

INTERNATIONAL TradeProbe

No. 10, September 2008

TradeProbe is a joint initiative by the NAMC and the Department of Agriculture's Directorate: International Trade. The aim of this initiative is to create knowledge of trade-related topics by discussing/reporting trade statistics, inviting perspectives from people working in related sectors, reporting on trade-related research and stimulating debate.

This issue of the TradeProbe covers the following topics:

- Trade profile
 - ✓ Whisky
- Contributed articles
 - ✓ Agricultural trade relationship between South Africa and the USA
 - ✓ SADC FTA launched: What are the implications?
 - ✓ Canned food in Norway and Switzerland from 2001 to 2011

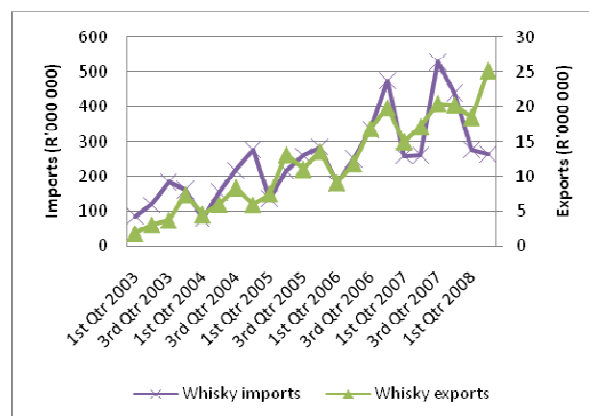


Figure 1: Whisky imports and exports of South Africa
Source: World Trade Atlas, 2008

SECTION 1 – TRADE PROFILE

1.1 Whisky (HS-220830)

South Africa is a net importer of whisky, expressed in value terms. **Figure 1** shows South African export and import values from 2003 to 2008.

A number of observations can be made, namely:

1. Both import and export values have increased significantly since 2003.
2. Imports of whisky tend to peak between the 3rd and 4th quarter each year.
3. Imports of whisky have dropped substantially since the 3rd quarter of 2007 until the 1st quarter of 2008, but exports remained relatively strong.

Table 1 presents the list of the top ten whisky exporters in 2006, expressed in value terms. The top three exporters accounted for 85 % of world whisky exports. These countries were the United Kingdom (UK) (70 %), the United States of America (USA) (10 %) and Canada (4 %). South Africa ranked number 23.

Table 1: Leading exporters of Whisky (HS code – 220830) in 2006

Exporters	Value exported in 2006, in US\$ thousand	Share in world exports, %
World total exports	6 627 371	100
UK	4 642 093	70.04
USA	678 789	10.24
Canada	276 242	4.17
Singapore	206 950	3.12
Ireland	162 776	2.46
Germany	138 781	2.09
France	80 840	1.22
Netherlands	56 818	0.86
Malaysia	53 499	0.81
Hong Kong	46 533	0.70
South Africa (23)	8 537	0.13

Source: ITC calculations based on COMTRADE statistics

Table 2 presents the list of the top ten whisky importers in 2006, expressed in value terms. The top three importers, namely the USA (18 %), France (10 %) and Spain (6 %) accounted for 34 % of world imports. It is noteworthy that the USA, the biggest importer, was also the second biggest exporter. South Africa ranked number 13 as a world whisky importer, representing about 2.76 % of world whisky imports.

Table 2: Leading importers of whisky (HS code – 220830) in 2006

Importers	Value imported in 2006, in US\$ thousand	Share in world imports, %
World total imports	6 692 216	100
USA	1 231 866	18.41
France	642 953	9.61
Spain	433 283	6.47
Germany	286 671	4.28
Republic of Korea	225 997	3.38
Greece	220 752	3.30
Japan	220 598	3.30
United Kingdom	210 344	3.14
Taiwan	209 948	3.14
Venezuela	197 120	2.95
South Africa (13)	184 532	2.76

Source: ITC calculations based on COMTRADE statistics

Even though South Africa ranked number 23 as a whisky exporter globally, it is important to outline the direction of South Africa's whisky exports. **Table 3** indicates that Angola was the main destination for whisky exported by South Africa in 2006, expressed in value terms. Angola alone accounted for 88 % of whisky exports from South Africa. The other two leading export destinations were Zimbabwe (1.64 %), the UK (1.55 %) and Mozambique (1.45 %).

