

**In Respond to CCSBT-CC/1910/10 - 2020: Initial investigation of the data discrepancies market trade SBT Indonesia**

The EC of CCSBT 25 requested the Secretariat investigate alternative sources of trade data statistics because some Members were concerned as to whether the Global Trade Atlas (GTA) could be considered an official information source. In addition, the 13th meeting of the Compliance Committee (CC13) requested Members and Non-Members investigate likely errors in the Global Trade Atlas relevant to them and report back. Indonesia noted the under-representation of its SBT exports in the GTA database compared to CDS figures and was to contact the relevant Indonesian authorities to resolve the under-representation of Indonesia SBT exports in the GTA database compared to CDS figures.

The Secretariat conducted a search for sources of trade data other than the Global Trade Atlas (GTA) and concluded that the UN COMTRADE database may potentially be an alternative and cost-effective option from which to source data for preparing future trade summaries.

The Secretariat has examined its CDS data as well as trade data from the UN COMTRADE database. In the CDS database and also in the EU's annual reports to the Compliance Committee and Extended Commission, only small imports of less than 0.1 tonnes are recorded as occurring between 2016 and 2018.

Indonesia's SBT exports are well under-represented in all 3 years of the COMTRADE export statistics – COMTRADE records only 11t, 16t and 0.3t of total exports (fresh and frozen SBT combined) for 2016, 2017, and 2018 respectively. Those data is significant different from Indonesia's CDS data on those years.

Regarding whether data Un Comtrade can represent Indonesia's SBT data, there are some limitations in UN Comtrade data based on the disclaimer of the UN Comtrade, as follow:

- a. The values of the reported detailed commodity data do not necessarily sum up to the total trade value for a given country dataset. Due to confidentiality, countries may not report some of its detailed trade. This trade will - however - be included at the higher commodity level and in the total trade value.
- b. Countries (or areas) do not necessarily report their trade statistics for each and every year. This means that aggregations of data into groups of countries may involve countries with no reported data for a specific year. UN Comtrade does not contain estimates for missing data. Therefore, trade of a country group could be understated due to unavailability of some country data.
- c. Data are made available in several commodity classifications, but not all countries necessarily report in the most recent commodity classification. Again, UN Comtrade does not contain estimates for data of countries which do not report in the most recent classification.

Keep considering that Indonesia does not have the mandatory to submit its data to Un Comtrade; therefore, UN Comtrade data does not describe the total volume or value of Indonesia's SBT export data.

Indonesia needs more time to investigate the data discrepancy between UN COMTRADE vs. National Data. While Indonesia investigates the discrepancy, Indonesia proposes Secretariat CCSBT to search alternative sources of trade data statistics representing market trade for SBT as accessed publicly.

Appendix 1. Discrepancies data between CDS Indonesia and UN COMTRADE data period 2015-2019

<b>Year</b>	<b>CDS (Indonesia)</b>	<b>UN COMTRADE exporter country report (Indonesia)</b>	<b>UN COMTRADE importer country report</b>
2015	463.3	18.6	403.6
2016	419.6	11.0	190.6
2017	290.5	16.0	70.7
2018	445.7	0.3	70.8
2019	425.2	9.7	35.7