Train-the-Trainers Workshop for Customs Trainers and National Stakeholders
On
Monitoring and Control of Ozone Depleting Substances
And Compliance under other Multilateral Environmental Agreements

Manila, Philippines, 3rd to 7th February 2003

Organized by:

United Nations Environment Programme’s
(Division of Technology, Industry and Economics)
OzonAction Programme
and the
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in co-operation with the
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with financial support from the
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Executive Summary

The training workshop in the Philippines was implemented as part of approved project to train customs officers and other national stakeholders in the country in order to assist them with improving capability to monitor ODS imports and exports UNEP the lead implementing agency. Decision XIV/7 of the Meeting of the Parties to the Montreal Protocol emphasized the need to monitor the trade in ozone-depleting substances and preventing illegal trade in ozone-depleting substances for Parties to the Protocol. The decision also encouraged parties to “make even greater use of the UNEP regional networks and other networks in order to increase cooperation on illegal trade issues and enforcement activities”. The implementation of this training workshop, and the participation of representatives from Thailand and Malaysia supported this decision, along with UNEP’s concerted efforts to ensure that this workshop was successfully implemented.

The main objective of the training programme was to provide the customs officers and relevant stakeholders of Philippines with the skills necessary to monitor and control the imports and exports of ODSs and products (including equipment) containing ODS as well as detecting and preventing illegal trade. In addition this workshop also served as a pilot training course for the implementation of an Integrated Strategy for compliance with other multilateral environmental agreements (MEAs), as agreed in the workplan for 2002-2003 by partners to the Integrated Training Initiative.

The programme consists of three phases, the train-the-customs-trainers phase, the train-the-customs-officers phase and a concurrent monitoring & evaluation phase.

The preparation of the workshop required the development of the "Philippines Handbook on ODS Legislation and Import / Export Licensing System" to complement the UNEP training manual "Customs Officers Training on Substances Depleting the Ozone Layer” by providing country-specific information and data. Local and international presenters contributed additional training materials. Special “hands-on” session, and evaluation of UNEP video film “Every Action Counts” presenting the threat of ozone depletion to the life on Earth, as well as the EIA film “Unfinished Business” on illegal trade in Ozone Depleting Substances were organised. The workshop included lectures on the harmful effects of ozone layer depletion and the resulting increase of UV-B radiation, national obligations under the Montreal Protocol and its amendments, national ODS regulations and the national ODS import/export licensing system. Breakout sessions were also organised. In addition, a presentation prepared by WCO was shown to the participants, showing the interaction between WCO and UNEP. Representatives of EIA and SEI brought in their valuable experience at dealing with issues of smuggling of ODS and regional co-operation.

The immediate result of the train-the-customs-trainers workshop is the availability of 31 trained customs trainers, customs officers and other relevant stakeholders and the inclusion of a Montreal Protocol related training module in the training curricula of the customs department for new customs officers. Also a module for integrated training on all MEAs has been worked out by the participants, available for use as a resource while developing the final module by UNEP on this issue.
The long term result of the training programme is to enhance awareness of ozone depletion issues among customs officers and other relevant stakeholders and to enable customs officers to enforce the import / export licensing system for ODS and products (including equipment) containing or using them.

The inauguration of the workshop included a message from the Philippines’ Environment Secretary Elisea G. Gozun, who exhorted the Customs Officers who are at the frontline and can check whether the imports follow the existing regulation, to be aware and commit to their role of monitoring ODS imports and exports. Many distinguished guests made opening statements.

The workshop was also geared towards developing an integrated training module on all MEAs. To support this, a full day was devoted during the workshop to the other MEAs. The Sessions here were led by local experts, though supported by UNEP personnel and the lead trainer.

A distinguishing feature of this workshop was the longer period of training as compared to earlier workshops. UNEP has been receiving feedback from the previous customs officers training workshop that the 3 day module concurred most of re issuing but did not provide enough time for going into details of the issues. Most of the previous workshops also recommended longer duration for similar training.

With this new approach, four days were devoted to the Customs training workshop while one day was set aside to discuss Compliance with other MEAs with the view to get agreement on the integrated training initiative. This approach also allowed the addition of an unscheduled group work session where the participants showed how they would teach the workshop further, thus enabling the UNEP team and the trainers to have an immediate feedback on the workshop.

The participants conducted a workshop evaluation (see Annex 10.5) and agreed a final set of recommendations (see Annex 10.4). The overall evaluation of the workshop was "excellent" (52%), "very good" (42 %) and “good” (6%). The Evaluation Matrix is at Annex 10.5. At the end of the workshop each participant received certificates of participation. The trainers and other international and local speakers who had contributed in making the workshop a success also received certificates of appreciation.

The workshop report will be disseminated to all participants and members of the contact group on customs training. It will also be placed on UNEP's homepage at: http://www.uneptie.org/ozonaction.html. It will also be disseminated to the other partner organizations in the integrated customs training initiative like WCO, Interpol, Secretariats of the Basel, Stockholm and Rotterdam Conventions.
1. **Background**

Upon the discovery that CFCs and other man-made substances are leading to a depletion of the ozone layer, the international community negotiated the Vienna Convention for the Protection of the Ozone Layer in 1985. Following this, the Montreal Protocol on Substances that Deplete the Ozone Layer was negotiated in 1997 with the objective of reducing and finally phasing out the use of ozone-depleting substances (ODS). The Philippines acceded to the Vienna Convention and its Montreal Protocol on March 21, 1991.

In most developing countries, the largest remaining sector in which ODS are used is the refrigeration and air-conditioning (RAC) servicing sector. In 2001, the Philippines consumed approximately 2109.16 metric tones of ODS which corresponds to 2085.87 Ozone-Depleting Potential (ODP) tonnes. The RAC sector consumed 1472.7 metric tonnes of ODS, which translates to 1472.7 ODP tonnes. This accounting for 70.6% of the Philippine’s total consumption in ODP tonnes in 2001.

Since the Philippines does not produce nor export ODS, its consumption depends solely on imports. In addition, appliances containing CFCs are imported into the country either already assembled (e.g. refrigerators, air-conditioning units), or in parts for local assembly.

Any abrupt non-availability of CFC refrigerants will adversely impact on important sectors of the local economy. It is therefore essential for users of CFCs to be able to reduce and subsequently phase-out their consumption in a coordinated, planned and cost-effective manner in compliance with their commitments under the Montreal Protocol.

