

IMPROVING THE FISCAL COMPONENT OF CUSTOMS ACTIVITY – A STEP TOWARDS THE IMPLEMENTATION OF CUSTOMS REFORMS

Olga BORISENKO

University of Customs and Finance, Ukraine

E-mail: acu_borisenko@yahoo.com

Irina KVELIASHVILI

University of Customs and Finance, Ukraine

E-mail: kvelin@ukr.net

Abstract

The study presented in this paper was carried out in the framework of research of the Department of Public Management and Customs Administration on the topic “Development of institutions and mechanisms for the implementation of Customs and tax policy of Ukraine in the conditions of integration transformations” (state registration number: 0114U000646, fundamental).

The paper deals with the problems faced by subjects of foreign economic activity, their authorized representatives as well as revenue agencies’ staff during Customs control and Customs clearance of goods.

The paper is also focused on the shortcomings of certain aspects of the national Customs legislation related to the control of Customs value of goods, the need for application of Customs procedures in the conditions of maximum certainty, openness and transparency.

In addition, the direction of government regulation has been considered in the field of Customs control (control at the time of Customs clearance and control after release of goods for free circulation (post-clearance audit)), the development of which will provide a sufficient level of coordination, planning and implementation of Customs procedures. This in turn will remove the tension in the sensitive issues of Customs value control and the use of other control measures during Customs clearance of goods will significantly reduce the consequences of incorrect decisions making and time spent on Customs formalities.

The authors have made a comparative analysis of the problems that arise in the process of the state Customs policy implementation and Customs activities directed at the control of Customs value and post-clearance audit.

The study of the questions highlighted in this paper makes it possible for the authors to assume that overcoming challenges and achieving results, which will bring Ukraine closer to the European community and allow to accept the country as an equal trading partner, is possible in case of the current Customs legislation improvement, the use of effective management and coordination tools, monitoring of revenue agencies’ activities during the process of budget revenues collection.

Keywords: Customs affairs, Customs legislation, Customs procedures, Customs control, Customs value, post-clearance audit, risk management .

Introduction

The current stage of the state policy implementation in the sphere of Customs affairs

of Ukraine is characterized by constant expansion of international trade, the increasing complexity of trade processes dynamics, strengthening of international organizations requirements to ensure free access of foreign goods to domestic markets and reduction of the national trade barriers (Borisenko 2012, pp. 179-180).

The state regulation of foreign trade provides a set of activities carried out to ensure compliance with the Customs Code of Ukraine, laws and other legal acts concerning Customs activities, international treaties of Ukraine concluded in accordance with the law (Borisenko 2012). When there is insufficient state control over the transported goods, “openness” of the national Customs territory for international trade can cause economic damage to the state in the form of non-payment to the budget of appropriate amounts of Customs duties as a result of:

- evasion of payment due to the distortion of information about the Customs value of goods,
- growth of illicit flows,
- Customs fraud and others.

On the other hand, business entities directly and the state indirectly bear the expenses of the inconsistency of Customs control procedures and Customs clearance procedures as a consequence of unpredictability of time and funds spent by business entities connected with Customs formalities and procedures. Under such conditions, the need to improve the efficiency of the national Customs policy in the sphere of the immediate response to external challenges and operational counter their possible negative consequences is becoming more and more actual.

Failure of revenues to the state budget is caused by smuggling, fraud, incorrect pricing and trafficking, among other things, significantly undermines the conditions of healthy competition and does not contribute to national economic development.

In addition, unexpected delays at borders increase trading costs, undermine the competitiveness of traders and harm the international supply chain. Furthermore, an increase in express deliveries for industrial enterprises requires acceleration of release time for sensitive goods across the customs border. The pressure on the revenue authorities results in necessity for modern international business models implementation, which also determines the need for a more efficient circulation of goods and minimizing delays at borders.

The need for international, state, business projects requires the revenue authorities to rapidly response and minimize delays at borders.

The rhetoric of politicians at different levels is focused on the necessity of trade facilitation national concept creation. The modernization of the Customs authorities is an important part of national programs and reforms.

The paper considers the issues of Customs control of goods in foreign trade operations, which raises a number of challenges for the Ukrainian business. The attention is focused on the problems that non-governmental organizations consider as such, without which it is impossible to integrate into the global community.

