TRADE DATA

Trade statistics are an important source of information that facilitates evidence-based trade policy and business decisions. This data enables policy makers and businesses to diagnose problems and identify and respond to opportunities.

The following are some specific examples of the importance of open trade data:

| Formulation and evaluation of a trade policy

From a policy maker's point of view, ease of access to sound data aids in making timely and evidence-based national policy decisions on international trade. It allows government agencies overlooking different trade sectors (e.g. agriculture, pharmaceuticals) to access data relevant to their respective sectors, reducing acquisition costs, redundancy, and overheads.

Free access to data is also important in terms of keeping the public informed on significant trade policy issues. In addition, with open data, businesses, universities and think tanks can more easily identify problems that need solving and better engage with the government on trade policy decisions. For instance, in Sri Lanka, there is currently a huge outcry for an inclusive trade policy. However, the capacity to develop an inclusive policy is limited in the absence of free access to trade data for all relevant stakeholders, including the private sector, academia, and government.

A key area in which timely trade data is vital is the negotiation of trade agreements. Free Trade Agreements (FTAs) are an important trade policy instrument, and the lack of feasibility studies on their impact is a key concern. Trade statistics play an important role in assessing the costs and benefits of such agreements both pre- and post-entry.

| Commercial use

Ease of access to trade statistics will help local businesses to innovate and expand. For instance, exporters need to refer to trade data when researching potential export markets and products, specifically to assess the potential market size, identify untapped markets and assess the level of competition in the market. Also, given that imports are a valuable source of inputs to domestic production, the ability of producers, through trade statistics, to evaluate sources

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of imports, import prices and quantities is important. In general, businesses benefit by obtaining a more accurate and complete insight on demand for their products: whether demand is growing or declining; market share; and the level of competition in the market.

Trade data are also important for businesses to assess the export potential of FTAs and their impact on domestic industry. This information is crucial in formulating measures to mitigate potential risks and exploit export opportunities, at both the pre-and post-entry stages. Trade statistics are also essential for local businesses to take full advantage of the recently enacted Anti- Dumping and Countervailing Duties Act, No. 2 of 2018, to determine the threat of injury to their businesses from imports and make their cases to the authorities.

Potential foreign buyers

Easy online access to trade data has the added value of being available to potential foreign buyers and investors scoping out business opportunities in certain sectors or regions. Sri Lanka's position of limiting online access to trade data, whilst other countries are proactively making such statistics available is a definite disadvantage. For instance, potential buyers of Sri Lankan goods need to assess the comparative advantages and nature of Sri Lankan exports to decide on what to purchase and from where. In addition, promoting trade data to potential investors would help showcase Sri Lanka's potential for increased foreign direct investment (FDI) in targeted areas.

HOW DOES SRI LANKA FARE AGAINST REGIONAL PEERS IN MAKING TRADE STATISTICS FREELY ACCESSIBLE ONLINE?

In recognition of the value of trade data, international organisations as well as countries across the world are taking steps to disseminate these statistics free of charge, online. In addition, technology is being used to enhance the ability to compare, contrast and analyse as well as to download data in formats (e.g. CSV) that make it easier to use for analytical purposes. Making trade data available free of charge, online in a downloadable format has become the international standard. However, as described below, Sri Lanka lags behind even the South Asian region in this respect.

In contrast to Sri Lanka, all other South Asian countries provide free and instant access to trade statistics on online platforms at the most disaggregated level (at HS 8-digit or 10-digit levels). With the exception of Pakistan and Bhutan, this data is available in downloadable and easily editable formats in all other countries in the region. Moreover, even in Pakistan and Bhutan, trade data is available free of charge and users can refer to the data online, which is better than what Sri Lanka provides (refer Figure 1 below). Sri Lanka must take note and follow the example of peer countries that have taken these initiatives.

**Ease of access:
Sri Lanka vs
South Asia**

Can trade data be obtained...

