

Expanding Trade Under a Free Trade Regime: Issues related to Market Access

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Abstract

Market Access issues are increasingly gaining importance due to their revival in the Doha Ministerial Declaration (DMD). Since 2001, the EU has adopted the Everything But Arms (EBA) initiative to allow developing countries increased access to its markets. The policy is expected to benefit poorer countries with increased volume of trade. Since a large number of exporters from developing countries belong to small and medium enterprises, the premise of this paper is to understand the impact of the EBA initiative on increased market access for small and medium-sized enterprises. This paper analyzes four selected export industries of Bangladesh: leather, knitwear, pharmaceutical and the shrimp processing industry and their exports to five EU countries: UK, France, Italy, Germany and Spain. Four categories of barriers were studied in this paper and in-depth interview techniques with top executives from 20 different companies were utilized. Each of these interviews took several days. Based on the responses, the paper shows that technical barriers to trade are the major stumbling blocks for the SMEs in Bangladesh. In most cases, cost of compliance, inadequate technical skills and institutional weaknesses are major problems. Among other types of barriers, the second most important one in terms of market access is related to customs and administrative procedures for customs valuation, classification, formalities, and rules of origin. Therefore, the World Trade Organization (WTO) should address these market access issues explicitly particularly from the perspective of small and medium-sized enterprises.

Key words

Market Access, Everything But Arms, Non-tariff barriers, Small and Medium-sized enterprises, Types of barriers.

Introduction

Despite the fact that new issues are increasingly at the centre of WTO activism (e.g. services, investment, intellectual property, competition policy, and so on); market access issues in merchandise trade have been revived in the Doha Ministerial Declaration (DMD)¹, which sets out the mandate for negotiations on 'Market Access for Non-agricultural products'. Trade preferences are considered as a fundamental component in the integration of developing countries particularly the least developed countries, into the world trading system (Brenton, 2003). Inconsistency in export success was observed under various trading schemes such as the Generalized System of Tariff Preferences (GSP) (introduced in the 1970s) and the most recent one, the EUs Everything But Arms (EBA) initiative that was commenced in 2001 (Brenton, 2003). It has been argued that in merchandise trade, developing countries could realize most gains from an improved market access regime (Lucian Cernat, *et al.*, 2002). Over the past decade, incidences of tariff restrictions have come down significantly and developed countries such as those in the European Union (EU) have come up with trading schemes like the EBA initiative allowing imports from developing countries at zero tariff. Hence, market access issues basically relate to non-tariff barriers such as standards, quotas, certification and regulations related to movement of goods and services. It has been observed that some of the expected gains from the removal of protection in textiles and clothing were offset by the use of anti-dumping duties and special safeguards (Lucian Cernat *et al.*, 2002). Stiglitz (2000) and Rodrik (2001) argue that new issues such as trade in services, investment and intellectual property rights and commitments resulting from the Uruguay Round were often poorly understood by developing countries and implementation has been made difficult by the lack of institutional and technical capacity. Furthermore, LDCs are not exempted from NTBs like standards, certification and other regulations which are permitted under several WTO agreements. While a set of the NTBs, for example, Sanitary and Phytosanitary Measures (SPS) are well accepted in the field of international trade; conforming to such standards on the part of exporters from LDCs was a major challenge. Many exporters, particularly Small and Medium-sized Enterprises (SMEs), find it difficult to follow such measures as either the initial investment is too high for them or requires a better skilled labor force who can understand and follow the rules set to produce their products. As a result, SMEs might not be able to compete with their larger counterparts.

This paper, therefore, examines market access issues between Bangladesh and the European Union (EU) and identifies the practical barriers for SMEs in four selected export industries of Bangladesh. The industries chosen are: leather and leather goods, knitwear, pharmaceuticals and shrimp processing. Five major EU importers² of Bangladeshi export products³ were studied. The objective of the study is to generate a micro or firm level understanding to determine practical barriers to trade for SME producers in Bangladesh. This paper ultimately ranks market access issues for SME exporters from Bangladesh to suggest policy changes for future rounds of negotiation to provide a better prospect for expanding trade from least developed to developed nations.

