



Revision of the tariffs losses of West Africa in case of a regional EPA: 2020-50

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Summary

After the Brexit it is useful to update the value of imports and losses of import duties (ID) of West Africa (WA) from the EU28 and EU28 minus the United Kingdom (EU28-UK) in case of ratification and implementation of the regional EPA (Economic Partnership Agreement) with the EU28-UK, and this on the basis of the EU exports in 2015.

As the WA Member States do not have reliable customs statistics and as the ITC TradeMap database is not reliable either, we took as a basis the EU28-UK exports to WA, that were supplemented by adding the following data:

- Addition of 30% to the FOB value to get the CIF value in WA.
- Addition of 25% to the CIF values to reflect the diversion of WA imports in favour of the EU28-UK and to the detriment of imports from the other WA States and from third countries.
- Addition of imports and ID due to the growth of the WA population.
- Addition of losses in the value added tax (VAT) on imports since it is levied on the CIF value plus import duties.

We have faced great difficulties to impute the codes of many Eurostat tariff lines to the ECOWAS CET (Common External Tariff) tariff lines, as they are often very different at the 10 digits level. It is likely that the ambiguity in the imputation of the Eurostat codes to the CET codes leads to very different interpretations from one ECOWAS Member State to the other, and even from one customs officer to the other.

On 18 August 2016 the Council of ECOWAS finance ministers stressed that six Member States have not yet implemented the CET theoretically in force since January 2015, while nine others have done. An inappropriate affirmation for Nigeria which continues to prohibit the import of many products – of which meat, eggs, oil, sugar, pasta – and adds to the CET ID specific taxes and excise duties on many products. Senegal has banned imports of chicken since 2006 with great success for local production. Ivory Coast imposed a tax of 1,000 CFAF per kg of imported poultry meat and special taxes on fish, rice, alcohol, tobacco and cigarettes, petroleum products and bans imports of sugar and wheat flour. The implementation of the EPA under these conditions augurs big problems, including EU prosecution for violation of the planned liberalization of imports in the EPA.

The losses of ID on liberalized products results from the comparison of their level at the average rate of 8.6% without the EPA recorded in 2015 with their level with the EPA.

The €26 billion of exports to WA from EU28-UK in 2015 would have generated €2.8 billion of ID (at EU FOB value) at the average rate of 10.7%, of which 17.6% on products excluded and 8.6% on products fully liberalized in T20 (2035). These accounted for 76.3% of total

exports and 61% of DD received in 2015. The Brexit reduces 6.7% of EU28 exports and 9.2% of ID.

Taking into account the four additions due to the difference between EU FOB values and WA CIF values, the diversion of imports for the EU, the increase in population and the reduction in the VAT on imports, total imports of liberalized products increase from €35.2 billion in T (2015) to €44.9 billion in T20 (2035) and €55.6 billion in T35 (2050). The annual losses of customs revenues (ID + VAT) due to the EPA would rise from €696 million in T5 (2020) to €4.5 billion in T20 (2035) and €5.5 billion in T35 (2050). Cumulative losses would leap to €8.5 billion in T10 (2025), €46.5 billion € in T20 (2035) and €121.8 billion in T35 (2050).

The percentage of imports of agricultural and fishery products liberalized at T20 (2035) represents 37.5% of total imports and 13.8% of total ID. This runs counter to the document *"The EPA would liberalize the majority of EU agricultural exports to West Africa"* of 26 May for which I made big mistakes of calculation, which I apologize deeply to the readers. The fact remains that, contrary to the allegation of the European Commission, the EPA will not exclude all agricultural products from liberalization in the EPA. This will be especially the case for cereals excluding rice and milk powder whose DD already minimal, at 5%, will be eliminated from T5 (2020).

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After the Brexit it is useful to update the value of imports and losses of import duties (ID) of West Africa (WA) from the EU28 and EU28 minus the United Kingdom (EU28-UK) in case of ratification and implementation of the regional EPA (Economic Partnership Agreement) with the EU28-UK, and this on the basis of EU exports in 2015. We have completely recalculated, tariff line by tariff line, the data presented in a document of April 2016¹ both to better stick to the timetable for the 4 groups of products excluded from liberalization (D) or liberalized (A, B and C) and to the rates of ID provided in the EPA Agreement (0%, 5%, 10%, 20% and 35%)². Since these calculations were time consuming we limited them to WA as a whole and did the calculations by grouping several chapters of the Harmonized System (HS) of trade codifications: see Appendix 1 for the EU28-UK exports to WA in 2015 and Appendix 2 for the EU28 exports, before Brexit. Detailed tariff lines are available upon request. Most comments will target WA imports from the EU28-UK.

As the WA Member States do not have reliable customs statistics and even more for 2015 and as the United Nations ITC Trade Map database is not reliable either³, we took as a basis the EU28-UK exports to WA, that were supplemented by adding the following data:

- Addition of 30% to the FOB value (free on board) of EU28-UK exports to get the CIF value (cost, insurance, freight) of the WA imports. Previously we had taken 20% but this percentage seems inadequate especially for Nigeria and the landlocked countries of the Sahel.
- Addition of 25% to the CIF values to reflect the diversion of WA imports in favour of the EU28-UK and to the detriment of imports from the other WA States and from third countries. We have reduced the previous 32.5% taken from Fontagné et al.⁴ as this percentage seems excessive compared with other estimates.
- Addition of imports and ID due to the growth of the WA population according to the UN database, revised in 2015. We have retained a growth rate of WA imports limited to 2/3 of the population's growth rate.
- Addition of the value added tax (VAT) on imports since it is levied on the CIF value plus import duties. As these will diminish with the EPA the VAT will diminish accordingly.

