

## The European Union's ENPI Programme for Ukraine

Support for the implementation of the EU-Ukraine Association Agreement / A4U Project

Project Identification No.  
EuropeAid/137074/DH/SER/UA  
Contract N°: 2015/370-128

### **A4U An. Studies N5 Remaining Tariffs under DCFTA that limit Ukrainian Exports to the European Union**

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This project is funded by  
the European Union



A project implemented by Consortium led by  
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## 1 Context

Based on the A4U Analytical Study on Underperforming Sectors under the DCFTA, a number of Ukraine's exports that were underperforming were subject to persistent tariffs, minimum prices and/or tariff rate quotas. The study found that of the 34 large<sup>1</sup> underperforming sectors, *a tariff barrier (tariff or TRQ) remains* on 9 sector(s) at a four digit HS level (two of which are polymer of Ethylene and Vinyl), including those products where the GSP rate is lower (due to DCFTA rates being set in 2012 and EU autonomously reducing GSP rates since) and although Ukrainian companies can use GSP until end 2018:

1. Wine (HS 2204) TRQ fully utilised on HS 2204 21;
2. Cigars, cheroots, cigarillos and cigarettes (HS 2402); TRQ of 2,500 MT, trade only in that heading but no use of available TRQ;
3. Footwear with outer soles and uppers of rubber or plastics (HS 6402) with normal tariff of 16.8%, GSP 11.9% and DCFTA rate of 11.2%;
4. Unwrought aluminium (HS 7601) with normal and GSP of 6% and DCFTA rate of 4%.
5. Casks, drums, cans, boxes and similar containers, of aluminium, of a capacity of <= 300 l, not fitted with mechanical or thermal equipment (HS 7612); DCFTA rate 0% except on 2% of exports where DCFTA rate is 4% (normal tariff of 6.0%, GSP of 2.5%);
6. Polymers of Ethylene and Vinyl in primary form (HS 3901 and HS 3904); DCFTA rate is 3.2% (normal tariff of 6.5% and GSP of 3.0%);
7. Titanium and articles thereof (HS 8108) with DCFTA rate of 3.3% (normal tariff 5% and GSP 0%);
8. Motor vehicles for the transport of good (HS 8704) with DCFTA rate of 16.5% (normal tariff 22% and GSP 15.4%).

Discussions with EU within AA Trade Committee could be used to accelerate the reduction of those underperforming sectors where a tariff barrier remain but a clear concise justification needs to be articulated. Moreover, EU tariff are determined at TARIC 10 digit customs level and so further analysis of these 9 sectors at a more detailed level is required. This paper builds on the previous analytical studies and provides more detailed analysis of these sectors to enable MEDT to present clear arguments to the EU for autonomous reduction of these tariffs on imports from Ukraine that are underperforming under DCFTA and do not pose a serious threat to EU trade.

<sup>1</sup> With global exports from Ukraine greater than US\$ 10 million

## 2 Identification of underperforming Sectors

In order to identify products that underperform under the DCFTA, Ukrainian products whose share of EU imports are less than Ukraine's share of global imports of the same product are analysed. The share of Ukrainian exports of any product in global markets sets the benchmark proxy for relative competitiveness of Ukrainian exports. It would then be expected that under the DCFTA, with additional preferential access, Ukraine's exports to the EU should be proportionately greater than Ukraine's global market share, *ceteris paribus*. If this is not the case, then there must be some tariff or non-tariff barriers (persistent tariffs, TRQs, minimum pricing, SPS or TBT, RoO or marketing constraints). So to identify underperforming products under the DCFTA, all products at HS4 whose market share in EU is less than market share in the world are calculated as follows:

$$I_i = \frac{m_{iUKREU}}{M_{iEU}} \bigg/ \frac{x_{iUKRWrd}}{M_{iWrd}}$$

$m_{iUKREU}$	Ukrainian exports to the EU of product i (EU imports from Ukraine)
$M_{iEU}$	Total EU imports of product i
$x_{iUKRWrd}$	Ukrainian global exports of product i
$M_{iWrd}$	World Imports of product i

If  $I_i < 1$  then Ukraine's exports to the EU are less than expected, that is they are underperforming in the EU market relative to performance in the rest of the world.