Table 3: Leading importers of Whisky (HS code – 220830) exported by South Africa in 2006

Importers	Exported value 2006 in US\$ thousand	Share in South Africa's exports, %
SA's exports	8 537	100
Angola	7 499	87.84
Zimbabwe	140	1.64
United Kingdom	132	1.55
Mozambique	124	1.45
Ship stores and bunkers	119	1.39
Congo	86	1.01
Zambia	77	0.90
Malawi	66	0.77
Macao (SARC)	60	0.70
DRC	53	0.62

Source: ITC calculations based on COMTRADE statistics

Since Angola is South Africa's leading export destination, it is important to analyse this market in more detail to get a better idea of the countries competing for this market. **Table 4** shows the top exporters of whisky into Angola in 2006, expressed in value terms. They were South Africa (46 %), Portugal (26 %), the

UK (15 %) and Camaroon (12 %). These countries accounted for 99 % of Angola's whisky imports.

Table 4: Leading exporters of whisky (HS code – 220830) imported by Angola in 2006

Exporter of whisky to Angola	Imported value 2006 in US\$ thousand	Share in Angola's imports, %
Angola's total imports	16 466	100 %
South Africa	7 499	46 %
Portugal	4 254	26 %
United Kingdom	2 489	15 %
Cameroon	1 978	12 %
Netherlands	99	1 %

Source: ITC calculations based on COMTRADE statistics

SECTION 2 - CONTRIBUTED ARTICLES

2.1 The agricultural trade relationship between South Africa and the USA¹

In 2007 South Africa was the 35th largest origin of USA imports, expressed in value terms, representing only 0.5 % of total USA imports. In terms of USA imports from the African continent, South Africa ranked 4th after Nigeria, Algeria and Angola, representing 1.8 %, 0.9 % and 0.6 % of total USA imports, respectively.

In 2007 the USA was the second biggest export market for South Africa's exports, it accounted for 10.5 % of total South African exports (The biggest destination was Japan accounting for 10.9 % of total exports).

It needs to be noted though that South Africa is an AGOA² eligible country. This means that a number of South Africa's products have preferential access to the USA market. AGOA was signed into law in 2000 under the Trade and Development Act of 2000, which was formulated to cover an eight-year period, ending in 2008.

Table 5 presents agricultural and forestry trade between South Africa and the USA, including the trade classified under AGOA. It is noteworthy that over the past three years the USA's agricultural exports to South Africa have grown much more than South Africa's exports to the USA. In fact, South Africa's agricultural exports under AGOA have grown very little over the past three years.

South Africa's exports of forestry products under AGOA declined over the last three years. The opposite is true for exports by the USA to South Africa.

¹ Bonani Nyhodo is a Senior Economist of the National Agricultural Marketing Council

² African Growth and Opportunity Act

Table 5: Agricultural trade between USA and South Africa

Agricultural products:	Value (1,000 dollars)		
	2005	2006	2007
US Exports to South Africa	175 778	147 260	323 969
US Imports from South Africa	250 326	289 136	258 344
Total AGOA including GSP provisions of AGOA	181 867	219 108	196 839
- US imports under GSP from South Africa	50 346	64 328	59 642
- US imports of duty-free items added under AGOA	131 521	154 781	137 197
Forest products:	2005	2006	2007
US Exports to South Africa	107 529	121 401	127 114
US Imports from South Africa	80 726	57 461	44 570
Total AGOA including GSP provisions of AGOA	24 909	8 542	3 784
- US imports under GSP from South Africa	24 900	8 525	3 757
- US imports of duty-free items added under AGOA	9	18	27

Source: AGOA website

A closer look at the USA's top ten agricultural imports from the rest of the world, and the top ten South African agricultural exports to the rest of the world is presented in the following section to give a broader view of the agricultural products of importance from a South African export perspective.

