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Intra-Regional Trade in Sub-Saharan Africa

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LIST OF ABBREVIATIONS

ADB	African Development Bank
ASEAN	Association of South East Asian Nations
CACM	Central American Common Market
CET	Common External Tariff
EAC	East African Community
ECCAS	Economic Community of Central African States
EFTA	European Free Trade Association
FIAS	Foreign Investment Advisory Service
FIAS	Foreign Investment Advisory Service
FOSIDEC	The development fund of CEAO
GATT	General Agreement on tariffs and trade
IOC	Indian Ocean Commission
LAFTA (LAIA) American	Latin American Free Trade Association (Latin Integration Association)
LOC	Letters of Credit
NTB	Non Tariff Barrier
OAU	Organization of African Unity
OGL	Open General Licence
PE	Public Enterprise
PTAFCCI Chambers of	Preferential Trade Area Federation of Commerce and Industry
QR	Quantitative Restriction
RCA	Revealed Comparative Advantage
RCTD	Road Customs Transit Document
SAC	Structural Adjustment Credit
SACU	Southern Africa Customs Union
SAL	Structural Adjustment Loan
SECAL	Sectoral Adjustment Loan
SITC	Standard International Trade Classification
SSA	Sub Saharan Africa
UNECA	United Nations Economic Commission for Africa
UNSO	United Nations Statistical Office
WDR	World Development Report

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Executive Summary

Objectives and Background

1. **Links to the Long Term Perspective Study.** The recently published Bank report *Sub-Saharan Africa: From Crisis to Sustainable Growth, A Long Term Perspective Study* emphasizes the importance of Regional Cooperation and Economic Integration as a key ingredient for the next generation of development policy in Sub-Saharan Africa. This report concentrates on the trade related aspects of this issue. It is thus able to explore in some detail the key issues that need to be addressed in making the proposed strategy of the Long Term Perspective Study operational.

2. **Objectives.** In particular, this report proposes an agenda to overcome the obstacles that have contributed to the stagnation at a low level of official intra-Sub-Saharan African trade. While it provides considerable statistical information on and a comprehensive account of the practical (non-tariff) constraints and barriers to intra-Sub-Saharan African trade, its main contribution is to link sustained increases in regional trade to the dismantling of the barriers that limit cross-border investment and labor flows. The report therefore analyzes the conceptual basis and efficiency implications of African economic integration initiatives. It sets out proposals on what needs to be done to overcome constraints limiting regional exchange of both products and factors of production. Making these proposals operational will require further analytical work in areas which the report identifies.

3. **Background.** The fragmentation of Africa has focussed attention on the benefits of economic integration. In practice, however, despite the rhetoric of African leaders and various attempts at market integration, little progress has been achieved. Thus, official trade among Sub-Saharan African countries has stagnated over the past two decades and amounts to a mere US\$4 billion -- only 6 percent of total African trade. This, despite estimates that up to a further US\$5 billion of Africa's imports from the rest of the world could be supplied by other African countries that are already exporting similar products outside the region ^{1/}.

4. Various regional organizations in Africa have been trying to achieve this potential and several have approached the Bank for help. The initial requests correctly focus ¹ on financing regional investment and on strengthening the payments mechanism amongst regional trading partners.

5. Increased foreign exchange availability from foreign sources in support of chronic deficits is not a sufficient response and it may, in fact, be dangerous as it will increase the likelihood of default. Instead it is necessary to make the deficits sustainable by strengthening the productive capacity of the deficit countries.

6. **The Basic Problem.** The lack of progress with regional trade liberalization stems mainly from inappropriate macroeconomic policies -- overvalued exchange rates, excessive fiscal deficits, distorted credit allocation, and heavy domestic market protection. These policies have also

^{1/} If the potential additional intra-regional exports of \$5 billion was achieved this would result in a \$10 billion increase in intra-regional trade to \$14 billion. Thus, the share of intra-regional trade would triple from 6 to 18 percent.

had an adverse impact on productive investment and hence economic performance in general. At the same time they have spurred the growth in Africa's parallel markets and informal border trade. Thus the prospects for regional integration are closely linked to general economic reform that addresses the macro-economic imbalances.

7. Unfortunately, experience suggests that the required adjustments will be slow. In particular, African governments have found it difficult to restrain fiscal and monetary policy sufficiently to implement an exchange rate policy that keeps the rate at a level which can be sustained without extensive payments restrictions. In turn, the administration of these restrictions seems to be biased against financing cross-border economic activity. In parallel, there is no incentive to trade at official relative prices when one currency is relatively over-valued.

8. Benefits. There may, thus, be significant returns from implementing, during the transition period, second best solutions aimed at relaxing administrative barriers against increased intra-regional activity. Any such measures would be implemented in parallel with ongoing national adjustment programs.

9. African economies are economically small (the whole of Sub-Saharan Africa is no larger than the Netherlands). This implies that attempts to create regional barriers against third parties are doomed to failure. These would make African production even less competitive by encouraging trade diversion (substituting cheap third party imports with expensive regional imports). Instead, the main benefits of regional integration will arise from the restructuring of African economies that is associated with trade creation (the substitution of expensive domestic production with less expensive regional imports).

Analytical issues

10. The report argues that regional initiatives should promote efficient resource allocation and better integration into the world economy. The ultimate objective should be to create conditions which would allow the private sector to freely work, invest and trade across African borders and with relatively low barriers against third parties. Thus a shift is needed by African governments and regional organizations from the concentration on selective tariff cuts to measures that promote factor mobility and support the free movement of goods and services.

11. Instead of relying solely on gradual liberalization of trade with the whole world on a unilateral basis, this approach would strengthen and extend ongoing adjustment efforts by adding another dimension: the liberalization of regional factor and product markets. To compensate for the narrower scope in terms of partners, mutual (regional) liberalization should be extensive and rapid. This may be politically more demanding than current reform programs and capital mobility would be easier to achieve than labor mobility.

12. Nevertheless, support for integration initiatives should not aim at saving so far-failed efforts at regional import substitution behind high barriers against third parties, even though that might be politically more attractive. If extensive mutual regional liberalization (i.e. the minimum reform required for greater integration along efficient lines) is not palatable, it would be preferable to concentrate on national efforts than to get involved with increasing trade discrimination against third parties which would either fail or be detrimental to efficiency.

13. The proposed approach relies on the pressure from a private sector constituency that would benefit from the focus on creating conditions conducive to legalizing and enhancing private cross-border economic activity. This and the voluntary and incremental mutual liberalization advocated could

contribute to increase political commitment by African Governments compared to the weak political support they extend to current efforts.

14. The basic premise of the report is that regional trade liberalization should be an intermediary stage towards general liberalization and this suggests discouraging the formation of Customs Unions ^{2/}. This is because future reform would be harder if lowering external tariffs required several governments to agree, such as in a Customs Union arrangement. Where a Common External Tariff (CET) already exists, as in UDEAC, its limitations will have to be accepted. Fortunately, the UDEAC CET itself does not appear to extend excessive regional preferences. Thus the promotion of efficient regional integration could be achieved while leaving the CET in place, provided all other import taxes and charges are replaced with domestic taxes.

15. Temporary increases in regional preferences are acceptable provided this occurs as part of a general and significant lowering of external protection with an assurance that this increase in regional preference would indeed be temporary. Such increased regional preferences could also be accepted if the resulting discrimination remained reasonable.

16. Closer economic links should be based on existing and potential complementarities and trade flows. In this respect, existing Regional Economic Groupings in SSA, set up for a variety of, sometimes non-economic reasons, are not necessarily optimal. However, given that they exist and given the commitment of the member governments to them, to the extent possible, any new initiatives should work with and through the existing sub-regional organizations. Nevertheless, new initiatives should promote factor mobility and the free movement of goods and services within the group as well as generalized trade liberalization with the rest of the world; they should not aim at reversing the failure to activate customs unions with high barriers against non-members including those on the continent.

17. Existing undertakings and agreements by the member states should be the starting point for a regional initiative and should be interpreted as the minimum commitment of member States. In consequence, existing organizations should allow and indeed encourage sub-groups of states to implement more rapid and extensive elimination of trade barriers and obstacles to labor and capital mobility between them, while recognizing that some members would not want to proceed further than already agreed. To support these efforts, donors could assist those individual member States that are prepared to relax controls on cross-border flows of factors of production and goods and services.

18. The report estimates potential trade based on existing formal trade. This Revealed Comparative Advantage methodology implicitly assumes efficiency in current trading patterns whereas in some instances imported inputs may be contributing to negative value added. Thus while the analysis is useful in indicating some orders of magnitude concerning the potential volume of trade that would occur in a liberalized trading regime, given the

^{2/} This is not to deny that Regional Integration has benefits that make it worthwhile to pursue as an objective in itself. Lachler (1989) argues that while size is not a substitute for openness, being big and open yields better growth performance than being small and open. This is because economic integration provides more room for internal competition through a larger internal market than could be achieved by uni-lateral liberalization. More importantly, labor and capital mobility within this larger market enhance the prospects of increased productive capacity and efficient use of factor resources. Further, there are also political imperatives that may make integration desirable. The point here is simply that regional trade liberalization should be seen as part of a wider process of lowering barriers against all third parties to avoid costly trade diversion.

extensive distortions, caution is required in judging specific trading opportunities that might be apparent from the data.

19. More work could be done to evaluate areas with actual comparative advantage that would be expected to lead to more regional trade. However, such an exercise is fraught with difficulty and the important message of the analysis is that substantial efficient trade flows would materialize provided distortions to the incentive structure were eliminated. An example of the difficulty of identifying winners and losers is provided by Mauritius. Within a decade it became the third largest exporter of woollen knitwear without a previous tradition of knitting or weaving, with no domestic supply of wool and with no prior expertise in a related industry.

20. In emphasizing the role of private economic agents in bringing about regional integration, the report advocates a new approach that is in line with the objectives of Bank supported adjustment. By establishing pre-set conditions for donor assistance, the proposed approach could be implemented in stages. As private interests respond to emerging regional business opportunities, they can become a local pressure group for further economic reform.

Scope of the report

21. The main purpose of the report is to identify barriers to intra-regional trade. In undertaking the study, it was realized that sustaining increased intra-regional trade requires extensive intra-regional liberalization of factor as well as product markets. This is why a discussion of regional integration is a focal point of the report. Nevertheless, the focus of this discussion has been kept on those aspects of regional integration that are most relevant to promoting increased intra-regional trade. This should not be interpreted as an indication that other aspects of integration or regional cooperation are viewed to be unimportant.

Operational issues

22. Political uncertainties, the need for further study of such key issues as factor mobility and the difficulties in harmonizing policies suggest great caution is required before moving ahead with any actual operation. Harmonization is likely to be particularly problematic since the relevant actions to achieve this -- particularly subsidy policy and the structure of incentives -- tend to be the most contentious issues in most national adjustment programs.

23. Until the political and other issues are better understood it would be wise for outside donors such as the Bank to consult closely with regional organizations and key governments in designing assistance to regional integration. Establishing a framework that countries would decide to adhere to at their own pace may also create operational difficulties that would need to be considered carefully. In some instances there might be actions that can only be taken at the regional level by the group of countries as a whole. In such cases it might therefore be necessary to insist on joint action.

24. The report identifies a range of possible actions going from areas for further studies to specific measures African governments can adopt and including forms of direct support by donors such as in risk sharing with commercial banks or financing of external inputs needed for restructuring of firms in a regional context. It will be helpful to keep this range of options in mind in designing any possible operation, and committed African governments and regional organizations could consider some policy reform even without external assistance.

Next steps

25. This report should be seen as a vehicle to help carry forward a dialogue between the Bank, other donors, African governments and relevant African regional organizations. This process should facilitate the emergence of a consensus on how to advance the cause of efficient regional integration efforts. Indeed, the report itself should be seen mainly as a vehicle to achieve this objective.

26. Much work will also need to be undertaken to obtain a better understanding of key issues and to deal with the various operational questions that need to be resolved before a program of assistance can be designed.

27. It would be wise to encourage all the member States to implement the rapid and extensive liberalization of factor and product markets advocated in the report. This would be fully consistent with provisions of the relevant Treaty to eliminate obstacles to the free intra-regional flow of goods and factors of production. However, given the wide-ranging and politically difficult implications of the proposals, it is possible that only a few governments would initially be able to embark on the suggested strategy.

28. Thus, the process of dialogue and further research will be critical in determining the extent and nature of future Bank responses to the increasing requests from African regional organizations and national Governments for assistance in this area.

I. GENERAL BACKGROUND AND CONTEXT

A. Motivation for this study

1.01 The recent economic performance of Sub-Saharan Africa (SSA) has been unsatisfactory. Over the period 1980-1986, average real per capita GNP has declined by 3 percent annually, partly reflecting an average annual decline in recorded exports of 2 percent compounded by increasing debt burdens. In this environment, the shortage of foreign exchange has forced a contraction of recorded imports from US\$47 billion in 1980 to an estimated US\$29 billion in 1986. To achieve sustained real per capita growth in SSA will require the easing of the foreign exchange constraints. This may involve increased external assistance, including more imaginative forms of debt relief. Nevertheless, without improved economic performance it is difficult to envisage a significant turnaround.

1.02 This is why, in the course of its ongoing policy dialogue with SSA country authorities, the Bank is supporting reforms that will make SSA economies more flexible. Specifically, the Bank has supported the adoption of market determined exchange rates, allocation of foreign exchange based on price signals instead of administrative fiat, the liquidation, privatization and/or rehabilitation of inefficient public enterprises, lower implicit and explicit taxation of export oriented activity, the reduction of barriers to trade and easing of price, profit margin and investment controls. For the purposes of this study, it is assumed that the authorities in SSA will increasingly restructure their economies along these lines. Thus the background assumed is one of a generalized trend towards liberalization even though this may not be uniform across countries or even over time. By the end of 1987, 32 countries in SSA had adopted some form of structural adjustment program with the support of the Bank and 16 countries had accepted the need to liberalize their trade regimes (see Chapter II, Table 3). However, despite these developments and some encouraging progress in countries that have implemented strong reform programs, far more could still be done to improve the outlook for SSA.

1.03 This is why emphasis needs to be given to measures that will strengthen ongoing reform efforts to achieve more rapid and extensive improvements in efficiency. In practice this requires initiatives in many directions (see *Sub-Saharan Africa: From Crisis to Sustainable Growth* (Landell-Mills, 1989) for details) including the strengthening and deepening of the adjustment process through regional integration and cooperation. While such efforts encompass many areas of activity, trade is a logical starting point as well as a natural focal point. This provides the broad justification for interest in promoting efficient intra-African trade.

1.04 This report investigates the potential gains from dismantling or reducing barriers against such trade, while not losing sight of the benefits of greater outward orientation and integration into the world economy.

1.05 In this respect, it is assumed, as argued by Balassa (1979), that the greatest gains require general trade liberalization since intra-SSA trade is not in itself more valuable than other international trade. Nevertheless, the study will investigate the extent to which, in a context of general liberalization, a greater degree of openness amongst SSA countries may yield significant benefits. This arises from the recognition that African countries, even under the most far reaching liberalization programs being considered, are unwilling and perhaps unable to reduce trade barriers close to the level in industrialized countries, let alone completely dismantle them.

1.06 This is mainly because, even in a distortion free environment, short run costs can not be reduced to world levels for the bulk of existing manufacturing activity in SSA. Indeed, trade liberalization may be frustrated in SSA because it would accelerate the necessary but politically

difficult restructuring of a large number of non-viable enterprises, the bulk of which are in the public sector. Liberalization is also inhibited by fear of excessive specialization in primary commodities and the belief that many of the dynamic gains from trade come from industrial exports.

1.07 These considerations underlie the apparent de facto consensus, as revealed in the design of the relevant adjustment operations, that it is reasonable to provide average protection of 40 to 60 percent with tariff rates of 5 to 100 percent, at least in the short to medium term. Such reform thus affords much greater protection than in industrial countries. More importantly, this degree of protection is high enough that there may be some scope for further reductions by pursuing a regional strategy that might result in greater unit cost reductions than achievable at the national level.

1.08 There is a significant trade potential estimated at US\$4 to US\$5 billion among SSA countries, both on primary and industrial exports. This potential is not realized, at least in part because of market and policy failures which discourage businessmen from identifying lower cost African suppliers to replace higher cost traditional partners. While continuation of commodity aid programs and special bi-lateral arrangements may prevent the full potential from being realized, the orders of magnitude involved suggest a large scope for efficient intra-SSA trade expansion.

1.09 At the same time, there may also be scope for increased intra-regional trade because it may be politically more acceptable to improve efficiency by initially exposing domestic firms to import competition from other African producers instead of world imports. This may result in lower priced products from partners that would limit some expensive domestic production, even though it will not give the full benefit of replacing expensive domestic output with the lowest priced goods on the world market.

1.10 Such considerations justify the speeding of trade liberalization towards other SSA countries. This would reverse the current trend of more rapid liberalization towards trade with non-African countries which arises from biases in the allocation of foreign exchange.

1.11 In the long run there must be an opening up to the discipline of the international market and therefore any regional trade preferences should not be excessive and should be reduced after a clearly specified adaptation period (say 5-10 years), to prevent significant diversion of efficient trade. This means that the eventual aim is to dismantle all non-tariff barriers against external partners and, where relevant, to reduce external tariffs towards the same low level granted to favored African partners.

1.12 To secure the competition needed for the restructuring of African firms through mergers, acquisitions and joint ventures, emphasis should be on generalized regional liberalization including factor flows instead of being limited to trade. Such generalized liberalization is also essential for sustaining increased regional trade by creating opportunities for generating the offsetting workers' remittances and investment flows to sustain the chronic trade deficits that some countries would face in the short and medium term.

1.13 A regional approach may also be valid in the current international climate when the free rider problem may limit future progress in the GATT. The emergence of a single European market in 1992, the US-Canada Free Trade Pact and suggestions for a Free Trade Agreement between the US and Pacific rim countries reflect concern that generalized concessions within the GATT may be harder to achieve now and in the future compared to the past. Indeed, the emergence of large blocs may help mitigate the free rider problem and thus facilitate the movement to ever freer international trade. SSA as a whole has the economic size of a small industrialized country (such as the Netherlands) and so the relevance of a SSA bloc should not be overemphasized. However, to the extent that internal liberalization within SSA facilitates a lowering of external barriers, this reduction in external protection should

provide moral arguments for more favorable treatment of African exports including such items as Kenyan cut flowers which face penal tariffs in the US which Colombia, for example, is exempt from.

1.14 Regional liberalization may also be more politically acceptable than unilateral concessions because of the tradeoff with other countries. Further, "binding" reforms through an international treaty will make it harder for opponents to challenge than national legislation.

B. Scope and coverage

1.15 It is hoped that this study will be useful in sharpening attention on key issues in the ongoing dialogue between the Bank, other donors and the relevant country authorities. To achieve this, the focus will be limited to broad issues relevant for SSA as a whole (or the majority of SSA countries). Further, special circumstances that are relevant only to particular countries will tend to be neglected; the expertise for tackling such issues resides with the Country Departments.

1.16 This study does not even attempt to deal with all relevant aspects of trade in SSA. Instead, the study will focus narrowly on the investigation of those barriers, to increased intra-SSA trade, whose removal would significantly improve the growth potential of SSA. This means, for example, that the interesting and important issue of unrecorded trade is largely ignored on the grounds that without extensive field work it is impossible to obtain generalized data that reliably establish the magnitude of such flows and the share of unrecorded trade that arises from lack of harmonization of Government policies compared with that which is forced underground by bad policies. Therefore it is not possible to evaluate how changes in Government policy that affect such trade would contribute to growth. Barad (1988) provides an excellent review of what is known about unrecorded trade in SSA and the December 1988/January 1989 issue of the *Southern African Economist* provides interesting illustrations for Southern Africa.

1.17 Sustainable increases in intra-African trade will require measures that allow all economic agents to freely trade, invest and work across African boundaries. This and various requests by existing SSA groupings for Bank assistance with regional integration efforts suggest the importance of developing a framework for Bank support in this area. The study therefore elaborates an approach that could build on regional integration to strengthen ongoing adjustment efforts and restore growth in SSA. This framework emphasizes measures that would support sustainable and efficient increases in regional exchange, but is not meant to exclude other worthwhile forms of assistance for specific programs such as locust control or financing for regional public sector infrastructure.

1.18 The nature of the data, the time frame for conducting the study and the number of countries in SSA have imposed the necessity to adopt a sampling approach relying on the collection of anecdotal evidence and the formulation of broad hypotheses. It will be up to individual country economists to follow up on the issues raised while using their own judgement as to which issues are the most pertinent for a particular country.

1.19 The study identifies the impediments to trade that would be expected on the basis of resource endowments and the current policy environment. This is done by concentrating on selected products rather than trade as a whole to facilitate drawing general and usable policy recommendations. The study implicitly raises questions regarding distributional issues, the political sustainability and phasing of reforms, fiscal and balance of payments implications of lowering barriers and the required supportive investment and price policies that need to complement trade liberalization. While these issues are critical, especially if reforms are to be implemented and sustained, they can not be adequately dealt with in the framework of the current effort and will need supplementary work, perhaps in the context of a follow-up to the current exercise.

1.20 The analysis covers a large number of countries in Sub-Saharan Africa and their recorded trade both with partners in established and active regional arrangements and other SSA countries. The active organizations either consist of the large multinational economic and trade organizations (PTA and ECOWAS --the meaning of the acronyms used here and a brief summary of the activities of these organizations is provided in annex 1) or smaller groups (CEAO, CEPGL, IOC and UDEAC). It also encompasses one multinational arrangement with a narrower agenda for coordination (SADCC) and a small trade organization and river basin development group (MRU). These organizations share a common goal, namely to cooperate for enhancing economic development through trade and investment. The other regional arrangements in SSA, developmental commissions for river basins or lakes, common services for research and/or technical services and financial institutions or monetary arrangements are not directly relevant for our purposes and are therefore neglected (Berg (1989) provides a comprehensive review). The Southern Africa Customs Union (SACU) is neglected because of its domination by South Africa which is not considered part of SSA and the Economic Community of Central African States (ECCAS) is not dealt with since it is only now becoming effective and therefore has no track record.

C. Outline of the report

1.21 The report is organized into chapters that can stand alone so that the reader may go directly to the issues that are of interest.

1.22 Chapter II explores the rationale for regional integration efforts and proposes an approach consistent with the free trade ideal while taking account of the constraints facing major liberalization efforts. Chapter III summarizes the economic characteristics and the pattern of recorded trade in SSA. The changes that have occurred in trading patterns over the period 1965 (before most groupings were formed) to 1983 are reviewed to provide a background for the ensuing analysis as well as motivating a discussion of the dynamics behind the formation of the various regional groupings and some preliminary observations about the impact of the various regional trade arrangements in SSA. In Chapter IV, the basic trade data is used to evaluate Revealed Comparative Advantage (PCA) which is then used to select products which are studied more extensively. Chapter V reviews the main barriers against intra-SSA trade for the selected products. This motivates a review, in Chapter VI of possible actions that might be taken to improve intra-regional trade and integration prospects.

II. THE RATIONALE FOR BANK SUPPORT TO INTEGRATION EFFORTS IN SSA

A. Does Regional Integration in SSA Make Economic Sense?

2.01 Regional integration is justified by a variety of reasons that include political considerations and the search for greater security. While these are valid in their own right and may even dominate other considerations, here the concern is over economic benefits.

2.02 Supporting regional integration in SSA is a new area of involvement for the Bank and the approach is still being developed. It is often argued that the benefits from greater intra-African exchange are limited given the similar economic structure based on primary commodity production for export outside the region. However, once the framework is extended to consider the different initial endowments of land and capital (including human capital) the potential benefits are more apparent. Economic integration may offer a means of realizing these benefits by dismantling barriers to the free flow of goods and services, labor and, especially, capital to promote industrial restructuring and allow the emergence of strong African firms through mergers, acquisitions, joint ventures and takeovers across African frontiers.

2.03 This would support ongoing national structural adjustment efforts with special relevance for liberalization of economic policy and the mobilization of the private sector 3/. For example, currency convertibility may be re-established less painfully through a gradual transition to a more realistic exchange rate if this is done collectively rather than individually. Similarly, a reform of investment laws would benefit from being carried out at the regional level.

