

2018 年度各国・地域の貿易・投資障壁改善に関する提言	Recommendations for Improvements on Trade and Investment Barriers in 2018
<p><u>．自国第一主義に伴う予見性の欠如</u></p>	<p><u>I. Lack of Predictability Associated with Nationalism</u></p>
<p>トランプ政権による米国第一主義や保護主義的政策、来年 3 月の期限が迫る英国の EU からの離脱 (Brexit) により、我が国企業にとって、ビジネスを行う上で不可欠な予見性の欠如が、昨今顕著に見られる。トランプ米政権による多国間枠組みの軽視、二国間交渉重視の姿勢は、我が国が推進してきた自由で公正な貿易体制と相容れないものである。英国の EU からの離脱 (Brexit) に関しては 2019 年 3 月の離脱期限があと 4 か月と迫る中、いまだに離脱後の英国、EU 間の関係が不透明であり、英国を欧州へのゲートウェイとして、欧州本社を置く企業が多い我が国産業界にとって、事業戦略立案が困難となっている。いずれも自国の利益のみを追求するのではなく、多国間の枠組みを尊重し、グローバルビジネスを行う上での予見性を確保することが強く望まれる。</p>	<p>A lack of predictability which is essential for Japanese companies in conducting business is prominent recently due to the America First and protectionist policies of the Trump administration and the UK's withdrawal from the EU (Brexit) approaching in March next year. The U.S. Trump administration's position on disregarding multi-lateral frameworks and focusing on bilateral negotiations is inconsistent with the system of fair and free trade that Japan has promoted. With the March 2019 deadline for the UK's withdrawal from the EU (Brexit) approaching in four months' time, the post-withdrawal relationship between the UK and the EU is still uncertain, and planning business strategy has become difficult for Japanese industry where there are many companies that have European headquarters using the UK as the gateway to Europe. In both cases, respect for multi-lateral frameworks and the securing of predictability for global business rather than the pursuit of national interest alone is strongly desired.</p>

<p>1. WTO ルールに基づく米国通商政策、TPP（環太平洋パートナーシップ協定）への復帰に向けた環境整備</p>	<p>1. Creating the Environment for a Return to U.S. Trade Policy Based on WTO Rules and the Trans-Pacific Partnership (TPP)</p>
<p>① トランプ米政権は、1962 年通商拡大法 232 条（米国の安全保障）を根拠とした鉄鋼・アルミニウム製品への追加関税賦課を行うと共に、自動車・自動車部品への追加関税を視野に入れた調査の実施を行っている。</p> <p>安全保障を根拠とした、追加関税措置は WTO 協定上の疑義があり、各国からの批判を招いている。</p>	<p>(1) The U.S. Trump administration imposed additional tariffs on steel and aluminum products on the basis of Section 232 (US national security) of the 1962 Trade Expansion Act, and has also conducted investigations with a view to additional tariffs on automobiles and automobile components. Additional tariffs on the basis of national security are questionable under the WTO agreements and have drawn criticism from individual countries.</p>
<p>② 同政権は、1974 年通商法 301 条（不公正貿易慣行）を根拠とした中国による米国企業の知的財産権侵害に対する追加関税賦課も実施しており、WTO 協定上の疑義を発生させていると共に、米中間による追加関税の応酬は、製品コストを引き上げ、世界経済下振れリスクを増大させている。</p>	<p>(2) The administration has also imposed additional tariffs relating to the infringement of the intellectual property rights of U.S. companies by China on the basis of Section 301 of the 1974 Trade Act, casting doubt on the WTO agreements. The exchange of additional tariffs between China and the U.S. also increases the cost of products and raises the risk of a downturn in the global economy.</p>
<p>③ 同政権による米韓 FTA 改正、NAFTA 改定交渉における数量制限や為替条項の導入は、WTO 協</p>	<p>(3) The introduction of volume restrictions and foreign exchange clauses by the administration in the negotiations for the revision of the US-South Korea Free</p>

<p>定上の疑義を生じさせると共に、対象国の金融政策を批判する根拠を与えることになることから、WTO 協定や従来からの金融政策を前提としてサプライチェーンを構築してきた我が国企業に戦略の見直しを強い、ひいては競争力減退のリスクを増大させている。</p>	<p>Trade Agreement and the NAFTA casts doubt on the WTO agreements. Since this also provides the basis for criticizing the monetary policies of the target countries, it forces Japanese companies, which have built their supply chains based on the assumption of the WTO agreements and existing monetary policy, to review their strategies, thereby increasing the risk of losing competitiveness.</p>
<p>④ 多国間協定である TPP からの米国の離脱は、同協定の価値、潜在性を損ねる可能性がある。同時に日本との二国間 FTA 締結要求は、これまで TPP 交渉を通じて米国及び他の参加国と交渉、合意した内容を覆すリスクがある。</p>	<p>(4) The withdrawal of the U.S. from the TPP, a multi-lateral agreement, could undermine the value and potential of the agreement. At the same time, there is a risk that the request for the conclusion of a bilateral FTA with Japan will overturn the content that has been negotiated and agreed upon thus far with the U.S. and other participating countries through the TPP negotiations.</p>
<p>⑤ イラン核合意「包括的共同作業計画(JCPOA)」からの離脱は、核軍縮を目指して米欧が構築した仕組みを根底から崩すものであり、イランから、我が国を含む第三国のあらゆる事業、ビジネスを撤退させるリスクを持つ。</p>	<p>(5) The withdrawal from the Iran nuclear agreement Joint Comprehensive Plan of Action fundamentally breaks down the mechanism created by the U.S. and Europe aimed at nuclear disarmament and involves the risk that third countries, including Japan, will withdraw all kinds of projects and business from Iran.</p>

【改善要望】	Requests to Japanese Government for Improvement
① 米政権に対し、WTO を始めとする世界共通のルールに基づく解決を促して頂きたい。	We request the Japanese Government to do the following: (1) Urge the U.S. administration to seek solutions based on common global rules, including the WTO.
② G7、G20、WTO/OECD 閣僚会合、ASEM 首脳会合、APEC 首脳・閣僚会合等のあらゆる機会を活用し、自国優先主義の政策を見直し、日本を始めとする世界各国との協調路線への復帰を促して頂きたい。	(2) Take advantage of all opportunities including the G7, G20, WTO/OECD Ministerial Meetings, ASEM Summit Meeting, and APEC Economic Leaders' Meeting and Ministerial Meeting to urge a review of national prioritization and a return to the path of cooperation with countries around the world, including Japan.
③ EU、中国等、個別問題毎に適切なパートナーと連携し、国際社会との協調路線への復帰を働き掛けて頂きたい。	(3) Collaborate with the appropriate partners for each individual issue, such as the EU and China, and urge a return to the path of cooperation with the international community.
④ 日 EU EPA の早期発効、TPP11 の加盟国拡大、RCEP の早期妥結等、自由で公正な貿易を目的とする多国間の枠組み構築を促進し、自国優先主義を進める米国に、戦略の再考を促す包囲網構築を推進して頂きたい。	(4) Promote the development of multi-lateral frameworks aimed at free and fair trade, including the early effectuation of the Japan-EU EPA, the expansion in TPP11 member nations, and the early conclusion of RCEP and build an encircling network that encourages the U.S., which is promoting national prioritization, to reconsider its strategy.