Table 6 lists the top ten agricultural imports by the USA in 2007, expressed in value terms, and **Table 7** lists the top ten agricultural exports by South Africa. A number of observations are drawn from the two tables, namely:

- Three products are common to the two countries' trade mix (top ten products), namely Wine of Fresh Grapes, Fish Fillets and other Fish Meat and Fruit Juice.
- There are other products that formed part of the USA's top agricultural imports but not part of South Africa's top agricultural exports and vice versa.

Table 6: Leading USA agricultural imports of agricultural products (HS code - 4) (Jan – Dec 2007) (US\$ millions)

HS	Description	Value
2208	Ethyl Alcohol, Undenat, Und 80 % Alc; Spirit Beverag	5 521.00
0306	Crustcns Lve Frsh Etc, Ckd Etc.; Flrs Mls H Cnsump	4 847.84
2204	Wine Of Fresh Grapes; Grape Must Nesoi	4 621.69
2203	Beer Made From Malt	3 640.09
0901	Coffee; Coffee Husks Etc; Substitutes With Coffee	3 513.35
0304	Fish Fillets & Oth Fish Meat, Fresh, Chill Or Froz	3 340.14
1905	Bread, Pastry, Cakes Etc; Comm Wafrs, Emp Caps Etc	2 265.64
0102	Bovine Animals, Live	1 896.96
1605	Crustaceans, Molluscs Etc. Prepared Or Preserved	1 789.02
2009	Fruit Juice Nt Frtfd W Vit/Mnl Veg Juice No Spirit	1 697.29

Source: World Trade Atlas, 2008

Table 7: Leading South Africa exports of agricultural products (HS code – 4) (Jan – Dec 2007) (US\$ millions)

HS	Description	Value
2204	Wine Of Fresh Grapes; Grape Must Nesoi	673.59
0805	Citrus Fruit, Fresh Or Dried	613.08
0806	Grapes, Fresh Or Dried	364.54
0808	Apples, Pears And Quinces, Fresh	329.55
1701	Cane Or Beet Sugar & Chem Pure Sucrose, Solid Form	276.07
2008	Fruit, Nuts Etc Prepared Or Preserved Nesoi	167.76
2009	Fruit Juice Nt Frtfd W Vit/Mnl Veg Juice No Spirit	134.86
2207	Ethyl Alcohol, Undenat, Nun 80 % Alc; Alcohol, Denat	105.34
0304	Fish Fillets & Oth Fish Meat, Fresh, Chill Or Froz	105.01
0307	Molluscs & Aqua Invert Nesoi, Lve Etc.; Flours Etc	105.00

Source: World Trade Atlas, 2008

The issue of interest is whether South Africa is exploiting potential trade (export) opportunities to the USA, i.e. where the USA imports a product in large values/quantities and South Africa exports the same product in large values/quantities, but the two do not match.

One way to determine whether this is the case or not, is to conduct a "trade-chilling" analysis. The methodology has the following points of departure:

- i. Market opportunity (importer) is viewed through the value or volume (high) of imports
- ii. Supply potential (exporter) is viewed through the value or volume (high) of exports
- iii. The importer (bullet number i) imports from other exporters but not the exporter (bullet number ii)
- iv. The exporter (bullet number ii) exports to other importers but not the importer (bullet number i)

Cognisance must be taken that the trade-chilling methodology is not sensitive to non-tariff measures and it does not capture the effect of tastes and preferences.

The analysis was conducted in the following way.

- South Africa's 2007 export of HS 4 lines of more than US\$ 5 million to the rest of the world were identified in order to denote the supply side.
- The USA's 2007 imports of HS 4 lines of more than US\$ 5 million from the rest of the world were then identified, to denote the demand side.
- The process was then narrowed down to agricultural products at HS 4 level.