The National CFC Phase-out Plan (NCPP) of the Philippines was approved by the 32nd Meeting of the Executive Committee of the Multilateral Fund to be implemented by Swedish International Development Cooperation Agency (SIDA) – Stockholm Environment Institute (SEI). The training of Customs Officers & National level stakeholders is a critical complement to the NCPP. It also draws experience from the Ozone-Customs officers network currently being implemented jointly by sida and UNEP.

The Philippines has a licensing system for ODS import/export mandated under a Chemical Control Order (CCO) issued under Republic Act 6969. The DENR-EMB and the Bureau of Customs manage and enforce this system. Therefore, the ability of customs, trade and standards officers to enforce controls over trade in ODS and ODS products/equipment is important for a successful and planned ODS phase-out. The Customs train the trainers workshop is an initial and much-needed attempt in this direction.

2. **Objectives**

*Train-the-trainer programme for Customs Officers*

The main objective of this training programme is to provide the customs, trade and other relevant national level stakeholders in the Philippines with the skills necessary to monitor and control the imports of CFCs and other ODS products/equipment. The detection and
prevention of illegal trade is part of this effort. Thus, addressing the key components of decision XIV/7 of the 11th Meeting of Parties (Rome: November 2003).

The training objectives were achieved by:

1. Increasing awareness of ozone depletion issues.
2. Introducing the different types of ODS being used in the sector and for which applications they are used.
4. Providing an understanding of the NCPP.
5. Providing an overview on the newly established licensing system for ODS and its implications for customs officers and other stakeholder agencies.
6. Presenting the revised customs codes, which allow for the identification of ODS and ODS products/equipment containing them.
7. Refining and optimizing the establishment of the operational details of the monitoring and control system for ODS.
8. Providing an overview of customs regulations and monitoring and control systems for ODS in other countries in the region.
9. Training on the use of identification equipment for refrigerants.
10. Designing the concept, agenda, strategy and the time schedule for the training of the remaining customs officers in the country.

*Integrated Training Strategy:*

Regarding the Integrated Training Strategy, the training objectives were achieved by:

- Initiating the development of a module for integrated training addressing enforcement and compliance issues for all MEAs
- Helping the key stakeholders understand the approaches to preparing a national training strategy.

3. **Expected Results:**

The immediate result is the availability of 31 trained customs trainers and key stakeholders and the development of a training approach and recommendation for the subsequent Phase II training of customs and enforcement officers in the Philippines.

A Montreal Protocol related training module will be included in the ongoing training programmes for new customs officers and will also be integrated in the refresher courses for experienced officers. Thus the sustainability of the training programme will be ensured.

The long-term result is to enhance awareness of ozone depletion issues among customs authorities and other relevant stakeholders as well as the achievements of the objectives stated in Section 2.
In addition, synergies for the enforcement of other relevant international environmental agreements such as the Basel Convention, CITES, Rotterdam and stakeholder Convention have been created. The success of most international environmental agreements will depend on the continued support of the world’s customs authorities and other key stakeholders.

4. Participants:

In total, 31 participants attended the train-the-trainers workshop. These included:

- 16 customs officers from various sections of the Customs Department
- 15 key stakeholders from the following National agencies:
  - the Tariff Commission
  - Philippines Ports Authority
  - Bureau of Food and Drugs
  - Department of Trade and Industry
  - Technical Education and Skills Development Authority
  - Fertilizer and Pesticide Authority
  - Delsa Chemicals and Multi-Products, Inc
  - Du Pont Philippines
  - Department of Environment and Natural Resources

The list of workshop participants is annexed as Annex 10.2. The participants in the Phase II training programme will be the remaining customs and enforcement officers of Philippines.

The design of the train-the-customs-trainers workshop followed an interactive and participatory approach and involved 15 local and regional trainers.

The trainers for the workshop were:

Ms. Meenakshi Passi, Additional Commissioner, Central Excise Commissionerate, Mysore, Karnataka, India.
Mr. K.M.Nair, Additional Director General, National Academy of Customs, Excise and Narcotics, Chennai, India.
Ms. Cecilia T. Mercado, UNEP ROAP CAP

The details of the trainers and resource persons are attached as Annex 10.3; and the agenda is attached as Annex 10.1.

5. Methodology:
The UNEP training programme for customs officers follows the "train-the-trainer" approach with the following key stages:

- **Phase I consists of “train the trainer”.** Once the national ODS import/export licensing system is in place or ready to be put in place and a Country Handbook on ODS legislation and import-export licensing system has been prepared Phase I is conducted. A group of 20-25 selected customs trainers, senior customs officers and other stakeholders involved in the monitoring and control of Ozone Depleting Substances are trained as trainers by UNEP.
- **Phase II:** A selected group of customs officers from the most important customs entry points will be trained by the local trainers trained during Phase I.
- Monitoring and evaluation during Phase I and II and preparation of a follow-up report after completion of the training programme.
- Inclusion of the training module in regular training curricula.

**Phase I: Training Programme for Customs Officers**

The train-the-trainers workshop for customs and other enforcement officers in the Philippines was the first workshop of its kind to be implemented as a complement to the NCPP.

The design of the programme required that an ODS import/export licensing system and related ODS regulations were in place before the train-the-trainers workshop starts. Decision IX/8 of the Ninth Meeting of the Conference of Parties made the establishment of such licensing system mandatory to the Montreal Protocol. The Philippines already has this system in place in the country.

The preparation of the workshop required the development of the “Philippines Handbook on ODS Legislation and Import/Export Licensing System” by the DENR-EMB-POD and a local legal consultant in consultation with UNEP. The Country Handbook complements the UNEP training manual “Customs Officer Training on Substances Depleting the Ozone Layer” by providing country-specific information and data.

The project preparation followed a participatory approach and involved a number of local resource persons. The workshop was enriched by the presence of representatives from Environmental Investigation Agency, SEI, Thailand and Malaysia. At the special “hands-on” session examples of ODS-containing products and equipment were shown to the participants and practical demonstration of ODS identifier was made. The participants had also the opportunity to use the ODS identifiers themselves. UNEP video film “Every Action Counts” presenting the threat of ozone depletion to the life on Earth, as well as the EIA film “Unfinished Business” on illegal trade in Ozone Depleting Substances was shown to the participants.
The immediate result of the train-the-customs-trainers workshop is the availability of 31 trained customs trainers, customs officers and other relevant stakeholders and the inclusion of a Montreal Protocol related training module in the training curricula of the customs department for new customs officers. Also a module for integrated training on all MEAs has been worked out by the participants, available for use as a resource while developing the final module by UNEP on this issue.