<p><u>2. 英国の EU からの離脱に係る離脱条件の早期明確化、合意なき離脱や Hard Brexit を避け、英国におけるビジネスへの予見性を確保する</u></p>	<p><u>2. Early Clarification of the Conditions for the UK's Withdrawal from the EU, Avoidance of a No-Deal or a Hard Brexit, and Ensuring Predictability for Business in the UK</u></p>
<p>① 北アイルランド・アイルランド国境問題を始め EU 離脱の基本条件で合意出来ないことから、「離脱協定案」及び英国と EU の将来関係の大枠を示す「政治宣言」のとりまとめが出来ない状態が続いている。これにより、離脱以降の「移行期間」設定が不確定となり「合意なき離脱」の可能性が増大している。</p>	<p>(1) Due to the inability to agree on the basic conditions for withdrawal from the EU, including the issue of the border between Northern Ireland and the Republic of Ireland, it continues to be impossible to draw up the draft Withdrawal Agreement and the Political Declaration that will indicate the broad framework for the future relationship between the UK and the EU. As a result, the establishment of the transition period after the withdrawal is uncertain, and the possibility of a No-Deal Brexit has increased.</p>
<p>② こうしたことから、離脱後の移民を含む雇用問題、税務問題を含め見通しが不明確なため、英国から大陸への拠点の移転、離脱後の一時的操業停止を決める企業が出始めている。</p>	<p>(2) Since the outlook for employment issues, including migrants, and taxation issues after the withdrawal is unclear because of this, some companies have decided to transfer sites from the UK to the continent and to temporarily suspend operations after the withdrawal.</p>
<p>【改善要望】</p>	<p>Requests to Japanese Government for Improvement</p> <p>We request the Japanese Government to do the following:</p>
<p>① EU 離脱後のビジネス環境に関する予見性を確保するため、「離脱協定案」及び「政治宣言」を</p>	<p>(1) Urge both UK and EU governments to agree on the draft Withdrawal Agreement and the Political Declaration as soon as</p>

<p>早期に合意するよう英国及び EU 両政府に働きかけて頂きたい。</p>	<p>possible in order to ensure predictability around the business environment after U.K. withdrawal from the EU.</p>
<p>② 関税、税関手続き、サプライチェーン、人、情報、資産の動き等、我が国企業の事業戦略立案に大きく影響する事項について、EU 離脱が与える影響や負担を最小限とするよう両政府に働きかけて頂きたい。</p>	<p>(2) Urge both sides to minimize the impacts and burdens imposed by the withdrawal from the EU on matters that greatly affect the business strategy planning of Japanese companies, including tariffs, customs procedures, supply chains, and the movement of people, information, and assets.</p>
<p><u>・グローバル化進展の停滞や保護主義的な動向</u></p>	<p><u>II. Stagnation of Progress in Globalization and the Trend of Protectionism</u></p>
<p>我が国企業は、世界各国に製品を輸出し、またサービスを提供し、現地に投資して生産販売活動を行い、その利益を日本に還流する際に様々な貿易・投資障壁・保護主義的措置に直面しており、現地政府等による WTO 不整合な政策措置や不透明な制度運用等への対応は困難を来している。一方で、サプライチェーンが複雑化した昨今において、マルチ及び二国間の EPA/FTA、プブリ協定等による貿易自由化のメリットは広く対象地域にもたらされる。</p>	<p>Japanese companies export products or provide services to countries all around the world and face various barriers to trade and investment and protectionist measures when investing and engaging in production and sales activities locally and when repatriating profits back to Japan. Dealing with policy measures by local governments and others that are inconsistent with the WTO and opaque regulatory operations creates difficulties. Meanwhile, now that supply chains have become more complex, extensive advantages of trade liberalization based on multi- and bilateral EPA/FTA and plurilateral agreements have been brought to the regions such agreements cover.</p>

1. 関税の引き上げ、高輸入関税、セーフガード措置、アンチダンピング措置の長期化	1. Raising Tariffs, High Import Duties, Safeguard Measures, and Long-term Anti-Dumping Measures
<p>① 「各国・地域の貿易・投資上の問題点と要望」調査の結果、「輸出入規制・関税・通関規制」に対する問題点の指摘は区分別総数比で 25.1%と最大であり、件数も昨年比で 23%増と、高い割合で増加している。</p>	<p>(1) In the results of the study on “Issues and Requests for Improvements on Trade and Investment Barriers”, the indication of problems with “Restrictive export/import trade, duty, and customs clearance” was the largest at 25.1% as a percentage of all the categories, and the number of cases was also up 23% year on year, increasing at a high rate.</p>
<p>② 全体の問題数に対する「輸出入規制・関税・通関規制」の問題点の指摘が占める比重は新興国、途上国と比べて先進国の比重が高い。但し、先進国、新興国、途上国を問わず、大部分は従来より指摘がある問題である。</p>	<p>(2) The share accounted for by indication of problems with “Restrictive export/import trade, duty, and customs clearance” out of all problems is comparatively higher in developed countries than emerging and developing countries. However, the majority of these are problems that have been indicated in the past, regardless of whether it is in developed countries, emerging countries, or developing countries.</p>
<p>③ 米国における時計についての定額税と従価税の組み合わせによる高輸入関税、東南アジアを中心に時計類、電化製品への高輸入関税が指摘されている。ブラジルでは、電気製品への課税が複雑であり、高率な輸入税に加</p>	<p>(3) In the United States, it was indicated that there are high import duties for watches due to the combination of fixed amount tax and ad valorem tax, and also mainly in Southeast Asia, high import duties for watches and electrical appliances. In Brazil, the tax system for electrical appliances is complicated and involves</p>