To prioritise products for further investigation, criteria based on significant levels of Ukrainian exports globally, significant and growing EU market and relative large potential increase (gap between EU and global markets) were applied as follows:

- products whose global exports are greater than US\$ 10 mn;
- products where EU imports are significant relative to Ukraine's potential (EU demand more than US\$ 50 mn; or 5 times Ukraine's global exports of that product);
- products where EU imports have been consistently growing over the last 3 years.

Ukraine exports 920 products to the EU at a HS4 digit customs code level. Around one quarter of product lines, or 242 products have market shares in the EU lower than global market shares, that is are underperforming in the EU market under the DCFTA. Of these, 69 have large global exports, over US\$ 10 million. A traditional opportunity scan of Ukrainian exports to the EU to narrow the focus of discussions on existing barriers to trade for Ukrainian business under the DCFTA, the focus of analysis and discussion with business will be reduced from 920 current exports to EU to 47 products, which can be further grouped in 34 sectors (based large global exports from Ukraine, significant EU

demand and average growth positive growth of the past 3 years). From these 34 sectors, a tariff or TRQ remains on 9 underperforming sectors at a 4 digit HS level.

### 3 Detailed Tariff Analysis

Analysis at a 4-digit customs classification level provides a useful tool to identify underperforming exports in Ukraine. However, tariffs are applied at a 8 or 10 digit level and therefore, to make any meaningful proposition to the EU to remove tariffs on underperforming sectors, a more detailed analysis is required.

#### 3.1 Wine (HS 2204)

Detailed examination of this sector shows that 2 products account for 83.9% of Ukraine's exports to the EU of HS 2204. However, these products are not subject to any tariff or tariff quota restriction. These are

- 22041093 SPARKLING WINE OF FRESH GRAPES WITH A PROTECTED DESIGNATION OF ORIGIN "PDO" (EXCL. ASTI SPUMANTE, CHAMPAGNE, CAVA AND PROSECCO) [57.7% of Ukraine's exports to EU of 2204]
- 22041098 SPARKLING WINE OF FRESH GRAPES (EXCL. VARIETAL WINES) [26.2%]

A TRQ is applied and fully utilised on all products under the 6 digit sub-sector HS 2204 21:

- 22042193 WHITE WINES NOT PRODUCED IN EU, IN CONTAINERS HOLDING <= 2 L, WITH PDO OR PGI (OTHER THAN SPARKLING WINE AND SEMI-SPARKLING WINE) 1.0%
- 22042194 WINES NOT PRODUCED IN EU, IN CONTAINERS HOLDING <= 2 L, WITH PDO OR PGI (OTHER THAN SPARKLING WINE, SEMI-SPARKLING WINE AND WHITE WINE) 0.8%
- 22042195 VARIETAL WHITE WINES WITHOUT PDO AND PGI, NOT PRODUCED IN EU, IN CONTAINERS HOLDING <= 2 L (OTHER THAN SPARKLING WINE AND SEMI-SPARKLING WINE)1.4%
- 22042196 VARIETAL WINES WITHOUT PDO AND PGI, NOT PRODUCED IN EU, IN CONTAINERS HOLDING <= 2 L (OTHER THAN SPARKLING WINE, SEMI-SPARKLING WINE AND WHITE WINE) 2.3%
- 22042197 WHITE WINES NOT PRODUCED IN EU, IN CONTAINERS HOLDING <= 2 L (OTHER THAN SPARKLING WINE, SEMI-SPARKLING WINE AND VARIETAL WINES)2.7%
- 22042198 WINES NOT PRODUCED IN EU, IN CONTAINERS HOLDING <= 2 L (OTHER THAN SPARKLING WINE, SEMI-SPARKLING WINE, WHITE WINE AND VARIETAL WINES)4.4%

Not only are these a small proportion of Ukraine's exports of HS 2204 (12.2%), they also are cumulatively only €0.2 mn. Therefore, although there is likely to be some benefit in increasing the TRQ as Ukraine exports €36 mn of wines of HS 2204 globally, and its share in EU imports is half its share in world imports, it is likely to be a low priority in discussions.