1. The problems of the national Customs legislation related to the control of Customs value of goods

One of the top priorities for the implementation of the Sustainable Development Strategy “Ukraine – 2020”, approved by Presidential Decree of January 12, 2015² № 5/2015 (Bulletin of the Supreme Court of Ukraine No 3(187)'2016) is considered to be the

¹ *Tamozhennyj kodeks Ukrainy* [Customs Code of Ukraine], St.4, pp.24

² *O Strategii ustojchivogo razvitiya “Ukraina – 2020”: ukaz Prezidenta Ukrainy ot 12.01.2015 № 5/2015* [On the Sustainable Development Strategy "Ukraine - 2020": Decree of the President of Ukraine of 12.01.2015 № 5/2015]

integration into the Customs community of the European Union through the reform of the State Customs Service.

Public organizations, whose purpose is to ensure cooperation between the executive authorities and business on the principles of partnership, openness and transparency, define the need for (Kveliashvili 2014):

- carrying out urgent Customs reforms, taking into account national features and conditions of business by means of international experience;
- solving issues of control and determination of Customs value, appeal procedures and refund of overpaid Customs duties;
- urgent revival of the post-clearance audit as a tool of international trade facilitation.

To solve the issue of shortcomings of the Ukrainian Customs as well as the negative attitude of society to the activities of revenue authorities it is necessary to study and analyze expert assessments and ratings of performance and make prompt multidirectional response for their improvement.

The object of research of national and foreign experts is also the Customs legislation of Ukraine. Expert assessments of the quality and efficiency of the national Customs regulations reveal flaws and imperfections to be overcome.

Thus, the Business Ombudsman Council, which protects business interests before public authorities both within the country and outside it, declared the system report “Problems of regulation of foreign economic activity in Ukraine” in October 2015 (http://zakon2.rada.gov.ua/laws/show/995_643). The content of this report is devoted to certain important matters of international trade regulation in Ukraine, in particular those having significant practical impact on transaction costs. The report is based on comments and complaints received by the Business Ombudsman Council.

The recommendations of the Business Ombudsman Council fall within the competence of the Cabinet of Ministers of Ukraine and the State Fiscal Service of Ukraine, namely they highlight the necessity:

- to prepare and adopt the Law of Ukraine on the compensation for damages caused by unlawful actions of Customs officers in order to strengthen the role of the administrative pre-trial settlement of disputes and prevent abuse of power;
- to update the list of cases when revenue agencies can raise questions about the correctness of the declared Customs value. If a Customs officer requires additional consultations on the Customs value of goods, the source of information should be uniform and clear. In case a Customs officer is in doubt, he must confirm his doubts by documentary evidence.

For a long time the theme of the definition and control of Customs value has been controversial and not harmonized in the process of fiscal authorities and business interaction.

The continued fiscal dominance in the work of revenue authorities and foreign economic entities’ desire to minimize costs during the Customs clearance of goods cause uncertainty, mutual mistrust, abuse from both sides, corruption and unlawful manipulation.

In fact, the current Customs Code of Ukraine stipulates for Customs valuation issues. These include:

- differentiation of rights and obligations between revenue authorities and a declarant;
- establishing a clear list of documents submitted by the declarant to confirm the declared Customs value;
- definition of the cases and the reasons for the request for additional documents confirming the Customs value declared in the Customs declaration from a declarant;
- definition of the grounds for refusal obtained from the revenues authority to make Customs clearance of goods with the Customs value declared by a declarant;

- approval of the regulations on the application of the methods of determining the Customs value at the transaction value of the goods being imported without the use of additional control measures taken to the Customs value declared by authorized economic operators.

In practice there is a whole set of problems related to incorrect determination of Customs value of goods, for example, manipulation of Customs value as well as difficulties in the application of the legislation concerning its methods of calculation.

Generation of mutual mistrust leads to abuse and conflicts of interest between business, revenue authorities and regulatory authorities. A large amount of decisions made by revenue authorities in respect of determining the Customs value for taxpayers is the reason for their appeal within the administrative procedure. And, unfortunately, for various reasons more than half of the administrative cases are resolved in favor of a taxpayer (Pashko 2012).

As a consequence an inconsistency in the interpretation of terms, procedures, methods of determining the Customs value is the reason for the conflict between subjects of foreign economic activity and government authorities, especially revenue ones.