2.04 Achieving these objectives requires significant reduction in external protection together with the free movement of goods and services that characterizes a Free Trade Area combined with the free flow of factor services that is a feature of a Common Market. A Common External Tariff (CET), that is characteristic of Customs Unions and Common Markets, should not be adopted where none exists so as to facilitate the lowering of external protection. A CET requires joint agreement by several countries for changes and this will needlessly complicate trade liberalization. However, where a CET is already in place, there would be no need to dismantle it unless excessive regional preferences are involved that could significantly divert trade. (Trade diversion occurs when more expensive union partners substitute for less expensive external trade partners as a result of preferences).

2.05 This is particularly true of existing customs unions such as UDEAC. 4/ Instead, the objective should be to emphasize factor mobility while limiting regional preferences by getting agreement to lower the CET where relevant. Care would be required, however, to avoid an increase in intra-union preferences by making its CET effective. In summary, with existing Customs Unions the end objective would be a transformation into a Common market with lower external protection than initially.

2.06 Previous and current attempts to achieve regional integration in SSA identify the need "to adopt a far-reaching regional approach based primarily on collective self-reliance" so as to make Africa less susceptible to "the economic and social crises suffered by the industrial countries" (Lagos Plan of Action, Preamble, article 1). They have therefore emphasized the granting of selective intra-union tariff preferences as a step to a Customs Union and eventually a Common Market with high protective barriers so as to achieve import substituting industrialization.

2.07 In contrast, experience suggests that maximizing the benefits from integration requires the emergence of more flexible economies that are better integrated into the world economy. The emphasis should be on increasing competition within SSA by liberalizing factor and goods and services flows across African boundaries rather than activating so far failed efforts to

3/ Here we are concerned with integration as a means of enhancing intra-regional exchange. The benefits of coordinating public investment and of joint intervention to fight locusts and riverblindness, for example, are therefore ignored. Berg (1989) reviews such issues in depth.

4/ In any case the preferences accorded by the CET tend to be undermined by other measures.

create customs unions that would grant high external protection against third parties 5/.

2.08 The proposed approach to regional integration is consistent with an outward-oriented strategy that "provides incentives which are neutral between production for the domestic market and exports" (WDR, 1987, page 8). In consequence, the supporters of regional integration in SSA, must reevaluate the argument that the failed policies of import substitution combined with industrial planning reflect problems of small market size rather than wrong policy choices. Experience shows that "the important lesson is that the strongly inward-oriented economies did badly." (WDR, 1987, page 8), a lesson whose validity is not affected by the size of the economy. In the short run there may be similarities between the two approaches, particularly regarding the dismantling of internal barriers that result in regional preferences. But in the approach suggested here, this is only a transitory phenomenon required to achieve broad based general liberalization.

2.09 This is why Customs Unions, with their potential for trade diversion behind a high CET, should not be the primary objective of integration efforts. Inevitably, a regional strategy will give some preference to regional partners, but avoiding Common External Tariffs will limit potential trade diversion and emphasize trade creation (the substitution of expensive domestic production by less expensive partner imports). In the absence of a CET, users of high cost regional imports can be expected to pressure their own national Government for a lowering of the national tariff on those items, thus helping to keep down trade diversion. Such pressure for lowering the common tariff of a customs union is likely to be resisted by the country with the high cost product protected by the high tariff. Where a CET already exists, efforts should be directed to ensure

5/ Mr. Jaycox has made several speeches emphasizing that "successful economic integration will be contingent on the implementation of policies that elicit the correct response from markets and which will boost regional production and demand. To strengthen that response, policy and institutional frameworks have to be put in place that facilitate the free flow of goods and factors of production within Sub-Saharan Africa." (Speech to SADCC, January 28, 1988, page 5). In the same speech he emphasizes that "the first imperative is for governments of the region to adjust their policy frameworks, to get their economies back on a growth track, make them as efficient and productive as possible, and to liberate the vast entrepreneurial potential of their people...Policy changes such as encouraging realistic exchange rate movements, liberalizing trade, designing price incentives for exports, improving public sector investment strategies and institutions, and increasing private sector activity must go hand-in-hand with specific investments in physical infrastructure and human resource development." (page 1). He laments that up to now "there has been too little effort to get traders, manufacturers, farmers and business people to participate in the process of cooperation and to establish commercial links among themselves. The result of all this? Not nearly enough intra-African trade; markets that are too small; inefficient, unofficial cross-border exchanges; costly excess industrial capacity in many countries; growing dependence on non-African sources for food; and increasing unemployment and poverty." (SADCC speech pages 2-3).

In another speech dealing with economic recovery in SSA, Mr Jaycox notes that "also critical is the harmonization of appropriate policies across national borders. These policies should be aimed at eliciting the correct response from markets and boosting regional production and demand. The World Bank, through its adjustment lending, is helping to facilitate the adoption of such policies and is keen to support further steps that will lead to enhanced regional cooperation." (Keynote address to Inter-agency Task Force on UNPAAERD, February 22-23, 1988).

that the resulting intra-union preferences be limited (if necessary by lowering the CET) to a differential that is not excessive, say no more than 20 percent.

2.10 Given the likely difficulties of later downward movement of the CET, caution is required in activating a CET that actually increases intra-union preferences, even where this is seen as transitory. Temporary increases in regional preferences should only occur as part of a general and significant lowering of external protection. Further, there should be reasonable assurance that the regional preference would indeed be reduced to a differential that is not excessive. It should be recognized that reaching this objective would require considerable external trade liberalization, and would usually involve lower barriers than currently envisaged in uni-lateral national reform programs.

2.11 In 1980 African Heads of State adopted the Lagos Plan of Action that advocated "a far-reaching regional approach based primarily on collective self-reliance" (Preamble, Article 1). In the current climate of adjustment, the objectives of the Lagos Plan need to be interpreted even more broadly: "to achieve the goals of rapid self-reliance and self-sustaining development and economic growth" (Lagos Plan of Action, Preamble, Article 3) requires the emergence of strong African firms able to compete in the world market and this is inconsistent with inefficient activity protected by high barriers. Thus, the spirit of the Lagos Plan is fully consistent with the promotion of extensive regional liberalization as the first step to generalized liberalization.

2.12 Economic integration may offer a powerful means for achieving an outward orientation ^{6/} in some SSA countries, given the reluctance to freely admit imports and the automatic de-facto monopolies created by the small size of virtually all SSA economies (except for Nigeria and, perhaps, Cameroon). Regional cooperation should result in increased openness (and thus a reduction in protection vis-a vis the rest of the world) on the part of the member countries of the regional union, leading to a reduction in barriers to trade in services and factors of production in addition to trade in goods.

2.13 However, regional liberalization should be more intensive than world wide liberalization, in particular by being extended to factors of production. The two are not incompatible, as demonstrated by the EC, for example. However, regional liberalization should take priority in terms of speed and degree. Such an approach could limit the possibility of increased dependence arising from a uni-lateral liberalization program.

2.14 Thus, the proposed strategy emphasizes extension of the size of all product and factor markets as a means of increasing competition and efficiency, thereby facilitating a lowering of external barriers. This contrasts with traditional approaches that emphasize the extension of the market for selected products to exploit the economies of scale perceived to be necessary for import substitution behind high barriers.

2.15 The economies of scale argument is worth reviewing since it tends to underpin much of the discussion concerning regional integration in SSA. Such arguments usually overlook that economies of scale tend to be more relevant for heavy industry and are irrelevant for agricultural goods and for services such as marketing and transport where significant increases in economic activity could be expected. Freeing agricultural trade is particularly important, both to support national reforms aiming to shift the

^{6/} Outward orientation simply means not creating anti-export bias and many countries have achieved this by offsetting some of the anti-export bias of import barriers rather than by totally dismantling such barriers (see WDR, 1987, page 81).

terms of trade in favor of the agricultural sector and to enhance food security by overcoming regulations, administrative problems and transport difficulties that prevent natural variations in output to be used to exchange temporary surpluses and deficits across SSA borders.

2.16 Notwithstanding these criticisms, it has been argued that "for large economies domestic trade may provide scope for adequate specialization, economies of scale, and enough competition to keep managers alert." (WDR, 1987, page 3). In that respect, in Brazil for instance, there is considerable "water in the tariff". However, as also noted by the WDR, "even large economies, if cut off from international trade, would lack stimuli for efficient industrial development." (page 3). This explains why, despite occasional temptation to rely on scale economies for achieving import substituting industrialization, Brazil has tended to have an outward orientation (WDR, 1987, Figure 5.1, page 83).

2.17 In any case, none of the existing SSA sub-regional groupings are large enough to rely on internal trade as can be gauged from the experience of Nigeria which has a larger economic size than any of the groupings in SSA; even SSA as a whole would only achieve the size of Belgium or somewhere in between Indonesia and Korea, all very open and export oriented economies that do not aim at import substitution behind high barriers (see Table 1). Paradoxically, the economies of scale argument would dictate production for the world market, since there is no economic rationale for limiting scale economies to continental borders.

Table 1: Comparative Market Size of SSA Economic Groupings (measured by GDP)

<u>SSA groupings</u>	GDP in 1988 (US\$ millions)	Comparable countries in ROW	
		<u>Industrial</u>	<u>LDCs</u>
SSA	149,550	Belgium	Indonesia/Korea
ECOWAS	62,648	N.Z/Denmark	Yugoslavia
Nigeria	29,370	Ireland	Hungary
ECOWAS without Nigeria	33,278	Ireland/NZ	Pakistan
CEAO	21,330	--	Morocco
MRU	4,770	--	Costa Rica
PTA	57,709	N.Z/Denmark	Thailand
SADCC	24,194	Ireland	Singapore
UDEAC	20,508	--	Bangladesh
CEPGL	9,740	--	Ecuador
IOC	5,799	--	Yemen

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Largest African Economies

SSA	149,550
Nigeria	29,370
Cameroon	12,900
Sudan	11,240
Cote d'Ivoire	7,650
Kenya	7,380
Angola	6,759
Zaire	6,470
Zimbabwe	5,650
Ghana	5,230
Senegal	4,980
Ethiopia	4,950

Largest Non-African LDCs

China	372,320
Brazil	323,610
India	237,930
Mexico	176,700
Korea	171,310
Indonesia	83,220
Argentina	79,440
South Africa	78,970
Poland	70,490
Turkey	64,360
Venezuela	63,750
Yugoslavia	61,710
Thailand	57,950
Algeria	51,900
Israel	44,960
Hong Kong	44,830
Portugal	41,700
Greece	40,900
Philippines	39,210
Colombia	39,070
Malaysia	34,680
Egypt	34,330
Pakistan	34,050
Hungary	28,000
Peru	25,670
Singapore	23,880
Chile	22,080
Morocco	21,990
Bangladesh	19,320
Syria	14,950
Ecuador	10,320
Tunisia	8,750
Oman	8,150

Industrial Countries

US	4,847,310
Japan	2,843,710
Germany	1,201,820
France	949,440
Italy	828,850
UK	702,370
Canada	435,860
Spain	340,320
Australia	245,950
Netherlands	228,280
Switzerland	184,830
Sweden	159,880
Belgium	153,810
Austria	127,200
Finland	91,690
Norway	91,050
Denmark	90,530
New Zealand	39,800
Ireland	27,820

Source: 1990 WDR, Table 3, pages 182-183 and staff estimates.

2.18 In or out of economic unions, SSA countries, like all small countries, will therefore depend for their growth "upon their ability to trade relatively freely with the rest of the world." (WDR, 1987, page 3). Notwithstanding any dynamic or static gains from regional trade, the most important benefits reside in expanding external trade and regional integration should be supported as a means of achieving greater eventual outward orientation. This is why the focus should be on creating competition in regional factor and product markets as a step to external liberalization.

B. Reconciling Regional Integration with Trade Liberalization

2.19 The need for a regional approach is rooted in the difficulties in pursuing all out liberalization. After eight years of structural adjustment efforts in SSA, progress with liberalization has been slow and accompanied with reversals. In general, trade regimes in SSA remain more restrictive than liberalized with less than half having eliminated all quantitative restrictions (import licensing and/or foreign exchange allocation system) (see Table 2).

Table 2: Classification of SSA Countries According to Trade Restrictions

Country	Fully 1/ Liberalized	Partially 2/ Liberalized	Limited 3/ Liberalization	Limited 4/ Restrictions	Partially 5/ Restricted	Very 6/ Restricted	Others 7/
Benin i/				X			
Botswana	X						
Burkina Faso					X		
Burundi	X						
Cameroon		X					
Cape Verde		X					
Central African Republic			X				
Chad							X
Congo				X			
Cote d'Ivoire					X		
Ethiopia						X	
Gabon				X			
Gambia	X						
Ghana	X						
Guinea	X						
Kenya ii/		X					
Lesotho	X						
Liberia							X
Madagascar		X					
Malawi		X					
Mali		X					
Mauritania				X			
Mauritius		X					
Namibia iii/				X			
Niger				X			
Nigeria iv/				X			
Rwanda						X	
Senegal v/				X			
Sierra Leone		X					
Somalia				X			
Sudan						X	
Tanzania		X					
Togo vi/				X			
Uganda				X			
Zaire				X			
Zambia						X	
Zimbabwe vii/					X		

- i/ Benin would be classified as partially liberalized except for import licensing requirements on imports from non-franc zone, non-ACP and non-EEC countries; these are expected to be removed by end-1991.
- ii/ Kenya would be classified as "partially liberalized" after July 1991 as QRs will be limited to public health, public security and environment related controls and the average tariff would be less than 70%.
- iii/ Limited information.
- iv/ Commodities such as rice, wheat, vegetable oil, textiles, beer and soft drinks are banned from importation, otherwise Nigeria would be classified as partially liberalized.
- v/ Senegal would be classified as partially liberalized except for QRs granted under special conventions.
- vi/ Togo would be classified as fully liberalized as of April 1, 1989, except for QRs that are imposed on a short list of goods.
- vii/ In the process of eliminating trade restrictions.
- 1/ Fully liberalized: Absence of QRs (import licensing and/or foreign exchange allocation system) and average tariff of less than 30%.
- 2/ Partially liberalized: Absence of QRs and average tariff of 30-70%.
- 3/ Limited liberalization: Absence of QRs and average tariff of over 70% or substantial exceptions with high tariffs.
- 4/ Limited restrictions: Limited QRs.
- 5/ Partially restricted: Substantial QRs.
- 6/ Extensive QRs.
- 7/ Others: Insufficient information or not fitting into above categories.

2.20 A regional approach may offer a new dimension to supplement the uni-lateral and uncoordinated national efforts of the sort currently being engaged in with World Bank and IMF support. Its bi- or multi-lateral nature may help make reforms more acceptable and "bind" them against reversals by national pressure groups.

2.21 To evaluate this argument it is necessary to understand the adjustment problems facing SSA. According to Nellis (1986) and Steel and Evans (1984), African countries have attempted to industrialize by relying on the public sector to set up operations geared at small national markets. As a result, many public enterprises in Africa are not only inefficient and badly managed but are overdimensioned. "The persistence of capacity underutilization... suggests that a temporary shortage of foreign exchange is not the fundamental problem. The underlying problems are the dependence of production on imported rather than domestically-produced inputs, and excessive growth of production relative to the growth of import capacity--and in many cases relative to the size of the market" (Steel and Evans, 1984, page 55). Under such circumstances privatization and rehabilitation efforts may offer only limited relief from overprotection and the resulting excessive consumption of foreign exchange. Such considerations partly explain the difficulties encountered by African governments in agreeing on the need for and in implementing trade liberalization.

2.22 Steel and Evans (1984) also note that high effective protection encourages new investment, even with unused capacity. In turn, "High cost operation is an inevitable consequence of these problems of capacity underutilization, inadequate infrastructure, declining productivity, and excessive capital intensity. At the same time, incentives to reduce costs have been blunted by high effective protection, import prohibitions, restricted competition, and administered pricing systems that base decisions on actual costs plus a margin. As a result, a large share of industrial production in Africa takes place at costs that are not competitive in terms of world market prices, and it is not uncommon to find some firms that actually use more foreign exchange than they save" (pages 59-60).

2.23 This supports the view of Nellis (1986) that making firms competitive requires competition. However, he notes that in "most African countries internal markets are so small that at least large manufacturing firms frequently acquire automatically a monopolistic or oligopolistic position." (page 44).

2.24 Thus, at least in the short and medium term, gains will not arise from customs unions that create opportunities to trade in a larger market behind continued third party protection; rather benefits would arise from the opportunities to rationalize production across borders through freer factor flows. In turn, larger regional markets may facilitate the adjustment and restructuring that African countries need to undertake as they move to an outward orientation.

2.25 In addition, a regional approach may be politically more acceptable, not only by building on the pan-African sentiment of the continent, but also by reducing the cost of adjustment. In the typical uni-lateral liberalization process, existing firms may need extensive restructuring to compete at world prices (plus some margin of protection). Thus, free importation, may result in short term losses of output and employment, even though over the medium term this will be more than offset by the emergence of new firms and the expansion of restructured enterprises.

2.26 The analysis of Nellis (1986) and Evans and Steel (1984), leads to the expectation that the short term costs of restructuring may be high for the majority of existing firms. If so, this would explain why, on the one hand, African governments seem to be aiming at average protection of 30 to 40 percent compared with less than 10 percent in industrial countries (WDR, 1987, page 136), while, on the other hand, it also explains the difficulties of getting meaningful implementation of even such limited

liberalization. For example, in Senegal all QRs have been abolished - except for those that protect entrenched (presumably) inefficient firms! Similarly in Kenya, some items have been moved back and forth across different categories in subsequent trade liberalization episodes. Indeed, the latest trade liberalization initiative, envisages less liberalization than planned in the first such reform at the start of the decade. (Kenya, ISAP, May 24, 1988, P-4819-KE).

2.27 In contrast, a program that liberalizes faster with regional partners may diminish the costs of adjustment by forcing competition first with firms that are of comparable levels of (in)efficiency before exposition to the most efficient firms in the world. This allows a reduction of costs, through mergers, acquisitions and takeovers, that may be significant enough to facilitate survival in the world market. The poor financial condition of many African firms may constrain such restructuring, but an opening of factor and product markets within a program of general liberalization may induce investment that would not be forthcoming in a purely national context. Therefore, restructuring could be facilitated compared to uni-lateral liberalization and, under efficient management possibly from a neighboring country, the restructured firm will have a large enough internal demand to eliminate "wasteful overcapacity". 7/ In addition, the more dynamic firms that survive may takeover some of the plant and equipment of the less efficient firms and keep portions of the workforce and sales network in the neighboring countries, something that does not happen when imports from outside replace domestic production. These benefits will be limited by the tendency of rationalization to lead to a concentration of production at one place, but there may be instances where existing facilities can be recycled to other uses, possibly through intra-firm specialization.

2.28 Finally, it is worth considering the benefits of a multi-lateral approach as a means of "binding" any reform effort. It has been widely reported that the main motivation for Mexico to join the GATT was to provide the defense of an international treaty against powerful domestic pressure groups that could otherwise have forced a reversal of the liberalization effort. Similarly, it may be politically easier to defend trade liberalization proposals as well as resist proposals to roll them back if the Government can argue that it is getting some reciprocal benefits. In some cases the groups that will benefit from concessions from neighbors may act as a counterforce to those arguing against liberalization. This may be especially relevant for countries like Kenya (that is again facing difficulties in implementing its latest liberalization program) and Zimbabwe (that is timidly considering liberalization) that have established firms that could benefit from wider market access.

2.29 It is noteworthy that a similar approach has been advocated for the Central American Common Market (CACM) that until 1980 was the most successful regional grouping, in terms of generating intra-union trade, in the developing world (see Chapter III, Table 4). Thus, it is argued that "even after all reforms have been carried out, some external tariff barriers will still remain, partly to generate Government revenues. Domestic industries would, therefore, still be receiving a certain amount of protection against outside competition, both during the transition, while external trade barriers are being lowered, and afterwards. The removal of intra-regional trade barriers in this context would enable efficiency gains ... Moreover, the reduction in intra-regional trade barriers, as recommended here, would be accompanied by lower extra-regional trade barriers. This

7/ This is not an argument in favor of import substitution in a large internal market. Given existing widespread underutilization of capacity, a policy of regional liberalization will lead to fewer plants at greater levels of capacity utilization, but this should provide the basis for external trade liberalization rather than used as a justification for continued third party protection.

would also reduce the danger of trade diversion ... These arguments present a case in favor of achieving regional reintegration in the context of an overall free trade environment, but not as an alternative to external trade liberalization since Central America, even if fully integrated, would still be better off by liberalizing trade with the rest of the world." (CODII, LAC & IDD, PPR (1989), pages iv & v).

C. Risks and Limitations of a Regional Approach

2.30 The major risks of this approach are lack of interest by SSA Governments and Regional Organizations or an implementation that results in diverting trade from efficient suppliers because the expected generalized liberalization does not materialize.

2.31 It may be politically difficult for the majority of SSA Governments to implement the extensive liberalization required even on a regional basis. This is why it is essential to accept that different countries are unlikely to be able and willing to liberalize at the same rate. The failure of existing groups largely reflects the unrealistic expectation that it is feasible for many countries to simultaneously agree on major and rapid liberalization, especially when many of them do not have common interests or extensive mutual economic relations. Provided a few countries might be willing to accelerate adjustment through a regional approach, it may be worthwhile to explore this option. The cost of eventual lack of interest is low compared with the alternative of putting financial resources in regional projects that make the situation worse than it would otherwise be, particularly if it retards ongoing or potential adjustment.

2.32 This is why efforts should be redirected from the activation of customs unions or the granting of tariff preferences. Instead, emphasis should be put on the dismantling of non-tariff barriers to the free regional movement of factors of production and goods and services. In eliminating non-tariff barriers against regional partners as a first step to their eventual total elimination, governments would simply be adopting a different form of phasing from the current approach of distinguishing between types of imports exempted from QRs. However, since tariff reform does not aim at zero tariffs, implementing regional tariff cuts would not be equivalent. It is therefore difficult to envisage how the Bank could support African governments in implementing tariff preferences. Bank management could not easily justify to the majority of member governments, including affected ones in Africa, why it urged a sub-set of African countries to discriminate against them in the course of trade liberalization.

2.33 The worst possible scenario would be the activation by existing unions of extensive regional preferences that result in diversion of trade from both African and extra-regional partners to union partners favored by tariff or quota preferences (see Chapter III for details on which unions are most likely to divert trade from other SSA countries). The tariff preferences that have been implemented so far have been modest and it seems unlikely that significant changes will occur for most of the SSA groupings. Therefore it is unlikely that there is much cause for concern in practice. Nevertheless, it would be advisable for African governments to ensure that regional tariff preferences do not become excessive. In any case, as argued in chapter V, tariffs are not a major obstacle to intra-African trade.

2.34 In the case of a grouping that already has a CET, the same approach should be adopted. If, as is often the case, the CET itself is relatively low, then attention should be focussed on tax reform involving the replacement of all other import taxes with non-discriminatory sales or value added taxes. Where the CET extends excessive intra-union preferences, Bank support could be more easily justified if the union were to reduce these.

2.35 From a purely theoretical perspective that ignores social and political costs, the first best solution is likely to be rapid and far-reaching unilateral liberalization with the commensurate exchange rate

action. This would involve rapid and extensive restructuring driven by the competition from imports that would channel factors of production to newly profitable activity. Such an approach would supersede any need to specifically encourage regional economic integration.

2.36 Where possible, African governments should adopt such an approach. In practice, however, we are far from a first best situation as can be gauged from Table 3 which summarizes the objectives and achievements of Bank supported trade liberalization efforts in SSA. It is noteworthy that even the Bank's current objectives do not aim at anything close to industrial country level of protection, let alone full liberalization. This is why the regional approach may have practical relevance.