Classification of NTBs

Non-tariff barriers (NTBs) can be segmented into four⁴ broad categories. Each category represents a class of barriers. In this study we investigate which one of them is relatively more important or difficult to overcome from our exporters' perspective. Table 1 shows the four broad classes of non-tariff barriers.

Table 1: Classification of Non-tariff Barriers

Types of Barriers	Lists of items
Type I	Government Participation in trade and restrictive practices (state aid, countervailing duties, state trading enterprises, government monopoly practices), customs and administrative entry procedures ⁵ (anti-dumping duties, customs valuation, classification, formalities, rules of origin)
Type II	Technical Barriers to Trade or TBT ⁶ (technical regulations, standards, testing, certification arrangement)
Type III	Specific Limitations (quantitative restrictions, import licensing, embargoes, exchange control, discriminatory sourcing, export restraints, measures to regulate domestic prices, requirements concerning marking, labeling and packaging)
Type IV	Import Charges (prior import deposits, surcharges, port taxes, statistical taxes, border tax adjustments, safeguard measures).

Source: Gallezot, 2003.

Both primary and secondary data were collected and utilized in this study. In-Depth Interviews of company executives of 20 companies (5 from each sector of the selected four industries - leather and leather goods, pharmaceuticals, knitwear and shrimp processing industries) were conducted from December 2004 to May 2005 to understand their viewpoints and to identify the barriers that were either barring their access to EU markets or hampering their exports to selected EU countries. Industry operators of both small⁷ and medium⁸ sized enterprises were interviewed from the leather and leather goods, shrimp processing and pharmaceutical industries. However, only small-sized enterprises from the knitwear industries were interviewed because it was difficult to find both willing and eligible respondents in the medium-sized enterprises in this industry. Finally, the paper utilized the responses from the top executives of these industries to rank the four types of barriers in terms of its effect in hampering smooth market access of their products to these five EU markets.

Section 2 of this paper briefly states the present status of trade between Bangladesh and the European Union. Section 3 identifies practical barriers in the selected four industries (i.e. leather and leather goods, knitwear, pharmaceuticals and shrimp processing) based upon industry responses and provides a ranking of these four types. Finally, section 4 incorporates policy suggestions in its concluding remarks.

2. Bangladesh - EU Trade Status

The Bangladesh export sector has undergone structural changes in the last ten years with a significant shift from jute-centered exports to ready-made garments and knitwear. The balance of trade with EU, over the years, remained hugely in favor of Bangladesh (3.3 billion euro in 2004) (www.eudelbangladesh.org).⁹ The main items that Bangladesh exports to the EU are readymade garments (90%), frozen food (6%), leather, jute and tea.¹⁰ The main imports from the EU consist of machinery and mechanical appliances (55%) and chemical products (14%).¹¹ In 2004, EU imports from Bangladesh were 4.2 billion euros and exports to Bangladesh amounted to 892 million euros.¹² The EU is the biggest export destination of Bangladeshi products (56%).¹³ Bangladesh's exports towards the EU are intimately linked to the Community's Generalized System of Preferences (GSP) scheme. Products originating from Bangladesh are eligible for total suspension of import duties and quotas under GSP scheme. The Everything But Arms (EBA) initiative approved by the EU in 2001 further opens the EU market to Bangladesh by granting duty-free access to essentially all products from the least developed countries. As a SAARC nation, Bangladesh also enjoys the benefit

of regional accumulation of the rules of origin.

3. Practical Barriers in four industries - Leather, Knitwear, Shrimp Processing and Pharmaceuticals

Of the four types of barriers listed in Table 1, responses from industry executives were used to rank them in order of importance. In the following paragraphs, we present the analysis of various types of barriers that were observed while interviewing top executives of the four industries in Bangladesh. The analysis is based on twenty in-depth interviews of top executives of these industries.