We met great difficulties to impute the ID of the ECOWAS CET (Common External Tariff) by tariff line, which are also those of the EPA, as its tariff lines are often very different from those of Eurostat which are generally more detailed at the HS 10 digits level, so that it is not always clear whether we should impute the ID rates of excluded products (particularly those at 20% or 10%) or those of liberalized products (of groups B or C at 10% or 20%). We present in Appendix 3 the main HS codes for which we found imputation problems. We know that the HS is established by the WCO (World Customs Organization) at the 6 digits level (SH6) that all member States of the WCO should respect, each State being free to choose its own more detailed codes, and its corresponding ID rates, at the 8 and 10 digits levels. When in doubt we applied most often the higher rate of group D, which may have had the effect of increasing imports of excluded products whereas in our study of April 2016 we had rather

¹ *The folly to implement the EU-West Africa Economic Partnership Agreement (EPA), based on 2015 trade data*, SOL, 19 April 2016, <http://www.sol-asso.fr/analyses-politiques-agricoles-jacques-b/>

² http://trade.ec.europa.eu/doclib/docs/2015/october/tradoc_153869.pdf

http://trade.ec.europa.eu/doclib/docs/2015/october/tradoc_153870.pdf

Group A covers essential social goods, basic necessities, basic commodities, capital goods and specific inputs; group B includes mainly inputs and intermediate goods and group C covers mainly final consumption goods.

³ According to ITC TradeMap the EU28 total imports from ECOWAS were of €40 billion in 2014 whereas ECOWAS exports to the EU28 were of €34.5 billion. For all cereal the figures are almost identical: €470.8 million of EU28 exports to ECOWAS (FO value) and €478.4 million of ECOWAS imports from the EU28 (CIF value), denying the sharp difference between EU FOB value and WA CIF value.

⁴ http://lionel.fontagne.free.fr/papers/fontalabmita_JAE.pdf

retained imports and ID of liberalized products. To overcome this difficulty the South Centre has applied an empirical method which leaves to be desired: *"The imported value of 6 digit codes (SH6) is thus divided between the 8-digit codes (HS8) of the WA tariff offer. If for example the 6-digit code contains 10 8-digit codes, of which 6 in group A and 4 in group D, 60% of the imported value is allocated to group A and 40% to group D"*⁵. This method may lead to large errors because one tariff line at 8 digits can have a higher import value than 7 other tariff lines.

It is very likely that the ambiguity in the imputation of ID on bills of EU imports under the Eurostat codes gives rise to very different interpretations from one ECOWAS Member State to another or from each customs officer to another, the more so as they are surely subjected to bribes from importers seeking to minimize the ID they have to pay. A meeting was held in Dakar from 16 to 18 August 2016 to adapt the CET to the 2017 version of the Harmonized System, which applies only to 6-digit codes⁶. This will not solve the problem of the consistency of the ECOWAS CET codes with the Eurostat codes, and it would be desirable to ensure this consistency for the 8-digits or even 10 digits codes, with its main trading partner, whether or not the EPA would be implemented. In the EAC (Eastern Africa Community) at least the tariff offers to the EPA are established on the basis of the HS 6 digit codes, which is fully compatible with the Eurostat data and facilitates assessing the impact of the EPA on DD.

Also on August 18 the Board of ECOWAS finance ministers stressed that six Member States – Cape Verde, the Gambia, Guinea, Guinea-Bissau, Liberia and Sierra Leone – have not yet implemented effectively the CET, and welcomed that the other 9 had done so. This statement is a bit premature if we take particularly the case of Nigeria who claims to have implemented the CET since mid-2015. Indeed not only it continues to ban imports of many products – including of basic food products such as meat (of chicken, beef and pork), eggs, oil, sugar, pasta⁷ – but the ECOWAS CET published on its website shows that, alongside the official CET ID, Nigeria adds levies on many products and also excise duties, including on some products with additional levies⁸. Thus to the CET 10% ID on rice Nigeria adds a levy of 60%; to the CET 20% ID on wheat flour Nigeria adds a levy of 65%; on the CET 20% ID on wines, spirits and cigarettes Nigeria adds a levy of 20% plus an excise duty of 20%; on the CET 35% ID on imports of many vehicles Nigeria adds a levy of 35%. But Senegal has also banned imports of chicken meat in 2006, contradicting the CET, with great success since the actual stopping of imports has allowed local production to reconquest the domestic market. Similarly Côte d'Ivoire imposes a levy of 1,000 CFAF per kg of imported poultry meat, special taxes on fish (20%), rice (between 5 and 10%), alcohol (45%), tobacco and cigarettes (between 30 and 35%), and petroleum products (20 to 44%), not to mention the ban on imports of sugar and wheat flour⁹, also in contradiction with the CET¹⁰. Not to mention the seasonal prohibition of imports of onions in Senegal¹¹ and Guinea, when domestic production is abundant as it is difficult to store it¹². And these examples are not exhaustive. We are therefore very far short of the target and the implementation of the EPA under these

⁵ E-mail of Peter Lunenborg of the South Centre.

⁶ <http://www.commodafrica.com/16-08-2016-la-cedeao-se-penche-sur-lunion-douaniere-dont-le-regime-fiscal-des-intrants>

⁷ <https://www.customs.gov.ng/ProhibitionList/import.php>

⁹ <http://www.commerce.gouv.ci/commerce.php?id=14&cod=2&idcom=6>

¹⁰ <https://importexporttransit.wordpress.com/2014/06/02/les-taxes-douanieres-en-cote-divoire/>

¹¹ Le gouvernement sénégalais poursuit ses mesures de soutien au secteur de l'oignon

¹² <http://www.commodafrica.com/17-08-2016-lundi-limportation-doignons-reprend-au-senegal>

conditions augurs big problems, including EU prosecution for violation of the trade liberalization provided for in the EPA Agreement.

