The knowledge developed prior to, but used in the creation of this publication, was obtained through the financial support of the Australian Government to The Asia Foundation under the DFAT–TAF Partnership arrangement.

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## NOVEMBER 2015

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Foreword

The DFAT–TAF Partnership represents a new form of collaboration between the Australian Department of Foreign Affairs and Trade (DFAT) and The Asia Foundation aimed at supporting programs and policy innovations that can improve aid effectiveness in the Asia Pacific Region. This objective is consistent with the development policy of the Australian government which seeks to promote prosperity, reduce poverty, and enhance stability.

The main premise underlying the Partnership is that investment in knowledge exchange and joint learning at the strategic and program levels can improve both impact and value for money in the assistance provided by both organizations. To this end, we have been developing, testing, and promoting cost-effective innovations that can increase the impact of development assistance that responds to the dynamic and evolving needs of the region.

Key areas of innovation include (a) efforts to advance entrepreneurial and politically-informed approaches to reform; (b) improving results through more effective and dynamic integration of research with on-the-ground action; (c) efforts to accelerate country-level reform and development through cross-border and regional solutions; and (d) exploration of quick response assistance to meet local needs as these emerge. In all of these areas, our approach has been to tap the deep knowledge and insights of our partners and staff, and combine investment in the most creative ideas with rigorous assessment of results.

As a contribution to organizational learning within DFAT and The Asia Foundation, the Partnership has launched a Working Paper Series. This series draws out some of the rich lessons being learned through the many country- and regional-level initiatives implemented under the Partnership. In many cases, these initiatives have taken on some of the most difficult and intractable development problems in the region, and often build skills, knowledge, and relationships in one part of the region that can be refined and brought to similar contexts in other countries. Ultimately, this analytical work will enhance the knowledge base on which DFAT and The Asia Foundation can draw in their efforts to improve development policy and programs. The series will also be of interest to the broader international community, helping to better ground debates in empirical evidence, advance theory, and ultimately improve development policy and practice across a variety of subject areas.

The forth paper in this series, Mapping Barriers to Trade in South Asia, examines the structural and procedural barriers to South Asian trade. In doing so, it finds many of these barriers are not as rooted in regional geopolitics as previously assumed. Instead, factors such as the lack of modernization, low investment in customs and port administration, poor quality infrastructure, and failures in governance are key reasons for poor trade facilitation. Thus, the paper encourages future trade-related interventions to address problems such as these, rather than focusing only on refining treaties and conventions.

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Mapping Barriers to Trade in South Asia

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INTRODUCTION

The formation of the South Asian Association for Regional Cooperation (SAARC) in 1985 allowed countries in South Asia to establish a platform for regional co-operation. This move also coincided with an ‘era of liberalization’ in South Asia that started in the late 1980s and continued through the 1990s, largely driven by the World Bank’s structural adjustment loans. Over these years, the countries in South Asia started to shed their protectionist policies, disinvest state-run enterprises, and open up competition in the economy. Trade liberalization in the sub-continent came riding on the wave of these reform measures, and countries entered into various trade agreements with each other, as well as with countries outside the region.

The South Asian Preferential Trading Agreement (SAPTA) was signed in 1997, and the South Asian Free Trade Agreement (SAFTA) became operational in 2006. Through these regional agreements, South Asian countries have signed several bilateral and global agreements designed to open up opportunities for international trade. In this sense, the intention of countries in South Asia to promote free trade is no longer in doubt; however, it is at the level of implementation that the region fails to perform, and over the last three decades, the intra-regional share of trade has stalled at about 5%. This paper maps out both the structural and procedural barriers to South Asian trade.²