1. Free of charge?
2. Online?
3. With no registration?
4. With immediate access?
5. In an editable format?

Yes No

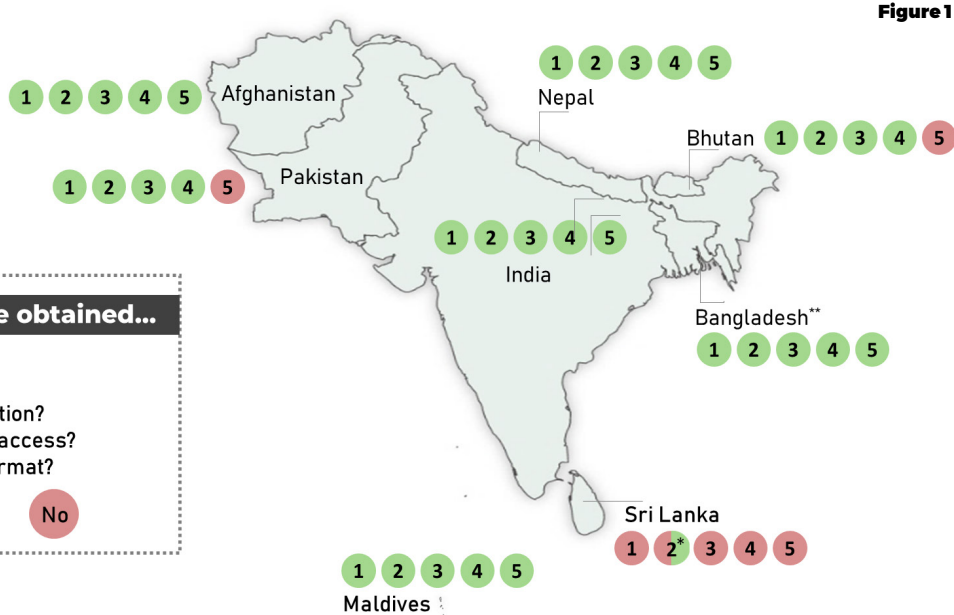


Figure 1

Notes:

**EDB provides data online, SLC does not.

** Up to date trade statistics at disaggregated level (HS 8 digit level) is available only for exports. Import statistics is only available up to HS 2 digit level.

Source:³ Department of Commerce India: Export Import DataBank; Pakistan Bureau of Statistics: External Trade Statistics Tables; Export Promotion Bureau Bangladesh: Export Data; Department of Customs Nepal: Statistics; Maldives Customs Service: Statistics; Ministry of Finance Bhutan: Bhutan Trade Statistics; National Statistic and Information Authority Afghanistan: Statistics; Export Development Board Sri Lanka.

WHY IS SRI LANKA LAGGING BEHIND?

As mentioned above, SLC is the primary source for trade statistics on Sri Lanka. SLC's Statistics Division collects and records export and import statistics and maintains real-time trade data, at the level of the tariff line of each product traded, in an editable CSV format.

Sri Lanka lags behind its regional peers in terms of ease of access to trade data mainly because of SLC's restrictive data dissemination policy. This policy has fostered an environment in which accessing trade statistics on Sri Lanka is expensive and time consuming. It must be noted that SLC does not have a documented data dissemination policy. The observations made in the following sections of this policy note have been identified through the response to a Right to Information (RTI) request filed with SLC by Verité Research on the 14th of August 2018.

Key problems with SLC's data dissemination policy and practice

1) Trade data is neither provided free of charge nor accessible online

As mentioned above, SLC does not provide data free of charge. For instance, to obtain a year's worth of complete export and import statistics by detailed product category (HS code 8-digit level) and the corresponding traded country (destination of exports and source of imports), the cost is LKR 20,000/ (see Annex 1 for the detailed price list). Potential users must visit the SLC headquarters to pay and collect the data as it is not disseminated online.

2) Information on available data and the procedure in place to access the data is not published

The type of data available, price, time taken to provide the data, contact persons and procedure/application form to obtain data are neither documented nor made available on the SLC website. In fact, a new user would not know if SLC even sells trade data in the first place as there is no mention of the availability of trade statistics for sale on its website. As such, the current process is very time consuming and inconvenient especially for those users outside Colombo and those residing outside the country.

Under the current legal framework introduced through the RTI Act, government agencies are mandated to proactively disclose information relating to available data and its accessibility to the general public (see Box 1 below)

Box 1

Regulation No. 20 under the Right to Information Act on Proactive Disclosure of information⁴

According to Regulation 20 issued in February 2017, all public authorities 'shall routinely disseminate, at a minimum' key information enumerated in the regulation. This dissemination could even be via 'a digital or electronic format'. Among other types of information,⁵ this regulation directs public authorities to disseminate information relating to:

- v. *Public services information: Descriptions of services offered to the public, guidance, booklets and leaflets, copies of forms, information on fees and deadlines.*
- xi. *Lists, registers, databases: Information on the lists, registers, and databases held by the public body. Information about whether these lists, registers, and databases are available online and/ or for onsite access by members of the public.*
- xii. *Information about information held: An index or register of documents/ information held including details of information held in databases.*
- xiii. *Information on publications: Information on publications issued, including whether publications are free of charge or the price if they must be purchased.*

The Statistics Division of SLC has failed to comply with Regulation No. 20 under the RTI Act, since it does not publish information on the policy, process, and fee schedule of the sale of trade data.