The long term result of the training programme is to enhance awareness of ozone depletion issues among customs officers and other relevant stakeholders and to enable customs officers to enforce the import / export licensing system for ODS and products (including equipment) containing or using them. The control of virgin ODS entering the country, following the phase-out schedules under the Montreal Protocol, will lead to increased prices of ozone depleting refrigerants, help reduce consumption and make the recovery & recycling (R&R) system economically viable. Furthermore, it will facilitate reporting to Ozone Secretariat and MF Secretariat and make the reported data more accurate.

The inauguration of the workshop included a message from the Philippines’ Environment Secretary Elisea G. Gozun, who exhorted the Customs Officers who are at the frontline and can check whether the imports follow the existing regulation, to be aware and commit to their role of monitoring ODS imports and exports. There was a welcome address by Mr. Julian D. Amador, Director, DENR-EMB, an opening Statement from Bureau of Customs by Atty. Juan Tan, District Collector, Port of Clark, and a keynote address by Ms. Cecilia Mercado, Programme Officer, UNEP ROAP. During the closing session, Mr. Fernandino Concepcion, Asst. Director- Department of Environment and Natural Resources, Environmental Management Bureau and Mr. Rodolfo Campos, Deputy Collector for Operations, Port of Clark International Airport were special invitees. Dr. Suresh Raj, Capacity Building Manager of UNEP DTIE spoke on the Synergies on Cooperation between related Conventions. The remarks of a participant, Major Enad, who had been, so far, battling this issue almost alone on the Customs front, were self-speaking – “Now I am not alone anymore. There are many with me.” A press statement was issued by Philippines Ozone Desk, highlighting the need for the workshop, the events in it as well as the achievements after the workshop.

The design of the train-the-customs-trainers workshop followed an interactive and participatory approach and involved 15 local and regional presenters. The workshop included lectures on the harmful effects of ozone layer depletion and the resulting increase of UV-B radiation, national obligations under the Montreal Protocol and its amendments, national ODS regulations and the national ODS import/export licensing system. Lectures on the enforcement of the licensing system, identification of ODS and ODS-containing products (including equipment), illegal trade in ODS and ODS-containing products and safe handling and storage of ODS were also included. In addition, a presentation prepared by WCO was shown to the participants, showing the interaction between WCO and UNEP. Representatives of EIA and SEI brought in their valuable experience at dealing with issues of smuggling of ODS and regional co-operation.

Interactive breakout sessions allowed the participants to discuss in small groups and to prepare group work reports including their findings and recommendations. The participants
discussed (i) the operational details of the ODS import / export licensing system; (ii) the enforcement of ODS regulations, and (iii) how to deal with seized ODS. Each group prepared reports with their findings and recommendations, which were then discussed in the plenary and became the basis for formulating the final workshop recommendations. The action plan for the Phase II training was also prepared by regional groups, then discussed in the plenary. The final shape to the recommendations made therein will be given by the DENR-PHILIPPINES OZONE DESK and the Bureau of Customs, in a joint effort.

A distinguishing feature of this workshop was the longer period of training as compared to earlier workshops. UNEP has been receiving feedback from the previous customs officers training workshop that the 3 day module concurred most of re issuing but did not provide enough time for going into details of the issues. Most of the previous workshops also recommended longer duration for similar training.

With this new approach, four days were devoted to the Customs training workshop while one day was set aside to discuss Compliance with other MEAs with the view to get agreement on the integrated training initiative. This approach also allowed the addition of an unscheduled group work session where the participants showed how they would teach the workshop further, thus enabling the UNEP team and the trainers to have an immediate feedback on the workshop.

The participants conducted a workshop evaluation (see Annex 10.5) and agreed a final set of recommendations (see Annex 10.4). The overall evaluation of the workshop was "excellent" (52%), "very good" (42 %) and “good” (6%). The Evaluation Matrix is at Annex. 10.5. At the end of the workshop each participant received a “Certificate of Participation” from the special invitees attending the closing ceremony. Presenters and Officers from various departments who had contributed in making the workshop a success received a “Certificate of Appreciation.”

The workshop report will be disseminated to all participants and members of the contact group on customs training. It will also be placed on UNEP's homepage at: http://www.unep-tie.org/ozonaction.html. It will also be disseminated to the other partner organizations in the integrated customs training initiative like WCO, Interpol, Secretariats of the Basel, Stockholm and Rotterdam Conventions.

**Phase II: Training of the remaining customs officers in the country**

The trained-customs-trainers will train the remaining customs and enforcement officers in the country. The aim is to train around 250 officers within this calendar year. This will be through a combination of formal and informal training initiatives. The three major Customs zones will handle the training, though trained trainers from one zone will contribute to training in other zones too.

The DENR-Philippines Ozone Desk will, in close collaboration with the Bureau of Customs, be responsible for making a specific time-table for the training of the remaining Customs officers in the country and take into account the recommendations from the train-the-trainers workshop.
Phase III: Monitoring and Evaluation:

The DENR-Philippines Ozone Desk will co-ordinate, monitor and follow-up on the training activities during Phase-II of the training programme and report progress in the project implementation to UNEP.

Immediately after the completion of the Phase II of the training programme, the DENR-Philippines Ozone Desk will evaluate the results of the training programme and prepare a follow-up and evaluation report. This report will be submitted to UNEP.

Integrated Training Approach

As already mentioned above, the workshop was also geared towards developing an integrated training module on all MEAs. To support this, a full day was devoted to the other MEAs. Mostly the local experts, though supported by UNEP personnel and the lead trainer, led the sessions here. The participants came up with suggestions about a module on MEAs where all the MEAs were assigned a day each. An important result achieved was that, the target group and the Customs Officers expressed that they were keen to have integrated training with all MEAs, ensuring that such initiative likely to be met with ready acceptance.

6. Content and structure of the train-the-trainers workshop

The training materials and the workshop agenda were designed to ensure that the objectives set out for the training programme are achieved.