3.1 Analysis of Type I Barriers

Type I barriers include government participation in trade and restrictive practices such as state aid, countervailing duties, state trading enterprises, government monopoly practices; and customs and administrative entry procedures related to anti-dumping duties, customs valuation, classification, formalities and rules of origin. Among these barriers formalities, customs valuation and rules of origin are the most important barriers in the leather and leather industry (40% industry responses) and in the knitwear industry (80% industry responses) whereas the rules of origin is the most important barrier in the shrimp industry (60% industry responses) and in the pharmaceuticals industry (80% industry responses).

Judging from the industry responses, **'formalities'** referred to formalities related to customs and administrative requirements for shipping, inspection and certification in the industry for leather industry. Lack of knowledge and training with respect to the use of shipping marks and putting hazardous materials shipping labels were also responsible for creating confusion in importing countries that ultimately hampered market access as it resulted in rejection of consignments. In terms of inspection certification, delays and improper surveillance of the inspection authorities in Bangladesh in providing certification and other related documents, complexity and cost of securing these documents served as a strong barrier towards accessing the EU market.

In the knitwear industry, our responses show that raw materials (fabrics) are mainly imported from China and India. During such imports, delays during custom clearance posed a major barrier, although it was more a failure of the host country than one emanating from the importing countries (known as barrier related to **'formalities'**). However, for the exporters this was a major cause of delay in fulfilling their export obligations in the EU markets and hence they were

unable to secure smooth market access in these countries. In general, shipments which exporters are supposed to get in 5-7 days were delayed by another 15-17 days which hampered the production process and ultimately posed a threat towards market access. For a small or medium-sized enterprise, this becomes a major barrier.

Poor 'customs valuation' procedures are found to have created a significant obstacle towards export in EU markets. Due to poor customs valuation procedures at Bangladeshi ports, exporters were often unsure about the duty amount which affected their quality of bids and offers. This problem was very common in the leather goods industry. Similarly, in the knitwear industry, customs valuation was also identified as a barrier as exporters are unaware of the rules and practices needed to ascertain the value of products for customs purposes. The process of valuation used at Bangladeshi ports is not transparent for exporters and hinders their ability to ensure competitive bidding during negotiating export deals.

In the shrimp and knitwear industries, the 'rules of origin' (Type I) was cited as an important barrier. Bangladesh cannot produce enough raw materials for the knitwear industry. Similarly, in the shrimp industry, production of shrimp is far below the processing capacity. As a result, these producers often import their raw materials from abroad. The rules of origin only recognize certain countries to enable to them to take advantage of EBA. This was cited as a barrier to market access by exporters. Haque (2004) has shown that shrimp processing firms operate only at 13% level of capacity due to acute shortage of raw shrimps. Compliance with strict rules of origin has also been considered a significant problem in the pharmaceutical industry as it requires major imports of chemicals to function.

3.2 Analysis of Type II barriers

Type II barriers include **Technical Barriers to Trade**-TBTs such as technical regulations, standards, testing, and certification arrangements. Among these instruments technical regulations, standards and certification arrangements are found to be the most significant barriers in the leather (80% industry responses) and pharmaceuticals industries (100% industry responses). In the knitwear industry, however, certification arrangement, standards and testing have been identified as major impediments towards market access (60% industry responses). Similarly, technical regulations, standards and testing are considered to be significant barriers in the shrimp processing industry (100% industry responses).

For leather industry, barriers related to 'certification arrangement' have been identified as significant impediments within Type II barriers. Most of this relate to certification for environmental-friendly chemical usage (e.g. preservative chemicals). In some EU countries, particularly in Germany, leather products have to be certified as AZO free. Many SMEs are not clear about the procedure required for getting such certification, and if they are aware, it is costly for them. In the knitwear industry, certification arrangement problem indicates holding of chemical certificates conforming to health standards in the selection of fabrics (mainly colored fabrics). Most of the time, importers express their preferences regarding companies which provides such certification. This increases the cost for exporters and reduces their competitiveness. In the Pharmaceutical industries, certification arrangements have created significant problems because of high cost and stringent standard requirements. In addition, product registration fees for some of the pharmaceutical products are extremely high (ranging from US\$10,000 to US\$40,000).