FRAMING THE ISSUE

GEOPOLITICS

Trade in South Asia cannot be discussed without first noting the tenuous geopolitical relations that undergird the South Asian economic landscape. Despite the ethnic and cultural affinity among people, their shared history, and similar aspirations for prosperity, regional integration as a growth strategy has never quite taken hold in South Asia. South Asia is often referred to as “the least integrated regional bloc in the world,” and intra-regional trade figures provide perhaps the strongest evidence to that effect: the intra-regional trade share in South Asia is only 4%—far lower than that of the European Union at 65% and East Asia at 24%.³

The stagnating intra-regional growth in South Asia remains, in many ways, counter-intuitive. South Asia is one of the most populace regions in the world, and the region’s steadily growing middle-class population who have the power to consume, is the main driving force of the economy. A World Bank estimate predicted 13-fold growth in the South Asian middle class between 2000 and 2030. Even in the suppressed growth years that followed the 2008 meltdown in the global economy, South Asian growth continued to average over 6%. While this level of growth continues in the South Asian agricultural, manufacturing, and service sectors, in individual countries, the pace of growth varies across sectors. Contrary to expectation, with concurrent growth in consumption and production, and despite the lower transportation costs associated with regional trade, South Asia still fails to intensify its intra-regional trade.

Consider the following example: in November 2004, Indian Prime Minister Manmohan Singh and his Pakistani counterpart, Shaukat Aziz, who joined politics from a banking background, signed an agreement to allow banks in each country to open branches in the other. This step was taken to resolve a long-standing problem in India–Pakistan trade—that of having to use an intermediary bank in a third country to issue letters of credit and any other banking instruments required to conduct trade between the two countries. After this 2004 decision, it took about two years for the governors of the central banks in the two countries to finally spell out the specifics of the agreement. On paper, this allowed banks in India and Pakistan to open branches in two locations in the other’s country on a “simultaneous and reciprocal” basis. It then took six more years to name the two banks. More than 10 years after this decision in 2004, the respective bank branches still have not opened. Given this example, one can readily imagine how challenging it is to change the order of things in South Asia.

¹. Sagar Prasai is the Country Representative for The Asia Foundation in India.
². This paper draws data and analyses from a synthesis report on South Asian Non-Tariff Barriers commissioned by The Asia Foundation to PLR Chambers, New Delhi in May 2015. Unpublished internal document.
³. Kumar and Singh 2009.
Trade relations are also routinely affected by security and other sectoral concerns in South Asia. For instance, the water-sharing and hydro-electric power development issues between Bangladesh and Nepal, and issues concerning illegal Bangladeshi migrants have resulted in political tensions between the respective capitals, and also in the curbing of trade. Between India and Pakistan, in addition, to their constant border conflicts and allegations about terrorist incursions on both sides, trade between these countries is also limited by poor infrastructure, technical regulations, customs, and procedural barriers, as well as challenging visa regulations. Even when governments have wanted to revive trading relationships between India and Pakistan, some non-trade related factor ends up derailing the effort. For instance, some progress was made in trade discussions held in 2006–2007, but then this suffered a reversal after the terror attacks in Mumbai in 2008, and bilateral trade between the two countries then declined from $2.2 billion to $1.6 billion. With regard to Sri Lanka, political tensions and civil unrest related to improving the rights of Tamils have affected trade with India, and these trade issues have lingered even though the civil war has ended.

STATE CAPABILITY

A second problem in South Asian trade is state capability. Despite the market size, this region has yet to enter the middle-income bracket by standard development measures. Reminiscent of the “stages of growth” argument made by W. W. Rostow in the 1960s, the current state of economic and institutional development in South Asia has not quite reached the rung of advanced trading economies. In the Ease of Doing Business Index published by the World Bank in 2014, out of 189 countries, all South Asian countries ranked 99th or worse. The governance characteristics across sectors and agencies in South Asian countries are more likely to be similar than dissimilar. One should not expect South Asia to manage its trade remarkably better than it currently manages its service delivery and revenue administration. The business process inefficiencies observable in other sectors replicate themselves in trade facilitation as well. A survey of trade facilitation measures undertaken by the United Nations Economic and Social Commission for Asia and Pacific in five Asian countries, including three from South Asia—India, Bangladesh and Nepal—put elimination of corruption in clearing imported goods and

7. Ibid.
improving coordination between government agencies as the two top priorities. Harmonization, standardization, reduction, and simplification of documentation requirements are all considered top priorities in most economies. However, these types of capability problems are not easy to eradicate, and they will impose a cost on trade as long as they continue.