The question of determining the value of goods crossing the border is located in the area of socially sensitive relationship between executive authorities and business. They have always been an occasion for debate in society, and therefore require a clear unambiguous interpretation in the legislation, so as not to be a subject for abuse (https://boi.org.ua/media/uploads/sysrep_trade_ukr_pdf.pdf).

2. Legal regulation in the sphere of Customs value control

The concept of value is usually used to determine the taxation base and is based on the utility criterion. The assessment of the object is subjective, since the evaluation of the object is made by the subject making the assessment (Moore 2014).

At the same time, the uncertain legal environment is almost inevitable, because even if lawmakers make every effort to use the exact wording, they can not predict all the innumerable contingencies that may arise during the operation of the law. Most of the legal doctrine argues that the vague wording does not imply the use of discretionary powers. However, this uncertainty causes the interpretation of the law and entails administrative authorities' discretion, where acting officials have greater autonomy to make choices that may be attributed to the actual use of discretionary powers (Moore 2014).

For the purpose of the correct application of the provisions of Articles 53 and 54 of the Customs Code (<http://zakon2.rada.gov.ua/laws/show/4495-17>) concerning the revenue authorities rights on monitoring the accuracy of Customs value assessment and its adjustment by the Supreme Court of Ukraine appropriate conclusions has been made (Bulletin of the Supreme Court of Ukraine No 3(187)2016).

The analysis of the provisions contained in the abovementioned articles of the Customs Code makes it possible to believe that the Customs has the full right to control the accuracy of calculation of the Customs value declared by the declarant. But these powers are exercised in compliance with the law, in particular according to the requirement of additional documents to confirm the declared Customs value and may take place only if there is reasonable doubt about the veracity of the information submitted by the declarant. Such doubts may occur due to the incompleteness of the submitted documents to confirm the declared Customs value of goods; incompliance of the goods specified in the documents with the Customs inspection of such goods; comparison the declared Customs value to amount of the Customs value of identical or similar goods, Customs clearance of which has already been accomplished etc.

If revenue authorities have a reasonable suspicion that a declarant has declared incomplete and/or inaccurate information about the Customs value of goods, including an

incorrect determination of the Customs value of goods (Customs Code of Ukraine, Article 54), it is a prerequisite for control. This is also the ground stipulated by the Customs Code for requiring additional documents from the declarant to submit for the Customs office and the right to perform the following actions aimed at identifying the real Customs value of goods.

However, it is necessary to request the documents which make it possible to verify the accuracy or inaccuracy of the declared Customs value, but not all provided by Article 53 of the Customs Code (Borisenko 2012). Failure to submit a complete list of required documents can be the basis for determining the Customs value not in accordance with transaction value only in the case the documents are insufficient or their full volume does not refute the doubts about the reliability of the information provided.

From the above we can reveal the lack of a clear regulatory provision related to consistency and legitimacy of actions of Customs officers in the control of the Customs value, which is aggravated by limiting the time of Customs procedures up to 4 hours established by the Customs Code.

Overcoming the uncertainty in determining the characteristics of the goods is a crucial task, because increasing uncertainty raises the risk of making a wrong decision. Customs value is always associated with the risk of a wrong decision, and risk factors always exist in each of the methods of determining the Customs value and due to the peculiarities of the application of the method chosen. However, the control of Customs value after the end of Customs clearance or post-clearance audit can greatly reduce the impact of incorrect decisions and reduce the time of checking the Customs value of goods during Customs clearance. Despite the fact that since 2002 there have been legal grounds for the introduction of post-clearance audit, so far this form of control has not received the necessary development (Borisenko 2012, p. 218). But in case of shifting certain Customs procedures, control measures to the stage after the completion of Customs clearance, it becomes possible:

- to relieve tension in monitoring the Customs value and the use of other control measures during the Customs clearance of goods;
- to establish a framework for effective implementation of the authorized economic operator system;
- to avoid restrictions to trade, which should lead to an increase in the GDP and revenues to the state budget (Kveliashvili 2016);
- to avoid restrictions on trade, which can lead to the GDP growth and state budget revenues increase (Colesky & Raath 2015).