On August 18 the President of the ECOWAS Commission, Alain Marcel de Souza, has rightly pointed out that, following the recent approval of the parliaments of Ghana and Côte d'Ivoire to ratify their interim EPAs with the EU, *"The implementation of the interim agreements on the ECOWAS Community market of European products at preferential custom duties different from those of the Common External Tariff will undermine all efforts together to consolidate the regional market"*¹³.

Let us be clear: the imports of products excluded from liberalization under the EPA are not prohibited but their ID will not be reduced with the EPA. Also to say that WA exports will not be taxed by the EU with the EPA, like those of LDCs without the EPA, does not mean they will not be subject to a double bind: to meet the EU criteria on rules of origin and on sanitary and phytosanitary rules.

Although the excluded products can continue to be imported at the existing ID of year T and as those imports could increase, we will limit ourselves to calculate the reduction of ID on the liberalized products of groups A, B and C from the EU28-UK or from the EU28. The ID collected on imports of excluded products would simply be increased by 30% in CIF value compared to their EU FOB value but we do not have to apply an impact of trade diversion in relation to third countries since their ID would remain the same. As for the impact related to the increased population it should play in part on the excluded products taxed at 10%, which represented 7.2% of the imports of excluded products coming from the EU28-UK in 2015.

The losses of ID results from the comparison of their level at the average rate of 8.59% without the EPA recorded in 2015 with their level with the EPA.

Table 1 shows that the 27.907 billion euros of exports from EU28 to WA in 2015 would have normally generated €3.079 billion of ID (on EU FOB value) at an average rate of 11.03%, of which 18.42% on excluded products and 8.70% on liberalized products. The products fully liberalized at the end of the liberalization period (at T20 or 2035) accounted for 75.6% of total exports and 60% of ID theoretically levied in 2015 on the basis of the CET (Common External Tariff) supposed to be in force from 1 January 2015 although it is far from being so in most of WA States as already mentioned. This confirms that the rate of WA market opening in the EPA is close to the 75% announced by the European Commission and lower than the 82% level put forward by the South Centre although, as explained above, the methods used to determine the precise value of the liberalized imports will remain unconfirmed as long as the WA tariff offer for the EPA, based on the ECOWAS CET, will not be consistent with the Eurostat codes or will not be restricted to 6 digit codes as the EAC has done.

On the other hand, if the Brexit took place in 2015, the €26.048 billion of the EU28-UK exports to WA would have generated €2.797 billion of ID (at EU FOB values), at an average rate of 10.74%, of which 17.61% on the excluded products and 8.59% on products fully

¹³ <http://fr.allafrica.com/stories/201608181080.html>. SOL has written two papers on this issue: *Perpetuating the interim EPAs of Ivory Coast and Ghana would be meaningless*, May 17, 2016; *Ghana's thoughtless ratification of the interim EPA, based on false data*, August 9, 2016, available on SOL website: <http://www.sol-asso.fr/analyses-politiques-agricoles-jacques-b/>

liberalized in T20. These accounted for 76.3% of total exports and 61% of ID theoretically received in 2015. We see that the Brexit reduces 6.7% of the EU28 exports to WA and 9.2% of ID, of which 11.5% for the excluded products (in EU FOB value). We will focus here on the DD losses related to imports from the EU28-UK. This does not prejudice the level of ID that will result from the new bilateral trade policy to be concluded between the UK and WA.

Table 1 – WA reductions of import duties on the EU28 and EU28-UK exports with the EPA

€ million	In T (2015)			Reductions of WA ID in EU FOB value from T5 (2020) to T20 (2035)			
EU28							
	EU exports	WA ID FOB EU	ID rate	T5 (2020)	T10 (2025)	T15 (2030)	T20 (2035)
Excluded products	6688,5	1232,1	18,42%	1232	1232	1232	1232
Liberalized products	21218	1846,5	8,70%	1468,1	730	76,1	0
Total	27906,5	3078,6	11,03%	2700,2	1962,1	1308,2	1232
% liberalized products	76%	60%		54,4%	37,2%	5,8%	0%
EU28-UK							
Excluded products	6191,6	1090,5	17,61	1090,5	1090,5	1090,5	1090,5
Liberalized products	19856,6	1706,2	8,59	1367,8	679,7	65,6	0
Total	26048,2	2796,7	10,74	2458,3	1770,2	1156,1	1090,5
% liberalized products	76,3%	61%		55,6%	38,4%	5,7%	0%

Table 2 presents the annual reduction of customs revenues (ID + VAT) on the liberalized products imported from the EU28-UK. Taking into account the four additions due to the difference between EU FOB values and WA CIF values, the diversion of imports for the EU, the increase in population and the reduction in the VAT on imports, total imports of liberalized products increase from €35.2 billion in T (2015) to €44.9 billion in T20 (2035) and €55.6 billion in T35 (2050).