3) The process in place is cumbersome and lengthy

Even users who are willing to pay for data must visit the SLC headquarters to obtain them. Although data requests can be emailed, payments cannot be made online. Users also waste time as there is no clear guidance on which officials to meet and where to go to at the SLC premises. In addition, as there is no working contact number for the Statistics Division posted on the website, potential users must call the general line and find someone knowledgeable who can then connect them to the relevant officials. As

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described above, attempts made by Verité Research to purchase trade statistics through SLC took up to 3-6 days.⁶

4) The incentive structure in place disincentivises SLC officials from giving free online access to trade statistics

Given the benefits for the country as expanded on above, the government should be incentivising and encouraging SLC to provide open access to trade statistics. Yet, the government seems to be doing exactly the opposite. A letter issued by the Ministry of Finance, dated 16th November 2004, is referred to by SLC in response to the RTI request made by Verité Research. This letter explicitly sets out that SLC is granted permission by the Ministry of Finance, as per the Establishment Code Chapter IX, para 2, to sell trade data and split the proceeds as follows: 40% allocated for the consolidated fund of the Ministry of Finance and the remaining 60% distributed at the discretion of the Director General of SLC amongst the officers involved in compiling the trade data set (see Annex 2 for the aforementioned letter). According to SLC, in 2017, it earned LKR 8.6 Million through the sale of import and export data. Around LKR 5.16 million of this total would have been retained within the entity and distributed among the "officers involved in the process."⁷ Clearly, the incentive structure currently in place disincentivises SLC from giving users free online access to trade statistics.

5) SLC lacks a rational basis to charge for trade statistics

SLC's main justification for selling trade statistics is that procuring and disseminating data is a service provided to the public, making it eligible for fees to be charged for its use (refer Box 2 for details on SLC's legal basis for selling statistics). However, given the low or zero marginal costs incurred in reproducing the data, this justification is questionable. The data is: 1) a by-product of normal customs operations, collected with no major additional costs; 2) non-rival in nature with no marginal costs associated with making additional copies; and, 3) funded through public taxpayer money.

Further, the argument that it is justified to charge private corporations and other private entities for the use of statistics, on the basis of affordability, and that they use this data to earn money, is simply not true. These private organisations already pay for the

data being collected by public officials through the payment of taxes. Further, the overall benefits to the country of the private sector, both local and foreign, having online access to these statistics free of charge are high. It is for this reason that other countries and international agencies are providing online data free of charge.

Box 2

SLC's legal basis for selling trade statistics

In response to an RTI request filed by Verité Research on the 14th of August 2018, the Statistics Division of SLC cites the following as its rationale for selling trade statistics as opposed to making them freely available. To prove that SLC has permission to sell trade statistics it cites a letter from the Ministry of Finance dated 16th November 2004 (see Annex 2), where the Ministry gives permission to SLC as per the Establishment Code Chapter IX, para 2 to charge for trade statistics from the private sector and split the proceeds 40:60, respectively, between the consolidated fund of the Ministry of Finance and the officers involved in the process of trade data collection. The Establishment Code's Chapter IX para 2 cited in this letter sets out the basis for government departments to charge the public for services provided, and SLC claims that the collection of trade statistics qualifies as such a service, and justifies the need for fees to be charged.

In addition, SLC also cites the Public Finance Circular No. 35, issued on the 6th of February 1997 by the Ministry of Finance, as another justification for its stance. This Circular empowers government departments such as SLC, to decide on fees for the provision of services (specifically for services for which fees are not governed by certain Acts and Regulations) at their own discretion. Further, this Circular empowers agencies to change fees as required over time, taking into consideration the country's economic situation (refer to Annex 3 for the Circular).

It should also be noted here that as per the RTI Act, permissibility of the sale of trade statistics by SLC remains questionable (refer to Box 3 for more details).

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Box 3

SLC's sale of statistics and the applicability of the RTI Act: A quick review

There is a lack of clarity as to whether SLC's selling of trade statistics is permissible under the legal framework set out under the RTI Act. According to the 'Right to Information Commission Rules of 2017' issued under the RTI Act, a public authority shall not charge a fee to process an RTI request and in terms of fees for information, the Commission Rules set out a fee structure. However, Rule 5 states that if a public authority has issued a fee schedule 'by way of circulars or regulations' prior to the 2017 Commission Rules, then such a fee schedule shall continue to operate. Therefore, it could be stated that in order for a public authority to claim the exemption provided through Rule 5, it must meet the criteria of having its fee schedule issued through a circular or a regulation.

As per Rule 5 of the Right to Information Commission Rules of 2017,

Where there exists a previous Fee Schedule prescribed or issued by Public Authorities by way of circulars or regulations, that Fee Schedule shall continue to operate notwithstanding the Fees prescribed in Rule 4. Provided that any dispute in regard to claims relating to existing Fee Schedules may be the subject of an Appeal to be determined by the Commission in accordance with these Rules on Fees and Appeals.