### **3.2 Cigars, cheroots, cigarillos and cigarettes (HS 2402)**

Ukraine exports €0.26 mn of HS 2402 and although a TRQ is available, these are not exported under the TRQ (2,500 MT) as it remains unused. This suggests that the product is either not commercially exported or, more likely, does not comply with the rules of origin. Therefore, there is no opportunity for liberalisation.

### **3.3 Footwear with outer soles and uppers of rubber or plastics (HS 6402)**

Five products account for 91% of Ukraine's exports to the EU of HS6402. However, two products enter tariff free under the DCFTA (64029190 and 64029998) accounting for one third of Ukraine's exports of this sector. The remaining products under this heading currently (2017) attract tariffs of 11.2 and 11.3% under the DCFTA and given, Ukraine's share in global imports of HS 6402 is eight times that of its share in EU markets combined with high tariffs in the EU, there is good potential in this sector if the tariffs is removed.

- 64029190 FOOTWEAR COVERING THE ANKLE, WITH OUTER SOLES AND UPPERS OF RUBBER OR PLASTICS (EXCL. INCORPORATING A PROTECTIVE METAL TOECAP, WATERPROOF FOOTWEAR OF HEADING 6401, SPORTS FOOTWEAR, ORTHOPAEDIC FOOTWEAR AND TOY FOOTWEAR) [21.1% of Ukraine's export to EU of 6402]
- 64029931 FOOTWEAR WITH UPPERS OF PLASTIC AND OUTER SOLES OF RUBBER OR PLASTICS, WITH A VAMP MADE OF STRAPS OR WHICH HAS ONE OR SEVERAL PIECES CUT OUT, WITH A MAXIMUM SOLE AND HEEL HEIGHT OF > 3 CM (EXCL. WITH UPPER STRAPS OR THONGS ASSEMBLED TO THE SOLE BY MEANS OF PLUGS) [11.5%]
- 64029939 FOOTWEAR WITH UPPERS OF PLASTIC AND OUTER SOLES OF RUBBER OR PLASTICS, WITH A VAMP MADE OF STRAPS OR WHICH HAS ONE OR SEVERAL PIECES CUT OUT, WITH A MAXIMUM SOLE AND HEEL HEIGHT OF <= 3 CM (EXCL. WITH UPPER STRAPS OR THONGS ASSEMBLED TO THE SOLE BY MEANS OF PLUGS) [29.2%]
- 64029950 SLIPPERS AND OTHER INDOOR FOOTWEAR, WITH OUTER SOLE AND UPPER OF RUBBER OR PLASTICS (EXCL. COVERING THE ANKLE, FOOTWEAR WITH A VAMP MADE OF STRAPS OR WHICH HAS ONE OR SEVERAL PIECES CUT OUT, AND TOY FOOTWEAR) [16.0%]
- 64029998 FOOTWEAR WITH OUTER SOLES OF RUBBER OR OF PLASTICS AND UPPERS OF PLASTICS, WITH IN-SOLES OF A LENGTH OF >= 24 CM,

FOR WOMEN (EXCL. FOOTWEAR COVERING THE ANKLE, WITH A VAMP MADE OF STRAPS OR WHICH HAS ONE OR MORE PIECES CUT OUT, OR INCORPORATING A PROTECTIVE METAL TOECAP, INDOOR OR SPORTS FOOTWEAR, WATERPROOF FOOTWEAR IN HEADING 6401, ORTHOPAEDIC FOOTWEAR AND FOOTWEAR WHICH CANNOT BE IDENTIFIED AS MEN'S OR WOMEN'S) [12.9%]

### **3.4 Unwrought aluminium (HS 7601)**

For the products exported by Ukraine, the DCFTA rate is already zero (other products attract a tariff) so there is no potential for further liberalisation of the tariff and other barriers remain to export that make the market share of this product less than share in global markets (although it is only slightly less anyway).