- Trade between South Africa and USA to the value of less than US\$ 50 000 per annum was denoted to mean no trade.

The analysis revealed 28 product lines at HS 4 level for which there is no match even though the USA imports them while South Africa exports them (See **Table 8**)

For about six of the 28 products one can argue that trade is not taking place due to high tariff (i.e. higher than 10 %). These are:

- ✓ Sugars Nesoi, Incl Chem Pure Lactose Etc; Caramel
- ✓ Peanuts (Ground-Nuts), Raw
- ✓ Malt Ext; Food Prep Of Flour Etc Un 40 % Cocoa Etc
- ✓ Milk And Cream, Concentrated Or Sweetened

- ✓ Tobacco & Tobacco Subst Mfrs Nesoi; Tob Proces Etc
- ✓ Buttermilk, Yogurt, Kephir Etc, Flavord Etc Or Not

Another three products are faced with ad valorem tariffs of between 5 % and 10 %. These are:

- ✓ Meat Of Bovine Animals, Fresh Or Chilled
- ✓ Meat Of Bovine Animals, Frozen
- ✓ Milk And Cream, Not Concentrated Or Sweetened

The remaining products attract ad valorem tariff equivalents of less than 5 %, and yet are not exported to the USA. These products may not be entering the USA market due to a number of reasons, such as possible non-tariff barriers.

Table 8: Agricultural products of strategic value to any bilateral or preferential access to the USA

HS	Description	USA imp from RoW US\$ mil-lions	RSA exports to RoW	RSA exports to USA	USA imports from RSA	Total ad valorem equivalent tariff (estimated)
2203	Beer Made From Malt	3 640.09	9.91	0.01	0.03	0.0 %
0811	Fruit & Nuts (Raw Or Cooked By Steam Etc), Frozen	414.40	7.57	0.00	0.02	0.8 %
1104	Cereal Grains, Worked Etc Nesoi; Cereal Germs, Wrk	103.03	5.78	0.02	0.01	0.0 %
1904	Foods Prep By Swell Cereal; Cereal Nesoi, Grain Fm	417.96	10.60	0.02	0.00	0.0 %
1702	Sugars Nesoi, Incl Chem Pure Lactose Etc; Caramel	282.83	7.72	0.04	0.00	14.8 %
1202	Peanuts (Ground-Nuts), Raw	9.35	10.14	0.03	0.00	68.4 %
2104	Soups, Broths & Preps; Homogenised Comp Food Preps	214.88	16.63	0.01	0.00	0.0 %
0703	Onions, Shallots, Garlic, Leeks Etc, Fr Or Chilled	389.67	10.35	0.00	0.00	0.0 %
1901	Malt Ext; Food Prep Of Flour Etc Un 40 % Cocoa Etc	456.77	12.43	0.00	0.00	17.3 %
1103	Cereal Groats, Meal And Pellets	64.79	5.52	0.00	0.00	0.0 %
0809	Apricots, Cherries, Peaches, Plums & Sloes, Fresh	164.79	49.87	0.00	0.00	0.0 %
1512	Sunfl-Seed, Safflow Or Cottonsd Oil Etc, No Ch Mod	104.64	9.31	0.00	0.00	0.0 %
0710	Vegetables (Raw Or Cooked By Steam Etc), Frozen	565.44	6.42	0.00	0.00	0.0 %
0402	Milk And Cream, Concentrated Or Sweetened	63.45	14.36	0.00	0.00	16.6 %
2301	Flour, Meal Etc Of Meat Etc, Not For Human; Greavs	68.36	26.42	0.00	0.00	0.0 %
1602	Prepared Or Preserv Meat, Meat Offal & Blood Nesoi	681.55	9.67	0.00	0.00	0.0 %
1517	Margarine; Edible Mixtures Etc An Or Veg Fat & Oil	111.19	8.02	0.00	0.00	2.8 %
1108	Starches; Inulin	134.97	6.35	0.00	0.00	0.0 %
0102	Bovine Animals, Live	1896.95	9.27	0.04	0.00	0.0 %
1005	Corn (Maize)	257.33	32.06	0.03	0.00	0.0 %
2403	Tobacco & Tobacco Subst Mfrs Nesoi; Tob Proces Etc	22.15	54.89	0.00	0.00	116.7 %
0403	Buttermilk, Yogurt, Kephir Etc, Flavord Etc Or Not	39.96	6.15	0.00	0.00	29.3 %
0401	Milk And Cream, Not Concentrated Or Sweetened	14.92	5.21	0.00	0.00	7.8 %
0701	Potatoes (Except Sweet Potatoes), Fresh Or Chilled	126.87	12.23	0.00	0.00	0.0 %
1001	Wheat And Meslin	501.47	12.76	0.00	0.00	0.0 %
0201	Meat Of Bovine Animals, Fresh Or Chilled	1 234.91	9.63	0.00	0.00	7.4 %
0202	Meat Of Bovine Animals, Frozen	1 598.24	5.81	0.00	0.00	6.7 %
0207	Meat & Ed Offal Of Poultry, Fresh, Chill Or Frozen	130.45	5.03	0.00	0.00	0.0 %