<p>えて、付加価値税、商品流通サービス税、工業品税、サービス税（役務の場合）といった関税への重層的な課税があり、日本企業にとって製品・サービスの競争力確保が困難な状況である。EU では電気電子製品、自動車部品、化学品原料への高関税が指摘されている。</p>	<p>multiple layers of taxation: a high rate of import duty, VAT, Merchandise and Services Circulation Tax (ICMS), Industrialized Products Tax (IPI), and service tax in the case of services (ISS). It is difficult for Japanese companies to secure competitiveness of goods and services. In the EU, it was also indicated that high tariffs are levied on electrical and electronic equipment, automobile components, and chemical raw materials.</p>
<p>④ 自国の産業を保護するため、鉄鋼製品の関税を引き上げたり、アンチダンピング課税措置やセーフガード措置を発動するケースが頻発している（ベトナム、タイ、メキシコ、コロンビア、チリ、ロシア、韓国）。一定期間の終了後アンチダンピング税を廃止するサンセットレビュー条項があるにも関わらず、長期間継続課税されるケースもある（米国）。</p>	<p>(4) There were frequent cases of raising tariffs on steel products and invoking anti-dumping duty measures and safeguard measures in order to protect domestic industries (Vietnam, Thailand, Mexico, Colombia, Chile, Russia, and South Korea). Despite the existence of the sunset clause to abolish anti-dumping duty after the end of a certain period, there is also a case in which such taxation is maintained over a long period (United States).</p>
<p>⑤ 中国においてサンプル品への輸入関税賦課、設備輸入の免税基準が不明確であること、書籍、食料品、中古機械設備の輸入規制の問題がある。</p>	<p>(5) In China, the imposition of import duty on samples, unclear exemption criteria for equipment imports and the import restrictions on books, foodstuffs, and used machinery and equipment are problems.</p>

<p>【改善要望】</p>	<p>Requests to Japanese Government for Improvements</p> <p>We request the Japanese Government to do the following:</p>
<p>① WTO 協定に反する形で輸入制限的な措置が行われる場合は、二国間協議、及び利害を共有する第三国・地域と連携し、また WTO 紛争解決手続の利用も視野に入れるなどして、当該国政府への積極的な措置撤回の働きかけを要望する。</p>	<p>(1) When measures to restrict imports are taken in a form that is contrary to the WTO agreements, actively urge the government in question to withdraw the measures through engaging in bilateral consultations and collaborate with third countries and regions with shared interests, as well as looking to the use of WTO dispute resolution procedures and other means.</p>
<p>② 関係国において関税引き上げや輸入抑制等が行われる場合には、関連業界への早期連絡を行った上での二国間協議、および利害を共有する第三国・地域と連携した WTO ルールとの整合性確認を要望する。</p>	<p>(2) When tariff increases, import restrictions and the like are implemented in the countries concerned, verify the consistency with WTO rules through engaging in bilateral consultations based on early liaison with the industries involved and collaborating with third countries and regions with shared interests.</p>
<p><u>2. 輸出入通関手続きの煩雑さ、不透明さ、不統一、関税分類に関する恣意性、困難な輸入許可証取得</u></p>	<p><u>2. Complexity, Opacity, and Inconsistency in Customs Clearance Procedures, Arbitrariness in Duty Classifications, and Difficulties in Obtaining Import Permits</u></p>
<p>① 我が国企業が日常的に直面している輸出入通関手続における非関税障壁として、通関手続の煩</p>	<p>(1) As the non-tariff barriers in customs clearance procedures that Japanese companies face on a daily basis, many problems with complexity, opacity, and</p>

<p>雑さ・不透明さ・遅延・担当官の恣意性の問題が、途上国・新興国を中心に多くの国で多数指摘されている。例えば、中国では輸入手続は煩雑でかつ遅延が多い。2017年6月に公表された輸出管理法（案）は中国の国家安全、利益の発展を目的として再輸出規制等を規定していることから、多くの懸念が表明されている。また日中間の政治的問題が通関措置に反映されるとの声もある。タイにおいては担当者への奨励金分配制度が問題の温床であるとされている。ベトナムにおいて、抗菌薬や自動車の輸入規制、通関手続き煩雑さ、遅延への指摘が多い。ブラジルでは、輸入手続き関係書類へのポルトガル語での表記義務、インボイス上に製品アイテム毎に材質や重量を記載しなければならないことが輸出者の負担となっている。</p>	<p>delays in customs procedures and the arbitrariness of officials were indicated in many countries, primarily in emerging and developing countries. For example, there are many complexities and delays in import procedures in China. The draft Export Control Law published in June 2017 stipulated re-export regulations aimed at advancing China's national security and interests, so many concerns were expressed. There is also a view that political problems between Japan and China are reflected in customs measures. In Thailand, the reward-sharing system is said to be a hotbed of problems. In Vietnam, there were many indications about import restrictions on antibiotics and cars, and complexity and delays in customs procedures. In Brazil, there is an obligation to write documents related to import procedures in Portuguese, and a burden for exporters is the fact that the material and weight for each product must be stated on invoices.</p>
<p>② 輸入許可証に関して、完成品、原材料・部品の輸入の際、モデル毎の輸入ライセンス登録が必</p>	<p>(2) The complexity that import license registration is required for each model when importing finished goods, raw</p>

<p>要になる煩雑さが指摘されている（ミャンマー）。</p>	<p>materials, and parts was indicated with regards to import permits (Myanmar).</p>
<p>③ ベトナムにおいて、遡及発行された日越 EPA 原産地証明書不受理の問題への指摘や、メキシコにおいて HS バージョンの違いによる日墨 EPA の特惠税率不適用の問題がある。</p>	<p>(3) In Vietnam, problems were indicated with the non-acceptance of Japan-Vietnam EPA origin certificates issued retrospectively. In Mexico, there are problems with the non-application of the Japan-Mexico EPA preferential tariff rate due to differences in the HS version in Mexico.</p>
<p>④ エジプトにおいて、納入製品が 1 ロットに限定されることによる生産数量の調整負担、エジプト輸出入管理公団(GOEIC) による、工場や企業名の事前登録完了までの輸入制限が問題となっている。</p>	<p>(4) In Egypt, there are problems with the burden of adjusting production volumes due to the fact that product deliveries are limited to one lot, and the restriction of imports by Egypt’s General Organization for Exports and Imports Control (GOEIC) until the completion of preregistration of plant and company name.</p>
<p>【改善要望】</p>	<p>Requests to Japanese Government for Improvements</p> <p>We request the Japanese Government to do the following:</p>
<p>① WTO 貿易円滑化協定の発効に伴い、協定内容を実施するための国内法整備が不十分な国は、急ぎこれを整備支援することを要望する。また、協定に関連して、関係国が関税分類、関税評</p>	<p>(1) With the effectuation of the WTO Trade Facilitation Agreement, urgently support countries where the domestic legislation is not developed enough to implement the content of the Agreement to establish such legislation. Moreover, in relation to the Agreement, we request the Japanese</p>