However, the applicability of the Rule 5 exemption to SLC is questionable for two reasons:

(1) The fee schedule documentation SLC shared with Verité Research for the fees to be charged for the statistics is a document signed by the Director General of Customs on 1st February 2016 (refer to Annex 1). This does not appear to have been issued through a circular or a regulation as stated in Rule 5. As such, it is questionable as to whether this SLC fee schedule falls within the exemption provided in Rule 5.

(2) The other documentation relied upon by SLC (i) Ministry of Finance letter dated 16th November 2004 and (ii) Public Finance Circular of No. 351 issued on the 6th of February 1997 are general references discussing the entity's ability to charge for services offered. This documentation does not deal with a specific fee schedule for SLC. For instance, the 1997 Public Finance Circular was issued by the Ministry of Finance to all government departments. Therefore, it could be argued that reliance on this documentation does not serve for the purposes of Rule 5 discussed above.

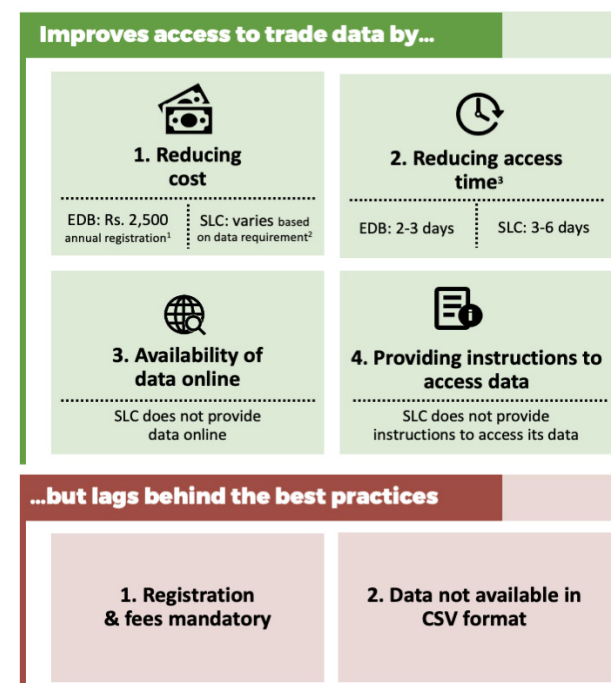
SLC's restrictive data dissemination policy limits other agencies from providing online access to trade statistics free of charge

As detailed below, other government agencies and international organisations have attempted to make trade data on Sri Lanka freely available online. However, SLC's restrictive data dissemination policy and the reluctance on the part of this entity to share trade statistics freely have prevented these initiatives from being useful open data platforms. SLC's policy of charging for its data sets essentially limits any other organisation from accessing these statistics and making them freely available.

1) The Export Development Board's online trade platform is a step in the right direction, but not on par with regional best practice

In early 2020, Sri Lanka's Export Development Board (EDB) established an Online Trade Statistics Platform. Users registered with this platform are able to get instant online access to disaggregated import and export data, by product at the tariff line. The EDB sources this data directly from the SLC. Prior to this initiative, no local agency maintained such an online platform to make trade statistics on Sri Lanka accessible online (refer Figure 2 below).

EDB Trade Data Platform: Easing access to trade data as of January 2020 **Figure 2**



Notes:
¹ An annual registration fee of Rs. 2,500 provides unlimited access to data on the platform.
² Refer Annex 1 for the fee schedule.
³ Time frames based on attempts by Verité Research to access data.

Source: EDB and SLC

Indian Export-Import Data Bank

GOVERNMENT OF INDIA
Ministry of Commerce & Industry
DEPARTMENT OF COMMERCE

EXPORT IMPORT DATA BANK Version 7.1 - TRADESTAT

Exports

- Commodity-wise
- Chapter-wise all commodities
- Commodity-wise all Countries
- Commodity x Country-wise
- Country-wise
- Country-wise all Commodities
- Region-wise
- Region-wise all Countries
- Region-wise all Commodities
- Predefined Group of countries
- Customised Group of countries

Imports

- Commodity-wise
- Chapter-wise all commodities
- Commodity-wise all Countries
- Commodity x Country-wise
- Country-wise
- Country-wise all Commodities
- Region-wise
- Region-wise all Countries
- Region-wise all Commodities
- Predefined Group of countries
- Customised Group of countries

Total Trade
Country-wise
Top n countries

Data available 1996-1997 to 2019-2020(Apr-Feb(F)) Last data updated on 25/06/2020 Feedbacks/ Suggestions Help Data Source : DGCI&S, Kolkata