EXPERIENCE AND OBJECTIVES OF BANK-SUPPORTED TRADE LIBERALIZATION EFFORTS IN SSA
CATEGORY 1: LIBERALIZED a/

COUNTRY	ACTION TAKEN		OBJECTIVE OF THE BANK AVER. RATE OF PROTECTION TARGET AND SPREAD E.T.C.	REASONS FOR INCOMPLETE OR NO ACTION
	COMPLETE	INCOMPLETE NONE		
Burundi		Still QRs on importation of glass bottles, pharmaceutical and textiles. Comment: all these are public enterprises. Agreement to eliminate these by 1990.	Obj.: Reduction of effective protection. Elimination of all QRs. Comment: partly achieved. Nominal effective protection spread 15-45%. Target: 10-35%.	The analytical underpinning supporting the initial proposal is weak. Work is on-going on a new proposal to lower the average nominal rate of protection and achieve target spread of 10-35%.
Ghana	No known QRs on imports and exports (except repatriation requirement).		Obj.: Use of FOREX auction rate for customs valuation. Elimination of all QRs. Comment: for most items, the duty rate is 20-25%. Luxury items attract higher rates.	
Guinea	All QRs have been eliminated.		Obj.: To replace QRs with tariffs not to exceed 100%. Comment: a uniform tariff rate of about 10% is in place now. Only a few luxury items attract a tariff rate of up to 30%. The av. effective rate of protection is only 15% since there is little or no distortions due to tariff rates.	Tariff reform met all the expectations.
Kenya	July 1991 all QRs eliminated except those required for public health, security and environmental reasons. Automatic licenses for almost all tariff categories.	All imports still require licensing.	Obj.: Tariff to replace all QRs and not to exceed 100%. Reduction of av. dispersion. Comment: no import items are currently subject to duty rates in excess of 100%. Range: 0-100% av.=40%. Two studies provide two different estimates of net effective rate of protection: One is 60% and the other is 30%. More work is on-going in this regard.	SAL I and SAL II targets thought to have been too ambitious, given the short timetable. The recent industrial sector adjustment credit program, followed by the export development credit, while retaining similar targets, used a more cautious approach. Liberalization is now being achieved in phases; all QRs will be removed by July 1991, dispersion in tariff rates is being reduced, and two reductions in the average tariff rate of five percentage each were planned; one was completed in June 1990, and the other is due in June 1991.
Madagascar	All QRs on imports and exports have been eliminated.		Obj.: Reduce max. tariff to 80% and a min. of 10%. Reduce av. nominal protection to 35% in 4 years with a dispersion around the av. of 1. Comment: tariff range of 10-80% is achieved. Lending is continuing.	Further work is still required for the reduction of average nominal protection rate, on-going dialogue.

a/ Fully or partially liberalized, per Table 2.

CATEGORY 1: LIBERALIZED (continued)

COUNTRY	ACTION TAKEN			OBJECTIVE OF THE BANK AVER. RATE OF PROTECTION TARGET AND SPREAD E.T.C.	REASONS FOR INCOMPLETE OR NO ACTION
	COMPLETE	INCOMPLETE	NONE		
Malawi	All QRs eliminated with the exception of a small negative list comprising luxury, health, or safety goods.			Obj.: (1) Elimination of all all QRs, with the exception of a small negative list. (2) Reduction in effective protection, particularly lower tariff spread and elimination of domestic surtax suspension. Comment: QRs eliminated and rationalization of trade tax regime being phased in over several years. Current tariff rate is moderate but varied, with an avg eff. protection rate of 36%.	Local business interests are resisting reduction in domestic protection. Further analytical work is also required to identify optimal tariff scenario.
Mauritius	All QRs have been eliminated.			Obj.: Max. tariff 107% Elimination of all QRs. Comment: only few luxury items attract a tariff rate of 107%. Most are much lower. Effective protection rate for import substitution industries is in the range of 30-40%.	
Tanzania	Nearly all QRs have been eliminated. Short negative list on OGL (Open General License). Broad positive list on own-funded imports.			Obj.: Maximum tariff of 60 percent or less with 4 positive rates.	

EXPERIENCE AND OBJECTIVES OF BANK-SUPPORTED TRADE LIBERALIZATION EFFORTS IN SSA
CATEGORY 2: MIXED b/

COUNTRY	ACTION TAKEN			OBJECTIVE OF THE BANK AVER. RATE OF PROTECTION TARGET AND SPREAD E.T.C.	REASONS FOR INCOMPLETE OR NO ACTION
	COMPLETE	INCOMPLETE	NONE		
Congo		QRs exist in importation of 8-9 products. Owned mostly by a powerful industrialist. Importers must buy 80% of their need of these products before they can import 20%.		Obj.: Replace import quotas by tariffs. Replace export and import licensing system. Reduce tariff range from (0-200%) to (40-60%). Comment: QRs removed except in the case of 8-9 products. Export and import licensing still exists.	Membership in UDEAC affects ability to influence individual tariff. Lobbying effort by a powerful industrialist. Ministry of Commerce fear revenue loss.
Namibia				Target effective rate of protection will be in 20-30 percent range on MFN basis.	Bank dialogue is recent. Action is envisaged under renegotiation of South African Customs Union protocols to be initiated through proposed Regional Integration project.
Niger		All QRs have been eliminated except on the importation of petroleum.		Obj.: Dismantling of import licensing and import monopolies. Comment: for 1986 SAL, there was no tariff reform requirement. (I) Trade policy and incentives study completed 1988. No action taken but will be included in SAL II. (II) Recommended trade policy reform to be refined in context of Sahel Trade Policy Study.	
Senegal		All QRs are eliminated except for products produced by firms under special conventions. (Minimum specific duties were however introduced on 180 products from July 1989.)		Obj.: Completion of tariff reform with a new tariff law. Harmonization of effective protection through tariff. Gradual elimination of QRs. Comment: the new tariff reform is in place. It essentially reduced the effective rate of protection from about 80% to 40%. Harmonization refers to harmonization of effective protection rate for all members of the CEAO union. The special conventions are being renegotiated and no new ones granted.	Some discrimination still exists in the tariff rates because of social goals. Bank, while dissatisfied, is working to prevent misallocation of products among the four different tariff bands. Harmonization is difficult because of different effective protection rates among members of CEAO. Moreover, a true customs union is not expected to emerge. This issue will be looked at again in the Sahel Trade Policy Study.
Somalia	Free access to foreign exchange.	Partial adjustment in tariff reduction with most rates below 60%.	Import licensing formally remained in place but in practice it applies to only limited goods.	Reduce tariff protection below 60%; free access to foreign exchange complete elimination of QRs.	Macro instability/war.

b/ Limited liberalization or limited restriction, per Table 2.

CATEGORY 2: MIXED (continued)

COUNTRY	ACTION TAKEN			OBJECTIVE OF THE BANK AVER. RATE OF PROTECTION TARGET AND SPREAD E.T.C.	REASONS FOR INCOMPLETE OR NO ACTION
	COMPLETE	INCOMPLETE	NONE		
Togo				Fiscal study to raise import duty yields and streamline incentives and protection. Creation of export processing zones.	
Uganda	Export licensing eliminated.	QRs still exist for 7 products. Imports to stop being licensed except for those on a small negative list. Max. tariff now =50%.		Objective of reform is to remove all QRs and move to a tariff regime with 4 levels of tariffs, the maximum being 50%.	QRs used for the 7 items because it is claimed that customs are ineffective and tariffs are not paid.
Zaire	In principle, all QRs have been eliminated (except in one instance for political reasons).			Obj.: 60% max. tariff. 10% min tariff. Target NRP=30% in 4 years. Comment: target not yet achieved.	Revenue problem has delayed implementation. Moreover, the target spread of 10-60% tariff is to be achieved in phases.

EXPERIENCE AND OBJECTIVES OF BANK-SUPPORTED TRADE LIBERALIZATION EFFORTS IN SSA
CATEGORY 3: RESTRICTED c/

COUNTRY	ACTION TAKEN			OBJECTIVE OF THE BANK AVER. RATE OF PROTECTION TARGET AND SPREAD E.T.C.	REASONS FOR INCOMPLETE OR NO ACTION
	COMPLETE	INCOMPLETE	NONE		
Côte d'Ivoire	QRs apply to about a third of total imports, especially on consumer goods (textiles, shoes, food...)			Obj.: Tariff reform (acceptable to the Bank). Target effective rate of protection; 40% for industry and 20% for agriculture across the board. Elimination of all QRs.	QRs reintroduced in 86/87 after trade liberalization in 1985 following a sharp deterioration in terms of trade and important devaluations in neighbor countries. Work on a new trade reform is on-going.
Ethiopia			No actions taken	Ensure private sector access to foreign exchange. Eliminate export/import licensing.	Adjustment program was not agreed to due to excessive fiscal deficit and general political instability.
Sudan		Some multiple exchange rate practices; introduction of own financed schemes.		Adjusting the exchange rate to a realistic level; relaxing import regulations; abolishing export licensing.	Political instability and failure of talks with the IMF.
Zimbabwe		There is a process of trade liberalization.	There is complete foreign exchange allocation.	Obj.: Prepare 4 year tariff reform aimed at establishing 30% max. NRP.	A new government program is being implemented. The bank is supporting through a SAL (soon to be appraised).

c/ Fully or partially restricted, per Table 2.

EXPERIENCE AND OBJECTIVES OF BANK-SUPPORTED TRADE LIBERALIZATION EFFORTS IN SSA
CATEGORY 4: OTHERS d/

COUNTRY	ACTION TAKEN			OBJECTIVE OF THE BANK AVER. RATE OF PROTECTION TARGET AND SPREAD E.T.C.	REASONS FOR INCOMPLETE OR NO ACTION
	COMPLETE	INCOMPLETE	NONE		
Guinea Bissau				Reduce state monopoly on imports; increase stamp tax and customs duties.	

d/ Limited information.

2.37 Nevertheless, the recent study of liberalization experiences summarized by Papageorgiou, Choksi and Michaely (1987) and by Michaely (1988) argues that one-shot liberalization may also be preferable for practical reasons. The study finds that expanding sectors grow fast enough to offset unemployment in the adjusting sectors when liberalization is immediate, while phasing the process provides opportunities for contracting sectors to overturn the reform by providing opportunities to generate political resistance.

2.38 The Papageorgiou review includes no SSA countries, and SSA may not be comparable to other regions concerning the impact of trade liberalization. This is because, as discussed above, in SSA the economic base is so narrow, the distortions so extensive and the supply of investment so constrained, that there may be few sectors or firms that can provide an offset to the general contraction induced by the liberalization. In this regard, even in Nigeria, one of the most diversified and the largest economy in SSA, the experience with liberalization has been that unemployment rises in the short run since the expanding sectors grow from a low base while the contracting sectors involve larger firms (Zanini, 1987 and van Eeghen, 1988).

2.39 The case of Nigeria is also relevant in emphasizing that significant economic benefits cannot arise simply from extensive economic integration. None of the economic groupings (including ECOWAS without Nigeria) has as large and unified a market, total factor mobility, harmonized investment and tax codes and common external tariff, to the same extent as Nigeria (viewed as an economic unit). The poor economic performance of Nigeria reinforces earlier arguments concerning the importance of generalized liberalization to secure major economic benefits. Integration is only a useful means to that end.

2.40 The Papageorgiou findings notwithstanding, it is unrealistic to expect most SSA Governments to adopt immediate and extensive trade liberalization. It is this view together with the substantial progress still possible that leads to a pragmatic view that regional liberalization may yield more lasting and worthwhile results in some cases where extensive uni-lateral liberalization is resisted.

2.41 The Bank emphasis on regional cooperation is designed to strengthen current adjustment efforts in SSA and therefore should not be formulated as an alternative to programs at the national level. In particular, for the strategy to be effective, regional efforts will need to offset the smaller number of partners affected with a bolder and faster dismantling of barriers than envisaged in current national programs. Ideally, it will involve complete liberalization of trade and capital flows as well as full labor mobility with regional partners. At the very least all non-tariff trade barriers should be removed and firms from any partner country within the group should be treated as domestic firms rather than as foreign firms, with provision for the free flow of inputs and dividends across the national boundaries within the group.

2.42 The integration effort must also be placed within the framework of a general process of liberalization to avoid diverting efficient trade with industrialized countries and other developing countries (including those in SSA not in the arrangement) in favor of relatively less efficient regional partners favored mainly by high common external protection. At the same time, it is important to note that the traditional arguments about trade creation versus trade diversion assume perfect information and competitive markets. The reality in SSA is that because of policy and market failures there may be a potential for efficient trade switching to less expensive African exporters from costlier traditional suppliers (see Chapter V for more detail. In Chapter III this potential is estimated at between US\$4 and US\$5 billion). There is also an unrealized

trade potential in agricultural commodities that is hindered by national regulations on both the export and import side.

2.43 The harmonization of policies is also important. A significant share of unofficial trade is the result of differences in Government policies that result in inefficient supplying of certain markets; for example, Gambian smuggling of rice to Senegal arises from the attempts of the Senegalese to maintain above world market prices while the Gambians have a liberalized trade regime. Similarly, the Zambian subsidy on sugar encourages smuggling to Zaire. Harmonization of policies to eliminate such flows will also have to be an important element of any integration strategy.

2.44 It is also worth emphasizing that while economists have always agreed on the benefits of free trade, in practice no economic development experiment, including that of the NICs has ever involved systematic and extensive free trade. Movement to freer trade is indeed usually follows the attainment of a certain level of industrial development. Thus, the issue of the rate and scope of external trade liberalization should be seen in a practical context of movement towards a system that is more open and less biased against exports.

D. Achieving Success Where the Regional Groupings Have Failed

2.45 Berg (1989) argues convincingly that the likelihood of creating successful customs unions is low and that the expected benefits are small. Instead he suggests that a functional approach based on specific objectives (e.g fighting river blindness) would be more fruitful. Both conclusions should be endorsed while noting that his suggested approach is fully consistent with the proposals outlined here that call for small sub-groups of countries to mutually agree on extensive liberalization of factor and goods and services movements §/. The expectation should be that, especially initially, only a minority of countries would be willing to go down this path. However, for that minority it would, unlike the activation of customs unions, provide an additional tool to deepen and strengthen ongoing adjustment efforts.

2.46 Successful implementation of the integration strategy described above requires accepting the existing broad parameters already agreed by African Governments. At the same time, nothing significant can be achieved by sticking to the current approach based on a consensus system which results in going no faster than the slowest performer. To make matters worse, superimposed on this weak structure is a lack of commitment to implement decisions that are not seen as of immediate benefit. Chapter 6 of an early draft of the Long Term Perspectives Study and Berg (1989) provide detailed information on the difficulties encountered. For current purposes it suffices to suggest that new approaches are required that will be inspired by the broad strategies and goals of existing groupings but have an incentive structure for reform that is more flexible along the lines suggested above. More precise suggestions are made in Chapter VI.

III. ECONOMIC CHARACTERISTICS AND POLICY OF INTEGRATED AREAS

A. Present status of SSA arrangements

3.01 The seven arrangements covered in this study aim at industrial cooperation and trade liberalization in one form or another. Their objectives are generally consistent with the endorsement of collective

§/ The emphasis here is on measures relevant to increasing trade and facilitating greater outward orientation. This is not inconsistent with support for specific regional projects or initiatives along the lines suggested by Berg.

self-reliance by the Lagos Plan of Action in April 1980, even though most of them predated it. A list of these organizations and national members as well as the date of their formation is in Annex 1. Chapter 6 of the sub-zero draft of the Long Term Perspectives Study provides an excellent account of the history of these unions and why, except for the CEAO (Economic Community of West Africa), they have not achieved their main objectives. Therefore, it will not be productive to repeat the same type of analysis here. Instead, the emphasis in this chapter is placed on describing some of the economic characteristics of the unions and the pattern of recorded trade within the unions and with other African countries. While much of this chapter is descriptive in nature, the information does provide some insight into some of the elements required for successful integration and the appropriateness of various unions in view of existing patterns of recorded trade.

3.02 Although the treaties of six of these organizations envisage an across-the-board, high level form of integration, none of them have so far achieved this objective. The most ambitious are UDEAC, CEPGL, ECOWAS and CEAO, a sub-region of ECOWAS (Acronyms and membership are detailed in the Annex). Most countries lowered some internal trade barriers, usually some tariffs, but failed to reach consensus on the Common External Tariff or the elimination of most binding non-tariff barriers. Capital and labor mobility have in general not been secured in practice, even where there is a formal commitment. The major exception is the CEAO which is the only union to have achieved substantial labor mobility. Significantly, the CEAO is also the most successful grouping in terms of intra-union trade. The MRU is a smaller organization aiming to form a customs union. A less ambitious organization but a large one is the PTA: a preferential trade area started in 1984. The SADCC, launched in Lusaka in April 1980, gives priority to transport and communications and food security. Insofar as it aims at industrial cooperation, it does envisage growing trade on narrow lines of production covered by industrial planning. Recently, however, SADCC has developed an interest in liberalizing internal trade within the group.

3.03 In the description that follows, the analysis is based on recorded trade flows. Some countries are not included for lack of information (for example the SSA members of the Southern Africa Customs Union (SACU)--Botswana, Lesotho and Swaziland) and the trade that is recorded is not always reliable. In addition, the importance of unrecorded trade varies significantly from country to country. To avoid needless repetition, no reference is made below to the fact that the analysis is based on partial information, a factor that should always be borne in mind.

B. Economic Characteristics and Performance

3.04 Introduction. To evaluate the performance of the existing groupings in SSA it is useful to consider the experience in other regions of the world. Table 4 summarizes some basic indicators for the Central American Common Market (CACM), the Andean Pact, the Association of South East Asian Nations (ASEAN), the Latin American Free Trade Area (LAFTA), the European Free Trade Area (EFTA) and the European Community (EC6 for the initial membership of 6 countries and EC9 for the enlargement to 9 members; information for the current 12 member community was not readily available).

3.05 It is striking that the groupings in SSA have experienced the greatest degree of opening up of all unions. This is all the more remarkable given the rhetoric of self-reliance and de-linking from the world trading system that underlies much of the official justification for such

groupings (see Chapter II). 2/ Both the share of regional trade and intra-union trade creation in SSA are generally lower than in other regions except for the Andean pact with its ill-fated attempts to take industrial planning to extremes through proposed sharing out of component industries.

3.06 It would appear that the opening up of the African groupings is more a reflection of the failure to achieve extensive and efficient import substituting industrialization than of explicit policy decisions. In turn, this probably reflects the inappropriateness of such a strategy given the small market size of all the SSA groupings (see Chapter II, Table 1). It is noteworthy that the CACM achieved large increases in regional trade, that made it the most successful union in the developing world measured in terms of intra-union trade creation, by effectively pursuing an import substitution strategy. However, the gains were based on production of consumer goods at prices exceeding those on the world market. The inputs for this production were financed by buoyant commodity export receipts.

2/ It should be noted that the heavy dependence on export commodity production, the increases of import prices, especially of fuels, and the increased reliance on food imports have importantly contributed to this result. It is also true, that in some cases import substitution requires imported inputs to produce output with negative value added at world prices. Nevertheless, regardless of such explanations this increased dependence on the world economy serves to emphasize the folly of autarchic policies for Africa.

Table 4. Basic Indicators for Selected Economic and Trade Groups
(In percent)

Group	Share of Regional Trade 1/	Degree of Openness (Trade/GDP) 1/	Net Trade Gains (Change in Degree of Openness) 2/	Crude Trade Creation 3/	Trade Diversion (-) or Gains (+) with non-Partners	GDP			POP (mils) mid-1986	GDP p.c. (US\$)	Distribution of GDP in %			Area (thousands of square kms)
						US\$ bills 1986	Averg. An. Growth 1965-80	Rts 1980-86			Agr 1986	Ind 1986	Manufa 1986	
Outside SSA														
CACM	23	43	8	8	--	22	4.6	-	24	914	23	27	19	423
EC12 4/	50	46	-4	1	-5	3771	4.0	5.2	323	11675	6	35	18	2256
EC9	50	48	13	7	6	3057	3.7	1.5	264	11629	5	37	20	1527
EC6	42	31	3	5	-2	2508	3.8	1.2	198	12645	3	36	24	1169
EFTA	24	36	-1	2	-3	475	3.5	2.3	32	15047	5	38	23	1236
ASEAN	14	58	13	1	12	192	7.8	3.5	295	652	18	33	22	3064
ANDEAN P ¹ ACT	6	41	9	1	8	120	5.6	-	83	1458	16	33	19	4719
LAFTA	11	15	-6	--	-6	550	5.3	0.1	351	1566	15	35	22	19311
In SSA														
CEAO	9	57	31	3	28	18	4.1	0.7	47	379	37	22	13	4444
ECOMAS	6	33	30	2	28	78	6.3	-1.8	179	436	40	26	9	6093
PTA	7	41	18	1	17	33	3.9	2.1	146	227	40	22	14	4973
UDEAC	2	42	35	1	34	18	5.9	6.2	23	805	19	36	5	1708
MRU	1	42	35	1	34	4	3.3	0.2	12	346	41	23	3	429
CEPGL	--	47	11	--	11	9	2.4	1.3	43	208	35	31	14	2399
IOC	3	42	na	na	na	7	na	2.5	13	517	na	na	na	562

1/ Data is for 1983.

2/ For SSA, calculations are based on difference between 1965 and 1983. For other groupings, various dates are used corresponding to a period before and after the union became effective.

3/ Here trade creation/diversion is measured as the change in trade relative to GDP. A more precise measure should take account of production and demand in a well specified model (see Corado and De Melo (1986)). Note that Net Trade Gains (column 4) = Crude Trade Creation (column 5) + Trade Diversion (-) or Gains with non-Partners (column 6). Crude Trade Creation is the change in the share of regional trade in GDP following the creation of the Union.

4/ Data for EC12 countries (1988) from World Development Report 1990.

Note: The European Community is denoted by EC6 for the initial membership of six countries EC9, for the enlargement to nine members and EC12 for the current 12 member community.

Sources: Monacott and Lutz (1988), CONTRADE (A UNSO Database) and staff estimates.

When commodity prices collapsed in the late 1970s and foreign financing became unavailable in the early 1980s, the earlier gains were reversed (see CODII, LAC & IDD, PPR (1989)).

3.07 All the groupings increased their degree of openness (trade expressed as a percent of GDP) except for LAFTA, with its emphasis on import substitution and EFTA that lost important members to the EC. Outside SSA, all organizations except for ASEAN and the Andean pact generated more internal than external trade while in SSA the reverse is true. In the case of ASEAN this result is not surprising given the negligible emphasis placed on intra-union trade liberalization. Despite this, the share of regional trade within ASEAN is relatively high, while ASEAN also displays the greatest degree of openness. Similarly, the CEAO is both the most open group in SSA and the one with the largest share of intra-regional trade. This suggests that regional exchange may be favored by openness instead of requiring external barriers (also see paragraph 3.55 (e)).

3.08 This quick comparison suggests that unions in Africa have been less successful than those elsewhere, except for the Andean Pact which failed through overemphasis on industrial planning. Surprisingly, African unions have witnessed more external than internal trade generation and have moved from being relatively closed in the 1960s to about the same degree of openness as unions in other parts of the world. In evaluating the performance of the SSA unions, it will be useful to remember this background.

3.09 ECOWAS. With 16 members this is the grouping in SSA with the largest GDP (\$63 billion). Its population of 190 million leaves it with a per capita income of US\$330 (see Table 5). The organization was established in 1975 and regroups the relatively well integrated economies of the Communauté Economique de l'Afrique de l'Ouest (CEAO) with the other countries of West Africa. Despite many revisions in the target date for achieving a single internal market, agreed decisions to liberalize internal trade and factor flows have not been implemented. As a result intra-ECOWAS trade has stagnated and the overall share of 6 percent mainly reflects the 10 percent intra-regional trade within the CEAO. The protocol on free movement of labor is not implemented in practice. When Nigeria benefitted from its oil boom, there was some degree of labor mobility involving inflows into Nigeria. When recession hit, Nigeria expelled other ECOWAS nationals.

3.10 In an attempt to overcome past inaction, at the 1990 summit, a decision was taken to implement a Monetary Cooperation Program that would lead to Monetary Union. While the three year timetable envisaged is unrealistic, the emphasis on the elimination of cross-border trade and investment barriers as a first step is consistent with the strategy proposed in this report (see Chapter VI) and offers a pragmatic approach that could reverse past inaction. The ECOWAS Secretariat has commissioned a study that would propose concrete actions for removing existing obstacles to the free flow of goods, services and investment within the ECOWAS region. It is expected that the results would be ready in time for submission to the next ECOWAS summit in mid-1991. This would then set the stage for ECOWAS to implement the measures at the national level.