Table 2 – WA reductions of import duties on the EU28-UK exports with the EPA from 2020 à 2050

	Imports at T	Droits de douane perçus (sur valeur FAB UE28-RU)				
Euros million		T0 (2015)	T5 (2020)	T10 (2025)	T15 (2030)	T20 (2035)
WA imports and import duties at CIF values of liberalized products libéralisés (+30% on average over the EU FOB value)						
	25813,6	2218,1	1778,1	883,6	85,3	0
WA imports and import duties with trade diversion of liberalized products (+25% on average over the WA CIF value)						
	32267	2772,6	2222,7	1104,5	106,6	0
Imports and import duties on liberalized products taking into account the population increase						
		T to T5	T5 to T10	T10 to T15	T15 to T20	T20 to T35
Population increase (%/year)		2,66%	2,51%	2,47%	2,37%	2,14%
Increased imports "		1,77%	1,67%	1,65%	1,58%	1,43%
	T	T5	T10	T15	T20	T35
Total liberalized imports	32267	35225,5	38266,7	41529,7	44915,8	55577,1
Imports duties with the EPA	2772,6	2426,5	1199,9	115,7	0	0
Total annual reductions of customs revenues with the losses of VAT on imports						
ID rate without liberalization	8,59%	8,59%	8,59%	8,59%	8,59%	8,59%
ID without liberalization	2772,6	3026,8	3287,1	3567,4	3858,3	4774,1
Imports + ID without EPA	35039,6	38251,4	41553,8	45097,1	48774,1	60351,2
VAT at 16% without EPA	5606,3	6120,2	6648,6	7215,5	7803,9	9656,2
IDD + VAT without EPA	8378,9	9146,1	9935,7	10782,9	11662,2	14430,3
Imports + ID with EPA	35039,6	37652	39466,6	41645,4	44915,8	55577,1
VAT with EPA	5606,3	6024,3	6314,7	6663,3	7186,5	8892,3
Losses of VAT	0	95,9	333,9	552,2	617,4	763,9
Losses of ID	0	600,3	2087,2	3451,7	3858,3	4774,1
Total annual and cumulative losses of customs revenues on imports (ID + VAT) wit the EPA from T5 (2020) to T20 (2035) and T35 (2050)						
Annual losses		696,2	2421,1	4003,9	4475,7	5538
Cumulative losses		696	8515	25050	46463	121816

Table 3 shows that the annual loss of customs revenues (ID + VAT) due to the EPAs will increase from €696 million in T5 (2020) to €2.4 billion in T10 (2025), €4 billion in T15 (2030), € 4.5 billion in T20 (2035) and €5.5 billion in T35 (2050). Cumulative losses would leap to €8.5 billion in T10, €25 billion in T15, €46.5 billion in T20 and €121.8 billion in T35.

Table 3 – WA annual and cumulative losses of ID on imports from the EU28-UK with the EPA

€ 1000	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
Annual	696,2	893,3	1146,2	1470,7	1887	2421,1	2677,3	2960,5	3273,7	3620,1	4003,9
Cumulative	696,2	1589,5	2735,7	4206,4	6093,4	8514,5	11191,8	14152,3	17426	21046,1	25050
	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041
Annual	4094	4186,1	4280,3	4376,6	4475,7	4539,7	4604,6	4670,5	4737,3	4805	4873,7
Cumulative	29144	33330,1	37610,4	41987	46462,7	51002,4	55607	60277,5	65014,8	69819,8	74693,5
	2042	2043	2044	2045	2046	2047	2048	2049	2050		
Annual	4943,4	5014,1	5085,8	5158,5	5232,3	5307,1	5382,9	5459,9	5538		
Cumulative	79636,9	84651	89736,8	94895,3	100127,6	105434,7	110817,6	116277,5	121815,5		

Table 4 presents the progressive losses of ID according to their rates and groups of liberalized and excluded products. 55.2% of imports and 64.3% of ID in T (2015) of liberalized products were made in group B, the only group at the 10% rate. 35% of imports and 20.3% of ID at 5% in T (2015) of liberalized products were made by the 3 groups A, B and C. Only 6.6% of imports of liberalized products with 15.4% of ID were made at 20% on group C products. Finally duty free imports on products of groups A and B have accounted for 3.1% of total imports.

For all products, including those not liberalized, 45.2% of imports were taxed at 10% and contributed to 54% of ID. 26.7% were taxed at 5% and contributed only 9.9% of ID. 19.1% of the 20% taxed imports contributed to 28.2% of ID. 3% of imports taxed at 35% contributed to 7.9% of ID. Finally 6% of imports were duty free.

Table 4 – Losses of ID on liberalized and total imports according to ID rates and groups

ID rates	Groups	Imports	Reductions of import duties				
		FAB UE28-RU	T (2015)	T5 (2020)	T10 (2025)	T15 (2030)	T20 (2035)
Liberalized products							
Sub-total 0%	A+B	627	0	0	0	0	0
Sub-total 5%	A+B+C	6947,3	346,7	8,4	0	0	0
Sub-total 10%	B	10969,9	1097	1097	548,5	0	0
Sub-total 20%	C	1312,3	262,5	262,5	131,2	65,6	0
Total	A+B+C	19856,5	1706,2	1367,9	679,7	65,6	0
All products, excluded and liberalized							
Sub-total 0%	A+B+D	1566	0	0	0	0	0
Sub-total 5%	A+B+C	6947,3	346,7	8,4	0	0	0
Sub-total 10%	B+D	11773,2	1900,3	1900,3	1351,8	803,3	803,3
Sub-total 20%	C+D	4967,7	993,6	993,6	862,3	796,7	731,1
Sub-total 35%	D	793,5	279,1	279,1	279,1	279,1	279,1
Total	A+B+C+D	26047,7	3519,7	3181,4	2493,2	1879,1	1813,5

Table 5 shows the percentage of imports of agricultural and fishery products (Chapters 01 to 24 of the Harmonised System) which will be liberalized at T20 represented 35.7% of exports of these products by the EU28 and 13% of ID levied on these products in 2015. With the Brexit the percentage of agricultural and fish products imported from the EU28-UK which will be liberalized will rise to 37.5% and ID rates will rise to 13.8%. This therefore runs counter to the document "*The EPA would liberalize the majority of EU agricultural exports to West Africa*" of 26 May 2016. After verification of the calculations made then on several agricultural chapters it appears that I had double counted several exports of codes at the 6 digit level and those at the 8 or 10 digit levels. I deeply apologize to the readers. Although the EU28 exported to WA certain agricultural products outside chapters 01 to 24 for €23.6 million in 2015, taxed at 5% or 10% and representing only 1% of the total, we did not take them into account in agricultural products.