NOTE:

- India's Imports/Exports include re-imports/re-exports also.
- Imports/Exports from unspecified country includes
 - Trade transactions where country of origin/consignment/destination is not specified or invalid country codes have been assigned in the customs declaration.
 - All re-imported/re-exported transactions which fulfill condition (a) above.
- Trade figures in US\$ from the year 2006-07 onwards are addition of monthly US\$ figures.
- Where periods are not mentioned with year, it is yearly data from April to March e.g. 2012-2013 means Apr2012 to Mar2013

HOME

Disclaimer:
The data referenced in the system do not have any legal sanctity and is for general reference only.
The user may like to verify official publications for DGCI&S, Kolkata for any further reference

India's online trade databank has been set up by the Department of Commerce of the Government of India (see: <https://commerce-app.gov.in/eidb/default.asp>).

This online platform provides free, instant access (without the need to register) to both import and export data, product-wise, country-wise, and region-wise at the most disaggregated product level (HS-8-digit level). The platform also allows users to make customised data requests and download these statistics in a CSV format.

Clearly, India has recognized the importance of ease of access to, and the need for free dissemination of, trade data. India's actions call into question SLC's justification for charging for data to compensate for services rendered and collection costs. Given the volume of statistics generated in India, it is likely to incur much higher costs than Sri Lanka for data collection. In 2019, India's good exports were valued at USD 323 Bn and imports at USD 480 Bn, while Sri Lanka's goods exports and imports were valued at USD 12 Bn and 20 Bn, respectively, in 2019. The data for India must also be collected from 29 states for goods that pass-through around 13 seaports, 34 international airports and cross 7 land borders. In contrast, Sri Lanka has one main seaport, which account for almost 90% of its cargo, and one international airport.

The EDB has clearly recognised the importance of making trade statistics easily accessible, as is reflected in its online data platform. However, as mentioned above, it is still not on par with regional best practice. Doing away with criteria such as paying a fee, registering on the platform, and allowing data to be downloaded in a CSV format will improve the functionality of this initiative. Yet, EDB will continue to face limitations given that it has to source data from SLC and function within the constraints of this entity's data dissemination policy.

2) Sri Lanka fails to reap the benefits of having its trade statistics made accessible through international databases

The Platforms such as the World Bank's WITS database, the International Trade Center's Trade Map, and the UN COMTRADE platform, publish detailed cross-country trade databases, indicating the importance placed by these international organisations on ease of access to these statistics. These platforms facilitate the access of free downloadable data in CSV format similar to what can be purchased from SLC (refer Table 1).

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Table 1: Trade statistics made available by international organisations and availability of data on Sri Lanka¹

Organisa-tion name	Name of platform	Level of disaggre-gation of available data	Ability to download in CSV format	Ability to visual-ise data using analytical tools	Free of charge	No. of countries	Type of data available	Availabil-ity of Sri Lanka's trade data
United Nations	UN COM-TRADE comtrade.un.org	HS 6-digit level	Yes	Yes	Yes	204 countries and territories	Annual	2017
							Monthly	Feb 2012
World Bank	WITS Da-tabase wits.world-bank.org	HS 6-digit level	Yes	Yes	Yes	204 countries and territories	Annual	2017
Interna-tional Trade Centre (ITC)	Trade Map www.trademap.org	HS 8 to 10 digits	Yes	Yes	Yes	220 countries/ territories, 150 coun-tries at tariff line and 100 countries on a quar-terly and monthly basis	Annual	2017

¹Data availability as of 03rd June 2020.

Source: ITC Trade Map, World Bank – WITS Database and UN COMTRADE

The value of featuring data on Sri Lanka on these international platforms is that it allows for compara-tive analyses with other countries, as these platforms are one-stop shops that provide access to the trade statistics of all countries through a single window. These platforms also provide access to comple-mentary statistics such as tariff data and advanced analytical tools, which can be useful for analysis if the data featured on these platforms are up to date. For instance, these platforms may be the primary source of data on trade for foreign businesses and investors. If updated statistics on Sri Lanka were available on these platforms, it would allow foreign businesses and investors examining international cross-country data to identify suitable opportunities in the country's products and markets.

From the government's perspective, when Sri Lanka engages in formulating a trade policy, it is import-ant to analyse local data together with international

data to get a better understanding of the country's strengths and weaknesses. When data on Sri Lanka is available on more sophis-ticated web platforms, it is easier to undertake the type of sound analyses required for policy formu-lation. For local business-es assessing the benefits of FTAs and market op-portunities in other coun-

“International organisa-tions have attempted to make trade data on countries freely available and provide cross country statistics and advanced analytical tools. However, delays in sharing these statistics prevent Sri Lan-ka from fully realising the benefits of these interna-tional databases.”