In addition to the main recommendations of legislative character presented in section 1 of this paper the Business Ombudsman Council has proposed provisions relating to regulatory measures for the consideration by the Cabinet of Ministers of Ukraine and the State Fiscal Service of Ukraine, namely (<http://zakon2.rada.gov.ua/laws/show/4495-17>):

- to update the list of cases where the revenue authorities may raise questions about the correctness of the declared Customs value. If a Customs officer requires additional consultations on the Customs value of goods, the source of information should be uniform and clear. If a Customs officer has doubts, he should confirm them in documentary evidence;
- to reduce the number of inspections during Customs control and clearance of goods in the national system of Customs standards;
- to strengthen the role of risk management and post-clearance audit;
- to ensure regular training of Customs officers in order to improve their skills to determine the Customs value of goods. It is essential that Customs officials should develop a deep understanding of methods and can apply the official recommendations and clarifications of the World Customs Organization;

– to reboot the system of post-clearance audit in Ukraine and provide an adequate level of coordination, planning, implementation and enforcement procedures under Articles 345-354 of the Customs Code (Borisenko 2012), create a relevant database and a tracking system, use modern tools for the development of post-clearance audit.

3. Development of the national Customs post-audit control based on the risk analysis and risk management system

The simplification of the international trade procedures can be regarded as a way to improve the country's competitiveness by reducing red tape during Customs procedures. The World Customs Organization (www.wcoomd.org) defines trade facilitation as a condition for avoiding unnecessary restrictions on trade while the World Trade Organization (<https://www.wto.org>) determines it as a facilitation and harmonization of international trade procedures.

In practice, trade facilitation is achieved through the use of tools and concepts such as: a time release study tool, the concept of risk management, the authorized economic operator concept etc. (<http://www.pwc.com/ua/uk/press-room/2015/customs-post-clearance-audit.html>).

The issues of creating transparent Customs control technologies, adequate to modern trends and standards of the international trade and law, aimed at protecting the legitimate rights and interests both of business and state have been the subject for discussions among theorists and practitioners in the field of foreign trade and Customs affairs, businessmen, Customs brokers and other stakeholders.

Modern Ukrainian scientists, who are the leading specialists in the field of Customs, define the Custom audit control on the base on the system of analysis and risk management system as a priority direction to improve Customs administration in Ukraine (<http://www.pwc.com/ua/uk/press-room/2015/customs-post-clearance-audit.html>).

Scientists have concluded that it is essential to introduce the following procedures:

– introduction of Customs control on the basis of Customs post-audits in the premises of economic operators that will improve the quality of examination, reduce border delays and speed up the clearance of goods;

– obtaining electronic information from the ministries and departments on the authorization documents defining the non-tariff measures;

– implementation of the systems for information legal validation as well as personal identification of persons who provide this information (for example, by using electronic digital signature);

– changes in the accounting systems of companies, which are economic operators inside the country. Such changes should include a mandatory indication in the accounting documents of the number of the customs declaration confirming the fact of importation of goods into the territory of Ukraine as well as the appropriate account of the goods, which will carry out control procedures not only at the time of declaration at the Customs office, but also during the examination of consignment within retail network;

– changes in the accounting system of products for enterprises with a simplified procedure of such accounting;

– introduction of additional control measures in respect of goods being exported, transited and within Customs regimes providing for their long stay in the country;

– creating a system for receiving from law enforcement and government agencies processed information about product characteristics controlled by revenue authorities on the customs border of Ukraine and the specific government agencies within its territory;

– creating control system by the public over the integrity of sellers of goods, for example, through the creation and operational 24-hour support of the State Fiscal Service

site with an expanded access for citizens, which will allow by the number of the customs declaration to get the information about goods being imported;

- determining the number of persons and their right to conduct a Customs audit as well as the possibility given to certain specialists to have a prompt access to a common database of Customs information;

- modernization and strengthening of Customs information protection from the possibility of its replacement and counterfeiting;

- possibility given to revenue agencies to receive from law enforcement and other authorities and process the information connected with the fight against crime in the area of Customs security;

- introduction of a multi-stage analysis system and risk management.

These measures should improve the efficiency of Customs control as well as provide Customs authorities with the possibility to ensure the verification of information on goods transported across the Customs border.

The proposed systematic approach to conducting the post-clearance audit can serve as a basis of the monitoring system being applied by the regulatory agencies that implement the objectives of the State Fiscal Service of Ukraine.

The current Ukrainian system of control after release of goods is fundamentally different from the foreign post-clearance audit. According to the Customs Code of Ukraine it is, first of all, a form of Customs control. Its main goal is to identify violations of the law and recovery of additionally charged Customs payments and penalties for late payment.