2.2 SADC FTA launched. What are the implications?³

The Heads of State and Governments of the Southern African Development Community (SADC) launched a Free Trade Area (FTA) during their annual Summit held in Sandton, South Africa on 17 August 2008. The launch is the achievement of the first milestone to integrate the economies of the region. Next in the Community's economic integration programme is the achievement of a customs union in 2010. This is to be followed by a common market in 2015, a monetary union in 2016 and finally a single currency by 2018. The launch follows eight years of phasing down 85 % of the SADC border tariffs to zero, starting from 2000. Reducing 85 % of the tariffs was seen as a condition sufficiently adequate to declare the Community a free trade area. By 1 January 2008 the status of the free trade area was achieved. The Sandton launch was the formalisation and endorsement of the FTA status of the region by Heads of State and Governments.

Expectations from the FTA

The launch has raised expectations from business operators, importers and exporters alike. Ideally, they will expect to trade freely within the region. Consumers also expect to benefit from reduced prices resulting from cheap imports of finished goods and raw input material for processing. High tariffs are normally passed over to the consumer in the form of higher prices for imported goods. Increased trade should also lead to competition that should result in price decreases, benefitting consumers. There are however a number of issues that could restrict complete free trade in goods and services. The following are issues, legitimate or otherwise, that could negatively affect free trade in the region, especially during the early period of implementing the FTA:

Non Tariff Barriers

The Community has established a well-structured institutional mechanism for use by business operators to identify and report the Non Tariff Barriers (NTBs) that they encounter, to government. The mechanism has recently been approved by Ministers and its effectiveness is still to be tested. Establishment of the mechanism to address the NTBs is an indication that these measures, legitimate or otherwise, exist and will continue to do so despite the region having been declared a free trade area. Studies have shown that as tariffs are reduced, countries resort to NTBs to restrict trade and protect their industries. A mid term review of the phasing down of the SADC tariffs identified this practice. The mechanism places much responsibility on them to report these measures so that they can be addressed.

³ Lentheng Tswai is a Deputy Director of Bilateral Trade Relations – Africa, Directorate International Trade, DoA.

Rules of Origin

Rules of origin exist to ensure that only goods produced or manufactured within the region benefit from the agreement. Goods imported from outside the region will continue to be charged the applicable most favoured nation (MFN) or other preferential duties of other trade arrangements that individual Member States have with other countries outside the region. The rules state that all basic commodities to be traded free of import duties must be wholly produced in the region. The same applies to products manufactured from these basic commodities. Basic commodities imported from outside the region for re-export into the region will carry the applicable duties. However, products processed from basic commodities imported as raw input materials can qualify to be traded freely provided they meet certain conditions of processing, one of which is that the basic commodity must undergo substantial processing (change of form) and processing must take place within the region.