3.11 ECOWAS contains Nigeria, Africa's largest economy (GDP of US\$29 billion as well as several of its smallest, Cape Verde, Gambia and Guinea Bissau (GDP of about US\$0.2 billion). It includes the Sahelian countries which depend heavily on agriculture and some of the more industrialized economies in SSA such as Senegal, Nigeria and Cote d'Ivoire (19, 18 and 16 percent of GDP from manufacturing, respectively). The population varies from one third of a million in Cape Verde to 110 million in Nigeria while per capita income ranges from US\$190 in Guinea Bissau to US\$711 in Senegal.

3.12 ECOWAS countries as a group have registered the worst growth performance of all the groupings and, ironically, performance was better

before the creation of the union--annual growth declined from 3.5 percent between 1965 and 1980 to 1.2 percent from 1980 to 1988.

3.13 With a market size comparable to Yugoslavia and somewhat smaller than Denmark (see Chapter II, Table 1), ECOWAS is the only grouping in SSA where the economies of scale argument might appear justified (see Chapter I).

3.14 Over the period 1965 to 1983, the degree of openness of ECOWAS increased by 30 percentage points (Table 4). The creation of ECOWAS does not seem to have led to trade diversion, since all but 2 percentage points of this increase is accounted for by greater trade with non-ECOWAS partners. Total trade flows increased by nine-fold for ECOWAS as a group. The share of trade with SSA rose almost twice as fast as overall trade over this period, with intra-union trade increasing slightly faster than this (see Table 6). Within ECOWAS, the exchanges between CEAO and other ECOWAS members rose slightly less rapidly than for ECOWAS as a whole while trade between the MRU and other ECOWAS members rose twice as fast. Overall, the creation of ECOWAS seems to have had a negligible impact in increasing the share of regional exchange.

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TABLE VI BASIC INDICATORS

Country	GDP			POP (bill.)	GDP per (US\$)	Structure of area (1988)			Degree of openness	Area (thousands square km)
	US\$ bil.	Av. An. Grth Rate (%)	Rate (%)			Share in GDP (%)				
	1988	1985-88	1980-88			1988	1988	Agri		
FTA	57,709	4.2	2.1	207.2	270	36	22	13	47%	10,424
** Angola	6,759	9.5	713	21	10	3	57%	1,277
Burundi	960	5.6	4.3	5.1	188	56	15	10	30%	28
** Cameroon	194	0.4	440	39%	2
Djibouti	13	37	23
Ethiopia	4,950	2.7	1.4	47.4	104	42	17	12	30%	1,222
Kenya	7,388	6.4	4.2	22.4	329	31	20	12	41%	583
Lesotho	330	5.7	2.9	1.7	194	21	28	13	...	30
Malawi	1,080	5.6	2.6	8.0	135	37	18	...	66%	119
Mauritius	1,600	5.2	5.7	1.1	1,455	13	33	25	13%	2
Mozambique	1,100	...	-2.8	14.9	74	62	20	...	74%	802
** Namibia	1,900	1.7	1,118	13	37	...	69%	824
Rwanda	2,310	4.9	2.1	6.7	345	38	22	15	21%	26
Somalia	970	3.4	3.2	5.9	164	65	9	5	42%	638
Sudan	11,240	3.8	2.5	23.8	472	33	15	8	15%	2,306
Swaziland	595	0.7	810	17
Tanzania	2,740	3.7	2.0	24.7	111	66	7	4	57%	945
Uganda	3,950	0.8	1.4	16.2	244	72	7	6	21%	236
Zambia	4,000	1.9	0.7	7.6	526	14	43	25	49%	753
Zimbabwe	5,650	5.0	2.7	9.3	608	11	43	31	52%	391
ECOMAS	62,648	3.5	1.2	189.6	330	38	23	9	45%	8,129
CEAO	21,330	2.9	2.4	48.3	442	37	21	11	49%	4,444
Benin	1,710	2.1	2.4	4.4	389	40	13	6	37%	113
Burkina Faso	1,750	3.5	5.5	8.5	206	39	23	13	54%	274
Cote d'Ivoire	7,650	6.8	2.2	11.2	683	36	25	16	51%	323
Mali	1,940	3.9	3.2	8.0	243	49	12	5	40%	1,240
Mauritania	900	2.0	1.6	1.9	474	38	21	...	87%	1,031
Niger	2,400	0.3	-1.2	7.3	329	36	23	9	33%	1,267
Senegal	4,980	2.0	3.3	7.0	711	22	29	19	38%	196
NERU	4,770	3.3	0.6	11.7	408	38	24	4	45%	429
** Guinea	2,540	3.8	2.9	5.4	470	30	32	5	41%	266
** Liberia	960	3.3	-1.3	2.4	400	37	28	5	72%	111
Sierra Leone	1,270	2.8	0.2	3.9	326	46	12	3	21%	72
OTHER ECOMAS	34,318	4.3	0.5	129.6	282	39	24	12	41%	1,256
** Cape Verde	245	0.4	680	25%	4
** Gambia	164	0.8	200	55%	11
Ghana	5,230	1.4	2.1	14.0	374	49	16	10	38%	239
** Guinea-Bissau	179	0.9	190	29%	36
Nigeria	29,370	6.9	-1.1	110.1	267	34	34	18	47%	924
Togo	1,360	4.5	0.5	3.4	400	34	21	8	55%	57
UDEAC	20,508	5.9	6.2	23.0	890	29	28	11	48%	3,020
Cameroon	12,900	5.1	5.4	11.2	1,152	26	30	13	24%	475
Central African Rep.	1,080	2.6	2.1	2.9	372	44	12	8	34%	623
** Equatorial Guinea	138	0.3	410	39%	28
Congo, People's Rep.	2,150	5.9	4.0	2.1	1,024	15	30	8	71%	342
Chad	920	...	3.9	5.4	170	47	18	15	54%	1,284
Gabon	3,320	9.5	-0.2	1.1	3,018	11	51	...	66%	266
CEPSA	9,740	4.0	2.8	45.2	215	42	24	11	38%	2,399
Burundi	960	5.6	4.3	5.1	188	56	15	10	30%	28
Rwanda	2,310	4.9	2.1	6.7	345	38	22	15	21%	26
Zaire	6,470	1.4	1.9	33.4	194	51	34	7	64%	2,345
SABCC	24,194	5.2	2.4	77.6	312	29	28	14	69%	4,934
Angola	6,759	9.5	713	21	10	3	57%	1,277
Botswana	1,940	14.3	11.4	1.2	1,617	3	55	5	126%	600
Lesotho	330	5.7	2.9	1.7	194	21	28	13	...	30
Malawi	1,080	5.6	2.6	8.0	135	37	18	...	66%	119
Mozambique	1,100	...	-2.8	14.9	74	62	20	...	74%	802
Swaziland	595	0.7	810	17
Tanzania	2,740	3.7	2.0	24.7	111	66	7	4	57%	945
Zambia	4,000	1.9	0.7	7.6	526	14	43	25	49%	753
Zimbabwe	5,650	5.0	2.7	9.3	608	11	43	31	52%	391
IOC	5,799	3.5	3.2	13.1	443	27	25	25	71%	593
** Comoros	194	0.4	440	39%	2
Madagascar	1,880	1.8	0.6	10.9	172	41	16	...	35%	587
Mauritius	1,600	5.2	5.7	1.1	1,455	13	33	25	13%	2
** Reunion	1,866	0.6	3,240	2
** Seychelles	258	0.1	3,800	0

Sources: World Development Report 1990, World Bank Atlas 1988, IMF Direction of Trade Statistics 1987, and staff estimates.
* GDP reported instead of GDP; ** staff estimates of GDP; # Exports and imports from IMF Direction of Trade Statistics.

3.15 In 1983, Intra-Ecowas trade accounted for 91 percent of the African trade of ECOWAS members and most of the remainder was with UDEAC (see Table 7). Thus ECOWAS treated as a whole appears to be a coherent union whose activation into a customs union would divert little African trade from non-members, although liberalizing trade with the UDEAC countries would be beneficial. For ECOWAS as a whole, intra-African trade only accounted for 6 percent of its total trade. Nevertheless this average masks a wide dispersion ranging at one extreme between less than one percent and 4 percent for Cape Verde, Nigeria and Liberia and at the other extreme from 23 to 33 percent for Niger, Burkina Faso and Mali. Indeed, the average level of intra-SSA trade is unduly influenced by the low share for Nigeria which has a big weight because of its size. Except for the three countries at the bottom of the scale listed above and Gambia, Ghana and Guinea Bissau, the intra-SSA trade of all the 10 other ECOWAS members accounts for at least 10 percent of the total trade and 7 members have shares of 20 percent or more.

3.16 It would appear that while ECOWAS has not generated much new regional trade, an important part of the trade of many of its members has been with other SSA countries, even though this is masked in the overall numbers by the dominant position of some of the large economies that have little regional trade, specifically Nigeria and Ghana. As an illustration, if the median were used instead of the mean, this would give an average share of about 11 percent for SSA trade of ECOWAS instead of 6 percent.

3.17 ECOWAS as a whole displays a degree of openness of 45%, close to the median of 41%. Mauritania is the most open economy (trade is 87 percent of GDP) and Cape Verde is the most closed (trade is 25 percent of GDP).

TABLE - TRADE GROWTH IN SUB SAHARAN AFRICA : 1985-1983

(Growth of trade with SSA countries expressed as a ratio of growth of total trade with SSA; growth of trade with SSA as a ratio of growth of total trade. Eg. growth of Burundi's trade with Kenya is 1.34 times growth of its trade with SSA. Growth of Burundi's trade with SSA is 2.7 times growth of its trade with World.)

PTA	BURUNDI	COMOROS	DJIBOUTI	ETHIOPIA	KENYA	MALAWI	MAURITIUS	RWANDA	SOMALIA	TANZANIA	UCANDA	ZAMBIA	ZIMBABWE	PTA
PTA														0.99
BURUNDI	ERR	ERR	ERR	ERR	0.53	ERR	ERR	-0.05	ERR	ERR	-0.09	ERR	ERR	9.47
COMOROS	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR
DJIBOUTI	ERR	ERR	ERR	24.12	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	134.45
ETHIOPIA	ERR	ERR	0.97	ERR	0.76	ERR	-0.23	ERR	-1.43	ERR	ERR	ERR	ERR	11.81
KENYA	1.34	ERR	ERR	2.29	ERR	2.73	1.02	7.88	ERR	ERR	ERR	-18.72	-10.82	21.01
LESOTHO	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR
MALAWI	ERR	ERR	ERR	ERR	0.12	ERR	1.14	ERR	ERR	0.82	ERR	-37.69	-1.58	0.55
MAURITIUS	ERR	ERR	ERR	-0.09	0.13	3.33	ERR	ERR	ERR	-0.03	ERR	1.59	-61.98	2.32
RWANDA	-0.06	ERR	ERR	ERR	3.16	ERR	ERR	ERR	ERR	0.32	-0.09	ERR	ERR	6.93
SOMALIA	ERR	ERR	ERR	-0.10	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	0.59
SWAZILAND	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR
TANZANIA	ERR	ERR	ERR	ERR	ERR	18.40	-0.21	0.79	ERR	ERR	ERR	-36.13	ERR	17.65
UCANDA	-0.08	ERR	ERR	ERR	ERR	ERR	ERR	0.08	ERR	ERR	ERR	ERR	ERR	20.82
ZAMBIA	ERR	ERR	ERR	ERR	0.18	8.96	-0.13	ERR	ERR	0.38	ERR	ERR	3.79	-0.13
ZIMBABWE	ERR	ERR	ERR	ERR	0.06	0.20	2.71	ERR	ERR	ERR	ERR	2.03	ERR	-0.21
ECOMAS														3.13
CEAD														3.49
BENIN	ERR	-0.11	ERR	ERR	ERR	ERR	ERR	ERR	ERR	-0.03	ERR	ERR	ERR	190.77
BURKINA F.	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR
IVORY COA	-0.07	ERR	ERR	ERR	26.29	ERR	ERR	ERR	ERR	15.96	ERR	-28.22	ERR	20.84
MALI	ERR	ERR	ERR	ERR	-0.03	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	-0.50
MAURITANI	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR
NIGER	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR
SENEGAL	ERR	-0.11	ERR	ERR	-0.03	ERR	ERR	ERR	ERR	ERR	0.09	2.48	5.95	-0.40
NERU														0.40
GUINEA	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR
LIBERIA	ERR	ERR	ERR	ERR	ERR	2.13	ERR	ERR	ERR	ERR	ERR	ERR	ERR	1.63
SIERRA LE	ERR	ERR	ERR	ERR	ERR	-0.51	ERR	ERR	ERR	ERR	ERR	ERR	ERR	-0.31
OTHER ECOMAS														4.51
CAPE VERD	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR
GAMBIA	ERR	ERR	ERR	ERR	ERR	16.47	ERR	ERR	ERR	ERR	ERR	ERR	ERR	11.44
GHANA	-0.08	ERR	ERR	0.13	31.10	ERR	ERR	ERR	ERR	1.68	0.00	2.42	5.54	11.06
GUINEA-BI	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR
NIGERIA	-0.08	ERR	ERR	0.13	0.65	ERR	ERR	ERR	-1.43	ERR	-0.09	3.19	5.95	0.94
TOGO	ERR	ERR	ERR	ERR	ERR	0.43	ERR	ERR	ERR	ERR	ERR	ERR	ERR	12.34
UDEAC														51.55
CAMEROON	ERR	ERR	ERR	5.83	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	244.89
CENTRAL A	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR
CHAD	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR
CONGO	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR
GABON	ERR	ERR	0.00	ERR	ERR	ERR	ERR	ERR	ERR	0.99	ERR	ERR	ERR	25.05
EQUATORIA	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR
CEPOL														1.98
BURUNDI	ERR	ERR	ERR	ERR	0.53	ERR	ERR	-0.05	ERR	ERR	-0.09	ERR	ERR	9.47
RWANDA	-0.06	ERR	ERR	ERR	3.16	ERR	ERR	ERR	ERR	0.32	-0.09	ERR	ERR	6.93
ZAMBIA	0.18	ERR	ERR	-0.10	0.33	21.38	ERR	-0.08	ERR	0.03	-0.09	3.19	5.95	-0.18
OTHER SSA														2.62
ANGOLA	ERR	ERR	ERR	ERR	ERR	ERR	-0.28	ERR	ERR	ERR	ERR	ERR	ERR	-0.52
BOTSWANA														
MADAGASCAR	ERR	-0.07	0.00	ERR	0.03	-0.62	0.14	ERR	ERR	ERR	ERR	ERR	5.95	0.86
Mozambique	ERR	ERR	ERR	ERR	3.57	2.04	ERR	ERR	ERR	ERR	ERR	3.19	-27.83	2.92
Sao Tome	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR
SEYCHELLE	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR
SUDAN	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR	ERR
AGGREGATES														
SSA	2.70	0.32	1.17	2.44	2.22	0.27	0.87	0.64	0.38	2.17	2.99	-0.46	-0.09	0.55
WORLD	4.18	21.15	11.50	4.17	15.47	4.11	4.41	18.66	1.92	13.72	3.91	0.69	1.86	3.48

3.18 PTA. The PTA is the counterpart of ECOWAS in the Eastern and Southern part of Africa and has the largest membership (19) and population (207 million) of all the SSA groupings. The PTA was established in 1981 to promote the development of its member states by creating a single internal market, undertaking regional development projects and programs, and encouraging cooperation in all fields of economic activity. Seventeen of twenty initially eligible Eastern and Southern African countries have joined (Angola, Burundi, Comoros, Djibouti, Ethiopia, Kenya, Lesotho, Malawi, Mauritius, Mozambique, Rwanda, Somalia, Swaziland, Tanzania, Uganda, Zambia and Zimbabwe) as have Namibia and Sudan (not in the initial group of 20). The application of Zaire (also not in the initial group of 20) is being favorably considered ^{10/}. It is the second largest union with a GDP of US\$33 billion (see Table 5), somewhat larger than New Zealand and comparable to Thailand (see Chapter 1, Table 1). Thus its market size is insufficient to provide scope for an efficient import substitution strategy dependent on economies of scale.

3.19 The PTA is a Union of contrasts and potential complementarities that suggests good prospects for economic specialization. It is the second poorest Union (just ahead of the CEPGL) with a per capita income of US\$279, with variations from US\$74 in Mozambique--the lowest in SSA--to US\$1,455 in Mauritius--fifth from the top in SSA (Table 5). The population varies from less than 1/2 a million in the Comoros to over 47 million in Ethiopia while GDP ranges from less than US\$0.2 billion in Comoros to US\$11 billion in Sudan. Together, the top 3 economies account for less than half the total for the group, so the fear of domination by one country is less pronounced than in the case of ECOWAS. Similarly, the PTA contains the top three manufacturers of SSA as well as the five that depend most on agriculture.

3.20 The growth performance of the PTA countries over the period 1965-80 of 4.2 percent a year on average was significantly below the 4.8 percent recorded by SSA as a whole, but in contrast, over the period 1980-88 the PTA grew by 2 percent a year on average while SSA stagnated.

3.21 Over the period 1965 to 1983, before the union was effective, its degree of openness increased by 18 percentage points (Table 4) with virtual all the trade gains concentrated outside the PTA. Trade flows for PTA countries taken as a group increased more than three fold. The share of trade with SSA fell over this period with intra-PTA trade rising in line with the growth of trade with SSA as a whole (see Table 6). In 1983, 86 percent of the African trade of PTA countries taken as a group was with PTA partners and therefore, as in the case of ECOWAS, this suggests that diversion of trade with non-PTA SSA countries is likely to be small in case of effective activation of the Union (Table 7).

3.22 Trade with SSA accounts for 8 percent of overall trade of the PTA countries treated as a group, thus implying that intra-PTA trade is equivalent to 7 percent of total trade. However, as in the case of other Unions, this masks country to country variation. Thus between 1 and 3 percent of the total trade of Somalia, Mauritius and Ethiopia is with SSA at one extreme while at the other end, about 20 percent of the trade of Uganda and Rwanda is with SSA partners. The median share of SSA trade is 7 percent, slightly lower than the mean. Unlike the case of ECOWAS, the divergences are much less marked between countries. Indeed, for all but 5 countries the variation in the share of SSA trade is between 5 and 14 percent.

^{10/} Mozambique joined in 1989 and Angola, Namibia and Sudan in 1990. The trade analysis in this section, based on data before that time, is therefore limited to the other 15 members.

3.23 The PTA has a degree of openness of 47% and varies from 15 percent in Sudan--the most closed economy of SSA--to 139 percent in Mauritius--the most open economy of SSA. Most PTA countries have a degree of openness that is bunched between 30 and 57 percent.

3.24 Like ECOWAS, the PTA has postponed deadlines for implementing various intra-union liberalization decisions and has not achieved significant integration. The main focus of internal liberalization has been tariff preferences and the removal of non-tariff barriers for a limited list of products. A regional Clearinghouse and a PTA Trade and Development Bank for financing regional projects and trade have been established. The PTA Trade and Development Bank is located in Bujumbura, Burundi, far from the centers of economic and financial activity of the PTA. Recently, it has begun lending. On the trade side, the PTA Bank is trying to find ways of sharing risk with commercial banks to induce a resumption of credit lines and it has secured an arrangement with a Scandinavian Bank and with Citibank for opening letters of credit (LCs) in PTA members where international banks are normally reluctant to lend because of sovereign risk. In addition, the agreement with Citibank envisages lending for trade, particularly pre-export financing. Some pre-export financing operations in Ethiopia are credited with an expansion of leather exports. In contrast, the investment portfolio may eventually end up with problems even though up to now such lending has been limited to a few loans in Zambia and Uganda. However, there is a danger that political pressure will induce financing of public enterprises engaged in inefficient import substitution.

3.25 The PTA Clearinghouse, operated by the Reserve Bank of Zimbabwe in Harare, has also achieved significant progress in increasing the amount of intra-regional trade it handled from SDRs 86 million (9 percent of intra-PTA trade) in 1984 to SDRs 284 million (57 percent of intra-PTA trade) in 1989. Further, the percentage of transactions settled in hard currency has dropped from 88 percent to 48 percent over the same period. However, the level of intra-regional trade over this period has almost halved (from about SDR 1 billion to less than SDR 0.5 billion), largely reflecting the tightening of NTBs that tend to affect regional trade more severely than trade with the rest of the world 11/.

3.26 The PTA has, nevertheless, achieved significant progress, particularly in the area of trade facilitation and trade financing. It has undertaken activities for promoting co-operation in the field of trade and customs. These have embraced the establishment of the Common List of Commodities to be granted preferential treatment when traded between Member States, the publication by the Member States of PTA tariff rates in respect of the commodities in the Common List, formula for the progressive reduction and eventual elimination of customs duties on goods traded among the Member States, establishment of a time-table for the relaxation and eventual elimination of non-tariff barriers to intra-PTA trade, simplification of trade documents and procedures, removal of non-physical barriers to the free movement of cross-border traffic, establishment of a trade information center, undertaking of demand and supply surveys, holding of buyer/seller meetings and trade fairs and the establishment of a PTA Federation of Chambers of Commerce and Industry.

3.27 The PTA is making a substantial effort to achieve its objectives as reflected in the considerable honesty in discussing difficulties in implementing past decisions and the realism displayed at the latest meeting, in November 1990, towards the initial proposals of the Secretariat for immediate Monetary Union which were turned into a pragmatic

11/ In part, this is because bi-lateral donors tend to provide lines of credit that favor imports from their country. In addition, officials administering import controls tend to favor imports from outside the region which are regarded as more essential (see Chapter V, paragraphs 5.48-5.52).

program to improve economic links. Other encouraging measures include: (i) a three year program for phasing out import licensing for goods on the common list starting on January 1, 1992; (ii) proposals for developing a Monetary Harmonization Program including setting up a Monetary and Financial Cooperation Committee (MFCC) composed of technical experts from Central Banks and Ministries of Finance. The MFCC met in February 1991 to prepare a timetable of medium term actions, the first step of which will be to find means of removing Non-Tariff Barriers (NTBs) and freeing cross-border investment flows; (iii) adoption of draft proposals for a legal framework allowing the setting up of Multinational Industrial Enterprises (MIEs) within the PTA -- MIEs can be private, public or mixed enterprises and would be able to operate and invest more freely than foreign enterprises; (iv) understanding on expansion of the PTA Trade Information Network (TINET) and measures to make the private sector more aware of the facility; (v) agreement to implement a Customs Guarantee arrangement for PTA Transit Traffic; and (vi) adoption of suggested improvements to the Yellow Card Scheme (for PTA road transport insurance) and of a framework to expand intra-PTA air traffic rights.

28 Nevertheless, the PTA has found it hard to convince its members to act decisively to deal with the intra-regional barriers to trade and factor flows, particularly NTBs ^{12/}. In part this is because, when left to itself, the PTA has to reflect the lowest common denominator; this limits the pace of progress and results in too much emphasis on interventionism by the State (e.g. the proposals to set up multi-national public enterprises while national governments are trying to privatize; or the reluctance to let MIEs operate without government controls). Despite this, there is an increasing realization of the need to rely on private initiative, as evidenced by the rejection of a proposal to set up a Commercial Bank, the efforts to increase private sector use of TINET and attempts to facilitate transit and intra-PTA road insurance.

3.29 SADCC. The intra-regional trade performance of SADCC will not be covered since trade promotion is not one of its major objectives and since all nine SADCC members except for Botswana have joined the PTA. SADCC was set up to facilitate the coordination, with the help of donors, of measures that would reduce dependence on South Africa.

3.30 With a GDP of \$24 billion, the group a slightly larger market size than UDEAC and the CEAO with a GDP of US\$17 billion but its population of 78 million is 3 times as large as that of the UDEAC and half again as large than that of the CEAO (Table 5). Its per capita income level is therefore US\$312.

3.31 CEAO. The CEAO is the only grouping in Sub-Saharan Africa to have achieved a reasonable degree of economic integration as evidenced by both trade creation and share of intra-union trade. This has been facilitated by (1) a (common) convertible currency -- the CFA Franc -- that is used by all the member countries (except for Mauritania, which interestingly has the lowest share of intra-union trade); (2) substantial intra-union factor mobility (both labor and capital); and (3) a workable compensation agreement -- that supported the initial stages of integration

^{12/} Except for granting tariff preferences on a limited range of products. These preferences are in turn nullified by the maintenance of NTBs.

although in current circumstances the compensation mechanism is starting to act as a brake against further integration ^{13/}.