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tries, having Sri Lanka's data alongside other countries' is useful as it allows for quick comparisons.

For international organisations to make data available on their platforms, local agencies that collect this data (SLC in Sri Lanka's case), must share timely statistics on their respective countries.

Given the benefits of having trade statistics accessible on international platforms, it is crucial for responsible government agencies to take steps to share data with international organisations in a timely manner. However, significant delays can be observed in this regard. For instance, there is a two-year lag (as of 3rd June 2020 the latest data available is for 2017) for annual trade data on Sri Lanka on the UN COMTRADE platform. Compared to other countries sharing annual trade data on this platform, the most recent data on Sri Lanka is from 2017, while 68% of the countries/territories (out of the 204 countries/territories featured in the platform) have data from 2018 and 2019. In fact, 29% of the countries/territories have updated their annual data up to 2019. The most recent monthly data

on Sri Lanka is from February 2012, while 85% of the countries/territories (out of 155 countries for which monthly data is available) have monthly data updated since at least 2017, with 34% having monthly data from 2020 (refer Table 2). Sri Lanka also lags behind other South Asian countries, ranking only 5th out of the 8 South Asian countries in terms of the most up to date annual data on this platform. With regards to monthly data, when compared to Sri Lanka's latest update in February 2012, India and Pakistan feature monthly data up to January 2020 and the Maldives up to December 2018 (refer Table 3).⁸

The publishing of outdated statistics on Sri Lanka on these platforms limits the capacity of the government to undertake comparative analyses, and restricts both foreign and local businesses seeking to identify potential business opportunities. The disadvantages stemming from SLC's current policy are compounded by the fact that peer countries have taken steps to make up to date trade data available online and free of charge.

**Table 2 - Data availability on the UN COMTRADE - Comparison with the rest of the world
(The category Sri Lanka belongs to is highlighted)**

Annual Data Availability		Monthly Data Availability	
Latest year for which data is available ¹	No. of countries for which data is available	Latest year for which monthly data is available ¹	No. of countries for which data is available
2019	59	2020	52
2018	80	2019	44
2017	19	2018	24
Total number of countries that provide data for 2017 and above	158	2017	12
		Data on months before 2017	23
		Total number of countries for which monthly data is available	155

¹Data availability as of 03rd June 2020.

Source: UN COMTRADE (<https://comtrade.un.org/data/da>)

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Table 3: Data availability on the UN COMTRADE - Comparison with Other South Asian Countries

Country	Latest year/date up to which the data is available ¹	
	Annual	Monthly
India	2019	Jan 2020
Pakistan	2019	Jan 2020
Afghanistan	2018	N/A
Maldives	2018	Dec 2018
Sri Lanka	2017	Feb 2012
Nepal	2017	N/A
Bangladesh	2015	N/A
Bhutan	2012	N/A

¹ Data availability as of 03rd June 2020.

Source: UN COMTRADE (<https://comtrade.un.org/data/da>)

Restrictive behaviour stemming from SLC's current data dissemination policy is an example of privatisation of a public good

As mentioned above, the Ministry of Finance has granted SLC permission to split proceeds from the sale of trade data 40:60 between the consolidated fund of the Ministry and the officers involved in the process of trade data collection, respectively.

This process is a clear example of the privatisation of data, where statistics collected with public funds are being used by public officials to earn money. These circumstances essentially undermine the benefits of data for the public good. Moreover, this behaviour can lead to rent seeking, as in a private monopoly, given that SLC is the primary source for trade statistics in Sri Lanka mandated to collect data on imports and exports. When, for instance, 60% of the proceeds from the sale of data is distributed amongst the officers involved in the process, there is little incentive on the part of these officials to make data freely available and forego a valuable revenue stream. Actions such as delays in sharing data with international organisations and undermining attempts by other local agencies that strive to make trade data freely available in an editable format, as detailed above, are likely to follow from the current operating structure.

CONCLUSION

Sri Lanka's stance on trade statistics is not acceptable in a world that highly values open data. Sri Lanka lags behind many countries, including in South Asia, that are increasingly engaging in open data initiatives in an effort to make statistics easily available to the public to use, reuse, and redistribute.

The recalcitrant stance adopted by SLC is undermining sound research, and deterring policy makers, investors and other stakeholders who need research and data to contribute to the growth of the country. Data, particularly that generated by the government, is a public good that has been collated using taxpayer monies. As such, data must be accessible without any restrictions and ensuring a level playing field for everyone who can benefit from it – as opposed to being confined to those who can afford the high fees or have the right connections.