The workshop agenda included the following sessions:

- **Session 1**: Ozone layer depletion
- **Session 2**: International response
- **Session 3**: National obligations and response
- **Session 4**: National import / export licensing system
- **Session 5**: Thailand and Malaysian experience in enforcing the licensing system for ODS import/export
- **Session 6**: Global and regional context
- **Session 7**: Identification of ODS and ODS-based products
- **Session 8**: Illegal trade with ODS and ODS-based products
- **Session 9**: Safe handling, transport and storage of ODS
- **Session 10**: Practical exercises on identification of ODS
- **Session 11**: Integrating Elements from other MEAs
- **Session 12**: Checking papers, forms, permits
- **Session 13**: Regional Monitoring of ODS Imports and Exports in SEAP region
- **Session 14**: Action planning for Phase II and III of the customs training, and
- **Session 15**: Workshop evaluation

Time was also allocated for discussions among the participants and the presenters on the implementation of the Phase II and III of the training programme.
Detailed Workshop agenda is attached as Annex 10.1.

7. Results and lessons learned

The objectives set out for the workshop were fully met through the appropriate design of the workshop agenda during which the 15 workshop sessions addressed all relevant issues. A detailed evaluation of the most relevant issues is included in Annex 10.5

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<tr>
<th>OBJECTIVES SET OUT</th>
<th>RESULTS ACHIEVED</th>
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<tr>
<td>I. Increasing awareness of ozone depletion issues</td>
<td>Through Sessions 1, 2, 7, 8 and the UNEP video film “Every Action Counts”</td>
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<td>II. Introducing the different types of ODS being used in the sector and for which applications</td>
<td>Through Sessions 1, 2, 3, 4 and 6</td>
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<td>III. Introducing the provisions and phase-out schedules of the Montreal Protocol and its Amendments</td>
<td>Through Session 2 and 6</td>
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<td>IV. Providing an understanding of the NCPP</td>
<td>Through Sessions 3, 4</td>
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<tr>
<td>V. Providing an overview on the newly established licensing system for ODS and its implications for customs officers</td>
<td>Through Sessions 4, 6 and 12</td>
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<td>VI. Presenting the revised customs codes, which allow for identification of ODS and ODS products containing them</td>
<td>Through Sessions 7, 8 and the EIA video “Unfinished Business”</td>
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<tr>
<td>VII. Refining and optimizing the establishment of the operational details of the monitoring and control system for ODS in the region</td>
<td>Through Sessions 5 and 13</td>
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<tr>
<td>VIII. Training on the use of identification equipment for refrigerants</td>
<td>Through Session 7, 9 and 10</td>
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<td>IX. Designing the basic elements of the training of the remaining customs officers in the country.</td>
<td>Through Session 14</td>
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<td>X. Initiating the development of a model for integrated training addressing enforcement and compliance issues for all MEAs</td>
<td>Through Session 11</td>
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<td>XI. Helping the key stakeholders understand the approaches to preparing a national training strategy.</td>
<td>Through Session 11</td>
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In addition, the following specific outcomes were achieved:

- Successful training and certification of 31 participants (including DENR officers) on monitoring and controlling of imports and exports of ODS and ODS products / equipment in Philippines. This, followed by the further training of the remaining customs officers in the country should be a major help in preventing the illegal trade in ODS in the region.

- Execution of the pilot project on integrated training on MEAs.
- Getting feedback from participants as to how they see the MEAs being trained in an integrated manner.

- Demonstrating methods for the detection of CFCs refrigerants as well as for the checking of papers, forms and permits. The practical demonstrations included the use of a digital refrigerant identifier, and the” temperature-pressure gauge” on CFC, HCFC and HFC cylinders.

- Increased awareness on methods used to smuggle ODS through the use of photos of various ODS containers and their other methods

- Exchange of information and experiences between the participants and development of a network of personal contacts.

- Development of suggestions for amendments to the "Country Handbook" that will be used for the further training of customs officers.

- Detailed workshop recommendations by the participants containing, *inter alia*, a detailed draft plan for Phase II and Phase III of customs training.

- Certification of the participants by The Government of Philippines.

- Through participation of stakeholders from Malaysia & Thailand, initiated the development of a Custom training approach under the National and CFC Phase out Plan for Malaysia & Thailand

The following lessons were learned from the workshop in Philippines:

- The pro-active role of the NOU is essential for the success of any workshop.

- The regional approach to training where officials from UNEP can work in close co-ordination with the country officers was done for this workshop, and gave good results. This should be followed in other country trainings too. Adoption of this approach is likely to result in very successful workshops like the one in Philippines.

- The mix of customs officers and other key stakeholders was excellent. There were customs officers from all areas of operations and locations. It is important to have a good mix of customs officers and other stakeholders to ensure healthy interaction.

- The practical session was very informative for participants. The demonstration on CFC, HCFC and HFC cylinders with the identification kit helped participants to learn how to use the equipment. The availability of a number of testing equipment enabled greater practical participation among the participants. The participation of a capable and lively local technician also added to the practical aspect of this session.

- The break-out sessions on the effective operation of the import/export licensing system, enforcing ODS regulation, and dealing with seized ODS was well received by
participants. Many recommendations came out of these sessions. The final recommendations from the participants are included as Annex 10.4. Break out sessions brings out the best from the participants and should remain an integral part of any training.

- Not only ODS containers/cylinders and ODS identifiers, but also the standard equipment that may possibly contain ODS should be demonstrated to the participants.

- Additional agencies and stakeholders involved in controlling and monitoring ODS were invited and participated in the workshop. The participation of all relevant stakeholders should be ensured.

- A five-day module gave enough time to the participants to go into issues in depth and provided much needed time for various kinds of group activities.

- An unscheduled session added in on the last day, where the participants came forth and taught what they had learned served as a ready evaluation tool. The participants, full of verve, presented ably, using varied tools like the dramatization, singing and PowerPoint presentations. This helped the trainers and UNEP team to safely and authoritatively conclude that the next phase of training was in safe hands and will be a success.

**Integrated training on MEAs:**

- MEAs can be taught together in an integrated manner, though the exact workable module still needs to be worked out, and the participants to the workshop welcome the integrated training approach.

- While on the one hand, the integrated training module is being developed, simultaneously some key trainers can be given intensive training on the other MEAs, so that when the integrated training module is being rolled out, UNEP is ready with its trainers to do the job effectively.

- Participant of representatives from partner organisations of the integrated training initiative is critical ensure success of this initiatives

**8. Follow-up**

The DENR Ozone Desk will ensure that Action Plans for Phase II of the training are implemented as per schedule in order to avoid delays in project implementation. Full support should be given to the trained-trainers so that they can complete this phase as planned.