3.32 The CEAO countries are all members of ECOWAS and the continued existence of the CEAO (and the MRU, discussed below) has tended to complicate ECOWAS liberalization. At the same time, the grouping is a response to the fear of domination by Nigeria which has a GDP one third larger than that of the CEAO as a whole while its population is twice that of the CEAO (Table 5). Except for extremes of Burkina Faso and Senegal, with a per capita income level of US\$206 and US\$711, respectively, the per capita income distribution is bunched between US\$339 and US\$685, the smallest variation for any of the large groups (excluding those with only three members).

3.33 Population distribution also tends to be relatively uniform varying between 7 and 8 1/2 million except for the extremes of Mauritania (2 million) and Cote d'Ivoire (11 million) and 4 million in Benin.

3.34 The economic performance of the CEAO countries has been close to the average for SSA as a whole. Over the period 1965 to 1980 the group did slightly less well than ECOWAS as a whole but this was reversed between 1980 and 1986. Furthermore, while in the initial period only Cote d'Ivoire put in a performance above the average for SSA, in the later period, all but Niger performed substantially better than average.

3.35 Despite the small differences in income, the Union is characterized by significant differences in economic specialization. Thus, it includes the fourth and fifth most industrialized SSA economies (Senegal and Cote d'Ivoire, respectively) as well as the sixth most dependent on agriculture (Mali).

3.36 Over the period 1965 to 1983, trade flows for the CEAO countries treated as a group increased by more than 6 times (Table 6). The share of SSA in total trade increased over this period although intra-CEAO trade rose slightly more slowly than the overall share with SSA. The main beneficiary of this increased trade flow was the non-CEAO component of ECOWAS. In 1983, 51 percent of the African trade of the CEAO countries was with CEAO partners and 42 percent with non-CEAO ECOWAS partners (Table 7). Further, of its total trade, 18 percent was with SSA countries so that intra-CEAO trade accounted for more than 9 percent of total trade, the highest for all the groupings.

3.37 Despite the high level of intra-CEAO trade, the important share of trade with non-CEAO ECOWAS partners suggests that attempts to erect barriers around the CEAO would risk diverting important levels of trade from African, particularly ECOWAS, countries that are not CEAO members.

3.38 The CEAO countries taken as a group have a degree of openness of 57%, the highest for all the Unions in SSA. Further, the lowest degree of openness of 37% is the same level as the average around which most countries are bunched for other unions.

^{13/} Since there is a widespread view that the main obstacle to integration is currency inconvertibility (hence the adoption of Monetary Cooperation programs by both ECOWAS and PTA), it is useful to note that the UDEAC countries also share the CFA Franc as their currency but have the lowest intra-union trade creation and share of intra-union trade of all the major SSA economic groupings (see below). This suggests that convertibility is not in itself the source of the good performance of the group. In addition to convertibility, the CEAO is also the only union with significant labor mobility and has the most effective compensation mechanism. It is likely that it is the combination of these three elements that accounts for the success of the Union.

3.39 The CEAO has achieved a high degree of integration. Except for Mauritania, all its members also belong to UMOA (West African Monetary Union) and thus share a common central bank and have a common currency, whose convertibility is backed by France. Financial capital and labor are generally mobile within the union and there is a mechanism for compensating weaker states through regional projects funded by FOSIDEC, the Solidarity Fund of the union to which the stronger members, Cote d'Ivoire and Senegal are net contributors. A selected list of industrial products benefits from intra-union preferences while nearly all raw materials are traded on a duty free basis within the community.

3.40 UDEAC. It is ironical that the two unions that do not face the foreign exchange constraints blamed by many for poor regional trade performance should be at opposite ends in terms of trade creation and the share of recorded trade flows within the Union. UDEAC, unlike CEAO, has limited labor mobility and this may account in large part for the relative difference in performance. It is not possible to make a definitive link between labor mobility and importance of regional trade; nevertheless it is likely that with labor mobility countries with a regional trade deficit would be in a position to finance this through the export of labor. Indeed it is alleged that within the CEAO this happens in the form, for example, of Mali and Burkina Faso exporting labor to Cote d'Ivoire in exchange for manufactures.

3.41 The UDEAC has been characterized by dissension on the sharing of benefits which has resulted in the withdrawal of Chad at certain points. In recent years the Union has added Equatorial Guinea as a member. The Union is characterized by the most extreme differentiation in wealth of all the Unions. It includes Gabon, the third wealthiest SSA country, at one end with a per capita GDP of US\$3 012 and Chad at the other end with a per capita income of \$170, one of the lowest in SSA. (see Table 5).

3.42 With a population of 23 million and a GDP of US\$21 billion, UDEAC has by far the highest per capita GDP of all the unions, namely US\$890 (Table 5). It is also, the smallest of the major trade groupings (excluding the MRU and the CEPGL which each have only 3 members). Its economic size is similar to that of Bangladesh and about three quarters the size of Ireland, the smallest industrialized country (Chapter II, Table 1).

3.43 The economies of the union vary in size from one of the smallest in SSA (Equatorial Guinea with a GDP of about US\$0.1 billion, to the second largest (Cameroon with a GDP of US\$13 billion (Table 5).

3.44 The difference in economic size is reflected in the population distribution across the member countries with Cameroon accounting for half the total. Similarly, Cameroon is one of the more heavily industrialized economies in SSA while Chad and Equatorial Guinea have amongst the highest dependence on agriculture of all the SSA economies. Congo and Gabon rely largely on mineral resources for their income.

3.45 Over the period 1965 to 1983 the UDEAC countries treated as a whole made the largest gains of all the SSA unions in net trade gains. Despite this and despite being the only formal Customs Union in SSA, intra-union trade creation was no more than 1 percent (Table 4). Over this period the members of the union increased their trade flows by a factor of 10 (Table 6) while their trade with SSA rose between one and a half and three times faster than this rate, except for Congo and Equatorial Guinea for which the increase in African trade volume was only half the overall increase. All the members of UDEAC increased their trade with Cameroon at a considerably faster pace than the overall increase in trade with SSA countries as a whole. Except for the trade between Gabon and Equatorial Guinea which collapsed, the trade between the other members of the UDEAC either remained virtually non-existent or showed increases from a base of zero.

3.46 The above analysis suggests that the Union has been successful in increasing the share of intra-union trade as a share of trade with SSA as a whole. Further, it suggests that the biggest gainer was Cameroon. Nevertheless, such increases were from a low base and in 1983 intra-UDEAC trade accounted for less than 44 percent of the total African trade of the Union (Table 7), the lowest for all the major unions. Further, the overall share of African trade was less than 5 percent of total trade thus implying that intra-union trade accounted for about 2 percent of total trade, by far the lowest for any union in SSA.

3.47 Interestingly, the largest share of UDEAC trade with Africa was with ECOWAS and this amounted to almost 50 percent of the total African trade of the union, more than trade within UDEAC. Further, only 40 percent of this was with the CEAO countries that utilize the CFA Franc like the UDEAC members.

3.48 As in other unions, the aggregate picture is distorted by the dominant position of the most important members. Thus, Cameroon and Gabon, which account for almost three quarters of the trade of the union, recorded 48 and 22 percent, respectively, of their African trade as being with UDEAC partners. CAR, Chad and Equatorial Guinea, by virtue of having Cameroon as their major SSA trading partner, achieve intra-UDEAC shares of African trade of about 90 percent or more. Nevertheless, given that there is virtually no exchange except with Cameroon and that ECOWAS accounts for more of the African trade of the union than the partners in the group, it would seem potentially costly in terms of intra-SSA trade to activate the Union. This point is reinforced by noting that:

- (a) over 65 percent of the African trade of Gabon is with Nigeria and Ivory Coast;
- (b) Zaire, Senegal and Ivory Coast account for almost half the African trade of Congo; and
- (c) Guinea, Ivory Coast and Nigeria account for 45 percent of the African trade of Cameroon.

3.49 Indeed, except for all using the same CFA Franc currency, the logic for the existence of UDEAC is probably the weakest of all the major unions and may explain the ambivalence of many of its members to continued participation in the club. Under the auspices of the UNECA and inspired by the Lagos plan of action, the UDEAC countries are also members of a so far non-functional counterpart to ECOWAS and the PTA (the Economic Community of Central African States, ECCAS). However, the above analysis suggests that given existing trade patterns a more productive arrangement would be the liberalization of trade between ECOWAS and UDEAC.

3.50 The UDEAC countries display an average degree of openness of 42% when considered as a whole (see Table 5). However, this fails to reflect the relatively closed Cameroon economy which is offset at the union level by the openness of Congo and Gabon, largely reflecting their dependence on mineral exports.

3.51 Like the CEAO, the members of UDEAC also benefit from a common central bank and the same convertible currency, the CFA Franc. UDEAC is also the only union in SSA to have established a Common External Tariff (CET). However, the effectiveness of the CET is undermined by the ability of individual countries to set different tax rates on products traded within the union. Financial capital is relatively free of restrictions within the union but there is very little official labor mobility.

3.52 IOC. The IOC is an association of the islands of the Western Indian Ocean that was founded in 1982 by Madagascar, Mauritius and Seychelles to promote regional cooperation. In 1986 the Comoros and France

(Reunion) ^{14/} joined the group which set up a small Secretariat in April 1989. The membership of France makes this the only grouping with both developing and industrialized members and also limits the scope and objectives of the organization. Its main objective has been to facilitate regional exchange and it has concentrated its efforts on computerization and harmonization of tariff codes.

3.53 The IOC had been considering steps to multi-lateralize bi-lateral payments and clearing arrangements between Madagascar and Mauritius and Mauritius and Reunion. However, the recent changes in exchange rate policy and trade liberalization in Madagascar have made this unnecessary.

3.54 The short period of existence of the IOC precludes analysis of changes in intra-regional trade which accounted for only 3 percent of the total trade of the group in 1983 (see Table 4). The IOC has emphasized the role of private enterprise in bringing about increased regional economic activity. Thus, in 1988 the IOC set up a Federation of Chambers of Commerce and in November 1989 a meeting of businessmen in food processing industries was organized. The grouping would like to promote industrial cooperation that would center on cross-border investment into Madagascar. It is working on a charter that would automatically grant any regional firm access to the market in any other IOC country. IOC firms would be treated as any national firm; for example a Malagasy firm would be entitled to operate in Mauritius without the need to formally incorporate there and would be treated as any comparable Mauritian firm.

3.55 CEPGL and MRU. These two Unions will be treated together very briefly because neither of them has much economic justification. Both are made up of three countries. The CEPGL consists of the former Belgian colonies in Central Africa (Zaire, Rwanda and Burundi) and the MRU resulted from the personal relationship between the Presidents of Sierra Leone and Liberia. Guinea joined recently giving it some extra impetus since the current Presidents of the founding members no longer entertain as close a relationship as their predecessors.

3.56 Both unions are very open with large gains in trade concentrated on external partners and only insignificant intra-union trade creation (Table 4). Further, only 5 and 11 percent of the African trade of the CEPGL and MRU, respectively, is with union partners demonstrating clearly the irrelevance of these groups (Table 6). The MRU in fact is part of ECOWAS with which its members undertake three quarters of their African trade. Similarly, 88 percent of the African trade of the CEPGL is with the PTA, of which Burundi and Rwanda are also members in addition to their membership of the CEPGL. It is interesting to note that Zaire, which is not a member of any active union except for the CEPGL, has about 45 percent of its African trade with the PTA and 28 percent with the UDEAC, almost all of it with the Congo. This suggests that Zaire is a potential big loser if either the PTA or UDEAC would erect significant enough barriers to divert trade to union partners.

C. General Comments

3.57 The major themes which emerge from this quick overview of the economic characteristics and performance of the existing Unions can be summarized as follows:

- (a) The only relatively successful union, the CEAO, is characterized by currency convertibility and capital mobility, features shared only by UDEAC, which has been one of the least successful. The CEAO is also the only union with significant labor mobility. Thus it would appear that currency convertibility and capital mobility

^{14/} Reunion island is an overseas Department of France.

may be necessary for success but are not sufficient. Similarly, it would appear that it may be necessary to implement extensive labor mobility to achieve successful integration and enhanced intra-union trade.

- (b) The erection of a common external tariff around any of the major unions is likely to lead to some diversion of recorded African trade, in addition to diverting trade from the rest of the world (ROW). This is most serious in the case of UDEAC and would also be an issue in the case of the CEAO.
- (c) Except for the CEAO, none of the Unions has been particularly successful in creating intra-union trade or achieving a large overall share of intra-union trade. At the same time it is a myth that recorded intra-African trade is always low. ^{15/} The global figure tends to be distorted by the fact that of the top 10 largest economies in SSA, only Cote d'Ivoire and Kenya have shares of intra-SSA trade above 6 1/2 percent. Indeed, 17 out of 39 SSA countries for which data was available, had more than 10 percent of their recorded trade with SSA partners. Further, 7 of these countries achieved a share of at least 20 percent. These figures also raise the interesting question whether most of the unrecorded trade in SSA is connected with the largest economies.
- (d) The smallest unions, the MRU and CEPGL have little relevance for the promotion of intra-African trade and unless a compelling case can be made for other functions, it is unlikely that their continued existence could be justified.
- (e) There may be a positive relationship between degree of openness and the share of intra-regional trade. This would fit in with the observations of ITC based on work in the Caribbean. However, while this appears to be true in comparing the performance of the different Unions, there is an opposite tendency observed at country level as observed in Table 8. The countries in Table 8 are ranked by share of trade with SSA and the degree of openness is calculated for the top, middle and bottom third. This suggests an inverse relationship between the degree of openness and the share of SSA. It is possible that this reflects the tendency for the landlocked countries (which tend to be more closed) to register more important shares of intra-regional trade.
- (f) Most of the countries with substantial shares of intra-SSA trade are located in West Africa. (None of the Southern African countries has a share of intra-African trade exceeding 10 percent) and in (East and Central Africa except for Rwanda and Uganda all the countries have less than 15 percent of their trade accounted for by regional partners). It is possible that currency convertibility explains part of these variations since the ten West African nations with more than a ten percent share of intra-African trade are all members of the Franc Zone except for Sierra Leone,

^{15/} This is not to deny that in general intra-African trade is lower than in Asia or Latin America. However, notwithstanding the possible distortions from re-exports to landlocked countries, one third of SSA countries achieve recorded trade with their neighbors that is not out of line with experience in other parts of the developing world.

TABLE 8 : INTRA-REGIONAL TRADE AND DEGREE OF OPENNESS

Country	Trade with SSA as a share of Total trade	Degree of openness	Landlocked	Average degree of openness (13 countries)
MALI	33.4%	40%	Landlocked	41%
BURKINA	25.9%	54%	Landlocked	
NIGER	22.5%	33%	Landlocked	49%
RWANDA	20.5%	21%	Landlocked	
SIERRA LEONE	19.9%	21%		
TOGO	19.7%	55%		50%
UGANDA	19.6%	21%	Landlocked	
SENEGAL	18.9%	38%		49%
CONGO	17.6%	71%		
COTE D'IVOIRE	15.8%	51%		
CHAD	13.4%	56%	Landlocked	
BURUNDI	12.9%	30%	Landlocked	
KENYA	12.6%	41%		
MALAWI	12.0%	66%	Landlocked	
BENIN	11.7%	37%		
MAURITANIA	10.3%	87%		
GUINEA	10.0%	41%		
GUIN-BISSAU	9.5%	29%		50%
GAMBIA	9.0%	55%		
CENTR.AFRICAN R	6.9%	34%	Landlocked	
ZIMBABWE	6.5%	52%	Landlocked	
MOZAMBIQUE	6.4%	74%		
GHANA	6.0%	38%		
ZAMBIA	5.8%	49%	Landlocked	
CAMEROON	5.4%	24%		
TANZANIA	4.8%	57%		
GABON	4.8%	66%		
COMOROS	4.5%	39%		50%
LIBERIA	3.6%	72%		
EQ.GUINEA	3.2%	39%		
ETHIOPIA	3.2%	30%		
MAURITIUS	2.5%	139%		
NIGERIA	2.1%	47%		
ZAIRE	1.5%	64%		
SUDAN	1.0%	15%		
MADAGASCAR	0.9%	35%		
CAPE VERDE	0.8%	25%		
SOMALIA	0.8%	42%		

Sources: COMTRADE (A UNSO Database), World Development Report 1988
 Data not available for Djibouti, Angola, Sao Tome, Seychelles,
 Lesotho, Botswana and Swaziland.

Mauritania and Guinea. Further, Mauritania and Guinea have the lowest intra-African trade of this set.

- (g) The countries which are landlocked are those with the largest shares of regional trade (Table 8). Of the 11 landlocked countries for which data are available, all but three have at least a 12 percent regional trade share. While this is consistent with what might be expected, it is also possible that re-exports by neighbors might be inappropriately classified as exports from these countries and thus artificially inflate the recorded share of regional trade for these countries. Zimbabwe, Zambia and the Central African Republic have unusually low shares of regional trade for landlocked countries, possibly suggesting large unrecorded trade flows. This is especially true for Zambia which has a very open economy.
- (h) Since 1965, the SSA countries have strongly increased their openness, consistent with the development philosophy of the Bank and despite contrary rhetoric regarding the justification for these unions. The progress in this respect should be reinforced and great care is required in formulating any program of support for these organizations to ensure continued integration in the world economy, especially where customs unions are concerned.

IV. METHODOLOGY

A. Description of data

4.01 The data used in this study are taken from COMTRADE, a United Nations Statistical Office (UNSO) trade database. In principle, all trade is recorded as an export by one country and an import by another, so that every commodity is recorded twice (imports are reported at CIF prices and exports at FOB prices). In practice, however, it was found that imports are recorded more extensively than exports. Very often, a commodity is recorded as an import by one country, but is not recorded on the export side at all. Hence, for the purposes of this study, exports have been expressed as the dual of imports. In other words, the imports of Benin from Ghana, for instance, have been expressed as the exports of Ghana to Benin.

4.02 Commodities in COMTRADE are classified by the Standard International Trade Classification (SITC), available at 5 levels of disaggregation. The highest level of disaggregation (5 Digit) is no doubt the most valuable, but data at this level are very poor. Trade reported at the 2 Digit level is not necessarily disaggregated at the 5 Digit level, with the result that the latter suffers from large gaps. Most of the initial analysis, therefore, has been done with 2 Digit data, with a view to gaining a broad perspective of the situation. Having grasped these orders of magnitude, the analysis is then narrowed down to the 5 Digit level, to identify actual commodities for a few countries where data is available. It is important to bear in mind, though, that since 2 Digit categories are very broad, crossflows within a category are not reflected. Consider, for instance, the 2 Digit category, textile yarn and fabrics. A country may import yarn and export fabric, implying that it has a comparative advantage in the latter; however, this fact may not come through in the 2 Digit analysis.

4.03 The data are far from satisfactory. Many SSA countries report only sporadically and a few not at all. Besides, substantial amounts of African trade go unrecorded. Most available numbers are therefore, an underestimation of actual trade. At the same time, even though re-exports are supposed to be reported separately, this is often not done so that re-exports may be included in reported export values. In view of these shortcomings, it is necessary to exercise great caution while interpreting the results. Nevertheless, some data, if carefully used, is better than no data and this is the premise adopted here. Berg (1985) discusses comprehensively the limitations and problems with African trade data and

compares CONTRADE with IMF Direction of Trade Statistics. For our purposes the IMF data generally are not helpful as they only report aggregate flows with no information on the commodity composition of trade.

4.04 The analysis is done with export and import data for 41 countries in sub-saharan Africa over the period 1981-85. Trade is measured in US\$. Petroleum and related products have been kept out of the analysis.

B. Revealed Comparative Advantage

4.05 Ideally, it would have been useful to examine the imports and exports of every country in SSA at the 5 digit level and determine overlapping products. However, the deficiencies of the data and the magnitude of this task warranted a process of product selection so that only a relevant subset of commodities need be examined. This was done using a subjective and a more objective method.

4.06 The subjective method involved identifying products which were exported to the Rest of the World (ROW i.e all the countries except for those in SSA) by any African country and rejecting any product that did not account for at least 1 percent of the exports of any one country. ^{16/} In addition, exports that seemed rather peculiar, like aircraft engines (possibly representing re-exports) were rejected. However, this task had to be performed at the 4-digit level, given the poor quality of data at the 5-digit level and to make the task manageable. To avoid the problems of averaging over such a large initial data set, 1983 was selected as the latest year for which data were generally available. The selected products were checked to eliminate all those that were not imported by at least one SSA country from the ROW.

4.07 The more objective method used the concept of **Revealed Comparative Advantage (RCA)**. A product displays a Revealed Comparative Advantage if it is more heavily traded than average. Two versions of Revealed Comparative Advantage (RCA1 & RCA2) were calculated.

(a) RCA1, as developed by Balassa, is formulated as follows:

$$RCA_{ik} = \frac{(E_{ik} - M_{ik} / E_{ik} + M_{ik})}{(\sum E_{ik} - \sum M_{ik} / \sum E_{ik} + \sum M_{ik})} - 1$$

where E : Exports
M : Imports
i : country
k : product

The expression in parentheses is multiplied by -1 if there is a deficit in the trade balance.

A positive RCA value indicates that country i has a revealed comparative advantage in trading product k. Similarly, a negative RCA value points to a disadvantage. Stated simply, RCA1 measures the net trade of a country in a particular product, as a ratio of its total trade.

^{16/} The subjective method is only subjective to the extent that the cut-off was arbitrarily chosen. The one percent cutoff may appear too low. However, given the dominance of commodity exports and given that non-traditional exports, which may have a low base, often have the most growth potential, it seemed worth erring on the low side. This may, however, result in overstating the potential trade. However, the ITC using a similar method of "matching products" reports much larger estimates for potential trade (see Subregional Trade Potential in Africa South of the Sahara, Roelofsen, 1989).

4.08 RCA1 is calculated for three separate groups -the trade union, sub-saharan africa and the world. At the narrowest level, $RCA1_{ik}$ (union) indicates that compared to the other countries in the union, country i has the greatest advantage in trading product k. RCA1 (SSA) helps determine if a country has a revealed comparative advantage within sub-saharan Africa, and RCA (world) determines the same with respect to the world. In all three groups, the normalization term is common for countries within a trade union so that the RCA values are comparable among the countries of a union, but not between unions.

4.09 In each case, RCA coefficients were calculated first for each country and then aggregated for all countries belonging to a trade union. This indicates whether the union as a whole has a comparative advantage.

(b) RCA2 is based on exports only (unlike RCA1 which is based on net trade). The formulation is as follows :

$$RCA2_{ik} = \frac{(E_{ik}/W_{ik})}{(\sum E_{ik}/\sum W_{ik})} - 1$$

i i

where E_{ik} : Country i's exports of good k to the world.

W_{ik} : Total exports of good k in the world.

As in RCA1, a positive value indicates a revealed comparative advantage. The emphasis here is on efficiency in world markets - a positive value for RCA2 means that country i has an advantage in exporting product k to the world. The focus has shifted from union performance to the performance of an individual country in the world. The argument underlying this view is that if trade among African countries is to increase, they must be competitive in world markets.

RCA1 almost always picks up more products than RCA2. Besides, the use of net trade in the definition cancels out the possible effects of re-exports. If a country imports a product only for re-export, then it can not be said to have a comparative advantage in that product. However, under the RCA2 definition, the product shows a positive RCA, which gives the wrong signal. The RCA1 definition, on the other hand, will correctly rule out the above product, since it involves the measurement of net trade rather than just exports.

Despite these advantages, RCA1 seems to suffer from a major weakness. When trade is balanced, or very nearly so, as in the case of Sierra Leone, the use of RCA1 results in inordinately large numbers. Similarly, a very large surplus or deficit leads to very small numbers as in Zaire. RCA2 was developed chiefly to counter this problem. In addition, RCA2 is more easily computable, a practically relevant factor when considering the immense amount of data to be processed. In general, RCA1 seemed preferable for the 2 Digit analysis, given the importance of eliminating offsetting imports at this broad level of aggregation. In contrast, at the 5 Digit level, RCA2 can be more reliably used, given the lower level of disaggregation and hence lower likelihood of problems with offsetting imports.