The twin problems of geopolitical friction and relative weaknesses in state capabilities produce a variety of inefficiencies in trading systems, and give rise to non-tariff barriers (NTBs) that negate the trade competitiveness of South Asian products when traded within the region. The vast majority of cost-escalating NTBs such as the lack of infrastructure and low investment in customs modernization could be overcome in a relatively short time if the incentives for individual South Asian countries are aligned correctly. By putting aside the more entrenched ‘structural’ challenges such as geopolitical tensions and ‘stage of growth’ problems, one can begin to isolate those trade barriers that are procedural in nature.

**LOCATING NTBS IN SOUTH ASIA**

In order to map and locate key non-tariff barriers in South Asian trade, The Asia Foundation (the Foundation) and its partners, the Centre for Policy Research (CPR), the Institute of Social and Economic Change (ISEC), and the Centre for Research in Rural and Industrial Development (CRRID) in India; South Asia Watch on Trade, Economics and Environment (SAWTEE) in Nepal; the Metropolitan Chamber of Commerce and Industry, and Sustainable Development in Bangladesh; and the Policy Institute (SDPI) in Pakistan conducted a series of cross-border studies between January 2014 and July 2015. The Institute of Social and Economic Change examined trade between India and Sri Lanka, and the Centre for Policy Research worked with the Centre for Research in Rural and Industrial Development on prevailing non-tariff barriers in India-Pakistan trade. South Asia Watch on Trade, Economics and Environment studied India and Nepal trade, with special focus on the trade in ginger. The Metropolitan Chamber of Commerce and Industry in Dhaka tracked NTBs for Bangladeshi exports to India.

All these studies adopted similar methodologies. They initially identified a set of products; traced their movements across the designated border; and documented all the cost-escalating delays, procedural (business process) bottle-necks, infrastructural deficits, and time-consuming regulatory inspections encountered along the way. Beyond researcher-documented business process bottlenecks, perception surveys of transporters, handling agents, importers, and other stakeholders were conducted to document the procedural and structural barriers they experienced. Finally, focus group discussions and key informant interviews with customs agents, truckers, security personnel, customs officials, business association executives, and traders were conducted to capture detailed descriptions of the problems and test and refine recommendations for resolving these.

Presented below is a synthesis of the findings from the four studies which illustrate the nature of trade barriers in South Asia, ranging from those that are law and policy related to those that are practice and procedurally related.

**TESTING REQUIREMENTS**

Quality testing and inspection are routine and necessary operations in cross-border trade. South Asian sea ports, with the exception of a few smaller ports, have the necessary infrastructure to carry out these routine operations. However, with regard to land ports, decades of neglect and lack of infrastructure have made quality and SPS (sanitary and phyto-sanitary) testing a key cost-escalating factor in regional trade. The time it takes to conduct these quality tests is also often unpredictable. In South Asian land ports, co-locating all related services within the port has not taken root. Instead, testing labs are often located away from the ports. For instance, the SAWTEE-led study shows that ginger entering India from Nepal at the Kakarbhatta-Panitanki land port has to be tested in labs in Kolkata, 1,500 kilometers away. The ISEC study\(^9\) shows that Indian exports to Sri Lanka are subjected to similar time-consuming treatment. In the case of mango pulp, most importing countries have standard specifications, but in exporting this product to Sri Lanka, Indian exporters are required to obtain a Health Certificate from Sri Lanka’s Ministry of Health as well as passing the routine analysis. Such entirely avoidable barriers routinely affect the costs of trade across South Asia.