The fact remains that, contrary to the allegation of the DG Trade of the European Commission, the EPA will be far from excluding all agricultural products from liberalization. This will be especially the case for cereals excluding rice and milk powder whose ID already minimal, at 5%, will be eliminated from T5 (2020).

Table 5 – WA losses of ID on agricultural and fish imports from the EU with the EPA

€ million	In T (2015)			Reductions of WA import duties on EU FOB exports from T5 to T20			
	UE28						
	EU exports	WA ID/EU FOB	ID rate	T5 (2020)	T10 (2025)	T15 (2030)	T20 (2035)
Excluded products	2616,7	603,5	23,1%	603,5	603,5	603,5	603,5
Liberalized products	1448,7	90,3	6,2%	32,1	15,2	2	0
Total	4065,4	693,8	17%	63,6	618,7	605,5	603,5
% liberalized products	35,7%	13%		5%	2,5%	0,3%	0
	UE28-RU						
Excluded products	2446,2	560,7	22,9%	560,7	560,7	560,7	560,7
Liberalized products	1469,1	89,5	6,1%	30,4	14,2	1,8	0
Total	3915,3	650,2	16,6%	591,2	574,9	562,6	560,7
% liberalized products	37,5%	13,8%		5,1%	2,5%	0,3%	0

A comparison of tables 1 and 4 shows that the agricultural and fishery imports accounted in 2015 for 15% of total imports from the EU28-UK and 23.2% of total ID. They represented 39.5% of imports of excluded products and 51% of their ID. On the other hand they represented only 7.4% of imports of liberalized products and 5.2% of their ID.

Appendix 1 – Evolution from T to T20 of the EU28-UK FOB exports to WA
and of WA losses of import duties according to groups and ID rates

HS chapters			EU exports	T (2015)	T5 (2020)	T10 (2025)	T15 (2030)	T20 (2035)
01-02	D	35%	378515450	132480408	132480408	132480408	132480408	132480408
03-04			16006218	5602176	5602176	5602176	5602176	5602176
05-08			152812958	53484535	53484535	53484535	53484535	53484535
15-18			56659589	19830856	19830856	19830856	19830856	19830856
19-24			77580520	28502786,9	28502786,9	28502786,9	28502786,9	28502786,9
29-37			24276832	8496891	8496891	8496891	8496891	8496891
51-59			87651399	30677990	30677990	30677990	30677990	30677990
Sub-total			793502966	279075642,9	279075642,9	279075642,9	279075642,9	279075642,9
01-02	D	20%	2467415	493483	493483	493483	493483	493483
03-04			182482790	36496558	36496558	36496558	36496558	36496558
05-08			41811420	8362284	8362284	8362284	8362284	8362284
09-14			10296656	2059331	2059331	2059331	2059331	2059331
15-18			110326257	22065251	22065251	22065251	22065251	22065251
19-24			1096101326	219220265,2	219220265,2	219220265,2	219220265,2	219220265,2
25-28			41978514	8395702,8	8395702,8	8395702,8	8395703	8395703
29-37			170106167	34021233	34021233	34021233	34021233	34021233
38-43			205176225	41035245	41035245	41035245	41035245	41035245
44-50			99299285	19859857	19859857	19859857	19859857	19859857
51-59			239574963	47914993	47914993	47914993	47914993	47914993
60-62			40468825	8093765	8093765	8093765	8093765	8093765
63-70			368546773	73709354,6	73709355	73709354,6	73709354,6	73709354,6
71-73			80974568	16194913,6	16194913,6	16194914	16194914	16194914
74-76			45253321	9050664	9050664	9050664	9050664	9050664
77-83			130452733	26090547	26090547	26090547	26090547	26090547
84			40479661	8095932,2	8095932	8095932	8095932	8095932
85			57052350	11410470	11410470	11410470	11410470	11410470
86-90			549403582	109880716,4	109880716,4	109880716,4	109880716,4	109880716,4
91-97			143117319	28623464	28623464	28623464	28623464	28623464
Sub-total			3655370150	731074029,8	731074030	731074030	731074030,2	731074030,2
03-04	D	10%	301670356	30167036	30167036	30167036	30167036	30167036
09-14			7733669	773366,9	773366,9	773366,9	773366,9	773366,9
15-18			7587369	758736,9	758736,9	758736,9	758736,9	758736,9
19-24			4186183	418618,3	418618,3	418618,3	418618,3	418618,3
29-37			64393037	6439304	6439304	6439304	6439304	6439304
38-43			22680488	2268048,8	2268049	2268049	2268049	2268049
50-59			13959636	1395964	1395964	1395964	1395964	1395964
63-70			26339148	2633914,8	2633914,8	2633914,8	2633914,8	2633914,8
71-73			9625899	962589,9	962589,9	962589,9	962589,9	962589,9
77-83			1514492	151449,2	151449,2	151449,2	151449,2	151449,2
86-90			343651463	34365146,3	34365146,3	34365146,3	34365146,3	34365146,3
Sub-total			803341740	80334175,1	80334175,3	80334175,3	80334175,3	80334175,3
29-37	D	0%	939428315	0	0	0	0	0
Total	D	0% à 35%	6191643171	1090483848	1090483848	1090483848	1090483848	1090483848
01-02	A	5%	4418921	220946,1				
03-04			257123441	12856172	0	0	0	0
05-08			12767045	638352,25	0	0	0	0
09-14			652809567	32640478	0	0	0	0