### **3.5 Casks, drums, cans, boxes and similar containers, of aluminium, of a capacity of <= 300 l, not fitted with mechanical or thermal equipment (HS 7612);**

Around 92.7% of Ukraine's exports to the EU are of 76129080<sup>2</sup> whose tariff is zero under the DCFTA. Although some products under this heading attract 4% duties under DCFTA, the value of Ukraine's exports are limited and Ukraine's market share in EU is 2/3 of its global market share making any gains from more rapid liberalisation of the tariff under this heading insignificant.

### **3.6 Polymers of Ethylene in primary form (HS 3901)**

Two products represent 88.1% of Ukraine's exports to the EU of HS 3901 and these (and all exports from Ukraine under 3901) face tariffs under the DCFTA of 3.2% (with 3.0% under GSP), although Ukraine's market share is only slightly less than its global market share (9/10<sup>th</sup>) and so this would be a secondary priority for discussions with the EU.

- 39011010 LINEAR POLYETHYLENE WITH A SPECIFIC GRAVITY OF < 0,94, IN PRIMARY FORMS [51.1% of Ukraine's Export to the EU of HS 3901]
- 39011090 POLYETHYLENE WITH A SPECIFIC GRAVITY OF < 0,94, IN PRIMARY FORMS (EXCL. LINEAR POLYETHYLENE) [37.0%]

### **3.7 Polymers of Vinyl in primary form (HS 3904)**

Two products of HS 3904 represent 93.2% of Ukraine's exports to the EU and exports of 3904 face a 3.2% tariff (with 3.0% under GSP). In addition, Ukraine's market share of HS 3904 globally is 7 times larger than its market share in the EU, indicating high potential if the remaining tariffs are removed.

<sup>2</sup> casks, drums, cans, boxes and similar containers <= 300 l, of aluminium, for any material (other than compressed or liquefied gas), n.e.s. (other than collapsible tubular containers, containers for aerosols and containers manufactured from foil of a thickness <= 0,2 mm)

- 39042100 NON-PLASTICISED POLY"VINYL CHLORIDE", IN PRIMARY FORMS, MIXED WITH OTHER SUBSTANCES 51.4%
- 39042200 PLASTICISED POLY"VINYL CHLORIDE", IN PRIMARY FORMS, MIXED WITH OTHER SUBSTANCES 41.8%

### **3.8 Titanium and articles thereof (HS 8108)**

Unwrought titanium and titanium powders account for 91% of Ukraine's exports to the EU and attract a 3.3% tariff under the DCFTA. However, currently GSP rate is 0% and Ukrainian exporters can benefit from this until end 2018. It is therefore important that by this time (with exports to EU of €15 mn), the DCFTA tariff is removed and this becomes a priority for discussions with the EU. Other products of HS 8108 have a tariff of 3.5% and Ukraine's market share in the EU is just over 2/3 of its global market share.

- 81082000 UNWROUGHT TITANIUM; TITANIUM POWDERS 90.6%

### **3.9 Motor vehicles for the transport of good (HS 8704)**

Dumper vehicles account for 11% of Ukraine's exports but face 0% erga omnes and therefore, no benefit. However, a further 3 products representing 75% of Ukraine's exports to the EU face a 16.5% tariff under the DCFTA. Moreover, Ukraine share in global imports is 5 times higher than its share in the EU, making this a priority sector for negotiation.

