

UKRAINE TRADE

SUGAR MARKET OBSERVATORY
15 MARCH 2024



SUGAR IMPORT PROCESS

DOCUMENTS (AS THEY SHOULD BE)



CONTRACT – signed and valid

INVOICE (all data included: quantity, price, supplier, buyer, net/gross weight, delivery terms, packing as a minimum)

TRANSPORT DOCUMENT – matching the invoice, quantity

CERTIFICATE OF ORIGIN (EUR1)

QUALITY DOCUMENTS (basic):

- product specification / declaration of conformity – issued by producer
- analyses of chemical/physical characteristics issued by independent/accredited laboratory (polarization, content of ash, moisture, sensory characteristic – smell, taste, etc)
- Report of microbiology,
- Report of heavy metals
- Report on pesticides
- GMO declaration
- Allergen declaration
- Radioactivity certificate

NOTE: SOME QUALITY DOCUMENTS COULD BE ISSUED FOR BATCH/LOT

NO SPECIAL REQUIREMENTS – “**OPEN BAR**” FOR ALL EU OPERATORS (*even without a trade history*)

VAT PAID AT CLEARANCE (*where not AEO or postponed*)

ONLY 1%-2% PSYHICAL CHECKING – IF RISK PERCEIVED

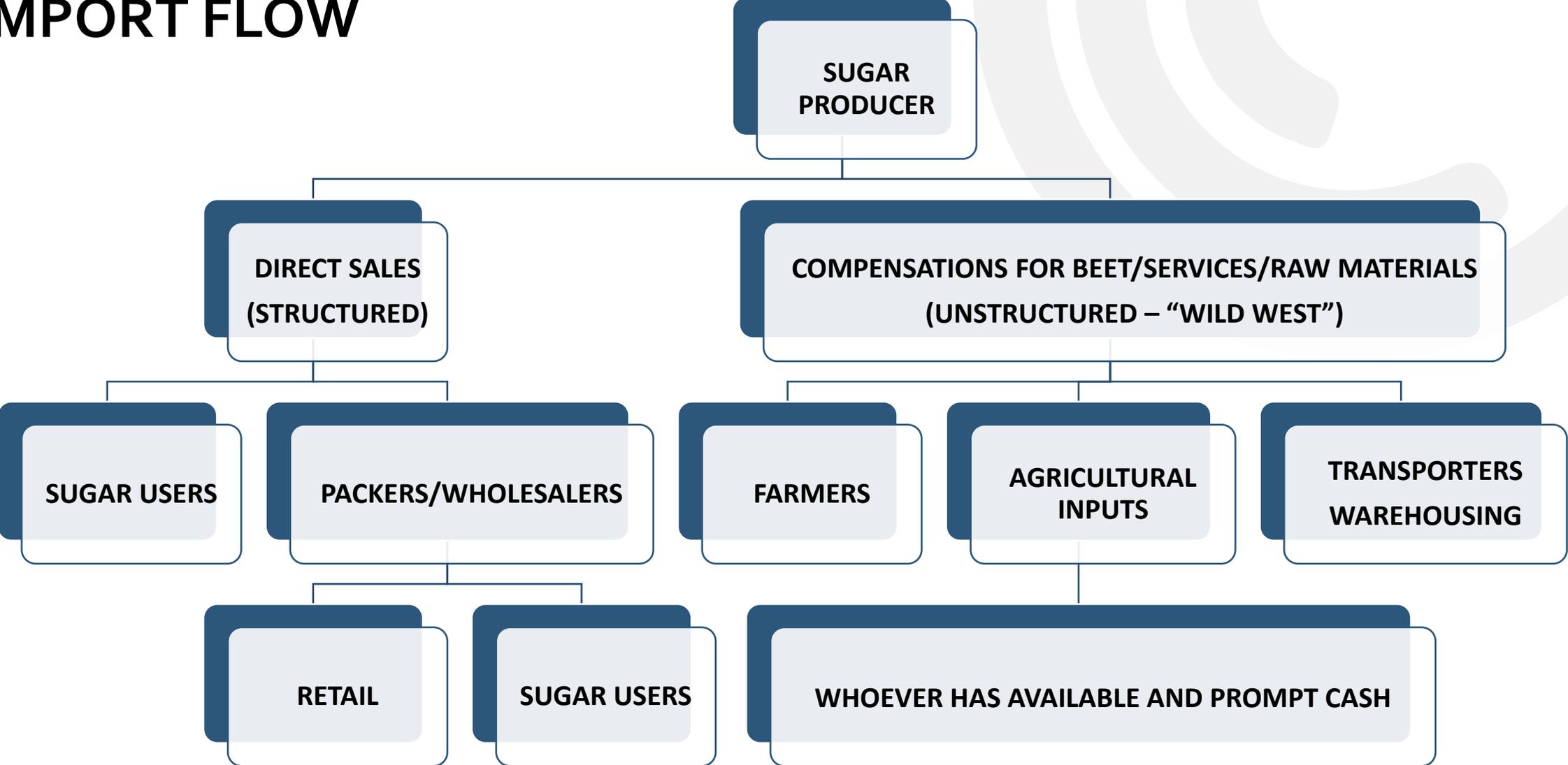
SEALS (WHERE AVAILABLE) CHECKED

ADDITIONAL HEALTH ANALYSES – RANDOMLY



CUSTOM CLEARANCE

IMPORT FLOW



WHERE ARE THE PROBLEMS?

QUALITY AND HEALTH DOCUMENTS

- NOT REALLY CHECKED IF VALID OR ISSUED BY CERTIFIED BODIES
- OBSERVANCE OF EU FOOD STANDARDS (color, granulation, packing)

TRACEABILITY /PUBLIC HEALTH

- NOT EASY TO TRACK DOWN THE REAL PRODUCER / IMPORTER
- MISSING MARKINGS OR LABELS /IMPROPER IDENTIFICATION OF LOT/BATCH, SOURCE

UNFAIR COMPETITION

- TAXATION COMPLIANCE
- DUMPING PRICES FOR CASH SETTLEMENTS

MARKET DISTURBANCE

- MULTIPLE OFFERS FOR SAME QUANTITY / “EBAY”
- CLIENTS MISLEAD / SPOT MARKET PREVAILS



RECOMMENDATIONS

IMPORT LICENSEES

- importing rights set aside for traders with history in sugar trade (12+12 months) as for CXL TRQs

ENFORCING MINIMUM DOCUMENTARY INSTRUCTIONS FOR IMPORTS

STRICTER CHECKING ON PROPER QUALITY /TRACEABILITY DOCUMENTATION





ASSUC

THANK YOU



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Where not mentioned, sources used in this presentation: ED&F Man Research, USDA Reports. Rabobank, Covrig Analytics, UNCA, ICE, Bloomberg