15-18			8219988	410999,4	0	0	0	0
19-24			245130911	12256545,55	0	0	0	0
25-28			249624142	12481207,1	0	0	0	0
29-37			250142639	12507132	0	0	0	0
38-43			161366192	8068309,6	0	0	0	0
44-50			129954283	6497714	0	0	0	0
51-59			6057298	302864,9	0	0	0	0
63-70			1458547	72927,35	0	0	0	0
71-73			301550231	15077511,6	0	0	0	0
74-76			84446196	4222310	0	0	0	0
77-83			16108363	805418,2	0	0	0	0
84			2373262593	118663129,7	0	0	0	0
85			657686839	32242061	0	0	0	0
86-90			1366444513	68322225,65	0	0	0	0
91-97			1128564	56428,2	0	0	0	0
Sub-total			6779700273	338342732,6	0	0	0	0
25-28	A	0%	37021420	0	0	0	0	0
29-37			342153610	0	0	0	0	0
38-43			39152268	0	0	0	0	0
44-50			109426091	0	0	0	0	0
71-73			11140	0	0	0	0	0
85			11092623	0	0	0	0	0
86-90			158352	0	0	0	0	0
Sub-total			539015504	0	0	0	0	0
Total A			7318715777	338342732,6	0	0	0	0
01-02	B	10%	9423450	942345	942345	471172,5	0	0
03-04			71861552	7186155	7186155	3593078	0	0
09-14			16713621	1671362	1671362	835681,1	0	0
15-18			11985789	1198579	1198579	599289,5	0	0
19-24			99456351	9945635,1	9945635,1	4972817,55	0	0
25-28			8744712976	874471297,6	874471297,6	437235648,8	0	0
29-37			317544418	31754442	31754442	15877221	0	0
38-43			272650940	27265094	27265094	13632547	0	0
44-50			99814244	9981424	9981424	4990712	0	0
51-59			6835793	683579,6	683579,6	341789,8	0	0
63-70			28550780	2855078	2855078	1427539	0	0
71-73			47014605	4701460,5	4701460,5	2350730	0	0
74-76			35070962	3507096	3507096	1753548	0	0
77-83			54276488	5427649	5427649	2713824	0	0
84			503355196	50335519,6	50335520	25167760	0	0
85			314887495	31488750	31488750	15744375	0	0
86-90			322903127	32290312,7	32290312,7	16145156,35	0	0
91-97			12861099	1286110	1286110	643055	0	0
Sub-total			10969918886	1096991889	1096991890	548495944,6	0	0
09-14	B	5%	42280843	2114042	2114042	0	0	0
38-43			29415030	1470751,5	1470752	0	0	0
71-73			5888440	294422	294422	0	0	0
Sub-total			77584313	3879215,5	3879216	0	0	0
29-37	B	0%	88006303	0	0	0	0	0
Total	B	0% a 10%	11135509502	1100871105	1100871106	548495944,6	0	0
01-02	C	20%	2231640	446328	446328	223164	111582	0
03-04			2991216	598243,2	598243,2	299121,6	149560,8	0
05-08			9400857	1880171,4	1880171,4	940085,7	470042,9	0
09-14			10643493	2128699	2128699	1064349	532174,7	0
15-18			464391	92878,2	92878,2	46439,1	23219,55	0
19-24			11146024	2229204,8	2229204,8	1114602,4	557301,2	0
25-28			157577205	31515441	31515441	15757720,5	7878860	0
29-37			18758275	3745701,2	3745701,2	1872850,6	936425,3	0
38-43			83054696	16610939,2	16610939	8305470	4152735	0
44-50			4789904	957980,8	957980,8	478990,4	239495,2	0
51-59			6385231	1277046	1277046	638523,1	319261,6	0
60-62			11805242	2361048	2361048	1180524	590262,1	0
63-70			101025743	20205148,6	20205149	10102574,3	5051287,15	0
71-73			408015608	81603121,6	81603121,6	40801560,8	20400780,4	0
74-76			19143223	3828645	3828645	1914322	957161,2	0
77-83			36720390	7344078	7344078	3672039	1836020	0
84			66075914	13215182,8	13215183	6607591	3303796	0
85			191954412	38390882	38390882	19195441	9597721	0
86-90			16877066	3375413,2	3375413,2	1687706,6	843853,3	0
91-97			153253784	30650757	30650757	15325378	7662689	0
Sub-total			1312314314	262456909	262456909,4	131228453,1	65614228,4	0
38-43	C	5%	83079139	4153956,95	4153957	0	0	0

70-73			6788557	339427,85	339427,85	0	0	0
86-90			165911	8295,6	8295,6	0	0	0
Sub-total			90033607	4501680,4	4501680,45	0	0	0
Total	C	5% et 20%	1402347921	266958589,4	266958589,9	131228453,1	65614228,4	0
TOTAL	A+B+C		19856573200	1706172427	1367829695	679724397,7	65614228,4	
TOTAL	A+B+C+D		26048216371	2796656274	2458313544	1770208246	1156098077	1090483848
ABC/ABCD			76,23%	61,01%	55,64%	38,40%	5,68%	0,00%

**Appendix 2 – Evolution from T to T20 of the EU28 FOB exports to WA
and of WA losses of import duties according to groups and ID rates**