- 87042291 MOTOR VEHICLES FOR THE TRANSPORT OF GOODS, WITH COMPRESSION-IGNITION INTERNAL COMBUSTION PISTON ENGINE "DIESEL OR SEMI-DIESEL ENGINE" OF A GROSS VEHICLE WEIGHT > 5 T BUT <= 20 T, NEW (EXCL. DUMPERS FOR OFF-HIGHWAY USE OF SUBHEADING 8704.10, SPECIAL PURPOSE MOTOR VEHICLES OF HEADING 8705 AND SPECIAL MOTOR VEHICLES FOR THE TRANSPORT OF HIGHLY RADIOACTIVE MATERIALS) 14.0%
- 87042299 MOTOR VEHICLES FOR THE TRANSPORT OF GOODS, WITH COMPRESSION-IGNITION INTERNAL COMBUSTION PISTON ENGINE "DIESEL OR SEMI-DIESEL ENGINE" OF A GROSS VEHICLE WEIGHT > 5 T BUT <= 20 T, USED (EXCL. DUMPERS FOR OFF-HIGHWAY USE OF SUBHEADING 8704.10, SPECIAL PURPOSE MOTOR VEHICLES OF HEADING 8705 AND SPECIAL MOTOR VEHICLES FOR THE TRANSPORT OF HIGHLY RADIOACTIVE MATERIALS) 10.6%
- 87042391 MOTOR VEHICLES FOR THE TRANSPORT OF GOODS, WITH COMPRESSION-IGNITION INTERNAL COMBUSTION PISTON ENGINE "DIESEL OR SEMI-DIESEL ENGINE" OF A GROSS VEHICLE WEIGHT > 20 T, NEW (EXCL. DUMPERS FOR OFF-HIGHWAY USE OF SUBHEADING 8704.10, SPECIAL PURPOSE MOTOR VEHICLES OF HEADING 8705 AND SPECIAL MOTOR VEHICLES FOR THE TRANSPORT OF HIGHLY RADIOACTIVE MATERIALS) 50.0%



## 4 Strategy and Approach to negotiation

It is recommended that Government of Ukraine, within the framework of the regular Trade Committee meeting, request EU removes tariffs on all underperforming sectors. It should be borne in mind that there could well be other non-tariff constraints to exporting to the EU that limit Ukraine's market share relative to its global share (underperformance) and whilst discussions with EU on tariffs will not solve these, it will set the framework for improved export performance.

The following discussions could be presented to the EU:

### 4.1 Opening Strategy

Despite the DCFTA, the Government of Ukraine has identified a number of sectors that are underperforming. These are sectors where Ukraine's market share in the EU is lower than its global market share. Since the object of the AA/DCFTA is to promote trade between the parties, it would be expected that the market share of each sector would be at least equal to that enjoyed globally and therefore, for those sectors affected, Ukraine requests in the spirit of the agreement, to reduce all remaining tariffs on those sectors (at a HS4 digit level) as follows: [these are in priority order for Ukraine]

1. Titanium and articles thereof (HS 8108) with DCFTA rate of 3.3% (normal tariff 5% and GSP 0%);
2. Polymers of Vinyl in primary form (HS 3904); DCFTA rate is 3.2% (normal tariff of 6.5% and GSP of 3.0%);
3. Footwear with outer soles and uppers of rubber or plastics (HS 6402) with normal tariff of 16.8%, GSP 11.9% and DCFTA rate of 11.2%;
4. Motor vehicles for the transport of good (HS 8704) with DCFTA rate of 16.5% (normal tariff 22% and GSP 15.4%).
5. Polymers of Ethylene in primary form (HS 3901); DCFTA rate is 3.2% (normal tariff of 6.5% and GSP of 3.0%);
6. Casks, drums, cans, boxes and similar containers, of aluminium, of a capacity of  $\leq 300$  l, not fitted with mechanical or thermal equipment (HS 7612); DCFTA rate 0% except on 2% of exports where DCFTA rate is 4% (normal tariff of 6.0%, GSP of 2.5%).