In the leather industry, container rejection based on non-conformity to standards, a Type II barrier has been identified as another barrier in accessing EU markets. Such rejections often cost nearly US\$3000 per 20 feet container (in-depth interview results). For a small and medium industry this acts like an entry barrier in the market. In the knitwear industry, importers often have their own preferences in the usage of fabrics. They specify the type and make of fabrics to be used during their shipment which increases the costs of production and reduces flexibility in substitution between orders. Such preference or conditionality to use specific fabrics leads to reduction of profits and becomes an indirect barrier particularly for small and medium-sized enterprises. After a particular consignment is rejected under various standards and testing, exporters often try to rechannel the goods to other places but finding another buyer for these goods can be extremely difficult for small and medium enterprises. The surveys further reveal that a major reason behind cancellation or rejection of consignment is the failure of timely shipment of goods. However, for small and medium enterprises, meeting deadlines is often difficult due to reasons beyond their control such as non-availability of raw materials in the domestic market, delivery failures by small sub-contracting firms and delays in customs clearance for imported raw materials.

In the shrimp industry, 'technical regulations' related to the compliance with the SPS and TBT provisions such as HACCP (Hazard Analysis and Critical Control Point) and criteria set by the Food and Veterinary office (FVO)¹⁵ are the

most important barriers in the Type II category. Complying with these standards requires adequate technical assistance and for small shrimp processing firms they became an entry barrier to the market. Consignment rejection was found to be a known phenomenon in the industry. Estimates show that costs of such rejection (for a 40 feet container) ranges around US\$15,000 (in-depth interview results). Haque (2004) shows that training costs for HACCP compliance varies from US\$250 to US\$1,100 and operating costs for the same varies from US\$11,400 to US\$ 28,500 for majority of the firms. On an average, a shrimp processing plant has invested US\$ 227,450.97 to upgrade its capacities to comply with the HACCP (Haque, 2004). In the pharmaceuticals industry, conforming to the strict conditions of the TRIPS (Trade-Related Aspects of Intellectual Property Rights) agreement and of compulsory licensing (known as barriers related to 'technical regulations') were identified as a Type II barrier. Similarly, traces of unauthorized antibiotics such as Nitrofurantoin or presence of antibiotics above the safe limit have also been mentioned as reasons for consignment rejections. Since raw shrimp is produced outside these processing plants, it is difficult for small and medium processing firms to ensure quality control at the farm level. Large farms, on the other hand, can overcome such barriers by intensifying their production system. Consequently, small and medium processing firms consider it to be a barrier.

3.3 Analysis of Type III barriers

Type III barriers include **specific limitations** like quantitative restrictions, import licensing, embargoes, exchange control, discriminatory sourcing, export restraints, measures to regulate domestic prices, and requirements concerning marking, labeling and packaging. Of them, 'packaging, marking and labeling' related problems are found to create strong obstacles among these barriers in the leather (60% industry responses) and in shrimp processing industry (40% industry responses).

In the leather industry, it was found that because of inadequate training and lack of skilled labor force, SME exporters cannot properly meet the **packaging, labeling and marking** requirements required by respective importers. In addition, affixing these requirements imposes additional costs to exporters. Again, in the knitwear industry, lack of skilled manpower was the major cause of errors related to labeling and marking of products, and placing the required information, which causes withholding of consignments and sometimes consignment rejection, leading to major financial losses. In the shrimp processing industry, too, packaging has to be tailored (based upon the importers' requirements) and perfectly sealed.

Labeling and marking over each package and over the container are to be done according to the importing countries official languages. For small and medium enterprises this means additional costs for each consignment.

3.4 Overall Ranking of Barriers by Industries

This paper further attempt to rank the four types of barriers based upon industry responses. Table 2 shows the ranking of the types of barriers in the selected four industries.