<p>価、特惠・非特惠原産地規則の事前教示制度を設けることを要望する。</p>	<p>Government to urge the countries concerned to establish an advance ruling system that covers tariff classifications, tariff assessments, and preferential and non-preferential origin rules.</p>
<p>② 一層の通関手続の簡素化および電子化を推進し、シングルウィンドウ構築を促進することを要望する。</p>	<p>(2) Promote the further simplification and digitization of customs procedures and the construction of single-window systems.</p>
<p>③ WTO 違反が疑われる特定国固有のルール、手続、ライセンス等の措置については、二国間での是正要請が功を奏さない場合、それにより被害を被っている米欧等第三国とも連携して WTO 提訴を検討するよう要望する。</p>	<p>(3) When bilateral remedial action on measures such as the particular rules, procedures, licenses and so forth of specific countries suspected of WTO violations fail to work, consider to file a WTO complaint in collaboration with third countries such as the United States and Europe that are suffering damage as a result.</p>
<p>④ 日越 EPA 及び日墨 EPA のような EPA の問題については、ビジネス環境整備委員会のような組織や、二国間の協議を通じ運用面での改善を求める。</p>	<p>(4) Pursue improvements on the operational front for EPA issues, such as the Japan-Vietnam EPA and the Japan-Mexico EPA, through organizations like the Committee for the Improvement of the Business Environment and bilateral consultations.</p>
<p>3 . 国際標準から逸脱した現地特有の規格</p>	<p><u>3. Local-Specific Standards that Deviate from International Standards</u></p>
<p>① 国際的な標準から逸脱した特定国特有の規格が貿易投資障壁に</p>	<p>(1) There were indications that local-specific standards that deviate from international</p>

<p>なっているとの指摘を受けているものがある。これらにはエジプトにおいて新標準規格への整合に関する確認に時間を要しビジネス停滞の原因となっているもの、サウジアラビアにおいて、現地特有の規格であるサウジスペックへの対応に伴う出荷前、通関時の検査が煩雑であること、コロンビアの省エネ認証規制に関し、内外差別への懸念や適合性評価手続きの煩雑さが問題となっているもの等がある。</p>	<p>standards are a barrier to trade and investment. In Egypt, confirmation of conformity with new standards takes time and is a cause of business stagnation. In Saudi Arabia, there are complex pre-shipment and customs inspections associated with compliance with Saudi Standard Specifications, the local-specific standard. In Colombia, there are concerns about discrimination between domestic and foreign, and problems with the complexity of compliance assessment procedures relating to that country's energy conservation certification standard.</p>
<p>【改善要望】</p>	<p>Requests to Japanese Government for Improvement</p> <p>We request the Japanese Government to do the following:</p>
<p>① 製品開発にコストの上昇をもたらす独自の規格については、IEC等の国際的基準への整合を求め、企業及び業界からの要請に基づく二国間協議、日本の在外公館を通じた働きかけ、WTOのTBT協定の活用等を通じ改善を働きかけて頂きたい。</p>	<p>(1) With regards to proprietary standards that increase the cost of product development, urge the relevant countries to seek conformity with international standards, such as IEC; work through bilateral consultations and Japan's overseas diplomatic establishments based on requests from corporations and industries; and encourage improvements through utilization of the WTO's TBT Agreement and other processes.</p>

4 . 事業出資に係る外資参入規制	4. Regulations on Entry of Foreign Capital for Business Investment
<p>① 外国企業における事業出資について、外資参入規制を実施している国がある。これらにはミャンマーの、個別案件毎の工事事務所設立規制や、アラブ首長国連邦(UAE)において、同国への事業出資に関し、外資が出資上のマジョリティを取れないこと等がある。</p>	<p>(1) With regards to business investment in overseas companies, some countries have implemented regulations on the entry of foreign capital. These include regulations on the establishment of a site office for each individual project in Myanmar; and in the United Arab Emirates (UAE), foreign capital cannot take a majority stake in business investments in the country.</p>
<p>【改善要望】</p>	<p>Requests to Japanese Government for Improvement</p> <p>We request the Japanese Government to do the following:</p>
<p>① ミャンマーとは二国間協議を通じ、UAE とは日 UAE 投資協定の早期発効により、内外格差を解消し、外資が共通の市場環境において事業が行えるよう環境整備がされることを求める。</p>	<p>(1) Pursue the resolution of disparities and the establishment of an environment under which foreign capital can conduct business in a common market environment through bilateral consultations with Myanmar and through the early entry into force of the Japan-UAE Investment Agreement with the UAE.</p>
<p>② 国固有の問題については、二国間、必要に応じ多国間の枠組みを通じて現地の規制を国際的基準に近づけ、外資が参入しやすい土壌を作るよう、現地政府に</p>	<p>(2) With regard to country-specific issues, urge local governments to work toward creating an environment with local regulations that are close to international standards and which is easy for foreign capital to enter through bilateral and,</p>

働きかけることを要望する。	when necessary, multi-lateral frameworks.
5 . 雇用関連の問題	5. Employment-Related Problems
<p>① 途上国・新興国を中心に労働者保護色の強い、現地労働法の問題が多々指摘されている。頻繁な最低賃金引き上げによる人件費の高騰、厳格な労働基準や安全基準等が雇用者である我が国企業にとっての大きな負担となっている。中国、タイ、ベトナム、ブラジル、メキシコ、ベネズエラ、サウジアラビア等の途上国・新興国のみならず、先進国の韓国でも、労働者を過度に保護する法制度があり、企業は対策に苦慮している。</p>	<p>(1) Many problems were indicated around local labor legislation with a strong tone of worker protection, primarily in emerging and developing countries. Issues such as sharply rising personnel expenses due to frequent increases in minimum wages and strict labor and safety standards are onerous for Japanese companies, which are employers. There are legal systems that excessively protect workers not only in developing and emerging countries such as China, Thailand, Vietnam, Brazil, Mexico, Venezuela, and Saudi Arabia, but also in South Korea, a developed country, and companies are struggling to take countermeasures.</p>
<p>② 駐在員や出向者の就労ビザや在留許可証の取得・更新手続きの遅延や煩雑さが途上国・新興国を中心に指摘されている。</p>	<p>(2) Delays and complexity in the acquisition and renewal procedures for working visas and residency permits for expatriate and seconded employees were indicated, primarily in developing and emerging countries.</p>
<p>③ 現地での雇用に関して、外国人（駐在員）の人数に対して一定の割合の現地人雇用が義務付け</p>	<p>(3) With regards to employment of local people, there are regulations that include the obligation to employ a certain percentage of local people relative to the</p>