### 4.2 Discussions At 4-digit level

The following are arguments at a 4- digit level for removal of all tariffs under four digit headings in priority order for Ukraine:

- Titanium and articles thereof (HS 8108): As of 2017, tariff rates under the DCFTA are up to 3.3% whereas the GSP rate is 0%, so that Ukrainian exports are worse off under the DCFTA compared with GSP (which Ukrainian exporters will not be able to apply after the end of 2018). Moreover, current EU imports from Ukraine of €17 mn (3 year average) is only 2 per cent of total

- third country imports so any reduction, whilst significant for Ukraine, would not disrupt EU trade.
- Polymers of Vinyl in primary form (HS 3904) attract DCFTA tariff rates of 3.2% in 2017(GSP of 3.0%). Average Ukrainian exports to the EU over the last 3 years have been only €0.25 mn and represent only 0.02% of EU third country imports and given Ukraine's share in global imports is 7 times higher, this may have a positive benefit on Ukraine without impacting at all on EU imports.
  - Footwear with outer soles and uppers of rubber or plastics (HS 6402) attract DCFTA tariffs of up to 11.3% and average EU imports from Ukraine over the last 3 years have been only €0.5 million representing less than 0.01% of EU imports. Given Ukraine's global market share 8 times that of its share in EU, it will have a significant impact on Ukrainian producers but not affect EU third country imports significantly.
  - Motor vehicles for the transport of goods (HS 8704) attract DCFTA tariff rates of 16.5% but EU imports from Ukraine average only €0.5 mn and are only 0.03% of EU imports. Ukraine's share in global imports is 5 times higher than that of the EU so the impact of removal of the tariff will provide important benefits to Ukraine, but since the share in EU imports is so small, it will not impact on EU trade.
  - Polymers of Ethylene in primary form (HS 3901) attracts DCFTA tariff rates of 3.2% averaging €0.5mn and representing only 0.01% of EU imports.
  - Casks, drums, cans, boxes and similar containers, of aluminium, of a capacity of <= 300 l, not fitted with mechanical or thermal equipment (HS 7612) attract DCFTA rates up to 4% with average imports of €0.5 mn and market share of 0.1%.

#### **4.3 Prioritised lists for negotiation at a product level**

If EU does not accept a sector heading level approach, the following products are priority for negotiation:

- 81082000 UNWROUGHT TITANIUM; TITANIUM POWDERS which Ukraine has a 0% access under the GSP but after end 2018 will revert to DCFTA which in 2017 is 3.3%. Ukrainian imports to EU are only €15 mn.<sup>3</sup> In order to maintain these exports, its important for Ukraine to maintain its market access after 2018.
- 39042100 NON-PLASTICISED POLY"VINYL CHLORIDE", IN PRIMARY FORMS, MIXED WITH OTHER SUBSTANCES attracts 3.2% under DCFTA in 2017, but average imports are €0.065 mn representing only 0.29% of EU third country imports

<sup>3</sup> Ukrainian exports are currently 3.9% of total EU imports so not necessarily a good argument for liberalization although it is unlikely this would increase.