The DENR-Philippines Ozone Desk will establish a monitoring mechanism to ensure that the objectives of the training programme are met and will produce a follow-up report on the status of implementation of the training programme.
The DENR-Philippines Ozone Desk will consider and, as far as possible, implement the workshop recommendations as adopted by the workshop participants. The recommendations should also be communicated to the relevant decision-makers and politicians.

9. Evaluation by participants

The overall evaluation of train-the-customs-trainers workshop participation was very good. 31 participants (100%) returned the evaluation questionnaire. Out of the 31 evaluations, two participants rated the workshop as “good” (6%), 13 participants as “very good” (42%) and 16 participants as “excellent” (52%).

A graphic analysis of the received evaluation questionnaires is included in Annex 10.5. Detailed feedback can be seen at Annex 10.6.

The following section includes feedback and suggestions received from the workshop participants concerning (a) the workshop itself, (b) the UNEP customs training manual and (c) the “Philippines Country Handbook”.

(a) Phase I Customs Training:

- The first phase of the course is very informative and enlightening process for Customs officers. It is a tremendous course that will keep all personnel concerned skilful, efficient, knowledgeable and by all means adept so far as Ozone Depletion Substance (ODS) is concerned.

- Needs some improvement but the quality can be improved through continuous holding of this kind of endeavor.

- Training abroad and local.

- Provide instruments for training.

- Mechanics of the workshop for each activity should be clear.

- Topics assigned for groups were tackled in different ways.

- More time needed for discussing concerns of Customs officers and sharing experiences that will help in apprehending illegal entries.

- More hands on sessions.

- Insert a half a day team building activity.

- Allow chance for active participation of the trainees through group work.
- I believe a more intensive training on the identification of ODS would be beneficial; more time on practical exercises.

- Additional meetings to harmonize/correct/improve discrepancies noted on the law, rules and guidelines.- eg. Miscommunication between DENR-EMB and Customs on the issuance of license to a certain importer.

- Provide all video material (VCDs, CDs, posters etc) available to the participants before the end of the training session.

- Course content is good, although five days is too long; three days’ timeframe is just right.

- More video presentations and case studies should be better in presenting actual documented smuggling of ODS.

- Quality of course is very satisfactory but instead of taking course for 5 days, it should be reduce / shortened for 3-4 days.

- More pictures showing/ identifying equipments containing ODS.

- Too much time was taken in the discussion of other MEAs, not related to ODS.

- Although the “ODS and ODS containing blends sorted by trade names” is included in the Customs Handbook, there should also be a handier version (eg. In a folder) for Customs Officers’ use.

- The moderator was effective in keeping the discussions (in the open forum) within the topics.

- There should be more time for open forum and group activities in the workshop.

- Include a basic retrofitting and how to identify the Ozone Friendly refrigerants through slide presentation that shows replacements like R-12 to R-134a and R-22 to R-404a etc.

- The participation of Philippines Navy and Philippines Coast guard is also important since they are the ones monitoring/ doing surveillance work in Philippines waters.

- Visits on premises/ factories to users of refrigerant users and analysis of storage and handling procedures.

- Convincing proofs that warrant immediate preventive response from all sectors are needed.

- The seriousness of the problem must be given vast and deeper response by our legislators and law-enforcers. Graver penalties must be imposed to violators and collaborators on the crime against environment.
- Focus on illegal trade in ODS- how to apprehend.

- Definitely I learnt a lot from the seminar shared by our efficient trainers.

- For easy assessment, to give pre (1st day) and post (final day) evaluation exercises covering same questions on the different topics of the training.

- Provide testing equipments (ODS identifiers).

- More audience participation in session discussions other than the workshop.

- Facilitators should observe the actualisms of the participants; whether they are in the mode of listening or feeling sleepy.

- Basic refrigeration cycle and fundamentals of refrigeration should be also added.

(b) UNEP Customs Training Manual:

- More case studies especially on documented smuggling or seizure of ODS

- More additional material that will help in the identification of ODS.

- The present one is a good one.

- Map of the world with Manufacturer’s plant sites for ODS and Alternatives.

- More material on the other MEAs be included in the appendix for information and an additional reference material too for more interested personnel.

- Computer diskettes with information on MEAs and first hand information depicting illegal smuggling of ODS, destruction to environment etc.

- Explanation of penalties for those caught importing/smuggling ODS etc. and actual examples of past cases.

- Customized to the Philippines setting.

- The training manual is already sufficient for Customs officers.

- Promotional posters / pins. Patches to inform others; not only Customs officials.

- List of countries party to the Protocol to easily spot whether trade should take place or not with a certain country.

- Attitudes and handicaps of Customs worldwide in enforcing preventive measures.
- Provide check sheet to international and domestic importers and qualified exporters names of ODS and Alternatives.

- To include in the manual the different types of ODS with its corresponding physical identifications, chemical properties, standard shipping regulations, safe handling etc.

- Environmental books and magazines or any material for that matter that will enable participants realize more the effects of ozone depletion.

(c) Country handbook Philippines

- Could have made some suggestions, but because of hectic schedule, have to read it later.

- More studies and trainings. Some case experiences from other countries.

- I suggest we include existing Philippines National laws, orders, memoranda, especially from DENR/EMB, BOC, FPA, so that Customs officers will have a full grasp and understanding of the importance and urgency of the issue.

- Computer lists of qualified importers of ODS in the country.

- Exercises on familiarization and distinguishing of ODS.

- Example of cases or model of enforcing experiences.

- It would be very helpful if certificates, forms and other clearances issued by regulatory agencies that are needed by importers and required by the Customs be rendered with colour guides or printed colour for easy verification. As well as important codes would be given emphasis.

- To include also websites of the different concerned agencies.

- Digest it in the form of a flier presented in such a way that it could easily be understood by the end-user.

- Practical exercises with case studies on actual Philippines experience.

- Provide diskettes on different issues pertaining to Ozone Layer Depletion and the different substances that contribute to the depletion.

- Directory of persons (customs officers) particularly within BIMP ESGS for co-ordination in monitoring ODS in southern Philippines.

- Copies of relevant laws and regulations.

- How to determine the chemical components and where they will be utilized by end-users.
- Hotline of agencies concerned – from committed people for immediate action when trouble would occur in the implementation of MEAs.

- To include in the Handbook, the complete HS codes corresponding to each type of ODS.

- BOCs Monitoring report of Actual importations for the year.

From the evaluation done by the participants, on perusal it is felt that if the following points are considered and taken care of, the efficacy and utility as well, of the course may be enhanced.