Table 2: Ranking of the Types of Barriers by the affected groups in the selected industries							
Types of Barriers	Ranking by the Small-sized enterprises in the selected industries				Ranking by the Medium-sized enterprises in the selected industries		
	LI*	KI*	SPI*	PI*	LI*	SPI*	PI*
Type I: Government involvement in trade and restrictive practices, customs and administrative entry procedures	+	+++	++	++	+	++	++
Type II: Technical Barriers to Trade or TBT	+++	++	+++	+++	+++	+++	+++
Type III: Specific Limitations	++	0	+	0	++	+	0
Type IV: Import Charges	0	0	0	0	0	0	0

Note:

+ means the degree of barriers exists in each industry. 0 means not found to be applicable.

* LI = Leather industry, KI = Knitwear industry, SPI = Shrimp Processing industry,

PI = Pharmaceuticals industry

Source: In-Depth interview results

The above table shows that Type I barriers (Government participation in trade and restrictive practices, customs and administrative entry procedures) are **highly dominant** (referred to as '+++') in the knitwear industry and is found to exist for small-sized enterprises. On the other hand, type I barriers are found to be **moderately dominant** (referred to as '++') in the shrimp processing industry and in the pharmaceutical industry both for small and medium-sized enterprises. However, for the leather industry Type I barriers are found to be **less dominant** (referred to as '+') both for the SMEs.

Type II barriers (Technical Barriers to Trade or TBT) are found to be highly dominant in the leather, shrimp processing and in pharmaceuticals industry, both for small and medium-sized enterprises. Type II barriers are found to be only moderately dominant in the industry for knitwear for small-sized enterprises.

Type III barriers (Specific Limitations) are only moderately dominant in the leather industry for SMEs. For the shrimp processing industry Type III barriers are found to be less dominant for both small and medium-sized enterprises. On the other hand, for the pharmaceutical and for knitwear industries, Type III barriers are not found to exist in the industry for pharmaceuticals and in the knitwear industry. Type IV barriers (import charges) are not at all found in any of the four industries.

4. Conclusion

The **primary objective** of this research was to understand issues related to market access from a micro or enterprise level perspective. We have used a simple classification method to understand market access issues among Bangladeshi exporters in the EU market. The study was limited to four industries: leather, pharmaceutical, shrimp processing and knitwear. Four types of barriers were studied: Type I, meaning barriers related to government participation in trade and restrictive practices; Type II, that is to say, barriers referring to Technical Barriers to Trade; Type III, barriers that are related to specific limitations in trade, and Type IV, barriers that include import charges.

In this study, the impacts of Everything But Arms (EBA) initiative of EU were studied for 5 EU member countries: UK, France, Italy, Germany and Spain. These countries are the major importers of Bangladeshi products. It is evident that because of the EBA initiative Type IV measures have been completely withdrawn from Bangladeshi products. However, this did not guarantee market

access for small and medium-sized enterprises. Other types of measures were found to exist while exporting Bangladeshi products to EU markets.

The paper found that **Type II or Technical Barriers to Trade** are the major stumbling blocks for SMEs in Bangladesh who want to venture into EU markets even under apparently free access conditions under EBA. The range of measures in this category includes technical regulations, standards, testing and certification arrangements. In most cases it is cost of compliance, inadequate technical skills and institutional weaknesses that are the major source of such problems. Haque (2004) has estimated the investment needed for shrimp processing plants in Bangladesh to comply with HACCP rules and regulations. This paper further strengthens this argument and shows that other sectors (major export items from Bangladesh) like knitwear, leather, and pharmaceuticals also face such barriers.

In order to deal with Type II barriers, Bangladeshi exporters need to upgrade their plants, alter the production system, and also find arrangements where cross-recognition of certification and testing procedures could be done. Unless these issues are addressed coherently it will be difficult for SMEs to access EU markets. It is also important to know that SMEs are the major source of **employment** for millions of people in developing countries like Bangladesh. If these issues are not properly addressed, **poverty alleviation** through trade will remain a far cry.

Among other types of barriers, **Type I barrier** is the second most important one in terms of market access. This type of barrier includes customs and administrative entry- procedures related to customs valuation, classification, formalities, and rules of origin. Our result shows that of these barriers, custom valuation, custom formalities and rules of origin are the most important ones applicable to Bangladeshi exporters. For the small- sized enterprises in the knitwear industry this is a major barrier to access EU markets. However, one should note that most barriers exist at the port of entry in Bangladesh where exporters import their raw materials on a back-to-back LC (Letter of Credit)¹⁶ system.