Chapters	Euros	ID rate	EU exports	T (2015)	T5 (2020)	T10 (2025)	T15 (2030)	T20 (2035)
01-02	D	35%	395135270	138297344,5	138297344,5	138297345	138297344,5	138297344,5
03-04			16049208	5617223	5617223	5617223	5617223	5617223
05-08			153096581	53583803	53583803	53583803	53583803	53583803
15-18			59885694	20959993	20959993	20959993	20959993	20959993
19-24			138085269	48329844,15	48329844,15	48329844,15	48329844,15	48329844,15
29-37			27029243	9460235,05	9460235	9460235	9460235	9460235
51-59			104054493	36419073	36419073	36419073	36419073	36419073
Sub-total			893335758	312667515,7	312667515,7	312667516,2	312667515,7	312667515,7
01-02	D	20%	2505728	501145,6	501145,6	501145,6	501145,6	501145,6
03-04			185603849	37120770	37120770	37120770	37120770	37120770
05-08			43304149	8660830	8660830	8660830	8660830	8660830
09-14			10751709	2150342	2150342	2150342	2150342	2150342
15-18			111039739	22207948	22207948	22207948	22207948	22207948
19-24			1159587707	231917541,4	231917541,4	231917541,4	231917541,4	231917541,4
25-28			42049650	8409930	8409930	8409930	8409930	8409930
29-37			241363578	48272715,6	48272716	48272716	48272716	48272716
38-43			239354883	47870976,6	47870976,6	47870977	47870977	47870977
44-50			108260564	21652113	21652113	21652113	21652113	21652113
51-59			26279536	52559072	52559072	52559072	52559072	
60-62			50730585	10146117	10146117	10146117	10146117	10146117
63-70			527763253	105552650,6	105552650,6	105552650,6	105552650,6	105552650,6
71-73			90435814	18087162,8	18087162,8	18087162,8	18087162,8	18087162,8
74-76			53869059	10773812	10773812	10773812	10773812	10773812
77-83			135811149	27162230	27162230	27162230	27162230	27162230
84			44789527	8957905,4	8957905	8957905	8957905	8957905
85			61892264	12378452,8	12378453	12378453	12378453	12378453
86-90			624931473	124986294,6	124986294,6	124986294,6	124986294,6	124986294,6
91-97			175991755	35198351	35198351	35198351	35198351	35198351
Sub-total			3936315971	834566360,4	834566360,6	834566361	834566361	782007289
03-04	D	10%	320662982	32066298	32066298	32066298	32066298	32066298
09-14			8368093	836809,3	805908,4	805908,4	805908,4	805908,4
15-18			7856103	785610,3	785610,3	785610,3	785610,3	785610,3
19-24			4727770	472777	472777	472777	472777	472777
29-37			78689720	7868972	7868972	7868972	7868972	7868972
38-43			26368408	2635416,6	2635416,6	2635417	2635417	2635417
51-59			15297247	1529725	1529725	1529725	1529725	1529725
63-70			26403841	2640384,1	2640384,1	2640384,1	2640384,1	2640384,1
71-73			10262363	1026236,3	1026236,3	1026236,3	1026236,3	1026236,3
77-83			1716605	171660,5	171660,5	171660,5	171660,5	171660,5
86-90			348307451	34830745,1	34830745,1	34830745,1	34830745,1	34830745,1
Sub-total			848660583	84864634,2	84833733,3	84833733,7	84833733,7	84833733,7
29-37	D	0%	1010178116	0	0	0	0	0
Total	D	0% à 35%	6688490428	1232098510	1232067610	1232067611	1232067610	1179508538
01-02	A	5%	4569801	228490,05	0	0	0	0
03-04			301763016	15088151	0	0	0	0
05-08			13372068	668603,4	0	0	0	0
09-14			585344355	29267218	0	0	0	0
15-18			8682760	434138	0	0	0	0
19-24			250254258	12512712,9	0	0	0	0
25-28			261536820	13076841	0	0	0	0
29-37			279762469	13988123,5	0	0	0	0
38-43			181162107	9011500,75	0	0	0	0
44-50			13210161	6605081	0	0	0	0
51-59			6057298	302864,9	0	0	0	0
63-70			1866209	93310,45	0	0	0	0
71-73			356565577	17828278,85	0	0	0	0
74-76			85430375	4271519	0	0	0	0
77-83			16242695	812134,8	0	0	0	0
84			2690327153	134516357,7	0	0	0	0