(a) The workshop itself

- More practical session on how to identify ODS
- Refresher Course
- Emphasis on country wise specific problems.
- More group discussions on common problems faced by Customs & DENR-Philippines Ozone Desk
- Even more time at group activities.
- More video films and other visual aids.
- Greater emphasis on the dangers caused by ODS.
- Provide the study material on diskettes.
- Supplying the presentations made by the trainers to the participants on CDs so they can use them for further trainings.
- The seating of the participants should be in a U shape or in small clusters instead of the traditional classroom settings, thus allowing better interaction. The size of the room should be large enough to allow comfortable seating of all participants and allow easy movement for the trainers. The small clusters seating in the course was useful; a U shaped seating works even better.
- The optimum number of participants in a course should be around 20-25, allowing individual attention to be given to each participant.

(b) UNEP Customs Training Manual
Specific allotment of time during the day for reading and analyzing the manual supplied which can be done at group discussion also.

For further integrated trainings, availability of a “Green Manual” would be very helpful.

Careful research is needed while formulating the actual Integrated training schedule. Participants of this workshop ask for even more time at the identification sessions, and if the final module will have only one day dealing with each MEA, the time given to identification is likely to go down, rather than increase.

(c) **Philippines Handbook**

Common modus operandi with a list of Importers, dealers, resource persons & organization to be included.

Access to the subject through the internet.

Photographs of the affected patients could be included.

Ways & means to implement ODS control – How to monitor & destroy.

**10. Annexes**

Annex 10.1 Agenda
Annex 10.2 List of participants
Annex 10.3 List of trainers / speakers
Annex 10.4 Workshop recommendations
Annex 10.5 Evaluation by participants
Annex 10.6 Feedback
ANNEX 10.1  Agenda

Day 1
Monday, 3 February 2003

8:00-8:30  Registration of participants

8:30- 9:30  Opening ceremony
(Emcee: Mr. Jaq Quiñones, Information Officer III, DENR-EMB-POD)

Welcome Remarks
Mr. Julian D. Amador, Director, DENR-EMB

Opening Statement from the Bureau of Customs
Atty. Juan Tan, District Collector, Port of Clark International Airport

Statement by UNEP OzonAction Programme
Cecilia T. Mercado, Programme Officer
UNEP Regional Office for Asia and the Pacific

The training team and workshop approach and objectives
Meenakshi Passi, Lead Trainer
National Academy of Customs, Excise and Narcotics, India

10:00-10:30  Break

10:30-10:45  Introduction to the Integrated Customs Training Approach for MEAs
Dr. Suresh Raj, Capacity Building Manager, UNEP DTIE

10:45-11:15  Background of the National Train-the-Trainers Course for Customs Officials
on Monitoring and Control of ODS
- What is to be expected from the course/course outline
- Expected output of the training programme for customs officers
- Training materials and display
- Self-introduction of participants including questions and answers
Meenakshi Passi, Lead Trainer

11:15-12:00  Session 1: Ozone layer depletion
- Environmental and human health consequences
- UNEP video: Every Action Counts
- Ozone layer science
  Ms. Meenakshi Passi, NACEN, India
12:00-12:30  **Session 2: International response**  
- International response – the Montreal Protocol and its Amendments  
- Phase-out schedule and strategies for Article 2 and Article 5 countries  
- Discussion  
  *Ms. Cecilia T. Mercado, UNEP ROAP*

12:30-13:30  **LUNCH**

13:30-14:30  **Session 3: National obligations and response (POD)**  
- Overview of updated country programme  
- Summary of national ODS consumption pattern  
- National phase-out obligations  
- National response – National CFC Phase-out Plan  
- Discussion  
  *Mr. Prudencio Calado III, Project Manager, Philippines Ozone Desk*

14:30-15:30  **Session 4: National ODS import / export licensing system**  
- Institutional framework  
- National ODS regulations  
- Structure of national import / export licensing system  
- Institutional arrangements and procedures to manage the system  
- Import quotas and application for permits and allowances  
- Information to importers, wholesalers and end-users  
- Handling of seized ODS and ODS-containing equipment and goods  
- Enforcement and penalties  
- Forms introduced by the licensing system  
- Discussion  
  *Atty. Rissa Oreta, Legal Consultant, Philippines Ozone Desk (POD)*  
  *Ms. Angelita Brabante, Chief, Chemical Management Section, DENR-EMB-EQD*  
  *Dr. Dario Sabularse, Deputy Executive Director, Fertilizer and Pesticide Authority*

15:30-1600  **COFFEE BREAK**

1600-17:00  **Session 5:** Thailand and Malaysian experience in enforcing the licensing system for ODS import/export  
*Thailand: Ms. Bongkoch Kittisompun, OPU Manager, Hazardous Substances Control Bureau, Dep’t. of Industrial Works, Ministry of Industry*  
*Malaysia: Mr. Tan Sim Kiat, Senior Asst. Director, Royal Customs Academy*

1700-1730  **Summary of the Day’s discussions**  
*(training team to be assisted by the workshop Secretariat)*
Day 2  
**Tuesday, 4 February 2003**

9:00-0945  **Session 6: Global and regional context**
- Global production and trade with ODS and ODS-containing products
- Transhipment harbors, production, disposal, reclaim facilities in the region
- Regional and global trade agreements
- Implementation of revised HS codes in the region
- Impact on trade and economy
- Discussion

  *Mr. K. M. Nair, NACEN, India*

0945-1100  **Session 7: Identification of ODS and ODS-based products**
- Harmonized System codes for pure and mixed ODS
- Common trade names for ODS, including CFCs, HCFCs, methyl bromide, halons, solvents, foams, aerosols etc.
- CAS numbers, ASHRAE numbers, UN numbers, etc.
- Examples of labelling of ODS-containing equipment and goods
- Detection of mislabelled ODS containers, cylinders, etc.
- Identification of ODS-containing equipment and goods
- Use of refrigerant identifiers (theory)
- Discussion

  *Ms. Meenakshi Passi, NACEN, India*

11:00-1115  **COFFEE BREAK**

11:15-12:45  **Session 8: Problem of illegal trade in ODS and possible means to solve it**
- Legal and illegal trade with Parties and non-Parties
- Detecting legal and illegal trade at local, regional and international level
- Trade with recycled, recovered, reclaimed or contaminated refrigerants
- Causes and trends of illegal trade
- Methods of smuggling
- Prevention of illegal trade
- Case study on illegal trade
- Video presentation
- Discussion