The rules are clear on what implies value addition. Processes such as blending and mere dilution, packaging, simple assembly, slaughter of animals and other small processes listed in the Agreement are not considered as such. Imported goods blended into a mixture therefore do not qualify to be traded freely. Goods imported for non-commercial purposes such as food aid also do not qualify to be traded freely.

There are rules still outstanding to be simplified as their current form restricts trade. These include coffee, tea, spices and mate. Current rules require that basic commodities to manufacture these products should be wholly produced from the region. The rules are restrictive as the region is not a major producer of these products. There are currently no rules for wheat flour. MFN duties are applied, meaning that despite the launch of the FTA this product is not traded freely

Outstanding 15 % tariffs protection

Despite the launch of the FTA, not all products will be traded free of duties. Provisions were made to delay the phasing out of duties for goods regarded as sensitive to competition until 2012. Tariffs for these sensitive products make up the remaining 15 % of tariffs within the region. These goods are of strategic importance for the economic development of many Member States in the region. With agriculture being the mainstay of the region's economies, there are quite a number of agricultural products belonging to this category across the SADC membership.

Multiple Membership SACU and Comesa Agreements vs. SADC FTA

There are also trade arrangements among some of the SADC Member States within the region, namely SACU to which Botswana, Lesotho, Namibia, South Africa and Swaziland belong, and Comesa, to which

Madagascar, Mauritius, Malawi, Mozambique, Swaziland, Tanzania, Zambia and Zimbabwe belong. These trade arrangements have their own rules which are different from those of the SADC FTA. However, SADC FTA does not nullify the rules and conditions of these trade arrangements. This means that inter-SACU trade will still be subjected to SACU rules. The question then is which one takes precedence in the case of inter-SACU or inter-Comesa trade. Since SACU countries are also members of SADC, a trade dispute could be lodged with the SADC Tribunal as long as the cause of the dispute is provided for in the SADC FTA rules. If the cause of the dispute arises out of the SACU Agreement, the matter can only be resolved within SACU because it was instituted as per that Agreement.

For further information on the SADC FTA visit the SADC website: www.sadc.int

2.3 Canned food in Norway and Switzerland from 2001 to 2011⁴

Introduction

This section provides a summary of the potential market for canned products in Switzerland and Norway; they are two European Free Trade Association members. According to Datamonitor (2008), this market shows potential over the next number of years. The choice of canned fruit and prepared meals in Switzerland and canned vegetables in Norway was informed by their estimated growth. The products were classified according to market value, market value forecast, market volume, market volume forecast, market segmentation and market share in both countries. The values are in Swiss Francs and Norwegian Kroner respectively for each country.

Country Analysis – Switzerland: Canned Desserts (2006-2011)

Canned desserts are a relatively small market and the seventh largest category within the Swiss canned food market, with 1 % of the total market value. The market for canned desserts sold in Switzerland was worth CHF4.6 (US\$ 3.6) million in 2006 - a growth in value of 0.2 % over 2005. The canned desserts category recorded a CAGR (Compound Annual Growth Rate) of 0.4 % between 2001 and 2006. The market for canned desserts increased by CHF 0.1 million (US\$ 0.1 million) over the last five years (2001-2006). According to Datamonitor (2008), the canned desserts market in Switzerland is forecasted to grow to CHF4.6 (US\$ 3.7) million in 2011, with an expected CAGR of 0.2 % between 2006 and 2011.

Figure 2 shows the projected growth in Switzerland for canned desserts (2001-2011).