- 39042200 PLASTICISED POLY"VINYL CHLORIDE", IN PRIMARY FORMS, MIXED WITH OTHER SUBSTANCES attracts 3.2% under DCFTA in 2017, but average imports are €0.05 mn representing only 0.09% of EU third country imports
- 64029931 FOOTWEAR WITH UPPERS OF PLASTIC AND OUTER SOLES OF RUBBER OR PLASTICS, WITH A VAMP MADE OF STRAPS OR WHICH HAS ONE OR SEVERAL PIECES CUT OUT, WITH A MAXIMUM SOLE AND HEEL HEIGHT OF > 3 CM (EXCL. WITH UPPER STRAPS OR THONGS ASSEMBLED TO THE SOLE BY MEANS OF PLUGS) attracts 11.2% under DCFTA in 2017, but average imports are €0.058 mn representing only 0.03% of EU third country imports
- 64029939 FOOTWEAR WITH UPPERS OF PLASTIC AND OUTER SOLES OF RUBBER OR PLASTICS, WITH A VAMP MADE OF STRAPS OR WHICH HAS ONE OR SEVERAL PIECES CUT OUT, WITH A MAXIMUM SOLE AND HEEL HEIGHT OF <= 3 CM (EXCL. WITH UPPER STRAPS OR THONGS ASSEMBLED TO THE SOLE BY MEANS OF PLUGS) attracts 11.2% under DCFTA in 2017, but average imports are €0.147 mn<sup>4</sup>
- 64029950 SLIPPERS AND OTHER INDOOR FOOTWEAR, WITH OUTER SOLE AND UPPER OF RUBBER OR PLASTICS (EXCL. COVERING THE ANKLE, FOOTWEAR WITH A VAMP MADE OF STRAPS OR WHICH HAS ONE OR SEVERAL PIECES CUT OUT, AND TOY FOOTWEAR) attracts 11.2% under DCFTA in 2017, but average imports are €0.08 mn representing only 0.02% of EU third country imports
- 87042291 MOTOR VEHICLES FOR THE TRANSPORT OF GOODS, WITH COMPRESSION-IGNITION INTERNAL COMBUSTION PISTON ENGINE "DIESEL OR SEMI-DIESEL ENGINE" OF A GROSS VEHICLE WEIGHT > 5 T BUT <= 20 T, NEW (EXCL. DUMPERS FOR OFF-HIGHWAY USE OF SUBHEADING 8704.10, SPECIAL PURPOSE MOTOR VEHICLES OF HEADING 8705 AND SPECIAL MOTOR VEHICLES FOR THE TRANSPORT OF HIGHLY RADIOACTIVE MATERIALS) attracts 16.5% under DCFTA in 2017, but average imports are €0.056 mn representing only 0.09% of EU third country imports
- 87042299 MOTOR VEHICLES FOR THE TRANSPORT OF GOODS, WITH COMPRESSION-IGNITION INTERNAL COMBUSTION PISTON ENGINE "DIESEL OR SEMI-DIESEL ENGINE" OF A GROSS VEHICLE WEIGHT > 5 T BUT <= 20 T, USED (EXCL. DUMPERS FOR OFF-HIGHWAY USE OF SUBHEADING 8704.10, SPECIAL PURPOSE MOTOR VEHICLES OF HEADING 8705 AND SPECIAL MOTOR VEHICLES FOR THE TRANSPORT OF HIGHLY RADIOACTIVE MATERIALS) attracts 16.5% under DCFTA in 2017, but average imports are €0.042 mn representing only 1% of EU third country imports
- 87042391 MOTOR VEHICLES FOR THE TRANSPORT OF GOODS, WITH COMPRESSION-IGNITION INTERNAL COMBUSTION PISTON ENGINE "DIESEL OR SEMI-DIESEL ENGINE" OF A GROSS VEHICLE WEIGHT > 20 T, NEW (EXCL. DUMPERS FOR OFF-HIGHWAY USE OF SUBHEADING 8704.10,

<sup>4</sup> This is 18% of EU third country imports so worth not mentioning here.

SPECIAL PURPOSE MOTOR VEHICLES OF HEADING 8705 AND SPECIAL MOTOR VEHICLES FOR THE TRANSPORT OF HIGHLY RADIOACTIVE MATERIALS) attracts 16.5% under DCFTA in 2017, but average imports are €0.2 mn representing only 0.4% of EU third country imports

- 39011010 LINEAR POLYETHYLENE WITH A SPECIFIC GRAVITY OF < 0,94, IN PRIMARY FORMS attracts 3.2% under DCFTA in 2017, but average imports are €0.3 mn representing only 0.02% of EU third country imports
- 39011090 POLYETHYLENE WITH A SPECIFIC GRAVITY OF < 0,94, IN PRIMARY FORMS (EXCL. LINEAR POLYETHYLENE) attracts 3.2% under DCFTA in 2017, but average imports are €0.2 mn representing only 0.02% of EU third country imports.