  *Mr. Sascha von Bismarck, Environmental Investigation Agency, Washington, USA*

12:45-13:45  **Lunch**

13:45-14:15  **Session 9: Safe handling, transport and storage of ODS**
- ODS Chemical information relevant to customs officers
- Safe handling of ODS and ODS-containing products
- Safe transport and storage of ODS and ODS-containing products
- Safe sampling of ODS – who is allowed to take samples and to use refrigerant identifiers
- Discussion
  
  Mr. K.M. Nair, NACEN, India

14:15-15:15  **Session 10: Practical exercises on identification of ODS**

  **Note:** Practical exercises to be held outside the training center

  - Examples of ODS containers and cylinders and ODS-containing equipment and goods
  - Hands-on work with CFC detection equipment (if available)
  - Identification of ODS-containing equipment and goods

  Ms. Meenakshi Passi and Mr. K.M. Nair, NACEN India
  (to be assisted by Mr. Manny Azucena, TESDA)

15:15-15:45  **Coffee Break**

15:45-16:45  Practical exercises on identification (cont.)

16:45-17:00  Wrap-up session and recommendations from the day’s sessions
  (training team to be assisted by the workshop Secretariat)

**Day 3**
**Wednesday, 5 February 2003**

9:00  **Session 11: Integrating Elements from other relevant MEAs**

9:00 –10:30  Implementation of Rotterdam and Stockholm Conventions

  Mr. Geri Geronimo Sañez
  Task Force Leader, RA 6969
  DENR-EMB Region III

10:30  **COFFEE BREAK**

10:40-11:00  The CITES Convention and its global implications

  Dr. Suresh Raj, UNEP DTIE in behalf of the CITES Secretariat, Geneva

11:00-11:30  The implementation of CITES in the Philippines

  - National wildlife regulations
  - Description of system to control international trade in endangered species
  - Causes and trends of illegal trade in flora and fauna, including methods for detection and prevention
Ms. Meriden Maranan, Supervising Environmental Mgt. Specialist, Protected Areas and Wildlife Bureau (DENR-PAWB)

11:30-12:00 Discussion

12:00-1300 Lunch

1300-1330 Institutional Framework for the implementation of the Basel Convention and the movement of hazardous wastes in the Philippines
Mr. Edwin Navaluna, Supervising Environmental Mgt. Specialist, EMB

1330-1430 Role of Customs Officers and other stakeholders in Monitoring imports and exports of flora and fauna, hazardous wastes and ODS (presentation prepared by WCO; presented by Ms. Meenakshi Passi)

1430-1530 Break-out working session: Discussion and agreement on common features related to the control of trade and synergies for customs authorities for effective enforcement of MEAs with a view to developing a common strategy for training and implementation coordinated by Ms. Meenakshi Passi and Dr. Suresh Raj

1530-1545 COFFEE BREAK

1545-1630 Plenary Session: each working group chair to report back on findings of group discussions

1630-1700 Discussion

1700-1715 Summary of the Day’s recommendations
Ms. Meenakshi Passi

Day 4
Thursday, 6 February 2003

9:00-10:00 Session 12: Checking papers, forms and permits

- Logistics and data management
- Application forms, permit forms, freight papers, retrofit certificates, etc.
- Practical exercise on checking freight papers and permits
- Discussion

Major Nicomedes Enad, Bureau of Customs, Philippines
(Mr. K.M. Nair will moderate the discussion)
10:00-11:00  **Break-out Session**: Effective operation of ODS import / export licensing system and enforcement of ODS regulations.  *In addition to two key topics, participants may suggest 2 additional topics of interest:*
- Topic 1: How to effectively operate ODS import/ export licensing systems
- Topic 2: How to effectively enforce ODS regulations
- Topic 3: To be suggested by participants
- Topic 4: To be suggested by participants

Break  Note: Coffee break will be in between this session

11:00-1130  **Session 13**: Regional Monitoring of ODS Imports and Exports in the SEAP Region  
*Ms. Katarina Axelsson, Research Associate, Stockholm Environment Institute*

11:30-1200 Discussion

1200-1330  **LUNCH**

1330-1530  **Break-out session**: Effective operation of ODS import / export licensing system and enforcement of ODS regulations  
Group moderators will co-ordinate the break-out sessions  
(group moderators to be assisted by the workshop Secretariat)

*Note:*
Group moderators will ensure the preparation of a short report and presentation of their findings including the group recommendations.

1530-1600 Plenary session to present findings of group discussion

1600-1630 Discussion

1630-1700 Summary of the Day’s recommendations

**Day 5**  
Friday, 7 February 2003

9:00-10:00  **Session 14**: Action planning for Phase II and III of the customs training

- How to design Phase II of the customs training (approach, duration, agenda, schedule, trainers, participants, etc.)
- Which training materials should be used for Phase II of the customs training and what should be the key contents of the training
- How to ensure timely implementation, monitoring and reporting
- Discussion  
*Ms. Meenakshi Passi, NACEN India*
1000-1030  **COFFEE BREAK**

10:30-11:30  Plenary Session to discuss final workshop recommendations

11:30-1300  **LUNCH**

1300-1500  **Closing session**

Conclusions and outlook by Ozone Officer

*Mr. Prudy Calado III, Project Manager, DENR-EMB-POD*

Conclusions on synergies on co-operation between related Conventions

*Dr. Suresh Raj,  UNEP DTIE*

Closing statement

*Ms. Cecilia T. Mercado, UNEP ROAP*

*Mr. Fernandino Concepcion – Asst. Director – DENR-EMB*

Distribution of Certificates of Completion

*Mr. Fernandino Concepcion – Asst. Director – DENR-EMB*

*Ms. Cecilia T. Mercado, UNEP ROAP*

*Mr. Rodolfo Campos, Deputy Collector for Operations, Port of Clark International Airport, Bureau of Customs*

Closing Remarks

*Mr. Rodolfo Campos, Bureau of Customs*

1530  **Closing of Workshop**

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**Annex 10.2: List of participants**