Considering the clear benefits of maintaining an open data policy and the fact that the usefulness of these statistics increases with more people having access, SLC must change its current data dissemination policy. Trade statistics on Sri Lanka must be free to the public, easy to access on an online platform, regularly updated, and shared with international organisations.

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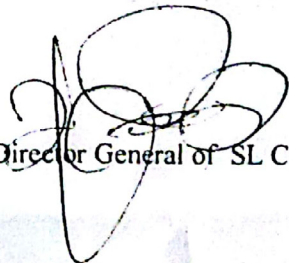
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Annex 1: SLC trade statistics fee schedule

*Proposed Rates Applicable for Supply of Trade Statistics under
C.F. Scheme (Effective Date: 01st of February 2016)*

<i>Type</i>	<i>New Rate</i>
Imports Exports data for a HS Code as giving in the Customs return for a month and Cumulative.	Rs. 100 for a table of page
Imports or Exports by Commodity for a Country for a specific period.	Rs.110 per page subject to minimum of Rs.700
Summary of Trade Statistics by Chapter (Imports or Exports)	Rs.310 per table
Customs Return for any Month	
i. Hard Copy	Rs.21,000
ii. Soft Copy	Rs.20,000
Imports Statistics by Country for a Specific period	
i. Soft Copy	Rs.12,000
ii. Hard Copy	Rs.13,000
Exports Statistics by Country for a Specific period	
i. Soft Copy	Rs.8,500
ii. Hard Copy	Rs.9,000
Photo Copy (Each copy)	Rs.70

2016. January. 1)



Director General of SL Customs

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Annex 2: Letter from the Ministry of Finance dated 16th November 2004

(A)



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MINISTRY OF FINANCE & PLANNING

Statute

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මගේ අංකය 2484500
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දිනය 2004.11.16
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සහතික පත්‍ර භාණ්ඩ ක්‍රමය යටතේ පුද්ගලික අංශයට සපයන
ලබන වෙළඳ දත්ත සඳහා අයකරනු ලබන මුදල්

උසස් කරුණ සම්බන්ධයෙන් ඔබේ සමාංක හා 2004.04.30 දිනැති ලිපිය හා බැඳේ.

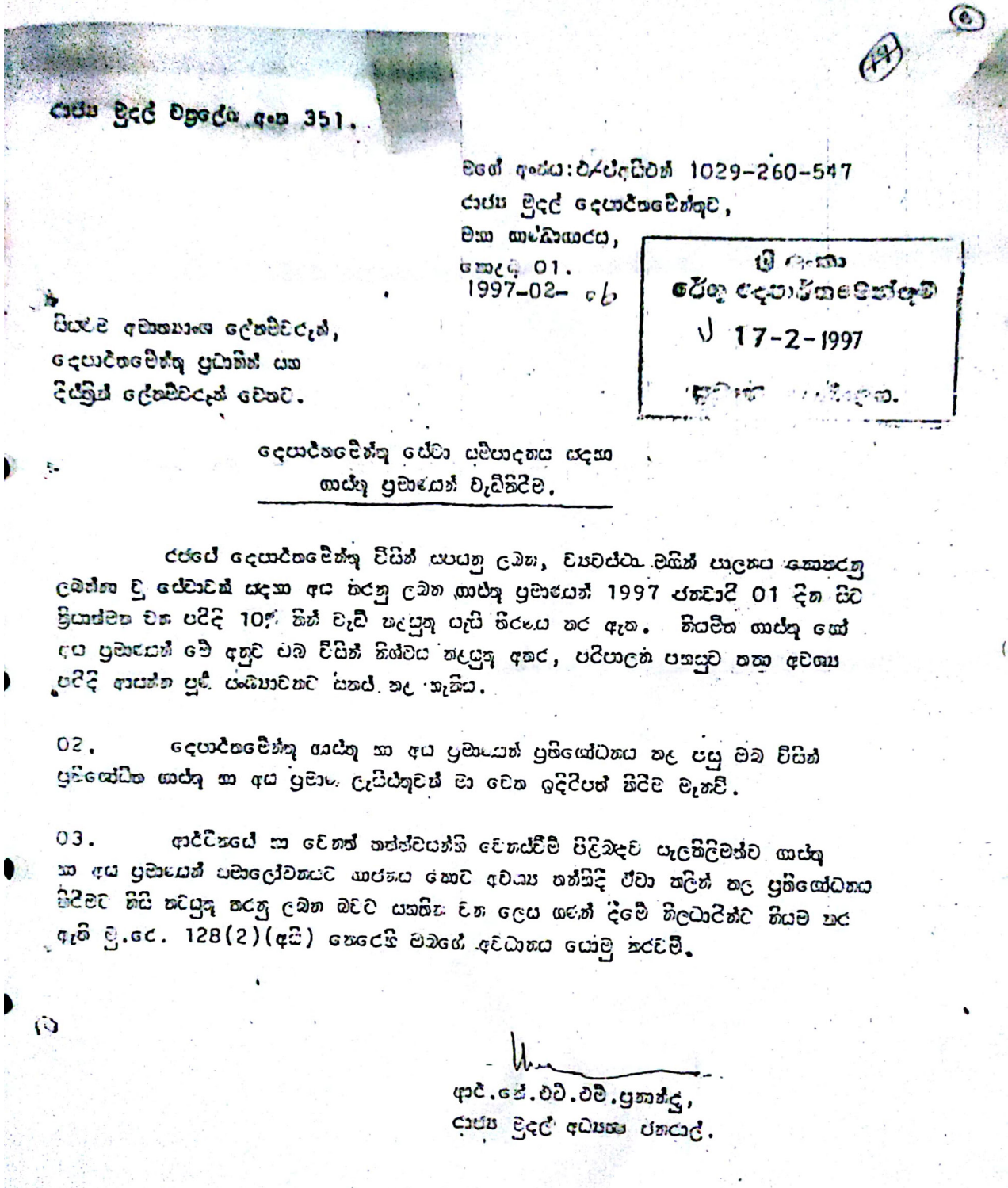
02. එම්.එම්. / රිඛි/බී/සී/ 297 හා 1975.10.15 දිනැති ලිපියට අමතරව ආයතන සංග්‍රහයේ 1x පරිච්ඡේදයේ 2 ඡේදයට අනුව සහතික පත්‍ර භාණ්ඩ ක්‍රමය යටතේ පුද්ගලික අංශයට සපයන වෙළඳ දත්ත සඳහා අයකරනු ලබන මුදල් වලින් 40% ඒකාබද්ධ අරමුදලට බැර කිරීමටත් 60% ක් එම කටයුතු වලට සම්බන්ධ නිලධාරීන්ට ඔබ විසින් අනුමත කරනු ලබන ගෙවීම් පරිපාටියට බෙදා හැරීමටත් අනුමත කළ බව කාරුණිකව දන්වමි.