**CERTIFICATIONS AND MUTUAL RECOGNITION**

The MCCI study\(^10\) found that certificates showing that products conform to the standards of the exporting countries are not accepted by importing countries across the region. However, while in some instances these certificates from the country of origin are ‘permitted’ on a case-by-case basis; in other instances, goods are subjected to recertification in the importing country.

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The ISEC study on India–Sri Lanka trade documented examples of Indian officials collecting multiple samples of the same product and batch, only because the goods were shipped in packages of varying sizes. The costs of certification were also found to be set arbitrarily. Since certification costs add to consumers’ costs for products, countries in South Asia sometimes resort to excessive certification requirements in order to increase the price of imports and make them less competitive than local products. While commitments have been made in several bilateral and regional trade meetings to resolve this problem through mutual recognition agreements, no further steps appear to have been taken.

**PACKAGING AND LABELLING REQUIREMENTS**

India has the largest consumer market in South Asia and food and agricultural products constitute a significant part of South Asian exports to India. Therefore, how India’s food safety standards are administered profoundly affects trade volumes in the region. The openness and efficiency of the Food Safety and Standards Authority of India (FSSAI) essentially determines the cost competitiveness of food and related products in the Indian market. A key problem currently faced with regional imports is the lack of harmonized labelling requirements. When packaging products for multiple markets, producers may not be able to afford FSSAI-specific labelling. In the case of India, the FSSAI will not allow exporters to paste India-specific stickers over the labels used for exporting to other countries. The rigidity of India’s labelling regulation significantly affects the competitiveness of South Asian products exported to India because re-labelling often entails expenses for repackaging, warehousing, and making the India-specific labels. Thus, meeting India’s labelling requirements is prohibitively expensive for Indian importers unless the volumes imported are large enough to cover the extra costs imposed by the FSSAI.

**PARA-TARIFFS**

Para-tariffs include additional duties and taxes that goods are subjected to above and beyond those identified as customs duties. Examples of additional duties/charges include port access fees and handling charges. Across South Asia, local governments tend to arbitrarily impose road taxes and other charges on long-haul trucks. In other instances, a combination of para tariffs are imposed to create intentional barriers to trade or “non-tariff measures” as they are referred to. In India, for instance, apparel products are subjected to landing charges (1%), countervailing duty (12%), education tax (3%) and, in some cases, an additional countervailing duty. On certain trade routes, such as the India-Bangladesh land route, porters’ and labourers’ trade unions also add additional charges to goods coming in to India by road.

**QUARANTINE AND WAREHOUSE CHARGES**

As discussed earlier in this paper, the lack of sanitary and phyto-sanitary testing facilities within the port lengthens quarantine periods, particularly, for the import of plants, live animals, fruit, and vegetables. For all imports, procedural delays, uncertainties concerning the movement of consignments, and port inefficiencies all can result in warehousing needs. When the requirement for an extended stay in a warehouse is coupled with lack of sufficient warehousing, the costs for warehousing escalate by length of stay, as well as by demand for warehousing far exceeding the supply. Across South Asia, nearly all sea and land ports have a shortage of warehousing. For governments, the policy conundrum is whether to resolve the warehousing problem by increasing warehouse capacity or through cutting procedural delays and uncertainties so that warehousing requirements are minimized. Unfortunately, until this problem is resolved, the everyday reality of this dysfunction will significantly add to the costs of trade.

**TRADE FINANCING**

Trade-related transaction costs on international payments are inflated at different levels across the region. For instance, as already explained, India and Pakistan do not currently (mid-2015) have any bank branches in each other’s country, and thus traders have to use third party/country banks to make payments for the sale of goods. This results in delays in payment and also forces traders to choose more expensive informal routes for payment. The Foundation’s joint study discovered that 60% of the parties participating in the survey in Pakistan, and 72% of the parties participating in the survey in India, rely on hawala payments for bilateral trade. In other instances, importing certain products requires that customs duties be paid prior to importing goods, and importers cannot claim this expense when calculating their taxes. In addition, countries in South Asia require a deposit of a refundable amount for certain sensitive products. These deposits are refunded when the products are used and their containers are returned through a collection system. The Indian exporters interviewed by the Foundation’s partner question the rationality of paying terminal charges.