However, such form of encouragement as the creation of the image of law-abiding taxpayer, or vice versa determination of the level of risk of a particular trader that naturally refers to the forms of post-clearance audit is not used at all. Despite the fact that in the international practice post-clearance audit is specified as one of the priorities in the strategic documents and Customs programs, the national system uses this form of Customs control as the possibility of additional charges for Customs duties. It should be noted that the statistics of additionally charged amounts of Customs payments and fines directly credited to the budget accounts is not in the open public access.

Within the current legislative conditions the Fiscal Service of Ukraine is unable to implement the post-clearance audit in the way that meets international standards, nor methodologically nor legally or technically.

To do this, it is necessary to move away from the principle of the priority of the collection of Customs duties and provide the benefits of trade facilitation and control of the supply chain. However, this is possible in a system that is free from excessive bureaucracy, corruption and dominance of fiscal functions. The national Customs risk management system and the Customs post-audit must be interconnected as required by the international practice.

The World Customs Organization has proclaimed the security of supply chains as a through idea of a post-clearance audit control, so a huge role in the process is given to the risk management system. On its basis the objects and subjects to be examined are defined and the information obtained is subsequently taken into account in the development of new risk profiles.

The implementation of post-clearance audit as a tool for integrated management of the supply chain of goods is a single set of measures, while the audit of Customs and accounting documentation is the basis for the control and verification activities, the purpose of which is to establish the inconsistency in classification of goods, the facts of understating the Customs value, the illegality of the use of Customs privileges and preferences as well as the violation of the stay of goods in the customs territory of Ukraine, where a subject of foreign economic activity receives financial benefits in the form of non-payment of Customs duties.

Conducting Customs audit after the release of goods for free circulation helps to reduce the number of control measures at the stage of a Customs declaration submission for registration, improvement of the process of incoming Customs revenues to the budget.

The World Customs Organization as the main expert on the implementation and development of Customs legislation in its reports repeatedly stressed the effectiveness of post-clearance audit and gave a positive assessment of the countries that have implemented and practiced it.

According to Standard 6.2 of Chapter 6 of the Kyoto Convention (Barreira 2010) Customs control should be minimized necessary to ensure compliance with Customs legislation. In any case it shall be an effective tool of state regulation of foreign economic activity and quality of Customs control. Acceleration and simplification of Customs procedures while ensuring the effectiveness of state regulation of foreign economic activity produce a necessity to transfer the main load from the stage of the operational Customs control at the border crossing to the stage of control after release of goods. As it has been stressed, introducing these procedures is becoming more important in connection with the fact that the Customs Code of Ukraine established a 4-hour limit for validation, documentary confirmation of information about products declared in the Customs declaration, which makes it impossible to ensure the quality.

According to the determination given in E.3 / F. 4 of the Kyoto Convention (Barreira 2010) the control based on the audit methods is understood as “measures to enable the Customs Service to ensure the correctness of declarations and accuracy of information contained in them by checking the stakeholders’ relevant accounting books, accounts, paperwork and business information”.

In the EU countries the Customs control using methods of post-clearance audit is considered to be the basis for Customs control. Further development of this type of Customs control is identified by one of the ways of improving the system of Customs administration in the EU countries (Moore 2015).

The main task of the post-clearance audit is to create transparency in the implementation of Customs activities that is adequate to the modern world trade trends and meet the standards, which have been adopted in the developed countries and properly protect legitimate economic rights both of subjects of foreign economic activity and a state.

In spite of many experts’ clear understanding of directions of the post-clearance audit development in Ukraine, scientists still highlight the existing problems, the solution of which should be urgent (Ivashova 2015):

– *dominance of fiscal orientation of Customs activity*. Both during the creation of Ukrainian independence and today the function of filling state budget with “fast” money of indirect taxation (in particular VAT, Customs duty and excise tax on imported goods) remained virtually unchanged. As a consequence, the protective function of the Customs taxation is almost completely nullified, and development of measures aiming at its maintenance (including Customs post-audit control) is being made at extremely unsatisfactory pace;

– *regulatory support*. The Customs Code of Ukraine 2012 (Borisenko 2012) though has improved and expanded the number of provisions of control and verification activities of the importers’ accounting and reporting system, however, still includes regulatory uncertainty and many disputable issues in important aspects. There is still an urgent issue of the integration of the regulatory authorities control activities in the further adaptation and creation of a common fiscal legislation, given that currently this type of Customs control is transferred to the Main Territorial Administrations of the Fiscal Service of Ukraine;