4.10 A word of caution about the relevance of RCA for policy : RCA has no direct bearing on determining either potential growth areas or true comparative advantage. Given existing resource endowments, tax and subsidization policy and any other policy induced distortions, it measures items which are more heavily traded than average. Thus, for example, even though the EC is an inefficient sugar producer with a production cost more than twice that of efficient producers such as Brazil, the EC sugar subsidization policy leads to an RCA in sugar for the Community.

C. Other Measures

4.11 A few more measures and indices were also developed to analyze other aspects of trade in Sub Saharan Africa. Given the shortage of information on intra-African trade this analysis could be useful for country economists and others who want to look at specific aspects of regional trade. However the specific data can be neglected without losing the sense of this report. In consequence, the complete analysis and presentation of detailed RCA results have been reported in a technical annex that is available on request. This includes the categories of products selected by the two RCA measures at the 2 Digit level for 41 countries of Sub-Saharan Africa and the results of the RCA2 analysis done on 5 Digit data for selected countries. Here we summarize the major findings.

D. General Results

4.12 The RCA results at the 5 digit level were used as the basis for selecting products for which barriers were the most evident and upon which attention could be focussed in field work to determine the main barriers (as reported in Chapter V). The more subjective method was used to identify the potential trade between SSA countries. Potential trade is defined as the value of imports currently coming from the ROW and for which at least one SSA country is making significant exports (at least one percent of its exports) to the ROW.

4.13 The potential trade thus estimated should not be interpreted as the amount of trade that would be realized if all current barriers (as discussed in Chapter V) were eliminated. There may be problems of supply; for example, total exports of Palm Oil to the ROW represent only 8 percent of imports from the ROW and it is not clear that SSA exporters would be able to satisfy total demand (see Table 9). There may also be problems of geography or transport, that would make it more economical for the main importers to keep purchasing outside the region. For example, the PTA is the main exporter of Bovine meat while ECOWAS is the main importer. There may be issues of differences in quality that can not be determined at the 4-digit level. Thus the Toys and Indoor Games exported by the PTA may be totally different from those imported by ECOWAS. Finally, there may be special bi-lateral trading arrangements which sustain exports even when the price may not be competitive with current suppliers outside SSA, as may be the case for sugar or rice.

4.14 Nevertheless the estimated potential of US\$4 to US\$5 billion (16 percent of total exports) is large enough to warrant further exploration of the reasons why this potential is not exploited (Table 9). The RCA analysis, suggests a lower trade potential of US\$1.6 billion, about 16 percent of the net exports of SSA for these same commodities (see Table 10). This figure represents the amount of imports from the rest of the world for which some SSA country has an RCA at the 2 Digit level. The estimate is only one third that given by the subjective method, partly because the RCA approach has focussed on a narrower subset: those goods that tend to be traded more heavily than average. Even so, the RCA based estimate needs to be treated with caution since the analysis has had to be performed at the 2 digit level. It is therefore possible that the African exports to the ROW do not correspond to imports from the ROW within the same SITC category (e.g textiles may include different types of material, some of which is imported and others exported).

4.15 Despite all the qualifications the data belie the typical view that there are few products that could be traded between SSA countries. Further, these results provide some prima facie evidence for the possibility of efficient trade switching (as opposed to trade diversion). It would be up to the relevant country teams to investigate the actual potential from the theoretical potential identified here. To help with this, the appendix includes a comprehensive listing by country and by product of all potential exports and imports at the four digit level. AFTTF would be able, if

requested, to refine this analysis at the 5 Digit level for selected countries (subject to the important proviso that the data at the 5 Digit level are adequate for the relevant country). However, given the extensive distortions in SSA, caution is required in assuming that specific trading opportunities that are identified in the RCA or subjective analysis, would indeed materialize in a distortion free environment.

TABLE 9 : POTENTIAL TRADE OF SEA : 1983

(In millions of US\$)

	PTA	ECOVAS	CEAG	MRU	OTHER ECU	LOEAC	CEPOL	OTHER SEA	SEA
Food and live animals									
0012 SHEEP AND GOATS, LIVE 1 Imports		29			29				29
0012 SHEEP AND GOATS, LIVE 2 Exports	1								1
0019 LIVE ANIMALS FR FOOD NES 1 Imports	1	1			1				2
0019 LIVE ANIMALS FR FOOD NES 2 Exports								50	50
0111 BOVINE MEAT FRESH, FROZEN 1 Imports	8	45	12	1	32	22	1	16	92
0111 BOVINE MEAT FRESH, FROZEN 2 Exports	10							2	12
0149 OTH PREPARD, PRESRVD MEAT 1 Imports	3	14	3	2	8	8	1	15	46
0149 OTH PREPARD, PRESRVD MEAT 2 Exports	13							1	13
0841 FISH FRESH, CHLD, EX FILLT 1 Imports		38	30		2				34
0841 FISH FRESH, CHLD, EX FILLT 2 Exports	1	38	11		28			1	38
0842 FISH FROZEN, EXCL. FILLETS 1 Imports	2	174	10	8	189	1	3		189
0842 FISH FROZEN, EXCL. FILLETS 2 Exports		27	23		8	0		1	29
0843 FISH FILLETS, FRESH, CHLD 1 Imports		37			37	2			40
0843 FISH FILLETS, FRESH, CHLD 2 Exports	3	5	5			0			8
0850 FISH SALTED, DRIED, SMOKED 1 Imports	4	163	1		182	11	5	5	187
0850 FISH SALTED, DRIED, SMOKED 2 Exports	1	2	1		1			1	4
0860 SHELL FISH FRESH, FROZEN 1 Imports	1	4	4			1			6
0860 SHELL FISH FRESH, FROZEN 2 Exports	5	136	115	12	9	12		26	211
0871 FISH PREPARD, PRESRVD NES 1 Imports	4	101	8	5	90	14	3	24	146
0871 FISH PREPARD, PRESRVD NES 2 Exports	7	108	104		4				118
0411 DURUM WHEAT UNMILLED 1 Imports	10	2	2				2		14
0411 DURUM WHEAT UNMILLED 2 Exports								4	4
0412 OTHER WHEAT ETC UNMILLED 1 Imports	99	157	88	5	64	42	7	48	245
0412 OTHER WHEAT ETC UNMILLED 2 Exports								2	2
0421 RICE IN HUSK OR HUSKED 1 Imports	8	14	3		10	10			31
0421 RICE IN HUSK OR HUSKED 2 Exports	1						1		1
0440 MAIZE UNMILLED 1 Imports	19	96	2	1	93	2	1	32	147
0440 MAIZE UNMILLED 2 Exports	36							2	38
0459 OTHER CEREALS UNMILLED 1 Imports	2	27	22		5	2		4	35
0459 OTHER CEREALS UNMILLED 2 Exports								3	4
0542 LEGUMINOUS VEGETABLES DRY 1 Imports	7	3	1		2			28	38
0542 LEGUMINOUS VEGETABLES DRY 2 Exports	32							4	36
0843 OTHER FRESH VEGETABLES 1 Imports	2	20	12	3	6	6		1	30
0843 OTHER FRESH VEGETABLES 2 Exports	21	9	8			2			33
0848 EDIBLE VEG NES FRESH, DRY 1 Imports	5	11	2		9	2			17
0848 EDIBLE VEG NES FRESH, DRY 2 Exports								12	12
0573 BANANA, PLANTAIN, FRESH, DRY 1 Imports		1	1						2
0573 BANANA, PLANTAIN, FRESH, DRY 2 Exports	18	38	38			22			76
0577 NUTS EDIBLE, FRESH, DRIED 1 Imports		7	5		2			1	9
0577 NUTS EDIBLE, FRESH, DRIED 2 Exports	33	11	9		2			19	63
0579 FRUIT FRESH OR DRIED NES 1 Imports	2	2	2					1	5
0579 FRUIT FRESH OR DRIED NES 2 Exports	5	77	76	1	2			2	87
0585 FRUIT OR VEGETABLE JUICE 1 Imports	2	5	1	1	3	1		1	9
0585 FRUIT OR VEGETABLE JUICE 2 Exports	8	2	2						9
0589 FRUIT PREPARD, PRESRVD, NES 1 Imports	1	2	1		1	1		2	6
0589 FRUIT PREPARD, PRESRVD, NES 2 Exports	40	11	11					1	51
0611 RAW BEET AND CANE SUGAR 1 Imports		8	8		1		1		9
0611 RAW BEET AND CANE SUGAR 2 Exports	254	6	6			5		28	308
0612 REFINED SUGAR ETC 1 Imports	15	498	25	9	482	5	5	5	821
0612 REFINED SUGAR ETC 2 Exports	32	13	13					19	64
0615 MOLASSES 1 Imports	1								2
0615 MOLASSES 2 Exports	11	8	8					19	29
0711 COFFEE GREEN, ROASTED, SUB 1 Imports	8	4	3		1	1		7	16
0711 COFFEE GREEN, ROASTED, SUB 2 Exports	1140	660	546	66	47	271	313	165	2297
0712 COFFEE EXTRACTS, ESSENCES 1 Imports		30	13	1	16				31
0712 COFFEE EXTRACTS, ESSENCES 2 Exports	1	22	22						24
0723 COCOA BUTTER AND PASTE 1 Imports		1	0					2	2
0723 COCOA BUTTER AND PASTE 2 Exports		163	85		78	23			187
0730 CHOCOLATE AND PRODUCTS 1 Imports	1	7	2		5	1		1	11
0730 CHOCOLATE AND PRODUCTS 2 Exports		18	16						18
0741 TEA 1 Imports	5	11	3	1	8	1		35	50
0741 TEA 2 Exports	269	2	1				4	16	289
0751 PEPPER AND PIMENTO 1 Imports		1						1	2
0751 PEPPER AND PIMENTO 2 Exports	2	1	1					3	6
0752 SPICES, EX PEPPER, PIMENTO 1 Imports	2	2	1		2			1	6
0752 SPICES, EX PEPPER, PIMENTO 2 Exports	34	1		1	1			87	133
0813 OILCAKE AND OTH RESIDUES 1 Imports	13	12	1		11	1			26
0813 OILCAKE AND OTH RESIDUES 2 Exports	14	87	59		7	3	2	25	111
0814 MEAT OR FISH MEAL FOODER 1 Imports	2	7	0		7			1	11
0814 MEAT OR FISH MEAL FOODER 2 Exports	1	2	2						3
Beverages and tobacco									
1211 TOBACCO, NOT STRIPPED 1 Imports	1	20	10	1	9	6		1	28
1211 TOBACCO, NOT STRIPPED 2 Exports	99					11		4	114
1212 TOBACCO STRIPPED OR PART 1 Imports	3	14	11		3	1		1	18
1212 TOBACCO STRIPPED OR PART 2 Exports	203					1			204
1213 TOBACCO REFUSE 1 Imports	2	1			1	1	2		4
1213 TOBACCO REFUSE 2 Exports	5					3			9
1223 OTH MANUFACTURED TOBACCO 1 Imports	3	2	1				5	3	10
1223 OTH MANUFACTURED TOBACCO 2 Exports	11	2		2					12
Crude material excl fuel									

TABLE 9 : POTENTIAL TRADE OF SSA - 1983 (cont'd)

(In millions of US\$)

		PTA	ECOWAS	CEAO	MRU	OTHER	BCC	LOEAC	CEPCL	OTHER SSA	SSA
2221	GROUNDNUTS, GREEN	1								6	7
2221	GROUNDNUTS, GREEN	2	32	9			24			9	43
2228	SESAME SEEDS	1								2	3
2228	SESAME SEEDS	2	3	3						29	33
2238	OIL SEEDS AND FRUITS NES	1	1				1			1	1
2238	OIL SEEDS AND FRUITS NES	2	28	16	1	8		1			29
2320	NATURAL RUBBER, CLMS	1								13	32
2320	NATURAL RUBBER, CLMS	2	123	28	78	20	18	12			150
2472	SAN-, VENEER-LOCKS NON-CON	1	1	1							2
2472	SAN-, VENEER-LOCKS NON-CON	2	817	268	48	9	258	12		1	888
2479	PTPROPS, POLES, PILING, ETC	1	8	1			1			1	4
2479	PTPROPS, POLES, PILING, ETC	2	37	18	21	1	18				83
2483	LUMBER SHAPED NON-CONIFR	1	4	3			1			3	11
2483	LUMBER SHAPED NON-CONIFR	2	100	84	3	13	38	5		1	141
2631	RAW COTTON, EXCL. LINTERS	1	4	1			63			4	72
2631	RAW COTTON, EXCL. LINTERS	2	120	207			20	91	2	202	639
2654	SISAL, AGAVE FIBRES, WASTE	1	1	1							1
2654	SISAL, AGAVE FIBRES, WASTE	2	30							9	39
2713	NAT CALCH PHOSPHATES ETC	1	5				5				6
2713	NAT CALCH PHOSPHATES ETC	2	127	89			69				127
2782	REFRACTORY MINERALS NES	1	7	1	3	3	2			2	11
2782	REFRACTORY MINERALS NES	2	6	6						8	14
2784	ASBESTOS CRDE, SHPLY WROD	1	17				18				19
2784	ASBESTOS CRDE, SHPLY WROD	2	49	2						1	82
2816	IRON ORE NOT AGGLOMERATO	1	7				7				7
2816	IRON ORE NOT AGGLOMERATO	2	1	463	158	307					464
2873	ALUMINIUM ORES, ALUMINA	1	170				170				170
2873	ALUMINIUM ORES, ALUMINA	2	382				2	1			383
2881	METALIFEROUS NONFER VSTE	1	2								2
2881	METALIFEROUS NONFER VSTE	2	18	2			1	1	1		19
2922	NAT CLMS, RESINS, LACS, ETC	1	1								2
2922	NAT CLMS, RESINS, LACS, ETC	2	3	2			2			68	73
2924	VEG USED IN PHARMACY ETC	1	13							2	15
2924	VEG USED IN PHARMACY ETC	2	5	2			1	3	6	5	20
2925	SEEDS, ETC FOR PLANTING	1	3	5			4	1		3	13
2925	SEEDS, ETC FOR PLANTING	2	5							1	6
2926	LIVE PLANTS, BULBS, ETC	1	1								1
2926	LIVE PLANTS, BULBS, ETC	2	1	4	3		1		1		6
2929	OTH CRUDE VEG MATERIALS	1	3	8	1		8	2		1	14
2929	OTH CRUDE VEG MATERIALS	2	17	1	1		2	2	1	7	22
Animal, veg oil, fat											
4234	GROUNDNUT(PEANUT) OIL	1	1				1				2
4234	GROUNDNUT(PEANUT) OIL	2	112	104			8			4	117
4242	PALM OIL	1	87	131			120			18	216
4242	PALM OIL	2	14	10	3			2	1	1	17
4243	COCONUT (COPRA) OIL	1	1				1			13	15
4243	COCONUT (COPRA) OIL	2	15	15							16
4244	PALM KERNEL OIL	1	4				4			31	35
4244	PALM KERNEL OIL	2	27	12			15		8		36
4249	FIXED VEGETABLE OILS NES	1	4	1	1		2	6		1	13
4249	FIXED VEGETABLE OILS NES	2	4	4						2	7
Chemicals											
5121	ACYCLIC ALCOHOLS, DERIVS	1	4	14	3		10	2		2	27
5121	ACYCLIC ALCOHOLS, DERIVS	2	1	5	3		2				6
5145	AMINE-FUNCTION COMPOUNDS	1	1	4	1		3			1	6
5145	AMINE-FUNCTION COMPOUNDS	2									0
5232	OTH HTL CHFD OF INRC ACID	1	14	173	5		167	2	1	4	194
5232	OTH HTL CHFD OF INRC ACID	2	11								11
5241	RADIOACTIVE ELEMENTS ETC	1						2			3
5241	RADIOACTIVE ELEMENTS ETC	2	233	233				68			301
5322	DYE, TANN EXTRACTS, TANNINS	1								1	1
5322	DYE, TANN EXTRACTS, TANNINS	2	7	1	1						7
5413	ANTIBIOTICS IN BULK	1	7	5			4				12
5413	ANTIBIOTICS IN BULK	2									0
5414	VEG ALKALOIDS AND DERIVS	1	2				2				0
5414	VEG ALKALOIDS AND DERIVS	2							8		8
5513	ESSENTL OIL, RESINOID, ETC	1	2	2			2			1	5
5513	ESSENTL OIL, RESINOID, ETC	2	3	2	2					4	9
5622	CHEM PHOSPHATIC FERTILZR	1	17	8			5	1			24
5622	CHEM PHOSPHATIC FERTILZR	2	7	6							7
Basic manufactures											
6114	LEATHR BOVINE NES, EQUINE	1	1	3	1		2			1	4
6114	LEATHR BOVINE NES, EQUINE	2	12							2	15
6341	VENEER SHEETS	1	1				1				3
6341	VENEER SHEETS	2	20	18			4	34	3		57
6342	PLYWOOD OF WOOD SHEETS	1	4	24	5	1	19			1	31
6342	PLYWOOD OF WOOD SHEETS	2						23			24
6412	PRINTG WRITING PAPER NES	1	18	65	11	7	53	9	7	8	101
6412	PRINTG WRITING PAPER NES	2									0
6513	COTTON YARN	1	18	39	6		33	1	1	1	57
6513	COTTON YARN	2	2	2						3	7

TABLE 9 POTENTIAL TRADE OF SSA 1983 (cont'd)

(In millions of US\$)

		PTA	ECOVAS	CEAO	MRU	OTHER ECO	UDEAC	CEPCL	OTHER SSA	SSA
6514 SYN FIB YRN, BULK, MONOFIL	1 Imports	17	63	4		58	2	2	5	88
6514 SYN FIB YRN, BULK, MONOFIL	2 Exports	6								6
6521 GREY WOVEN COTTON FABRIC	1 Imports	11	28	19	3	4	22		2	81
6521 GREY WOVEN COTTON FABRIC	2 Exports	6	11	11			7	1	19	43
6575 CORDAGE AND MANUFACTURES	1 Imports	3	21	3	1	17	2	1	10	39
6575 CORDAGE AND MANUFACTURES	2 Exports	14								14
6612 CEMENT	1 Imports	14	298	34	9	253	6	5	11	328
6612 CEMENT	2 Exports	22								22
6672 DIAMONDS NONINDUST, UNSET	1 Imports	3								3
6672 DIAMONDS NONINDUST, UNSET	2 Exports	23	180	38	107	40	69	140		400
6673 PREC-, SEMI-PR STONES NES	1 Imports	2	2	1		1				4
6673 PREC-, SEMI-PR STONES NES	2 Exports	25	1					1	2	28
6716 FERRO-ALLOYS	1 Imports	1	4			4			2	8
6716 FERRO-ALLOYS	2 Exports	113							3	115
6725 IRN, STL BLOOMS, SLABS, ETC	1 Imports	5	22	1		21	2			30
6725 IRN, STL BLOOMS, SLABS, ETC	2 Exports	14							22	38
6731 IRON, STEEL WIRE ROD	1 Imports	8	20	8		15	2		2	31
6731 IRON, STEEL WIRE ROD	2 Exports								7	7
6744 IRN, STL HYV PLATE, ROLLED	1 Imports	6	14	2	4	8	9	2	4	33
6744 IRN, STL HYV PLATE, ROLLED	2 Exports								2	2
6745 IRN, STL MED PLATE, ROLLED	1 Imports	4	7	1		6			1	13
6745 IRN, STL MED PLATE, ROLLED	2 Exports								3	3
6748 IRN, STL THIN PLATE, ROLLD	1 Imports	54	187	11		154	3	13	17	243
6748 IRN, STL THIN PLATE, ROLLD	2 Exports								10	10
6749 OTH IRN, STL PLATES, SHEET	1 Imports	22	45	14	3	28	4	8	7	78
6749 OTH IRN, STL PLATES, SHEET	2 Exports								1	1
6811 SILVER UNKND, PARTLY WRKD	1 Imports		1							1
6811 SILVER UNKND, PARTLY WRKD	2 Exports	10								10
6841 ALUMINIUM ALLOYS, UNWROHT	1 Imports	1	15			15				17
6841 ALUMINIUM ALLOYS, UNWROHT	2 Exports		109			109	67		1	178
6861 ZINC, ALLOYS UNWROUGHT	1 Imports	12	20	2		18	1		1	33
6861 ZINC, ALLOYS UNWROUGHT	2 Exports	22	2			2		35	1	57
Misc manufactures										
8423 -- TROUSERS, BREECHES ETC	1 Imports	2	10	1		8	1		1	15
8423 -- TROUSERS, BREECHES ETC	2 Exports	3	6	6		0				9
8424 -- JACKETS, BLAZERS ETC	1 Imports	1	1			1				2
8424 -- JACKETS, BLAZERS ETC	2 Exports	2								2
8435 -- BLOUSES	1 Imports		7	4		3	1	2	1	10
8435 -- BLOUSES	2 Exports	4				0				4
8441 -- MENS SHIRTS	1 Imports	4	17	1		16	3		1	26
8441 -- MENS SHIRTS	2 Exports	9				0				9
8451 -- JERSEYS PULLOVERS ETC	1 Imports	1	3	1		4				6
8451 -- JERSEYS PULLOVERS ETC	2 Exports	53								54
8459 -- OTHER CLTHG ACCESSRYS	1 Imports	1	12	2	1	9	1	1	1	15
8459 -- OTHER CLTHG ACCESSRYS	2 Exports	1				0				1
8462 -- OF COTTON NON ELASTIC	1 Imports	1	6	2		3	2			10
8462 -- OF COTTON NON ELASTIC	2 Exports	10	1			0				11
8472 -- KNITTED	1 Imports	1	2	1		1	1		1	4
8472 -- KNITTED	2 Exports	4				0				4
8481 LEATHER CLOTHES, ACCESSOR	1 Imports		3	1		2	1		1	5
8481 LEATHER CLOTHES, ACCESSOR	2 Exports	3				0				3
8748 ELEC MEAS, CONTRL EQU NES	1 Imports	25	82	17	1	64	22	2	19	149
8748 ELEC MEAS, CONTRL EQU NES	2 Exports	6	5	3		2	1		1	13
8842 SPECTACLES AND FRAMES	1 Imports	2	4	1		3			1	8
8842 SPECTACLES AND FRAMES	2 Exports	3								3
8851 WATCHES, MOVEMENTS, CASES	1 Imports	3	23	2	1	20	2	2	2	32
8851 WATCHES, MOVEMENTS, CASES	2 Exports	5				0				5
8942 TOYS, INDOOR GAMES	1 Imports	2	12	3	1	7	3		2	20
8942 TOYS, INDOOR GAMES	2 Exports	2								2
9999 Total: Imports	1 Imports	649	3245	473	72	2700	267	63	444	4643
9999 Total: Exports	2 Exports	2962	4038	2480	1028	531	1048	555	951	9386

Sources: COMTRADE and staff estimates

1/ The import figure represents the potential demand that could be satisfied by African exporters instead of suppliers from outside Africa

2/ The export figure gives some idea of current export supply for those commodities where there is a potential for exports to other SSA countries in replacement of outside suppliers.