<p>られていたり、総給与額に対して、外国人給与額の割合が一定の率を上回ってはいけないという規制があり、企業の負担となっている（タイ、ベネズエラ等）。サウジアラビアではサウダイザーションと呼ばれる一定比率のサウジ人雇用義務がある。</p>	<p>number of foreign employees (expatriate employees) and that salaries for foreign employees must not rise above a certain percentage of the total amount of salaries, which is onerous for companies (Thailand, Venezuela, etc.) In Saudi Arabia, there is an obligation to employ a certain percentage of Saudi people, which is called Saudization.</p>
<p>④ 国固有の問題として、ミャンマーにおけるミャンマー語での雇用契約提出義務、メキシコにおける労働者利益分配金制度、ベトナムにおける外国人（駐在員）の現地社会保険への強制加入義務等が、一般的な国際慣行と異なっていたり、改善が必要なものと考えられ、日本企業進出の足かせとなっている。</p>	<p>(4) Country-specific problems include the obligation to submit an employment contract in Burmese in Myanmar, the employee profit sharing system in Mexico, and the obligation for the compulsory enrollment of foreign employees (expatriate employees) in local social insurance in Vietnam, which are considered to differ from normal international practices and require improvement, forming stumbling blocks to the entry of Japanese companies.</p>
<p>【改善要望】</p>	<p>Requests to Japanese Government for Improvement</p> <p>We request the Japanese Government to do the following:</p>
<p>① 労働者・労働組合に有利な労働法制や慣行、調停・裁判の決定を中立的かつ、国際慣行に沿った制度でフレキシブルに運用す</p>	<p>(1) With regard to labor legislation, practices, decisions on mediation and judgements that are advantageous to workers and labor unions, urge its</p>

<p>るよう要望する。併せて企業内派遣者への現地社会保険強制加入についても、現地政府や業界団体との定期的な意見交換により改善を要望する。</p>	<p>neutral and flexible application in accordance with international practices. At the same time, seek for improvements on the compulsory enrollment of employees dispatched from Japan in local social insurance through regular exchanges of information with local governments and industry groups.</p>
<p>② 新たに EPA を締結する国との間では、人の移動の円滑化に関する条項を盛り込むと共に、社会保障協定の拡充を求める。EPA 締結国との間では、滞在許可、就労許可の申請許可手続きのワンストップサービスや併せて各種ビザ発給の諸手続を補完的に連結する包括的サービスの導入を要望する。これにより、帯同家族を含む企業内派遣者の入国・滞在・就労許可・社会保障・納税手続・運転免許証発行について、利便性・迅速性が確保されるよう要望する。</p>	<p>(2) Seek for the inclusion of provisions on facilitating the movement of people as well as the expansion of social security agreements with countries that conclude new EPAs with Japan. Urge to employ a one-stop service in application procedures for residency and work permits together with the introduction of a comprehensive service to link the various procedures for visa issuance in a complementary manner for countries with which Japan has concluded an EPA. By doing this, encourage that convenience and promptness will be assured for entry, residence, and work permits, social security, tax payment procedures, and the issue of driving licenses for employees dispatched from Japan, including their accompanying family members.</p>
<p>③ 現在 APEC で導入され、TPP でもその強化が確認されている</p>	<p>(3) The APEC Business Travel Card (ABTC) has been introduced by APEC</p>

<p>APEC ビジネス・トラベル・カード (ABTC) は APEC 内を頻繁に移動するビジネスマンにとって有用な便宜であり、これをモデルとして、我が国が EPA を締結している国および締結交渉を行っている国・地域への導入拡大を働き掛けるよう要望する。</p>	<p>and its enhancement has also been confirmed by the TPP. It is a useful convenience for business people who travel frequently within APEC. With this card as a model, encourage the introduction and expansion of such a card in countries with which Japan has concluded an EPA and countries and regions with which Japan is conducting negotiations for conclusion of an EPA.</p>
<p>④ 海外関連会社あるいは提携先に赴任する経営幹部、上級管理者、技術者等専門職員といったキーパーソンは、現地において多数の雇用を作り出すための企業内派遣者であり、また現地労働市場でも競合しないことから、一時滞在ビザ、就労ビザ取得の簡素化、迅速化、入出国審査の際の円滑化の便宜供与を要望する。更に、これらキーパーソンは雇用者総人数・給与総額に占める割合規制の対象外とするよう、二国間あるいは EPA 交渉の際取り決めることを要望する。</p>	<p>(4) Urge streamlined and faster acquisition of temporary residence and work visas and provision of smoother convenience in entry and departure screening for key persons such as executives, senior managers, and specialist employees such as engineers assigned to overseas affiliates or alliance partners as internally transferred employees who create large numbers of local jobs and who do not compete in the local labor market. Also, request that it be arranged to exclude these key persons from the scope of regulations on the percentage of total employees and total amount of salaries accounted for by foreign employees at the time of bilateral or EPA negotiations.</p>
<p>⑤ 国固有の問題については、二国間、必要に応じ多国間の枠組みを通じて現地の規制を国際的基</p>	<p>(5) With regards to country-specific problems, encourage local governments to work toward creating an environment with local regulations that are close to</p>