**PARTICIPANTS FOR THE NATIONAL TRAIN-THE-TRAINERS COURSE FOR CUSTOMS**
## OFFICERS

**AND OTHER KEY STAKEHOLDERS ON MONITORING AND CONTROL OF ODS & COMPLIANCE**

**UNDER OTHER MULTILATERAL ENVIRONMENTAL AGREEMENTS**

*Fontana Leisure Park, Clark Economic Zone, Angeles, Pampanga*

*February 3-7, 2003*

<table>
<thead>
<tr>
<th>COUNTRY/ ORGANIZATION</th>
<th>NAME AND ADDRESS</th>
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<tbody>
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Acting Customs Operation Officer V  
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</table>
**National Train-the-Trainers Workshop for Customs Officers on Monitoring & Control of ODS Imports & Exports, Manila, Philippines, 3-7 February 2003**

<table>
<thead>
<tr>
<th>National Stakeholders:</th>
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**UNEP DTIE OzonAction Programme**

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<table>
<thead>
<tr>
<th>Organization</th>
<th>Name</th>
<th>Position</th>
<th>Address</th>
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<tbody>
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<td>Foreign Assisted and Special Program (FASPO)</td>
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## Annex 10.3: List of trainers/ speakers

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<td>National Academy of Customs, Excise and Narcotics</td>
<td>Ms. Meenakshi Passi</td>
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<tr>
<td>Additional Commissioner</td>
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<td>Additional Director General &amp; Commissioner of Customs &amp; Central Excise</td>
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Annex 10.4 : Workshop recommendations

CONCLUSIONS AND RECOMMENDATIONS

Integrated approach to training for all MEAs

National Customs Officers training:

1. Hold intensive and periodic training on the synergies between MEAs among the various agencies involved in its implementation

2. Create a Working Group composed of agencies concerned along with the Department of Foreign Affairs and establish an MOU defining roles and responsibilities of various agencies to support this integrated training approach.

3. Establish a national database tracking system between the Bureau of Customs and the specific agency responsible for each MEA on Monitoring, Recording, Controlling and Reporting exports and imports of controlled products

4. Encourage the integrated implementation of a training programme for Customs Officers for MEAs

1. ENSURE THE EFFECTIVE IMPLEMENTATION OF ODS IMPORT/EXPORT LICENSING SYSTEM THROUGH:

- Strict registration of importers, manufacturers including local end-users;
- Strict implementation of the “One-shipment One substance- One clearance” policy currently being practiced by the BOC;
- Regular submission of a list of accredited importers and the PSICs issued to them, on a bi-monthly basis to the BOC by DENR-EMB-POD;
- Establish a computer link-up between BOC and DENR-POD especially to monitor imports for issued clearances;
- Establish and maintain an active Environmental Protection Unit (EPU) in each coordinating agency;
- Look for ways to ensure authenticity and preventing fraudulent clearances by using security stamps or security paper;
- Ensure that enforcers are provided with adequate ODS identifying equipment and protective personal equipment;
- Need financial assistance in order to fully implement proposed recommendations
2. ENFORCEMENT OF ODS REGULATIONS

THE BUREAU OF CUSTOMS SHOULD:

- Operationalize and strengthen the (EPU) environmental protection unit of the BOC
- Encourage intensive assessment/evaluation of suspected ODS imports as a deterrent to illegal trade
- Provide continuous training programmes for BOC officers to strictly implement the licensing system
- Encourage high level management support through regular information sharing with top management
- Ensure full understanding of the existing regulations and policies governing ODS trade
- Impose strict penalties to violators or file criminal charges
- Provide incentives to enforcers if they were able to apprehend illegal entries.

Other government agencies should:

- Create linkages with concerned government agencies through MOA/MOUs (i.e. DOTC re: motor vehicles still using CFCs)
- Create intelligence networking with international community (RILO)
- Create database/networking between BOC and POD
- Regulate importation of used equipment containing ODS
- Initiate intensive information/education campaign to disseminate the implementing laws/guidelines to all enforcers

3. Seized ODS should be disposed of as follows:

- Auctions, but limited only to the registered/Accredited ODS importer within their import quota limits for CFCs only
- For HCFCs, auctions but limited to the following:
  - Both active and inactive Accredited importers
  - Accredited service providers
  - Importers of alternatives
- Storage of excess ODS leftover after Auction
- re-export/send to countries with destruction facility to be funded by the Multilateral Fund or any other international funding institutions
- Donation to Training Institutions for Instructional Purposes such as TESDA
- Storage facility for seized ODS to be jointly managed by DOF-BOC & DENR-EMB
Implementation of Phase II Training Action Plans

- POD and BOC to finalize phase II training schedules and programmes in close consultation with regional DENR and BOC offices
- Immediate implementation of Phase II training once schedules have been finalized and agreed upon
- Goal is to train 250 concerned customs personnel and other stakeholders by the end of 2003, depending on availability of funds

Adopted at Clark Economic Zone, 7 February 2003 by participants to the National Train-the-Trainers course for Customs Officers and Other Stakeholders for Monitoring ODS Imports and Export and Compliance with other MEAs
Annex 10.5: Evaluation By the Participants

Evaluation Questionnaire
The following questionnaire was given to participants to evaluate the training course. The responses are tabled in a graph in the following page. The rating “1” stands for poor performance and the rating “5” for excellent performance.

1. What is your overall evaluation of the course?

2. Did the course provide the information you expected?

3. Was the communication between participants possible and useful?
4. Was the composition of the audience adequate?

5. As far as the contents of the presentation are concerned, did you find them adequate in explaining the following issues:

   a) Environmental and human health consequences of ozone layer depletion?
   b) International response to ozone layer depletion (Montreal Protocol)?
   c) National obligations and phase-out strategy (RMP)?
   d) Regulatory framework for the national import/export licensing system?
   e) Prevention of illegal trade of ODS?
   f) Role of customs officers in enforcing the import/export licensing system?
   g) Role of other stakeholders in implementing the import/export licensing system?
   h) How to identify ODS and equipment containing ODS and the use of ODS identifying equipment?
   i) Issues relating to safe storage and handling of ODS?
   j) Data reporting requirements and procedures?
   k) Enforcement, penalties and prevention of illegal trade

6. Did the training course provide you with adequate information regarding the subsequent training of the remaining customs officers?

7. Did the training course provide appropriate training material as the basis for the subsequent training of the remaining customs officers?

8. Can you think of any additional material that should be included in the "UNEP Customs Training Manual" to enable it to better achieve its goals?

9. Can you think of any additional material that should be included in the “Guyana Handbook on ODS Legislation and Import / Export Licensing System” to enable it to better achieve its goals?

10. Please give additional comments about the quality of the course and how similar
courses could be improved.