TABLE 10: TRADE POTENTIAL IN SSA : 1983

SITC 2D COMMODITIES	IMPORTS OF SSA FROM ROW (POTENTIAL TRADE) (US \$'000)	NET EXPORTS OF SSA TO ROW	SSA: POTENTIAL AS A % OF NET EXPORTS
00 LIVE ANIMALS FOR FOOD	25378	220595	11.5%
05 VEGETABLES AND FRUIT	201557	221175	91.1%
07 COFFEE, TEA, COCOA, SPICE	71249	4224455	1.7%
08 FEEDING STUFF FOR ANIM	76647	69639	110.1%
12 TOBACCO AND MANUFACTUR	152515	217394	70.2%
21 HIDES, SKINS, FURS UNDRS	282	158063	0.2%
22 OIL SEEDS, OLEAGINOUS F	8972	577566	1.6%
23 RUBBER CRUDE, SYNTHETIC	54672	102341	53.4%
24 CORK AND WOOD	27628	820421	3.4%
26 TEXTILE FIBRES, WASTES	236911	503075	47.1%
27 CRUDE FERTLZR, MINRLS N	170907	112838	151.5%
28 METALLIFEROUS ORES, SCR	182343	1152903	15.8%
29 CRUDE ANIMAL, VEG MAT N	45854	310956	14.7%
61 LEATHER, DRESSED FUR, ET	30742	11888	258.6%
63 WOOD, CORK MANUFACTRS N	97064	14655	662.3%
68 NON-FERROUS METALS	222416	1401687	15.9%
	1605137	10119651	15.9%

Sources : COMTRADE (A UNSO database)

4.16 Despite the earlier provisions, it would seem reasonable to use the RCA and subjective method estimates of trade potential to obtain a range of likely potential trade. If realized potential were limited to the US\$ 1.6 billion indicated by the RCA method, this would represent a 6 percentage points increase in exports. If the full potential indicated by the subjective analysis were realized, the share of SSA intra-regional exports would increase from about 5 percent to 20 percent of the total (see Table 11). This would imply a share comparable to that in other parts of the world (see Table 4). Interestingly, this would also replicate the achievement of the CACM which went from about 5 percent intra-regional trade, the current level for SSA, to 23 percent.

Table 11: SSA Trade Flows and the Share of Intra-Regional Trade, 1983

(In billions of US \$)			
	<u>Exports</u>	<u>Imports</u>	<u>Trade 1/</u>
Actuals in 1983			
Total	30	41	71
Intra-Regional	2	2	4
Rest of the World	28	39	67
Potential additional			
Intra-regional Trade 2/	5	5	10
1983 Actuals modified			
to reflect potential 2/			
Total	35	41	76
Intra-Regional	7	7	14
Rest of the World	28	34	62
Memorandum items	(In percent of total trade)		
Actuals in 1983			
Intra-Regional	7	5	6
Potential additional			
Intra-regional trade 2/	16	12	14
1983 Actuals modified			
to reflect potential 2/			
Intra-Regional	20	17	18

Sources: COMTRADE and staff estimates.

1/ Trade = Exports + Imports

2/ Assuming the full potential of the subjective method is realized.

4.17 The other major results can be summarized as follows:

- (a) As might be expected, most countries of Sub-Saharan Africa show a comparative advantage in commodities, metal ores and other crude products. The most widely exported products are coffee, sugar, tobacco and wood.
- (b) Despite the predominance of commodity exports, some countries do show positive RCA results for manufactures. Zaire shows a revealed comparative advantage in exporting cement, Cameroon and Cote d'Ivoire reflect an advantage in woven cotton cloth, Congo exports winches, hunting equipment and jewelry. Cote d'Ivoire and Nigeria both export cargo vessels. Nigeria also exports leather, photo film and gas turbines. Some of these results suggest that the RCA results probably reflect re-exports. The subjective approach also reveals interesting potential not only in such basic manufactures as textiles that might be expected, but also for Spectacles and

Frames; Watches, Movements, Cases; and Toys, Indoor Games. There is also potential in treated metals and cement.

- (c) Of the five countries examined at the 5 Digit level - Cameroon, Cote d'Ivoire, Congo, Nigeria and Zaire - the products with an RCA are mainly exported to the industrialized world. Meanwhile, other African countries import the same products from industrialized countries. This result suggests that there is potential for the countries of sub-saharan Africa to increase trade amongst themselves. Indeed, this is the main purpose of the RCA analysis : to find products which one would expect to be traded intra regionally and to find out from traders and producers in SSA, why such trade does not indeed take place. This issue forms the main focus of the next chapter.
- (d) Finally, a word about the levels of disaggregation. The 2 Digit analysis was carried out initially to provide certain orders of magnitude, under the assumption that the product selection done at this level would not differ significantly from the 5 Digit analysis. This is indeed borne out by the RCA results for the 5 countries mentioned above at the 5 Digit level.

V. THE MAJOR CONSTRAINTS ON INTRA-REGIONAL TRADE EXPANSION

A. Introduction

5.01 Regional trade in SSA is inhibited by a combination of natural barriers (such as distance), market imperfections (for example lack of information) and policy failures. It is useful to categorize the policy failures into bureaucratic weaknesses (like unclear direction to relevant agencies) which require mainly technical solutions and political obstacles (such as unwillingness to expose domestic activity to partner competition) that require policy decisions which may be harder to get agreement on. Such categorization helps to focus on the type of action that is required to overcome the relevant obstacles, even though the distinction between different types of barriers is not always clear cut and market failures, in particular, often arise from policy intervention.

5.02 Broadly, natural barriers may constitute constraints which have to be accepted (like long distances) but where intervention can reduce costs. Government, with donor support, would undertake infrastructure projects which are justified by traditional cost-benefit analysis (such as building railway lines). In principle, such intervention would be along the lines of ongoing national efforts and the regional dimension mainly involves a difference of scope.

5.03 Market imperfections justify Government intervention, unless the capacity to correct the failure is so weak that the resulting bureaucratic failure worsens the problem. Often intervention will mean changes in Government policy to create a better enabling environment. External donors probably would have a role in providing technical assistance, advice and financing, for example to cover risk that the private markets may not be willing to bear.

5.04 Bureaucratic failures essentially require Governments to improve their performance, and again external technical assistance and advice could be useful although the need for financial assistance would be limited. In general, the political obstacles revolve round short term costs that block long term benefits and arise from distributional issues concerning the ability of losers to block changes despite the overall positive net benefits.

5.05 It would be desirable to rank the constraints according to how badly they inhibit SSA trade. Unfortunately there is no established

methodology for such an exercise and the relevance of different obstacles differs across countries. In addition, regional exchange is limited by so many constraints that different policymakers or analysts emphasize different problems. Given the difficulties of such objective assessment, much needless argument tends to arise from a confusing necessary and sufficient action. For example, intra-trade in the CEAO and UDEAC countries is respectively about 9 and 2 percent, even though neither grouping faces the foreign exchange shortage that is usually blamed as the major constraint on intra-African trade.

5.06 This illustrates the futility of one-dimensional approaches. Indeed, significant increases in regional trade are unlikely unless several major constraints are simultaneously dealt with, or at a minimum tackled in sequence within a short period of time. In what follows, no distinction will, therefore, be made between necessary and sufficient conditions. Instead the discussion will focus on the relevance of various perceived constraints and how and by whom these constraints could be relaxed. Nevertheless, to guide policy action, it is useful to indicate the relative importance of major barriers. In the absence of an established methodology this will inevitably be somewhat arbitrary, but even a subjective ordering should be helpful in focussing policy discussion.

5.07 The major constraint consists of restrictive foreign exchange licencing and other quantitative restrictions, that arise either to support overvalued exchange rates or to extend protection to uncompetitive industry. The next set of problems arises from the high levels of non-commercial risk and obstacles facing the private sector, particularly certain of its components that are less politically acceptable because of their ethnic or racial origin. Following this is likely to be the cost of information gathering and the rents arising from various restrictions. The impact of complex rules and regulations would probably not be very serious if action were taken on all other fronts. Infrastructure is often cited as a major problem, but is likely to be a constraining factor only after substantial increases in recorded trade occur rather than being an obstacle to initial expansion.

5.08 It is noteworthy that many of the important blockages could be relaxed through changes in government policy that do not necessarily require external financial support. This is especially true of the most important reform: the creation of an economic environment which uses market clearing prices to signal economic agents how to allocate factors of production and how to organize distribution. This may involve innovative second best approaches, but without market clearing prices no lasting gains can be expected even if all other constraints are eliminated. It is also important to note that certain countries are likely to face chronic deficits in intra-African trade and this is why trade expansion needs to be linked with more generalized factor mobility so as to create opportunities for offsetting flows of capital and workers' remittances.

B. Natural Constraints

5.09 Population density in Africa is low while its distribution is uneven, thus raising the costs of marketing and distribution of products. For developing countries as a whole, the density is 53 per square kilometer and in industrial countries it is 24, while in SSA the density is only 20 per square kilometer. Further, while in the industrial countries 55 percent of the population lives in cities, only 42 percent of the population does so in SSA. Finally, the income of SSA is the lowest of all the regions. Its per capita level is US\$370 compared with US\$610 for all developing countries and its GDP accounts for about 7 percent of that of all developing countries and is equivalent to less than 2 percent of that of the industrialized countries. Thus it has been estimated (by MEDIA, the agency responsible for promoting external trade and investment in Mauritius) that it costs almost 4 times as much to promote sales in SSA than in industrialized markets.

5.10 SSA contains more landlocked countries than any other region and has the largest proportion of small States. Infrastructure is often deficient and many internal regions of even coastal countries are inadequately linked to the rest of the country. This is also true for regions within the same country but separated by another country (Casamance in Senegal and Gambia) or countries within the same grouping separated by a non-member (Cote d'Ivoire and Benin, in CEAO). The extensive seaboard provides opportunities for maritime transportation that are not adequately exploited, partly because of poor harbour facilities that adversely affect the profitability of African shipping lines. These constraints are reflected in the story of a Nigerian businessman who spent three months trying to find a ship to transport aluminum circles from Douala in Cameroon to Lagos, cities separated by a one hour flight. Such problems can be compounded by Government requirements to haul a certain amount of shipment using public enterprises.

5.11 It is often alleged that inadequate communications facilities, especially telephone and telex links, hinder intra-African trade. However, preliminary findings suggest that other inefficiencies are more to blame than the physical facilities.

5.12 In the short run it is not possible to offset infrastructural problems. However, the Bank and other donors are continuing their support to African governments to improve infrastructure. This will help to reduce the costs of transport and communications and thus encourage more trade. At the same time, justifying the costs of some infrastructural projects may require action that will increase the flow of goods and policies that will make users pay for maintenance and project costs. The most stark example of this is provided by one of the few concrete achievements of the Mano River Union: a bridge over the river which is hardly used because of restrictions on both sides of the borders that the bridge spans. Another example is the TAZARA railway linking Zambia with Tanzania which carries little traffic while extensive informal trade occurs at market clearing prices using other more expensive channels of transport. The message is that expensive infrastructure can not lead trade. Further, there is evidence that while recorded intra-SSA trade is stagnating, unrecorded trade is growing (see Barad (1988)), which suggests that infrastructure is not a binding constraint on official trade expansion.

5.13 It is possible that most current efforts are geared mainly to national systems and that emphasis is on maintenance rather than expansion and that more needs to be done regionally. A better picture should emerge following the completion of several ongoing studies. These include: the Sub-Saharan Africa Transport Program which is expected to produce research papers, case studies and guidelines for dissemination at workshops/seminars over the period to 1991; the Rural Water Supply and Sanitation Strategy Review to be completed in September 1989 and an evaluation of the Macroeconomic and Regional Implications of Urban-Rural linkages that is expected to be ready in October 1989. The Sahel and Great Lakes Corridors Studies which were completed in 1988 have already outlined specific areas for action such as the re-establishment of block trains and studies of such issues as funding of maintenance expenditure, load regulations and user charges.

C. Market Failures

5.14 In discussing market failures it will often be apparent that the failures arise from the policy regime. However the distinction made between market and policy failures is that the former arise when market incentives, given the policy environment, are insufficient to generate the socially desired level of output and services. In turn, the latter relate more to inefficiencies directly arising from bad policies. Thus, often, the most effective resolution of market failures will involve changes in policy as opposed to counteracting government intervention.

1. Trade Finance Facilities

5.15 Commercial Banks are unwilling to expose themselves to sovereign risk in SSA. Prior to 1985 the major international banks provided revolving credit lines of between US\$5 to US\$40 million to cover payments against Letters of Credit (LOCs) for periods of up to 1 year. Since then, these facilities have been suspended out of fear that the foreign exchange needed to repay drawings on these lines would not be released by the relevant Central Banks. In any case these facilities tended to be used to finance trade with industrialized countries and their reinstatement without provision for intra-regional trade cover would not necessarily help increase regional exchange.

5.16 The lack of cover for LOCs requires cash settlement before transactions can be effected and this reduces trade volumes. The provision of trade financing facilities by industrialized countries to finance imports from their manufacturers worsens this problem by creating a preference for industrialized country exports even where equivalent goods are available at competitive prices from neighboring countries. Indeed it discourages the search for such goods (see C.2). One such example consists of US cotton exports to Zaire despite neighboring countries exporting cotton.

5.17 The shortage of foreign exchange, which appears to be serious and arises essentially from inadequate exchange rates should not be confused with domestic currency credit availability, which in itself is only a problem where Governments crowd out credit (see D.ii.1).

5.18 The first best solution requires pricing foreign exchange at a market clearing price. This has the further advantage that African goods would become more attractive not only in each individual country but also in the region as a whole (and indeed on the world market). Most African Governments have been unwilling to do this and recent signs of flexibility still do not go far enough. Indeed, in some of the countries (such as Uganda, Zaire and Zambia) that had been willing to move to market based rates, there have been reversals.

5.19 In the absence of willingness to adopt market clearing exchange rates and with continued ties by donors between financing and exports, there may be a case for providing offsetting lines of credit to finance efficient intra-African trade. The established private commercial banks operating in SSA are willing to provide lines of credit provided they do not have to cover the sovereign risk related to the shortage of foreign exchange. There is therefore a potential for the Bank to provide a combination of foreign exchange or guarantee against the non-provision of foreign exchange by Central Banks.

5.20 The most practical scenario would be an agreement to share the risks with the Bank (possibly through MIGA) taking sovereign risk (given its comparative advantage arising from its leverage on national governments) and commercial banks taking the commercial risk (given their comparative advantage in this area). There is scope for joint action with the African Development Bank (ADB) in this area.

2. Informational Inadequacies

5.21 African importers and exporters often do not know about each other. In part this reflects the tendency to maintain established relationships, usually with firms in the former colonial metropolis, unless there are external pressures for change. This bias is reinforced by credit lines from donors (see section C.1 above) and the readily available trade information on export and import sources in industrialized countries through the NIMEXE and COMPASS systems. In contrast it is difficult to find any centralized information on suppliers or purchasers in SSA. For example, in Cape Verde there was no awareness that Cameroon could substitute for Portugal as a source of aluminum discs for making cooking utensils. Similarly, many

businessmen in Nigeria have no official trade experience with neighboring countries even though unofficial trade with these countries is widespread.

5.22 The problem arises mainly because the cost of gathering information and creating and updating a centralized data base is high while recovery of the cost is complicated by a free rider problem. Further, given the extensive restrictions on SSA trade (discussed in section D.i.3-5 and D.ii.2), the risk is high that even after identifying African partners suitable for trade, such transactions will not take place. This tends to discourage the allocation of resources to find alternative suppliers within SSA.

5.23 In this regard it is noteworthy that ITC sponsored buyer/seller meetings have generated US\$77.4 million of proforma invoices in the course of 4 events between January 1987 and March 1988; a fifth buyer/seller meeting took place in February 1989 and resulted in business negotiations worth US\$5.5 million. At the same time, restrictive import licensing seems to have hampered the execution of these contracts. On the anecdotal level, a Zimbabwean firm that wanted to import US\$50,000 of light bulbs from Mauritius was only granted licenses for US\$4,000; more broadly, the Reserve Bank of Zimbabwe has only set aside Zim\$60 million for PTA imports compared to Zim\$115 million of orders by Zimbabwean firms at the March 1988, Harare buyer/seller meeting.

3. Absence of Uniform Standards

5.24 Regional trade is complicated by the absence of uniform standards and specifications. At the simplest level this includes the failure to universally use the metric system. More complicated, is the preparation of products according to accepted specifications. Users and manufacturers in different countries have divergent needs and without concerted action it is difficult to get firms to produce according to norms that are acceptable to the bulk of economic agents.

5.25 Meanwhile, it may be more attractive to purchase from non-African sources where it is easier to verify product specification. In this regard, the participants at the 1988 ITC sponsored buyer/seller meeting in Harare specifically recommended that "the PTA Protocol on Standardization and Quality Control be implemented as a matter of urgency to ensure minimum quality levels of goods moving in intra-PTA trade and to protect PTA markets from sub-standard imports." Views on quality are reinforced by the poor quality of most output in the initial stage of production even if substantial improvements occur with experience. Nigerian manufacturers of construction materials, cosmetics and textiles allege that this is a problem in exporting to neighboring countries. It is noteworthy that such fears prevent a Nigerian bicycle firm from exporting directly to neighboring countries. Instead it exports to the UK which in turn re-exports to ECOWAS countries.

5.26 Remedying this problem should not be excessively hard if the governments are brought together, possibly by outside donors, and asked to agree on a harmonization program and timetable. To avoid needless discussions and given the importance of trade links with the EC, there should be prior agreement that the metric system and other EC wide guidelines should be the appropriate objective. At the same time, the use of standards should not be a means of keeping African exports out. For example an Ivorian firm alleges that Senegal uses stricter standards than in Europe as a means of keeping out Ivorian processed foods.

4. Reliability

5.27 African businessmen are often seen by their peers as unreliable and this perception is often justified. The bureaucratic inefficiencies and physical problems, that make it hard to respect schedules, tend to be accommodated by protected national markets. However, it discourages intra-

African trade. In the short run it may be difficult to resolve this problem, although liberalization would be expected to force firms to find means of counteracting the unfavorable production conditions at the risk of losing market share to imports. PTA businessmen meeting at the ITC organized Harare buyer/seller meeting urged that "the business community take the necessary steps to improve their practices, particularly in the field of communications, and follow up on business contacts and enquiries... (and) make every effort to deliver according to agreed terms and conditions in order to enhance confidence in the PTA business community." At the same time, unless physical and regulatory problems are solved this will be difficult to achieve.

5.28 There may be a role for technical assistance, perhaps through the Foreign Investment Advisory Service (FIAS) recently set up by IFC and MIGA to advise governments on how to attract foreign private investment. Further, various donors might be induced to finance training seminars and/or exchange visits that would provide a more professional approach to securing and maintaining international contracts. Regional institutions such as the Eastern and Southern Africa Trade Promotion and Training Centre in Nairobi, Kenya or the Abidjan Trade Centre in Cote d'Ivoire could play a constructive role in this regard.

5. Monopolies

5.29 In SSA, state trading companies are often the only alternative to monopolistic private entrepreneurs. Thus the competitive drive to find the least cost supplier is absent. In such a situation, established trade relations, which tend to be with non-SSA firms, continue at the expense of diversification that might favor more regional exchange. This is compounded by the approach of some foreign companies that create monopolistic niches by locating in each country under agreement to be sheltered from imports. This prevents the creation of a larger regional market where imports and other firms can compete with the established supplier. Sometimes ethnic minorities may also act in an uncompetitive manner.

5.30 Where monopolies arise out of a narrow base of traders it may be difficult to remedy this situation without the state intervening by providing competition. Creation of public enterprises for such reasons are rare but the Ghana National Trading Corporation was set up to compete with foreign trading firms and thus break their oligopolistic power (Ayub and Hegstad, 1986, page 60). In such cases, care needs to be exercised in setting out conditions of operation of the state enterprise to avoid the excesses that have drained resources into the state sector across SSA. In practice it may be necessary to envisage reforms of existing control mechanisms along the lines pursued by the Bank in various PE restructuring programs (see IDD, PPR (1989 for details).

5.31 Where monopolies are sustained by government action there is scope for increasing competition. While it is beyond the brief of this paper to investigate such issues in depth, other ongoing work in the Bank suggests that the informal sector provides plenty of opportunities for introducing competition. (See Azam (1988), Mac Gaffey (1988) and the forthcoming Long Term Perspectives Study). An issues paper is being prepared by the TD on the Underground Economy and the Urban-Rural linkages study should also be helpful. Meanwhile, Jean Marie Cour of AFTIN has extensive experience in this area). Indeed, it appears that unrecorded activity tends to limit the excesses of private monopolists and imposes a heavy burden on inefficient public enterprises.

5.32 Donors could contribute by encouraging the creation of mechanisms that would provide financing of activity by new entrants, particularly those currently in the informal sector. This may have to be pursued by cooperation with NGOs or other socially based organizations that have a capacity to marshal resources and impose peer pressure to ensure

repayments. More information on how to proceed should emerge from the studies referred to above.

6. Infrastructure

5.33 Private firms are sometimes in a position to build infrastructure that will facilitate trade but are prevented from doing so because it is difficult to collect user fees. An example of what can be achieved is provided by the experience of Agency Maritime International Zambia Ltd. Upon getting the relevant assurances on cost recovery, the firm built facilities at Mpulungu to resolve problems related to the shipping of heavy and bulky materials such as cement and steel over Lake Tanganyika between Zambia and Burundi.

5.34 There are also cases where existing facilities can be turned over for maintenance and operation to the private sector. In Guinea, for example in replacement of government operations in Conakry harbor, there now are five stevedoring companies competing for business; transit, storage and handling functions are being handled by private companies while cleaning and maintenance of port infrastructure is being contracted out. (Guinea: Transport Sector Appraisal Report, May 1987, #6787). Similarly, the airport is being managed by a joint venture with a foreign partner. Gabon and Togo are making similar arrangements for running their airports. In Guinea-Bissau the government has sold off its air traffic rights to a foreign airline while in Niger the ailing national carrier is being replaced by a mixed company. In the Kivu region of Zaire, there is some evidence that the private sector is contributing to the maintenance of infrastructure, especially roads, in the face of insufficient public spending (Regional Development of Kivu, First Draft of the Report, September 1, 1987, pages 64 to 69).

5.35 These examples notwithstanding, very little has been done in SSA, even in comparison with other regions. Governments, with support from the Bank could investigate ways in which provision of relevant guarantees relating to cost recovery would enable more private involvement in creating and maintaining the relevant infrastructure for facilitating trade flows. So far the Bank has done little formal work in this area specifically geared to SSA even though Asif Faiz of PPR has conducted a more general review (see, for example, World Bank (1988) for efforts in the road sector). In the Africa Region, Jean Marie Lantran (AFTIN) has been investigating this issue for some time and it would be useful to ask AFTIN to prepare an issues paper that might make some concrete proposals for Bank intervention in this area.

7. Appraisals of Large Projects

5.36 Identification and appraisal for large projects, especially in heavy industry, costs a lot. Further, the smaller the market, the greater the risk that appraisal will indicate that the proposed investment is not profitable. This discourages the private sector from undertaking such evaluations. Instead such projects tend to be left to the public sector with a resulting tendency to underestimate commercial risk and emphasis on prestigious ventures.

5.37 IFC and the Bank, working with national governments, have a possible role in carrying out such appraisals, possibly financed by SPPFs or other appropriate mechanisms. The objective should be to provide a subsidized service to private industry to evaluate, at its request, various projects that depend on large market size. It would also be desirable, as part of this process, to identify existing international firms that could participate in the appraisal and eventual project construction and operation. Such appraisals should concentrate on schemes which are unprofitable in a small national market but where a regional market may reduce unit costs to world prices. These would provide concrete pressure points for pointing out foregone gains from denying regional partners free

market access. Such schemes may also provide appropriate vehicles for cross-border investment and the emergence of strong African based multinational enterprise.

8. Financing for Trade Fairs

5.38 The experience of ITC in bringing buyers and sellers together is encouraging and would suggest that the private sector in SSA could be convinced of the positive payoff to contributing to such activities, perhaps in the form of a permanent fair location. In practice, such a development is blocked by the free-rider problem as well as the risk that government action will not permit trade to occur even where willing buyer and seller are identified, as discussed in section C.2 above.

5.39 The economic benefits of a permanent fair should be appraised on the basis of various options for cost recovery from the private sector. To the extent that there are positive net benefits, consideration could be given to financing such an undertaking. Important issues to be resolved include whether the public or private sector should operate the facilities and if national or supra-national authorities should be given charge. It would also have to be established if a permanent fair is more cost effective than a rotation from site to site.

5.40 ITC has recently initiated project activities, similar to those organized for the PTA, in ECOWAS and in selected countries of ECCAS. Additional funding is required to develop those projects into full-scale and broad based intra-regional trade promotion activities. If permanent facilities are not justified, consideration should be given to increase the financing available to ITC to allow it to organize more contacts between businessmen.