<p>準に近づけ、外資が参入しやすい土壌を作る現地政府に働きかけることを要望する。</p>	<p>international standards and which is easy for foreign capital to enter through bilateral and, when necessary, multi-lateral frameworks.</p>
<p><u>．国際的ルールからの逸脱及び不調和</u></p>	<p><u>III. Deviations from and Inconsistencies with International Rules</u></p>
<p>税制、知的財産権、工業／安全規格、環境規制等の分野では、企業が共通のルールに基づいてグローバルな事業活動を行えるよう、WTO や OECD を始めとする国際機関あるいは国際協定が、共通で普遍的なルールを取り決めている。他方でかような国際基準に沿ったルールは、(厳格なコンプライアンス、運用が求められるため、国によっては適用が困難であり、) 国の事情に応じた独自のルールが導入されていたり、知的財産権のように、国によって保護レベルにはばらつきが発生する問題があるのが実態である。我が国企業への負担を軽減すべく、当該国による国際的ルールからの逸脱を極力減らし、グローバル共通の土台で事業が行えるよう環境整備を求める。昨今は、個人データの域外への移転を禁止する国や、データを当該国に設置したサー</p>	<p>In areas such as taxation, intellectual property rights, industrial/safety standards, and environmental regulations, international organizations, such as the WTO and OECD, and international agreements have negotiated shared, universal rules so that corporations can engage in global business activities based on common rules. On the other hand, the application of rules in accordance with such international standards is difficult depending on the country (as rigorous compliance and operation is required), and it is a fact that unique rules based on national circumstances are introduced, and as with intellectual property, there are variations in the level of protection depending on the country. In order to lighten the burden on Japanese companies, we will pursue the establishment of an environment in order to reduce deviation from international rules by the countries in question as much as possible and to enable business to be conducted on a common global platform. In recent years, some countries have prohibited offshore transfer of</p>

<p>バーに格納することを要求する国が出てきており、デジタル経済におけるビジネス拡大を狙う我が国企業にとっての脅威となっている。</p>	<p>personal data and others have demanded data storage on servers located in the country in question, which poses a threat to Japanese companies aiming to expand business in the digital economy.</p>
<p><u>1. 税制度の問題と国際的に合意された税制度への我が国を含む対応の問題（税制分野）</u></p>	<p><u>1. Taxation Problems and Problems of Responding to the Internationally Agreed Taxation System, Including Japan (Taxation Area)</u></p>
<p>① OECD 諸国が認めている移転価格税制を採用せず、独自の税制を採用し、企業に負担を強いている国がある。</p>	<p>(1) There are some countries that do not adopt the transfer pricing tax system recognized by OECD countries and adopt their own tax systems, forcing a burden onto companies.</p>
<p>② 複雑な税制を採用し、企業に追加的負担を強いている国が散見される。例えばブラジルの移転価格税制は複雑かつ OECD 移転価格ガイドラインを採用していない。連邦税、州税、市税等、税の種類が多いこと、複層化していることにより、現地に進出した企業が複雑な、経理、税務手続きを強いられている。</p>	<p>(2) There are a few countries that adopt complex tax systems, forcing additional burdens onto companies. For example, Brazil's transfer pricing tax system is complex and has not adopted the OECD transfer pricing tax guidelines. Due to the many types of tax, including federal taxes, state taxes, and city taxes, leading to multiple layers of taxation, companies that enter Brazil are forced into complex accounting and taxation procedures.</p>
<p>③ インドの移転価格文書化要求 (BEPS 最終報告書を受けた法制化)において、本来最終親会社が作成する CbCR (国別報告書)の、マスターファイルでの記載</p>	<p>(3) India's transfer pricing documentation requirements (legislated in light of Base Erosion and Profit Shifting [BEPS] Final Reports) demand details beyond those negotiated by the OECD/G20, including a demand for entry in the master file of</p>

<p>要求等、OECD/G20 による取決め以上の内容を要求している。</p>	<p>the Country by Country Report (CbCR) which should basically be prepared by the ultimate parent company.</p>
<p>④ 日米租税条約の一部を改正する改正議定書が 2013 年 1 月に署名されたが、新日米租税条約改定議定書の米国議会承認が遅れている。</p> <p>また米国では支払利息損金算入の規制強化により、借入金に掛かる支払利息の損金算入が否認される問題がある。</p>	<p>(4) The protocol to amend the Japan-U.S. Tax Treaty was signed in January 2013, but U.S. Congress approval for the new Protocol to Amend the Japan-U.S. Tax Treaty has been delayed.</p> <p>In addition, in the U.S., there is the problem that the inclusion of interest expenses on borrowings in deductions is not recognized due to the strengthening of regulations on inclusion of interest expenses in deductions.</p>
<p>⑤ 途上国、新興国の多くで PE 課税の適用基準が不明確であり、現地に PE 施設を持たない場合や、長期出張者が実施する役務提供に対して課税されるケースがある。</p>	<p>(5) In many developing and emerging countries, application criteria for permanent establishment (PE) assessment are unclear, and there are cases of taxation being imposed when there are no local PE facilities or on service provision performed by employees on long-term business trips.</p>
<p>⑥ 中国を始めとする新興国では増値税（中国）、付加価値税や消費税等の還付手続きが煩雑であり且つ還付が遅延するケースが多いと報告されている。</p>	<p>(6) In emerging countries, including but not limited to China, it is reported that refund procedures for value added tax, consumption tax or the like are complex, and that there are many cases in which refunds are delayed.</p>
<p>⑦ 税率区分、税務調査における税務当局の恣意性が指摘されてい</p>	<p>(7) The arbitrary nature of tax authorities in tax rate classifications and tax audits was</p>

<p>る（中国、インド、タイ、メキシコ等）。</p>	<p>indicated (China, India, Thailand, Mexico, and others).</p>
<p>⑧ ミャンマー等においては、租税条約が未締結であることから、年間に 180 日以上現地に出張する長期出張者が PE と見做され、日本と二重で課税される問題がある。</p>	<p>(8) In countries such as Myanmar, because a tax treaty has not been concluded, an employee on long-term business trips in the country of 180 days or more per year is deemed as a PE, and there is a problem of double taxation with Japan.</p>
<p>【改善要望】</p>	<p>Requests to Japanese Government for Improvement</p> <p>We request the Japanese Government to do the following:</p>
<p>① 各国での課税の基本的原則や手続は、二国間租税条約はもとより、OECD や G20 での決議といった公正で透明性の高い国際的な共通ルールを基に策定されるべきである。特に、OECD/G20 の BEPS プロジェクトの各国での実施にあたっては、我が国民間企業に対し、過度の事務負担や情報開示等による手続コストと課税リスクを増大させないよう十分な配慮を要望する。</p>	<p>(1) The basic principles and procedures for taxation in each country should be formulated based on fair and transparent common international rules such as the resolutions of the OECD and G20 in addition to bilateral tax treaties. In particular, urge that sufficient consideration be given to not increasing procedural costs and taxation risk for Japanese private-sector companies through excessive administrative burdens and information disclosure in the implementation of the OECD/G20 BEPS Project in each country.</p>
<p>② 特定国固有の内外差別的税制措置については、それにより被害を被っている米欧等とも連携し</p>	<p>(2) With regards to certain country-specific taxation measures that discriminate between domestic and foreign, consider</p>