– *weak methodology of control and verification activities*, which leads to a practical impossibility to study a number of important aspects of importers’ activities and their foreign trade operations with the purpose of additional Customs duties assessment;

– *immature risk analysis system* of companies to detect possible violations of the Customs and tax legislation does not allow to reach the maximum efficiency of the planned documentary checks of subjects of foreign economic activity, and therefore the maximum fiscal effect. Automation of this process is virtually absent;

– *weak interaction between the Customs audit departments and revenue authorities with regard to the implementation of the post-clearance audit functions*. Taking into account that post-clearance audit requires an integrated approach to the verification of various aspects of foreign trade transactions (Customs value, goods code, country of origin etc.), Customs experts are not actually involved in documentary checks;

– *legal insecurity of a Customs auditor*. Work of an employee of a Customs audit department is particularly important, knowledge-intensive and sometimes dangerous. Some documentary checks cover periods of up to three years of activity of large enterprises with thousands of Customs clearance procedures and foreign trade turnover of hundred million hryvnias. Additional charges based on the verification activities results reach millions of hryvnias and often entail the opening of criminal cases and bringing to a certain kind of responsibility of the enterprises staff;

– *low level of financial support*. As already mentioned, the work of skilled personnel authorized to carry out post-clearance audit is specific and within a private sector comparable to the activities of specialists in accounting and auditing companies. At the same time, the level of material support of a Customs auditor is sometimes tenfold more different from that of the private sector.

As a consequence, the proportion of additional charges assessed by the departments authorized to carry out post-clearance audit in the total amount of Customs duties is very low. The process of Ukraine's integration into the world economy implies the opening of the Ukrainian market for foreign goods and services according to the agreements with the WTO and the EU. Therefore, a priority for Ukraine is holding a reasonable Customs policy, which provides for the gradual transformation of Customs control during Customs clearance of goods in the goods control mechanisms after their release into free circulation. Such transformations must be accompanied by legislative changes, retraining of Customs staff and regulatory bodies, legal and informational awareness of (EU Taxation Policy and Law).

It should be noted that in the countries where the post-clearance audit is implemented at a high level, Customs authorities also face the problem of reducing the number of auditors as well as budget cuts. In those circumstances, priority is given to more efficient use of available resources (Barreira 2010).

The development of technologies of post-clearance audit in modern international practice is not only based on the use of traditional forms of Customs control but also offers to actively introduce internal Customs audit by companies.

An internal control can be seen as a process that permeates all levels of an organization and is designed to provide reasonable assurance in achieving the objectives relating to the effectiveness and efficiency of foreign economic operations, the reliability of its financial reporting and its compliance with applicable laws and legal provisions. Establishing effective internal controls contributes to a legal requirements compliance culture, which will allow a company to get multiple benefits by exercising reasonable management, including increased business confidence, higher coherence and consistency, improved efficiency and reduced costs (Barreira 2010).

Internal Customs audit, which has been successfully used in the practice of foreign trade operators as a form of additional control, creates a stable development of cooperation between the executive authorities and business to achieve the safety and quality of the supply chain.

Summary and concluding remarks

Legal and regulatory gaps and inconsistencies in mainstreaming the national Customs legislation have already gone beyond the legal and scientific discussions. International, governmental, political and social structures strongly highlight the need to improve national Customs mechanisms in the context of Customs reforms.

The current state of the Ukrainian Customs activities demands for positive changes. Relevant transformation in the management of Customs control and Customs clearance, effective application of the forms of customs control stipulated by the Customs Code, international standards introduction contributing to the solution of the Customs value control issue, completeness of Customs duties collection, use of effective tools for the implementation of post-clearance audit, coordination and improvement of risk management system.

We believe that resolution of the issues and reaching the expected results in the work of revenue authorities can be achieved through:

- legislative introduction of monitoring technologies in the activities of regulatory and revenue authorities, operational analysis of their effectiveness;
- selection of positive improvements and rapid response to events, which implementation did not lead to positive and effective performance results;
- usage of the results based on the synergy approach while researching the questions of Customs value control and post-clearance audit as key elements in the collection of the state budget revenues through the activities of revenue authorities and the application of Customs legislation.

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