85			804513083	40225654,2	0	0	0	0
86-90			1589117837	79455891,85	0	0	0	0
91-97			1130024	56501,2	0	0	0	0
Sub-total			7450908066	378443372,6	0	0	0	0
25-28	A	0%	37144719	0	0	0	0	0
29-37			349802441	0	0	0	0	0
38-43			44669728	0	0	0	0	0
44-50			1310533	0	0	0	0	0
71-73			11140	0	0	0	0	0
85			11286969	0	0	0	0	0
86-90			336442	0	0	0	0	0
Sub-total			444561972	0	0	0	0	0
Total A			7895470038	378443372,6	0	0	0	0
01-02	B	10%	9448044	944804,4	944804,4	472402,2	0	0
03-04			72177351	7217735	7217735	3608868	0	0
09-14			22686563	2268656	2268656	1134328	0	0
15-18			1404016	1404016	1404016	702008,1	0	0
19-24			106190497	10619049,7	10619049,7	5309524,85	0	0
25-28			8875351227	887535122,7	887535122,7	443767561,4	0	0
29-37			365542272	36554227,2	36554227	18277114	0	0
38-43			299294287	29929428,7	29929428,7	14964714	0	0
44-50			108464936	10846494	10846494	5423247	0	0
51-59			8199711	819971,1	819971,1	409985,6	0	0
63-70			30771089	3077108,9	3077108,9	1538554,45	0	0
71-73			61691248	6169124,8	6169124,8	3084562,4	0	0
74-76			37002025	3700203	3700203	1850101	0	0
77-83			60974575	6097458	6097458	3048729	0	0
84			703805206	70380520,6	70380521	35190260	0	0
85			378849589	37884958,9	37884959	18942479	0	0
86-90			383470888	38347088,8	38347088,8	19173544,4	0	0
91-97			18138452	1813845	1813845	906922,6	0	0
Sub-total			11543461976	1155609813	1155609813	577804906	0	0
09-14	B	5%	33034147	1651707	1651707	0	0	0
38-43			32006727	1600336,35	1600336,35	0	0	0
71-73			3673149	183657,45	183657,45	0	0	0
Sub-total			68714023	3435700,8	3435700,8	0	0	0
29-37	B	0%	96081930	0	0	0	0	0
Total	B	0% à 10%	11708257929	1159045514	1159045514	577804906	0	0
01-02	C	20%	2250880	450176	450176	225088	112544	0
03-04			4835010	967002	967002	483501	241750,5	0
05-08			9566990	1913398	1913398	956699	478349,5	0
09-14			11113353	2222671	2222671	1111335	555667,7	0
15-18			466975	93395	93395	46697,5	23348,75	0
19-24			11521036	2304207,2	2304207,2	1152103,6	576051,8	0
25-28			161074071	32214814,2	32214814,2	16107407,1	8053704	0
29-37			21700384	4340076,8	4340077	2170038	1085019	0
38-43			93987057	18797411,4	18797411,4	9398706	4699353	0
44-50			5111329	1022266	1022266	511132,9	255566,5	0
51-59			7122166	1424433	1424433	712216,6	356108,3	0
60-62			16283306	3256661	3256661	1628331	814165,3	0
63-70			109292038	21858407,6	21858407,6	10929203,8	5464601,9	0
71-73			499324278	99864855,6	99864855,6	49932427,8	24966213,9	0
74-76			20400581	4080116	4080116	2040058	1020029	0
77-83			42553628	8510726	8510726	4255363	2127681	0
84			73452877	14690575,4	14690575	7345288	3672644	0
85			233873614	46774722,8	46774723	23387361	11693681	0
86-90			19573002	3914600,4	3914600,4	1957300,2	978650,1	0
91-97			178733860	35746772	35746772	17873386	8936693	0
Sub-total			1522236435	304447287,4	304447287,4	152223643,5	76111822,25	0
38-43	C	5%	84907040	4245352	4245352	0	0	0
70-73			6804135	340206,75	340206,75	0	0	0
86-90			355840	17792	17792	0	0	0
Sub-total			92067015	4603350,75	4603350,75	0	0	0
Total	C	5% et 20%	1614303450	309050638,2	309050638,2	152223643,5	76111822,25	0
TOTAL	A+B+C		21218031417	1846539524	1468096152	730028549,5	76111822,25	0
TOTAL	A+B+C+D		27906521845	3078638035	2700163762	1962096160	1308179433	1179508538
ABC/ABCD			76,03%	60%	54,37%	37,21%	5,82%	0%

Appendix 3 - Key difficulties of imputation of ID on WA imports from the EU related to the discrepancy between the ECOWAS CET and Eurostat codes beyond HS6 level

The following codes are not exhaustive examples of the difficulties of imputation of Eurostat codes to the WA CET codes.

0402 code and subcodes on milk powder and condensed milk: the CET has much lower duties (5%) on products in packages of more than 25 kg and products of less than 25 kg reserved for pharmacies, the other products being excluded and taxed at 10%, distinctions that are not used by Eurostat. We have opted to consider exports in packages of more than 25 kg.

0713 code and subcodes: the CET distinguishes between pulses reserved for seeds, taxed at 5%, while others are excluded and taxed at 20%. We have considered that most imports are not restricted to seeds and are excluded.

2009 sub-codes: as for milk powder the CET distinguishes between fruit juice concentrates imported in packages of more than 25 kg (taxed at 10% in group B) and the others, excluded and taxed at 20%. Here too we have chosen often to favour imports in packages over 25 kg.

380891 codes on insecticides: the Eurostat distinctions between sub-codes 11/20/30/40/90 are based on the nature of the active product and if the TEC distinguishes also the subcodes 1110-1190, and 1910-1920-1990-9000 according to the presence or absence of an active product (methyl bromide) it is not the same as those of Eurostat, with rates ranging from 5% (a) and 20% (C and D). The CET ID on pesticides used in agriculture are taxed at 5% against 20% (C) for the other, a distinction not made in Eurostat codes.

The CET sub-code 42021210 on packaging (including various bags and suitcases) has a rate of 10% (B) on components imports to be mounted in ECOWAS and the sub-code 42021290 has a rate of 20% (D) in the case of finished products. But the distinction between Eurostat sub-codes 42021211/19/50/91/99 is based on the type of container (plastic, textile). The same distinctions are repeated with the codes 420219, 420221, 420222, 420229, 420291, 420292, 420299.

The same CET distinction based on imported components or finished products are to be found with the codes 6401, 6402, 6403, 6404, 6405 on footwear and items while the Eurostat codes differ depending mainly on the nature of the material (rubber or leather in particular).

The same distinction on the import of spare parts or finished products can be found in HS chapter 84 of the various machines (of which 8418, 8472, 8473), certain electrical products of HS chapter 85 (of which 8527, 8528), and especially for vehicles (cars, motorcycles and bicycles) of HS chapter 87 (8701, 8702, 8703, 8704, 8711, 8712, 87). We have considered that most of those imports are finished products excluded from liberalization and taxed at 20% instead of being liberalized and taxed at 5%.

Those interested can request to receive the product codes according to the ID rates selected.