<p>て、内外差別解消の為の対応を検討するよう要望する。</p>	<p>countermeasures to eliminate discrimination between domestic and foreign in collaboration with the U.S., Europe and others suffering damage as a result.</p>
<p>③ 新日米租税条約改定議定書を早急に米国議会で承認するよう、二国間の協議を通じて米国政府に働きかけて頂くと共に、租税条約ネットワークの拡充を要望する。</p>	<p>(3) Exert influence on the U.S. government through bilateral consultations for the early approval of the new Protocol to Amend the U.S.–Japan Tax Treaty in the U.S. Congress in addition to expanding the tax treaty network.</p>
<p><u>2. 知的財産権保護不十分や模倣品取締不足等の知的財産権問題（知的財産制度運用分野）</u></p>	<p><u>2. Problems with Intellectual Property Rights, Including Insufficient Protection of Intellectual Property Rights and Inadequate Controls on Counterfeit Goods (Intellectual Property System and Management Area)</u></p>
<p>① 模倣品・海賊版に関する問題指摘は、中国を筆頭にタイ、ベトナム、インド等のアジア諸国で多い。中でも中国における行政執行の弱さ、刑事告発のための高い基準・軽い刑罰が知的財産権侵害の増長を招き、海外市場へ模倣品の拡散を招いているとの指摘がある。</p>	<p>(1) There were many indications concerning problems with counterfeit and pirated goods in Asia, topped by China and including Thailand, Vietnam, and India. Among these countries, there were indications that weakness in administrative execution and the high criteria for criminal prosecution and mild punishments in China have invited an increase in infringement of intellectual property rights and the spread of counterfeit goods into overseas markets.</p>
<p>② 中国においては他にも特許ライセンス契約に関する煩雑な届</p>	<p>(2) In China, in addition, there are still many types of indication of problems in</p>

<p>出・登録事務、外国企業にとり不利な特許侵害訴訟の手続きの煩雑さと不公正さ、内外差別の可能性のある中国向け技術輸出者に課す品質保証制度等、知的財産権分野においては、依然中国の問題指摘の種類が他国と比べて多い。</p>	<p>comparison with other countries in the intellectual property rights area such as complex notifications and registration administration for patent licensing agreements, the complexity and unfairness of the procedures for patent infringement litigation, which is disadvantageous to foreign companies, and the quality assurance system imposed on exporters of technology to China that has the potential for discrimination between domestic and foreign.</p>
<p>③ 知的財産権の保護強化は国際的に浸透しているが、タイ、ベトナム、ブラジル等の国では、審査遅延や担当者によるレベルのばらつき、特許侵害への水際措置の不十分等から知的財産権保護が不十分であること、早期審査制度の利用条件が限定的で利用しにくいこと、技術ライセンス契約の登録が、実質的な政府による審査権限の行使となっていること等の問題がある。</p>	<p>(3) The strengthening of protection for intellectual property rights has spread internationally. However, in countries such as Thailand, Vietnam, and Brazil, there are problems that include the fact that protection of intellectual property rights is inadequate due to delays in examination, variations in the level of examination depending on officials, and inadequate border measures against patent infringement, the fact that the conditions for the use of early examination systems are limited and difficult to use, and the fact that the registration of technology licensing agreements is the substantial exercise of the right of examination by the government.</p>

<p>④ 先進国については、米国での出願に伴う、先行技術の開示義務、外国出願・審査情報の開示義務及び、発明者宣誓書並びに譲渡書の提出義務の負担が重いとの指摘がある。EU では私的複製補償金制度について支払義務を履行しない業者の存在、越境取引での二重課金、業務用製品への課金等の問題指摘がある。</p>	<p>(4) With regards to developed countries, in the U.S., it is indicated that the obligation to disclose prior technology, the obligation to disclose overseas filings and examination information, and the obligation to submit an inventor's oath and transfer document are very onerous. In the EU, it is indicated that there are problems such as the existence of enterprises that do not perform payment obligations for the private copying compensation system, double charges on cross-border transactions, and charges on commercial-use products.</p>
<p>⑤ ある国で完成した発明を、まず最初にその国に出願しなければ、外国に出願できない第一国出願義務については、中国や英国において問題指摘がされている。我が国企業の多くが、多数国間に渡って研究開発を行っている状況では、制度が実態に即していないとの指摘がある。</p>	<p>(5) First country filing obligations under which an invention completed in a certain country cannot be filed in another country without first being filed in that country were indicated as problems in China and the UK. In circumstances under which many Japanese companies conduct multinational research and development, there are indications that the system does not accord with reality.</p>
<p>⑥ 音楽 CD 等の私的使用を目的とした複製を制限する権利保有者の権利行使に制限を設けて欲しいとの要望がオーストラリア、ベトナム、メキシコ、チリ等の国について出されている。</p>	<p>(6) There were requests for some countries such as Australia, Vietnam, Mexico, Chile, and others to establish restrictions on the exercise of rights of rightsholders to limit copying for private use, including music CDs.</p>

<p>【改善要望】</p>	<p>Requests to Japanese Government for Improvement</p> <p>We request the Japanese Government to do the following:</p>
<p>① EPA/FTA の知財章において、WTO 設立協定の附属書の一つである TRIPs と同水準あるいはそれ以上の規定を盛り込み、関係国との間で TRIPs レベルの知財手続きの共通化及び平準化を図るよう要望する。</p>	<p>(1) As well as promoting the inclusion of provisions in intellectual property sections of EPA/FTA that are the same level or higher than TRIPs, one of the annexes to the Agreement Establishing the WTO, work on TRIPs-level common and standardized intellectual property procedures between the countries involved.</p>
<p>② 各国税関での差止措置について、措置の対象となる知的財産権を共通化するとともに、その強化および輸入差押に関する国際協力体制を構築するよう要望する。</p>	<p>(2) With regard to customs injunction measures in each country, urge the standardization of intellectual property rights subject to measures as well as the strengthening of measures and the establishment of an international cooperation system related to import seizures.</p>
<p>③ 中国等新興国において実施されている一連の知的財産権法の改正に係る実施規則の整備において、我が国特許庁や税関等が運用経験に基づきコメントや指導を行い、法制度整備支援を提供することを要望する。</p>	<p>(3) Urge the Japan Patent Office, Japanese customs, and other Japanese authorities to provide comments and guidance based on their operational experience and provide support for the development of the legal system in the establishment of implementation regulations related to the series of amendments to laws on intellectual property rights being carried out in emerging countries, such as China.</p>