Similarly, shrimp processing and pharmaceutical industries also rated this type of barrier as their second most important set of barriers securing exports to EU. This is true for both small and medium-sized enterprises in these two industries. For the shrimp industry, it was found that low domestic production capacity of shrimps at the farm level forces processors to produce at a very low capacity of production since processing plants were operating at below 13% of

their capacity, on average. There are few ways of dealing with this problem. First, to **increase farm level production** of shrimp would require huge expansion of shrimp farming in coastal regions. For a land scarce country like Bangladesh this would be socially undesirable. Second, **intensification** of shrimp farming system which is often accompanied with adverse environmental effects. Third, **import** of raw shrimp from neighboring countries like India and Thailand. However, here the rules of origin used in international trade for EU markets are a major obstacle for Bangladeshi firms wanting to adopt this approach.

For the pharmaceuticals industry, barriers in this type include the **definition of the rules of origin**. Most producers import their chemicals for processing in Bangladesh. Therefore, strict adherence to the current rules of origin acts as a major barrier for them.

Type III barriers like labeling, marking, and packaging requirements are the third important barrier to market access. This is true for both shrimp and leather industries.

Considering the above findings, this paper shows that the **market access** issue is a major problem even when no tariff or quota restrictions are imposed. Therefore, WTO should explicitly address these market access issues particularly from the perspective of small and medium enterprises. This means that measures should be adopted to reduce formalities related to custom valuations and procedures both at the exporting and at the importing countries, strengthening institutions to provide certification related to technical standards at the exporting country and to remove variations in the labelling and packaging requirements. **Streamlining custom clearance procedures** at the exporting country has been clearly identified as a major bottleneck in securing market access.

The industry analysis undertaken gave us a clear image in terms of policy to handle Type I barriers in the respective countries' and departments. In terms of dealing with administrative and port problems, it can be pointed out that measures should be enacted and implemented in building capacity for both exporters' and the authorities so that the costs of handling shipments goes down at the port. The Government of Bangladesh should seriously consider **capacity building** at various levels to facilitate export of these products to EU markets. Otherwise, a large group of producers, the SMEs, will not be able to gain from the increased volume of trade that are expected to take place in a tariff and quota free trade regime.

References

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- 2 The importing countries have been selected based upon the amount of volume imported.
- 3 United Kingdom (UK), France, Italy, Germany and Spain are the major importers of the four leading export sectors of the Bangladesh economy, accordingly 20 companies were randomly surveyed; 5 companies from each sector.
- 4 Gallezot, Jacques, Real Access to the EUs Agricultural market, 24 July 2003, Jacques Gallezot is Director of Research at INRA and Associate researcher at CEPII, UMR d'Economie Publique, INRA – INAPG, 16 Rue Claude Bernard, 75005 (gallezot@inapg.inra.fr).
- 5 Customs and administrative entry procedures applicable both at entry and exit points.
- 6 Technical Barriers to Trade applicable both at entry and exit points.
- 7 Small-sized enterprises refer to firms with 50 or less full-time employees and with capital investment between Taka 300,000 and Taka 10 million.
- 8 Medium-sized enterprises refer to firms with capital investment between Taka 10 million and Taka 100 million and between 50-99 full-time employees.
- 9 Website of the European Commission Delegation to Bangladesh
- 10 From the website of European Commission Delegation to Bangladesh, www.eudelbangladesh.org
- 11 From the website of European Commission Delegation to Bangladesh, www.eudelbangladesh.org
- 12 From the website of European Commission Delegation to Bangladesh, www.eudelbangladesh.org
- 13 From the website of European Commission Delegation to Bangladesh, www.eudelbangladesh.org
- 14 Depending on the size of the consignments exporters sometime sub-contract the work to other small firms.

- 15 FVO is based in Dublin, Ireland.
- 16 Back-to-back LC refers to 'Letter of Credit' to import that has been issued against a corresponding export order.

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