



# 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

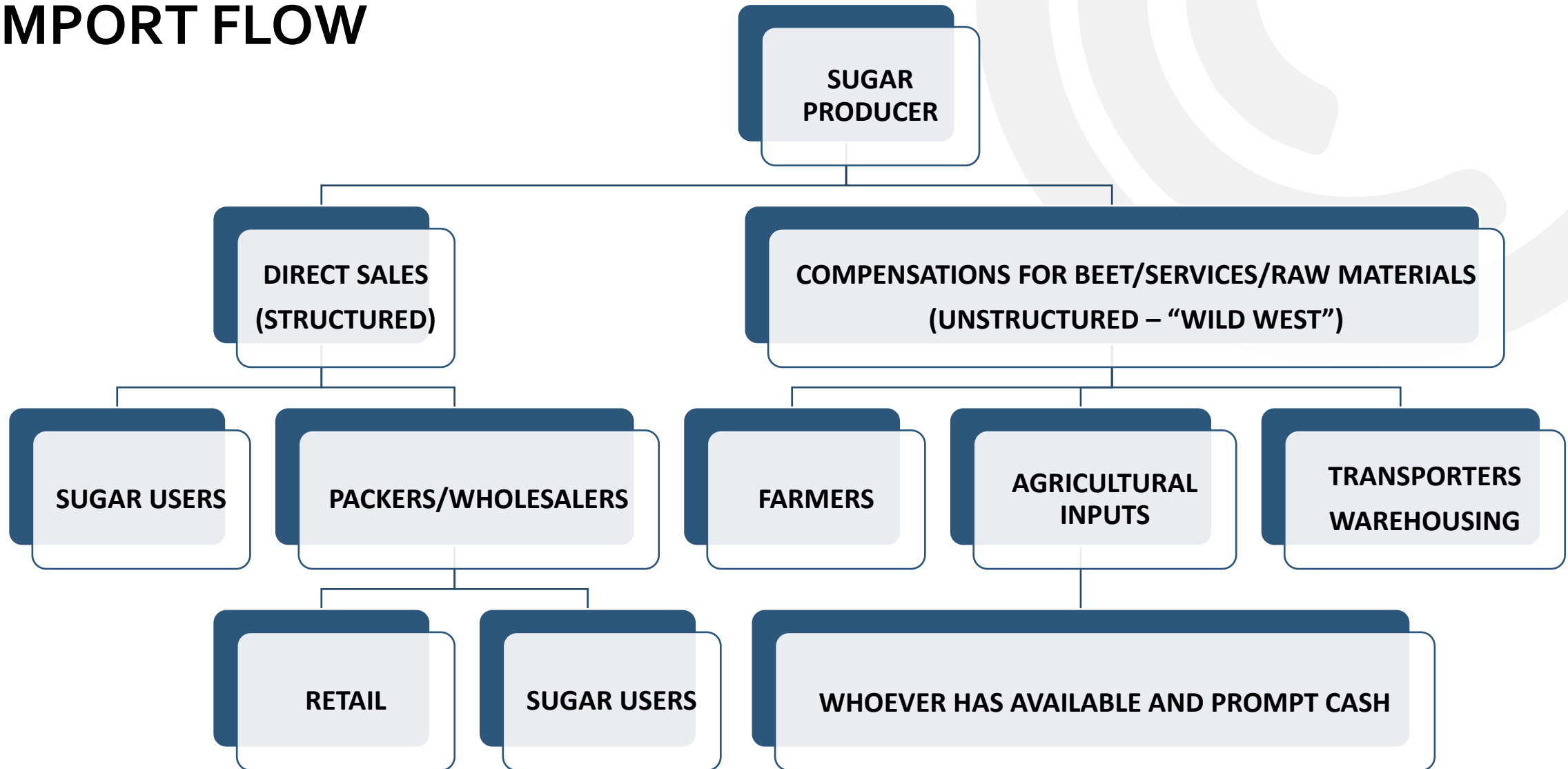
SEALS (WHERE AVAILABLE) CHECKED

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*