<p>私的複製補償金制度については、同制度を有するそれぞれの国において官民のベースで撤廃又は共通化に向けた改定を行う協議を行うよう要望する。</p>	<p>(4) With regards to the private copying compensation system, urge discussions on a public and private sector basis in each of the countries that use the system to implement revisions aimed at abolishing or standardizing the system.</p>
<p>第一国出願義務に関しては、研究開発が複数国に跨って行われているグローバル企業の活動実態を踏まえて、第一国出願義務の撤廃又は多国間協定、二国間の合意による第一国出願義務の適用緩和等を実現して欲しい。</p>	<p>(5) With regards to first country filing obligations, given the reality of global corporate activities under which research and development spans many countries, strive to achieve the abolition of first country filing obligations or relaxation of the application of first country filing obligations based on multi-lateral or bilateral agreements.</p>
<p><u>3. 個人データの保護や域外への移転に関する問題</u></p>	<p><u>3. Problems Concerning Protection and Offshore Transfer of Personal Data</u></p>
<p>中国サイバーセキュリティ法の制定により、同国で収集した個人情報データを国外に持ち出せない事態が予測される。規制の内容が現時点では不明確であるものの、現地で従業員を雇用し、多くの顧客データを収集している我が国企業の活動を制約する懸念がある。同種の法律が、ベトナムでも制定されたり、インドでも個人情報保護法（案）に同種の規定がある。</p>	<p>(1) With the establishment of China's Cyber Security Law, it is forecasted that the personal data collected in the country cannot be taken offshore. Although the details of the regulations are unclear at present, there are concerns that it will restrict the activities of Japanese companies that employ many employees and have collected a lot of customer data in China. Similar laws have been established in Vietnam, and the (draft) Personal Data Protection Act in India also has similar provisions.</p>

<p>【改善要望】</p>	<p>Requests to Japanese Government for Improvement</p> <p>We request the Japanese Government to do the following:</p>
<p>WTO 等の多国間の枠組みを活用し、電子商取引ルールの策定を急ぐとともに、TPP でも採用した電子商取引ルール 3 原則を今後全ての EPA に組み込み、中国を始めとするデジタル保護主義的政策をとる国に対して、こうした規制を撤廃させることを要望する。</p>	<p>(1) Utilizing multi-lateral frameworks such as the WTO, encourage the rapid formulation of electronic commerce rules and the inclusion of the three principles for electronic commerce rules adopted by the TPP in all future EPAs as well as urge countries that adopt protectionist digital policies, such as China, to abolish such regulations.</p>
<p><u>4 . 環境問題、廃棄物処理等に関する問題</u></p>	<p><u>4. Problems Related to Environmental Issues and Waste Disposal, etc.</u></p>
<p>UAE において、特定有害物質の製品への含有を禁止する RoHS が導入されたが、製品上市前の登録やテストレポートの提出義務等が企業にとって負担となっていることが指摘されている。</p>	<p>(1) In the UAE, RoHS, which prohibits inclusion of specific hazardous substances in products, has been introduced, but it was indicated that the obligations for registration before product launch and the submission of test reports are onerous for companies.</p>
<p>【改善要望】</p>	<p>Requests to Japanese Government for Improvement</p> <p>We request the Japanese Government to do the following:</p>
<p>環境規制に関しては、規制の発信地であり先進国である EU とも連携しグローバルで共通な制</p>	<p>(1) With regards to environmental regulations, urge the establishment of common global systems and structures</p>

<p>度や体制を整備し、企業への負担を最小化するよう二国間協議を通じて要請して欲しい。</p>	<p>through bilateral consultations in collaboration with the EU, a developed region which is the source of regulations, so as to minimize the burden on companies.</p>
<p><u>. 途上国、新興国におけるインフラ整備の遅れ</u></p>	<p><u>IV. Delays in Infrastructure Development in Developing and Emerging Countries</u></p>
<p>途上国、新興国への投資及びビジネス展開にあたっては、プロジェクト・事業を遅滞なく実施する上で、現地のインフラ整備が鍵となる。途上国においては、インフラが未発達な環境において、企業はリスクを抱えながら事業を実施しているため、インフラ整備の向上を支援し、事業における予見性を高めることが我が国企業のリスクを減らし、当該国の経済発展への貢献となる。</p>	<p>When investing and expanding business in developing and emerging countries, local infrastructure development is the key to implementing projects and business without delays. In developing countries, as companies engage in business while facing risk in environments where infrastructure is undeveloped, supporting the improvement of infrastructure development and increasing predictability in business will reduce risk for Japanese companies and contribute to the economic development of the country concerned.</p>
<p>インドやタイといった多雨地域では治水対策が課題である。タイにおいて 2011 年に発生した大洪水以降も、治水対策が遅々として進んでおらず、企業進出の足かせとなっている。</p>	<p>(1) In regions with high rainfall such as India and Thailand, flood management measures are an issue. Even after the major flooding that occurred in Thailand in 2011, flood management measures have progressed very slowly, forming a stumbling block for corporate expansion.</p>
<p>インド、タイ、ミャンマー等において、電力供給不足や、不安</p>	<p>(2) In countries such as India, Thailand, and Myanmar, there are indications that electricity shortages and unstable</p>

<p>定な通信インフラが、工事実施の妨げになっているとの指摘がある。</p>	<p>communications infrastructure hinder the implementation of construction.</p>
<p>不十分な交通、港湾インフラの整備状況が、物流リードタイムに影響し、プロジェクトの遅延を招いている（インド、ミャンマー）。</p>	<p>(3) Inadequate development of transportation and port infrastructure impacts on logistics lead time, leading to project delays (India and Myanmar).</p>
<p>【改善要望】</p>	<p>Requests to Japanese Government for Improvement</p> <p>We request the Japanese Government to do the following:</p>
<p>交通、港湾、電力、通信インフラ整備や治水対策について、円借款や無償資金協力の活用、アジア開発銀行との連携も含めて、質の高いインフラ整備に向けた政府支援をご検討頂きたい。</p>	<p>(1) With regard to the development of transportation, port, electricity, and communications infrastructure and flood management measures, consider government support aimed at the development of high quality infrastructure, utilizing ODA loans and grant aid and also including collaboration with the Asian Development Bank.</p>
<p>以上</p>	<p>End of document</p>