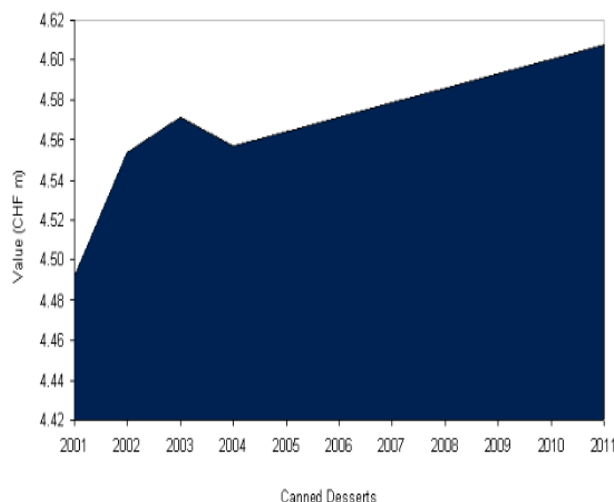


Figure 2: Switzerland canned desserts value & value forecast, 2001-2011 (CHF million, nominal prices)
Source: Datamonitor (2008)

Country Analysis - Norway: Canned vegetables (2006-2011)

The canned vegetable market in Norway is forecasted to be worth NOK 249.4 million (US\$ 38.9 million) in 2011, with an expected CAGR of 1.3 % between 2006 and 2011. It is estimated that by 2011 the tomato market within the canned vegetable category will be an estimated forecast of 82.6 % of the total market, with other canned vegetables accounting for the remaining 17.4 % share. The canned vegetable market is forecast to increase by NOK 15.1 million (US\$ 2.3 million) in sales over the five-year period spanning 2006-2011. Tomatoes are forecast to maintain their position as the leading segment within the canned vegetable category. The tomato market is expected to rise to NOK 206 million (US\$ 32.1 million) by the end of 2011, representing a CAGR of 1.3 % for the 2006-2011 period. The market share of other canned vegetables is expected to rise to NOK 43.4 million (US\$ 6.8 million) by the end of 2011, representing a CAGR of 1.2 % for the 2006-2011 period.

Southern African Customs Union and EFTA Free Trade Agreement

SACU and EFTA concluded a Free Trade Agreement in August 2005. Four agreements were negotiated and form part of the instruments for establishing a free trade area. In terms of the Free Trade Agreement SACU enjoys immediate duty-free access into EFTA for all products covered in the agreement, with the exception of processed agricultural products. SACU exporters will have better market access for canned oranges, mandarins and apricots into the Swiss market. The customs union also faces duty-free access for canned peaches, grapefruit and lemons. Table 9 and 10 shows EFTA's applied preferential tariffs against SACU under the SACU-EFTA agreement compared with EFTA's MFN duties against other supplier countries.

⁴ Tshepo Ranoto is an Assistant Director, Trade Research, Directorate International Trade, Department of Agriculture

Table 9: Switzerland tariffs on canned desserts

Tariff Heading	Description of Goods	Preferential duty rate applied	MFN duty
20.06	Vegetables, fruit, nuts, fruit-peel and other parts of plants, preserved by sugar (drained, glace or crystallised):	Mostly Free	3.26 %
20.08	Fruit, nuts and other edible parts of plants, otherwise prepared or preserved, whether or not containing added sugar or other sweetening matter or spirit, not elsewhere specified or included	0 % to 20 %	1 % to 34 %

Table 10: Norway tariffs on canned vegetables

Tariff Heading	Description of Goods	Concession to SACU	MFN duty
ex ⁵ . 20.01	Vegetables, fruit, nuts and other edible parts of plants, prepared or preserved by vinegar or acetic acid	0 % to 15 %	1 % to 211 %
20.02	Tomatoes prepared or preserved otherwise than by vinegar or acetic acid	free	29.13 %
20.03	Mushrooms and truffles, prepared or preserved otherwise than by vinegar or acetic acid	free	7.05 %
ex. 20.04	Other vegetables prepared or preserved otherwise than by vinegar or acetic acid, frozen, other than products of heading 20.06	0 % to 15 %	1 % to 296 %
ex. 20.05	Other vegetables prepared or preserved otherwise than by vinegar or acetic acid, not frozen, other than products of heading 20.06	0 % to 20 %	0 % to 288 %
ex. 20.06	Vegetables, fruit, nuts, fruit-peel and other parts of plants, preserved by sugar (drained, glace or crystallised).	free	0 % to 12 %

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⁵ Some tariff lines under this heading received no concessions.