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13. Ibid.
14. *Hawala* is a method of transferring money within close networks on the basis of promissory notes rather through formal banking channels. The practice is a criminal offense under anti-money laundering laws in all countries but continues to flourish in areas where banking channels are not available.
15. Centre for Research in Rural and Industrial Development 2015.
handling charges at Colombo port as well as Chennai’s. Exporters and importers alike have expressed their displeasure about these avoidable barriers that tend to arbitrarily distort the end prices of exported products.16

INFORMATION ASYMMETRIES

Settled and predictable regulations, taxes, duties, and charges reduce prices as well as supply uncertainties. However, when regulations, supply signals and the cost parameters of trade change unexpectedly, trading becomes difficult. The institutions and agencies involved in trade facilitation in South Asia have so far failed to provide stable trading regimes. Some of the risk and cost-escalation associated with the unpredictable operating environment can be managed if information flows quickly enough to make risk management decisions. When timely information itself is difficult to obtain, the problem becomes more difficult. The recent Trade Facilitation Agreement in the WTO advises that all trade-related measures should be published by the government prior to actual application of the measures, and that the information should be made available through the Internet for ease of access. On the ground, studies conducted by the Foundation’s partners have concluded that exporters and importers find it exceptionally difficult to obtain information on administrative decisions and rulings. Exporters and importers also expressed concerns about delays in the publication of the gazettes that are supposed to detail the latest trade-related regulations and costs.17

CORRUPTION

The key informant interviews conducted by the Foundation’s partners reveal that corruption remains a problem in South Asian ports. While informal payments are difficult to quantify and document, they do impact the cost of trade to some degree. When procedural delays begin to increase the cost of trade, handling agents have an incentive to resort to informal payments to ensure that goods are released on time. In addition, some of the discretionary authority granted to customs officials to facilitate trade, sometimes generates the reverse effect and allows rent-seeking behaviour to flourish. For example, the tariff applicable on imported goods is normally calculated either according to the quantity or according to the value of the goods. When a new product is imported with no pre-existing pricing and invoice records, customs officials are given the authority to value the goods by decree if there are reasonable grounds to doubt the invoicing. The Foundation’s joint studies uncovered examples of customs officials using a decreed valuation for products on a routine, rather than on an exceptional, basis.18 The arbitrariness of this practice usually results in an increase in the cost for trade and makes import of new products more expensive.

RESTRICTIVE POLICIES

Article XI of the GATT Agreement bars signatories from imposing any prohibitions or restrictions that are applied through quotas, import and export licences, or other measures. To circumvent this restriction, citing security concerns, South Asian governments routinely designate inconvenient entry points to certain products with the intention of increasing transport or other transaction costs to the importer so that the product become less competitive. Similarly, for certain products, quotas and conditions, including requirements for additional certification, are imposed in direct violation of agreements. Trade between India and Pakistan, in particular, suffers from such restrictions. Trade through the Wagah land port, for example, is based on a positive list that restricts trade to only 138 items. However, the Mumbai-Karachi sea route allows approximately 7,500 items through.19

Moreover, India and Pakistan do not have a transit agreement. Irrespective of WTO and other trade agreements that India and Pakistan are party to, neither country will allow the other to ship goods through its territory and on to other nations. The Foundation’s joint studies also identified numerous products that require a licence to be traded. For instance, commodities such as meat cannot be imported into India without a special import licence issued by the Ministry of Agriculture’s Department of Animal Husbandry & Dairying.20 In some South Asian countries, Indian pharmaceutical companies cannot market their products unless the product is registered with the authorities in the name of a local/domestic entity.21 In the India–Sri Lanka bilateral agreement, for instance, preferential access is given to a fixed quantity of certain products. However, if the quantity of these products is greater than what has been specified, these products will not be accorded preferential treatment. Examples of this include both tea and pepper.22