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භාණ්ඩාගාර නියෝජ්‍ය ලේකම්
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(Signature)
ඒ.එස්.එම්.එස්. මහානාම
අතිරේක අධ්‍යක්ෂ ජනරාල්
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POLICY NOTE

Annex 3: Public Finance Circular No. 351 issued on the 6th of February 1997 by the Ministry of Finance



Endnotes

¹ Harmonized System – HS was developed by the World Customs Organisation to assess product concentration and composition of exports. The level of detail in the classification of products depends on the HS level specified. For example, a product classified at an 8-digit level is more specific than one classified at a 4-digit level.

² A file format that allows for data to be opened in software such as MS Excel, providing for the manipulation of statistics.

³ Department of Commerce India: Export Import DataBank (<http://commerce-app.gov.in/eidb/>); Pakistan Bureau of Statistics: External Trade Statistics Tables (<http://www.pbs.gov.pk/trade-tables>); Export Promotion Bureau Bangladesh: Export Data (http://epb.gov.bd/site/view/epb_export_data/-); Department of Customs Nepal: Statistics (<https://www.customs.gov.np/page/statistics>); Maldives Customs Service: Statistics (<https://www.customs.gov.mv/Statistics>); Ministry of Finance Bhutan: Bhutan Trade Statistics (<https://www.mof.gov.bt/publications/reports/bhutan-trade-statistics/>); National Statistic and Information Authority Afghanistan: Statistics (<https://nsia.gov.af/services>); Export Development Board Sri Lanka (<https://stat.edb.gov.lk/>)

⁴ Extraordinary Gazette No. 2004/66, issued in February 2017.

⁵ Ibid.

Note: Regulation 20 directs that the following types of information should also be proactively disclosed: 'Institutional information, Operational information, Decisions and acts, Budgetary information, Open meetings information, Decision-making and public participation, Information on Subsidies, Public procurement information, Information about the right to information and Disclosed information'.

⁶ In order to assess how long it takes to access trade statistics from both SLC and the Online Trade Platform of EDB, Verité Research opted to go through the process of making a similar data request from both entities. With EDB, the process of registering with its Online Trade Platform – payment of registration fees and obtaining login details – took 2 days, following which the requested data was accessible. The process with SLC entailed contacting, and purchasing the requested data from its Statistics Division, which took an estimated 3-6 days.

⁷ As per information received by Verite Research on 11th November 2018 through an RTI request to SLC.

⁸ UN COMTRADE, "Data availability", available at <https://comtrade.un.org/data/da>, [last accessed, 03 June 2020].