17. Ibid.
21. Ibid.
22. Ibid.
POOR HARMONIZATION AND MODERNIZATION OF PROCEDURES

Variations in customs procedures from one port to another, and poor harmonization of procedures across countries cause delays in the movement of consignments, introduce uncertainties, and add to the procedural costs of trade. The impact of poor harmonization is visible on all South Asian trade routes, and is particularly pronounced with India-Pakistan trade. In addition, a thorough business process analysis that stipulates the expected time-burden of procedures has not been attempted in South Asia. For traders and freight handlers, it has always been difficult to predict how much time procedures will take even under normal circumstances. In order to curb delays caused by manual transactions, some automation and digitization of procedures has begun in all countries, but these efforts fall far short of what is needed. For example, customs procedures are now supposed to be carried out over the Internet, but the Foundation’s joint studies show that the computer systems for submitting and processing documents are not integrated well or maintained properly. Participants in the Foundation’s study indicate that these Internet-based systems ‘crash’ quite often and fragment document sets, leaving traders with no recourse but to revert to manual transactions. The customs agencies themselves do not have much faith in automation. Even after Internet systems for submitting documents have been set up, traders are still required to take physical copies to concerned officials for their signature. These modern solutions, which were implemented to improve trading, have, in fact, resulted in more delays and additional tasks, rather than simplifying procedures.

CONCLUSIONS AND RECOMMENDATIONS

The findings presented above point to at least three distinct perspectives on South Asian trade. First, the prevalent barriers to regional trade in South Asia may not be as deeply rooted in the contentious geopolitics of the region as one would assume, even though some of the problems are of a geopolitical nature. The findings of the Foundation’s joint research studies point instead to factors such as the lack of modernization and lack of investment in customs and port administration, poor quality infrastructure, and failures in governance as the key reasons for poor trade facilitation. Second, since the current level of intra-regional trade is so low, and impact of improved facilitation has never quite been tested, a compelling case for protectionist measures cannot be made in any South Asian country. In this sense, there appears to be no inherent policy logic in creating barriers to intra-regional trade. Third, trade-related institutions and agencies in all South Asian countries will need to find a way out of the “stage of growth” rut and begin to perform at a higher level of efficiency if growth truly matters to these economies.

To this end, the following recommendations can be made: a) the time and cost burden of each procedure needs to be methodically reduced by all agencies; b) at least one integrated customs post should be initiated in each South Asian country to map out the harmonization challenges in detail; c) to eliminate redundancies and improve logical flows, regulatory agencies should review each procedure and the steps traders must take to fulfil each requirement; d) investments in infrastructure upgrades and personnel training should be ramped up significantly; and e) redressal and oversight mechanisms should be strengthened to reduce corruption and increase performance. A realistic intervention designed to increase intra-regional trade has to operate at this level of detail rather than through further refining treaties and conventions.
References

Understanding_Non-Tariff_Barrers_between_India_and_Pakistan


The Asia Foundation is a nonprofit international development organization committed to improving lives across a dynamic and developing Asia. Informed by six decades of experience and deep local expertise, our programs address critical issues affecting Asia in the 21st century—governance and law, economic development, women’s empowerment, environment, and regional cooperation. In addition, our Books for Asia and professional exchange programs are among the ways we encourage Asia’s continued development as a peaceful, just, and thriving region of the world.

Headquartered in San Francisco, The Asia Foundation works through a network of offices in 18 Asian countries and in Washington, DC. Working with public and private partners, the Foundation receives funding from a diverse group of bilateral and multilateral development agencies, foundations, corporations, and individuals. In 2013, we provided nearly $114 million in direct program support and distributed textbooks and other educational materials valued at over $10 million.

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