9. Clash between Market Incentives and Regulations

5.41 The PTA, ECOWAS and ECCAS have each set up a clearinghouse mechanism to economize on the use of foreign exchange in intra-union trade. (ECCAS is not yet functional but its Clearinghouse is a successor to the Zaire-UDEAC one). Yet no attention is paid to providing financial inducements to economic agents to use that channel. Indeed, it is alleged that in the PTA and ECCAS the commercial banks, who finance and channel the bulk of trade transactions, are given an incentive to discourage their clients from using the clearinghouse since they get a lower commission for such transactions. Similarly, in countries with export retention schemes and/or export compensation schemes, there is a financial incentive to generate hard currency as opposed to using clearinghouse facilities.

5.42 Governments and supra-national institutions responsible for regional trade need to be encouraged to think about incentives that will induce private agents to use facilities designed to promote regional exchange. It is often apparent in discussing with officials that they tend to think as central planners and believe that administrative fiat is sufficient to obtain desired results. The Bank in its ongoing dialogue with country authorities needs to persevere in the general message that without the appropriate incentive structure, it is unlikely that private agents will behave as desired by policy makers.

D. Policy Failures

(i) Bureaucratic Weaknesses

1. Multiplicity of Targets

5.43 The economic groupings in SSA, have very broad objectives of fostering cooperation and development in all fields of economic activity. Regional integration involves a broad range of activities in the social and cultural fields as well as the economic. In consequence there has been a tendency for various organizations to attempt to move on many fronts at the same time. The PTA Treaty, for example, has twelve protocols dealing with matters ranging from tariff and non-tariff barriers to the creation of infrastructure, the development of agriculture and industry and the standardization of products. Given the limited resources and the difficult tasks these face, best results could be expected from a narrower focus on key issues with the greatest multiplier effect on the integration process. This would allow concentration on the essential but politically tough policy reforms required to create a unified market for goods and factor services. In contrast, ECOWAS has got involved, through the ECOWAS Fund, in infrastructure development, has set up various West African federations (Universities, Youth Organizations and Trade Unions) and even organized sporting events, all while deadline after deadline for internal liberalization pass without significant action and while some of the gains in labor mobility are occasionally reversed.

5.44 SADCC is the economic grouping that tends to be most highly praised in SSA, largely because it has a small secretariat, works through national governments and has a concrete and limited agenda. The other economic groupings (and any new efforts at regional integration) should be based on the same principles. It may be more fruitful to discuss and implement one protocol at a time instead of trying to work ineffectively on a dozen fronts. In the case of the trade organizations that are the primary focus of this paper, they should concentrate their efforts on eliminating the barriers that prevent Africans from working, investing and trading across the borders of the continent.

2. Complexity of Rules and Regulations

5.45 The rules and regulations are needlessly complex, reflecting an attempt to accommodate the special interests of each member country. For example, rather than eliminating tariffs (a simple and easily understood measure) or granting a straight preference (less radical but still simple), the typical approach is to agree on a restricted list of eligible items. In addition, even after establishing that it is dealing with a Common List item, the firm has to determine which preference category the good qualifies for (varying, in the case of the PTA, for example, from 10 percent to 70 percent within 6 groups and 10 categories). To complicate matters even further, a firm needs to demonstrate that it qualifies under the rules of origin for 30 percent, 60 percent or 100 percent preferential treatment depending on its local equity holding. The rules of origin also create major obstacles within ECOWAS, in particular between the CEAO and Nigeria.

5.46 When combined with their timidity, the costs of obtaining such preferences can outweigh the benefits, especially since the real obstacles are the procedures that need to be satisfied rather than tariffs. In contrast, the EC market is accessible with much less paperwork, clearer requirements and lower tariffs than in union partners. The benefits are further reduced when the problems of admission are taken into account. It has been estimated by the ITC that up to 70 administrative steps are involved in legally moving goods across African borders. In Zaire, for example, there are 39 administrative steps necessary for exports and 30 for imports. These steps include multiple controls, signatures and validations, licenses and authorizations from various services of different administrations. The use of mercurial values and import surcharges and

other restrictions on imports further raises the cost of trading across African frontiers even when official tariffs are reduced.

5.47 The Bank, the EC and other donors could provide technical assistance to simplify bureaucratic procedures and introduce more automaticity and recording mainly for statistical rather than control purposes. Ongoing and past support by the Bank for national adjustment programs form a useful basis for extending advice to interested Governments.

3. Administration of Licencing Arrangements

5.48 The administration of licencing arrangements tends to be biased against intra-regional trade, partly because of an unwritten but prevalent attitude that imports from outside the region tend to be "essential" while those from SSA can be substituted by home production. This bias is worsened by the provision of lines of credit by foreign donors that can only be used to import from their country (see section C.1 above).

5.49 A dramatic demonstration of this bias is provided by the results of the cancellation in 1984 of the open general import licence agreement between Malawi and Zimbabwe when they both adhered to the PTA. Zimbabwe imports from Malawi fell by US\$10.5 million from an average of US\$14 million over the previous 5 years. In contrast, imports from Botswana, with which a similar agreement was maintained because it did not join the PTA, remained at around US\$35 million. So the import licencing regime brought the curious result that joining a trade enhancing grouping actually eliminated an export market for Malawi. (Also see section C.2 above).

5.50 It is noteworthy that the Report of the Twelfth Meeting of the PTA Council of Ministers recognizes that "restrictive import licensing seemed to be a major problem to intra-PTA trade." (Page 8). The businessmen of the region have also identified this as a serious obstacle and called on the governments of the PTA countries for "the liberalization of the licensing policy and practices for imports from PTA countries be expeditiously implemented in accordance with the articles of the PTA Treaty and the decisions of the PTA policy organs."

5.51 Since 1987 ITC has assisted the PTA in the organization of five buyer/seller meetings (see para 5.23) and two trade fairs. The fairs took place in Nairobi (1986) and Lusaka (1988) and business worth US\$160 million and US\$100 million respectively was negotiated at these events. ITC would be happy to further discuss with the Bank the scope for expanding these and other subregional trade promotion activities with the direct participation of the business community in SSA. To the extent that licencing reflects a shortage of foreign exchange, resolving the problem lies in finding a more realistic exchange rate and adopting a policy of allocating foreign exchange by relying on market signals. However, even within the current context it should be possible to improve the situation by explicitly favoring partner nations in the allocation of foreign exchange to offset some of the existing biases arising from foreign financed credit lines. Zimbabwe has responded to criticism by introducing an allocation specifically for the PTA and has gradually increased the amount from Zim\$10 million in 1984 to Zim\$60 million in 1988. However, it would appear that such moves do not go far enough when compared to the Zim\$115 million of pro forma invoices to Zimbabwe importers issued at the last buyer/seller meeting in Harare. A more liberal arrangement for the issuance of import licenses for partner imports could be justified if the Clearinghouse extended its role to create a facility to allow private agents to freely trade local currencies (see Goreux (1988) for some suggestions).

5.52 To circumvent the biases in the allocation of import licenses it would be important to try to establish an Open General Licence (OGL) system for partner imports. In this respect a good model would be provided by the Open General Import Licence agreement between Zimbabwe and Botswana

originating in the 1956 agreement between the Federation of Rhodesia and Nyasaland and Basutoland, the Bechuanaland Protectorate and Swaziland. To the extent that the exchange rate remains significantly overvalued, the OGL could apply until a certain level of foreign exchange had been expended rather than requiring the issuance of licenses for all imports. Further, the allocation of the freely issued licenses should reflect some elements of market pricing to avoid small latecomers being excluded from the line. The Liberalized Import Regime adopted by Madagascar in 1986 and currently being considered by Somalia offers one possible approach.

4. Administration of Control Procedures

5.53 There is poor coordination between the government agencies negotiating the reduction of impediments to regional trade and the implementing agencies that have to implement the decisions that are intended to simplify procedures. Thus the Harare Buyer/Seller meeting asked that the "PTA Secretariat impress upon Governments to introduce without delay, at the operational and administrative levels those measures which have been agreed upon for the facilitation of intra-PTA transit transport like the yellow insurance card and the Road Customs Transit Document (RCTD)" (ITC, Harare Buyer/Seller Meeting, page 4).

5.54 This reflects the experience of several transporters who were faced by puzzled customs officials concerning the use of the RCTD, intended to replace all other documentation for within PTA movement of goods. It has been reported that at some customs posts, the RCTD is now accepted in addition to all the usual documents! The meeting also urged that "Government licencing authorities refrain from insisting on Certificates of Origin at the time applications for import permits are submitted and that certifying authorities, as designated by national Governments are respected in accordance with the relevant Protocol of the PTA Treaty" (ITC, Harare Buyer/Seller Meeting, page 5).

5.55 Similarly it is reported that customs officers at the Togo/Ghana border systematically unload and check goods "for security reasons", notwithstanding the agreements for free movement within ECOWAS.

5.56 Governments need to be urged to ensure that decisions taken at higher level are passed on down the ranks, especially to the remote posts far removed from the capital. The secretariats of the existing regional trade organizations could devote special efforts to assist national authorities in disseminating appropriate information "down the ranks" and could be empowered to help in moving relevant information in this manner.

(ii) Political Obstacles

5.57 The following sections will document the various political obstacles without suggesting particular action that could overcome them. This is because by their nature they are likely to be more problematic to overcome than the other barriers discussed above. Instead, Chapter VI summarizes issues that need to be dealt with to achieve an increase in official regional trade and makes suggestions for possible intervention by the Bank to facilitate this.

1. Inappropriate Macro-economic Policies

5.58 The most serious obstacles to recorded intra-regional trade arise from unintended effects of inappropriate macro-economic policies. Overvaluation of exchange rates and inappropriate credit policies are at the core of many problems limiting trade.

5.59 The exchange rate is important both as a price signal and because of the resultant shortage of foreign exchange when the rate is overvalued. It is impossible to price (at official exchange rates) the exports from the

country with the greater overvaluation, even though at parallel rates trade would (and often does) occur.

5.60 As an example, consider a situation where the official rates are at parity with the US\$ but where in country A the parallel rate is 2 units to the US\$ and in country B it is 4 units to the US\$. Assume that an exporter in country B is prepared to trade for at least 4 units of his domestic currency while the importer in country A is willing to pay up to 2 units of country A currency. At parallel rates, they would fix the price at 1 US\$, but at official rates the exporter requires at least 4 US\$. In contrast the importer is not willing to pay more than US\$2. So trade can only take place when it is transacted outside official channels.

5.61 The counterpart of this argument is that imports from country B obtain a larger exchange rate subsidy than the implicit tax on country A exports and therefore overvaluation should encourage trade in the opposite direction i.e imports into the country with the more overvalued rate. In practice, however, with no incentive for official exports from the country with the relatively more overvalued exchange rate, the necessary foreign exchange to support such activity is unlikely to be available on a sustained basis. Instead imports are restricted by use of licencing requirements. Therefore the overvaluation tends to limit overall trade rather than just exports from the country with the more overvalued exchange rate.

5.62 The general shortage of foreign exchange associated with overvaluation results in the need to ration foreign exchange. This leads to the biases against regional imports discussed in section D.i.3 above and is also illustrated by Zairian and Nigerian exporters preference to sell outside the Clearing arrangement so as to receive foreign exchange. It also inhibits investment that is essential to produce the tradeable goods required to pay for imports. In turn, this complicates the sharing of benefits since incentives to induce a shift of economic activity to the weaker economies cannot operate if production and dividends are not realistically priced when converted to the currency of the investor.

5.63 The overvaluation of the exchange rate is probably the single most important inhibition to increased trade. However, as explained earlier, it is not sufficient to have sensible exchange rate policies. UDEAC, despite using convertible currency, has much less intra-regional trade than other groupings where foreign exchange shortages are an important problem.

5.64 Credit policies can be problematic when inefficient sectors absorb an excessive share and the resulting rationing crowds out productive activity. Unfortunately no detailed data are available to show the share of total credit going to finance trade in general and regional trade in particular. On the basis of anecdotal evidence in discussions with businessmen and bankers, however, when credit is tight there appears to be a bias against providing credit to finance regional transactions so that these have to be financed using cash resources.

2. Unwillingness to Significantly Dismantle Barriers

5.65 The experience of trade groupings in SSA demonstrates the strong resistance against significant reduction of trade barriers. This reflects similar difficulties in other regions. For example, in July 1988 CARICOM failed to agree on the implementation of previously agreed measures that would have virtually eliminated all trade barriers within the region. Similarly, ASEAN has found it difficult to agree on mutual dismantling of trade barriers and has tended to concentrate on security issues (Meyanathan, 1988). ASEAN also provides a useful lesson on the dangers of a gradualist item by item negotiation for the reduction of regional trade barriers: in the limited list of liberalized items one finds snow ploughs and nuclear reactors. This experience needs to be contrasted with that of the CACM which experienced a five fold increase in trade by adopting the opposite approach of liberalizing trade in everything except for a limited list. The

limited liberalization approach provides too much time for pressure groups to resist an opening up in the areas where the greatest amount of trade creation could be expected. In consequence the benefits of acting where agreement is reached (on items such as snow ploughs) is so small that there is little incentive for implementation.

5.66 In SSA, ECOWAS has consistently failed to implement decisions concerning trade liberalization. No action has followed the 1983 agreement by the ECOWAS heads of state on a liberalization scheme. Indeed in recent tariff reforms in Nigeria and Ghana, no account was taken of the agreement to initially freeze and then lower tariffs to ECOWAS members. Thus the ECOWAS secretariat notes that "despite the impressive number of agreements reached and decisions taken regarding the harmonization of Customs documents, the adoption of common procedures, and the program for deregulating non-manufactured crude goods, traditional handicrafts and industrial products, the Economic Community of West African States has not made tangible progress in practical terms." (ECOWAS Annual Report, 1985/86, page 14).

5.67 In the UDEAC, "instead of a common external tariff, the Union embodies a multiplicity of import tariffs... Contrary to the initial objective of guaranteeing free movement of products within the Union, the taxe unique as implemented today amounts to an import duty that provides additional protection to members and contradicts the principle of free trade within the Union." (Samen, 1988, page 11).

5.68 Similarly, "since 1983 the Policy Organs of the PTA have been taking a number of decisions aimed at liberalizing and facilitating intra-PTA trade. However, the majority of important decisions have not yet been implemented by most of the member States. As a result, five years after the PTA was established, there is virtually no preferential trade in the subregion." (PTA, 88-0184, May, 1988, page 1).

5.69 The other groupings in SSA reflect similar reluctance to open up their economies to their neighbors. Some Government officials argue that liberalization that does not lead to equal benefits to all can not be tolerated. This in turn means that it is difficult to liberalize since the whole purpose is to generate adjustment which by its nature must be expected to have a differential impact. This is especially true in the short run, before the pressure from increased competition can lead to an environment more conducive to economic growth. There are also strong interest groups that are threatened by liberalization that would expose inefficient import substitution to foreign competition. "Africa's domestic private manufacturers are fewer and less powerful than Latin America's. The real pressures for import substitution policies have come from civil servants, politicians, and military men. These often justify opposition to trade liberalization in the name of nationalism and the need to be modern and industrialize. But they benefit especially from non-tariff barriers such as import quotas and licenses which allow them to make profits from illegal sales and/or to increase their power" (Bienen, 1987, page 3). Such considerations explain in part why in Senegal, for example, chocolate imports from Cote d'Ivoire are discouraged by using mercurial prices and tough health standards; there are bans or high taxes on the import of palm oil in Niger, Nigeria and Cote d'Ivoire and cotton in Nigeria and why Mali limits the issuance of import licenses for regional imports, all despite their contradiction of the principles of ECOWAS and the CEAO.

3. Barriers Outside the Region are Lower than Within

5.70 It is well known that African countries have much higher tariff and non-tariff barriers than industrialized countries. For example, the average tariff facing developing country finished and semifinished manufactures ranges from just under 7 percent in the EC and Japan to just under 9 percent in the US (WDR, 1987, page 136) while in SSA the equivalent figure is 18 percent. This figure reflects extensive exemptions that may often require side payments. The theoretical average tariff is 35 percent. Unfortunately, no data could be obtained for the trade weighted theoretical tariff which is more relevant for determining the extent of exemptions. Given that there are more tariff lines at the low end of the scale, one could expect the straight average to be downward biased, but there is an offset arising from the lower level of recorded imports at the high end of the tariff.

5.71 Similarly, according to UNCTAD data, the range of NTBs in SSA is much larger than in industrialized countries where most goods trade freely except for textiles and agricultural products (WDR, 1987, Chapter 8). NTBs in SSA also tend to be much more variable in scope and extent so that the effective protection fluctuates significantly from year to year. This mainly reflects decisions concerning the allocation of import licenses and/or foreign exchange authorizations. The variability is further enhanced by foreign exchange retention and export compensation schemes that partially compensate for exchange rate overvaluation.

5.72 Higher barriers in SSA than in industrialized countries do not in themselves account for low shares of regional trade since all imports into SSA face the same high barriers. However, UNCTAD and ITC argue, on the basis of their experience in the Caribbean, that there is a strong relationship between the level of trade and the share of regional trade. This reflects the low marginal costs of finding new markets once economic policy encourages a more open trading system that orients domestic activity to traded goods. It is plausible to expect that as trade barriers are reduced, unrealized potential in regional trade would be exploited as part of a general expansion in trade.

4. Barriers to Cross-border Investment

5.73 SSA countries have extensive restrictions on the capital account as documented by the IMF annual review of exchange and trade restrictions. Further, hardly any emphasis is given to a liberalization of capital flows in any of the structural adjustment programs supported by the Bank and the IMF in SSA, on the correct logic that, to avoid unsustainable capital outflows, appropriate economic policies and a liberalization of the current account are a necessary precondition.

5.74 Under current circumstances it is difficult for trade to lead to investment for production in the importing country. It is also difficult to rationalize production through takeovers, mergers and acquisitions and this sustains high costs that require extensive protection from imports. Foreign firms also often face different regulatory and tax frameworks from those confronted by domestic firms.

5.75 The problem partly involves reluctance on the part of Central Banks to provide foreign exchange for cross-border investment when they are unsure that a reverse flow of dividends will follow. For example, there is much potential for rehabilitation of firms in Mozambique that Zimbabwean entrepreneurs, for example, are interested in taking over from the Mozambique Government. Yet the few acquisitions that have taken place by Zimbabwean firms have required using externally available foreign exchange given the reluctance of the Reserve Bank of Zimbabwe to authorize such transactions.

5.76 Central Banks in SSA seem unwilling to 'lose' capital to other SSA countries, and in the process block the natural evolution from exports to investment and further trade expansion by denying funds for investment.

i. Fears of Economic Domination

5.77 In all Unions in SSA, the fear of economic domination retards integration. ECOWAS is particularly handicapped by this since Nigeria accounts for more than half the population and GNP of the grouping. This is also a problem in UDEAC with fear of Cameroon obtaining most of the benefits reinforced by the pattern of intra-UDEAC trade (see Chapter III). The fear of falling behind is also a constraint, even where there is more balance, as in the PTA where Ethiopia has the largest population, Zimbabwe the largest manufacturing sector, Kenya the largest GDP and Mauritius the highest per capita income. The authorities in some countries argue that it is necessary not only to achieve an absolute increase in wealth but that their relative income should not deteriorate.

5.78 This approach is incompatible with the adjustment and economic specialization that joining a Union is geared to achieve and accounts for much of the lack of progress in significantly dismantling barriers. Such problems are worsened when factor mobility is limited. It is significant that the CEAO which has a much higher degree of labor mobility than the UDEAC, also has much more recorded trade.

6. Concentration on Fund Raising Rather Than Problem Solving

5.79 Berg (1987) notes that there is little commitment to regional organizations by the governments that set them up. Indeed, the proliferation of such organizations in Africa reflects the view that there is little fiscal cost and that these organizations can mobilize external resources.

5.80 In SSA, the regional trade organizations are not exempt from these pressures and the Bank has recently been approached by the PTA, the CEAO and ECOWAS (through the ECOWASFUND) to finance various activities ranging from regional projects to providing trade financing and taking a share of capital in some institutions. The ECOWASFUND has also tried to obtain donor support for its headquarters building.

5.81 In Africa skilled labor is scarce and the diversion of attention of officials involved in reducing barriers to fund raising reduces their effectiveness in achieving the primary purpose that the Union is supposed to achieve.

7. Compensation of Relative Losers

5.82 Integration has been retarded by the belief that this should lead to balanced growth with an equal share of industry in each member or at a minimum financial compensation to the less successful members. UDEAC has experienced the temporary withdrawal of Chad because it felt it was being inadequately compensated. The CEAO seems to have worked better than most Unions partly because Cote d'Ivoire and Senegal were willing to shoulder an extra burden. Indeed, CEAO has performed less well since the recent economic crisis in Cote d'Ivoire that led to a reduction in its willingness to subsidize the poorer members and a search is now underway for a new compensation formula.

5.83 In the EC, national income per capita varies from US\$2,250 in Portugal to US\$12,600 in Denmark while manufacturing accounts from 18 percent of output in the Netherlands to 32 percent in the Federal Republic of Germany. Even amongst the original six members who have had most time to equalize their position, income per capita ranges from US\$8,550 to almost 50 percent more in the richest country.

5.84 Regional and state by state variations in industrialization and income are significant even in the US which has a single economy. Thus, the share of output arising from manufacturing varies from 3 percent to 26 percent with significant variation between these extremes around a mean for the whole country of 15 percent. More surprisingly, even after accounting for Federal redistribution, per capita disposable income is twice as large in the wealthiest state compared with the poorest.

5.85 Unlike the groupings in Africa (except perhaps for the CEAO) labor and capital can move relatively freely in the EC and even more so in the US, but even this is insufficient to equalize incomes levels. Regions which are more exposed to trade tend to have the highest income levels. In groupings which are more restrictive, regarding factor mobility, it would be expected that the variation would be even greater.

5.86 Furthermore, the main economic rationale for integration is that it will lead to better resource use and allocation and therefore economic specialization with a concentration of industry and benefits should be expected, as is observed even within individual industrialized countries.

5.87 Attempts to redress this "uneven" pattern of development would be expected to result in trading off increases in general welfare for the sake of less inequality: in the extreme it would suggest limiting industrialization and incomes to the level of the least fortunate country.

5.88 It seems reasonable to conclude that successful economic integration will increase the economic specialization of each country compared to the no union case. While it is not clear if an economic union, once in equilibrium, would reduce the initial relative income gap, it is reasonable to hypothesize that substantial income inequality, reflecting differences in resource endowments, will persist even in the steady state. Further, the less factor mobility prevails, the greater the likely income disparities. It is also likely, especially with continued restrictions on factor movements, that in the short run the income disparities would grow for some sub-set of countries, just as income inequality initially increases with development.

5.89 One reason for lack of progress in achieving intra-union liberalization is that the relative "gainers" are unable to compensate the relative "losers" sufficiently unless they give up virtually all their gains. In any case, as is evident from the consequences of the break up of the East African Community (EAC), the weaker countries do not necessarily improve their relative position outside the union while they do forego some growth when on their own.

5.90 Thus in the heyday of the community, from 1966 to 1973 Kenya was growing 1 1/2 and 2 1/3 times as fast as Tanzania and Uganda, respectively. In the period of breakup, from 1976 to 1979 Uganda experienced negative growth while Tanzania could only manage less than half the growth of Kenya. After adjustment to the breakup, in the period 1980 to 1986, Kenya grew almost 4 times as fast as Tanzania and almost 5 times as fast as Uganda. However, the absolute performance of Kenya relative to other African countries seems also to have suffered from the breakup. Thus from 1966 to 1973 Kenya was growing twice as fast as all SSA countries while from 1976 to 1979 this was reduced to only one and half times the average. Kenya does seem to have recovered, however, since it has achieved a 3.4 percent growth rate from 1980 to 1986 while on average SSA has stagnated.

5.91 Economic performance is the result of complex interactions and special circumstances other than the breakup of the EAC may explain some of these variations. However, it does seem that the strongest economy recovered better from the breakup.

5.92 From an economic perspective, calls for compensation amount to paying the weaker countries to do something that is in their own interest.

Nevertheless, the experience to date shows that from a political perspective an effective compensation mechanism may be required to keep intra-union barriers down.

8. Unwillingness to Rely on the Private Sector

5.93 The Governments of many SSA countries are unwilling to rely on the private sector to achieve regional cooperation and economic integration. This reflects general attitudes to the private sector that emphasize the role of the public sector. In part this reflects the political unacceptability of relative enrichment of the more economically dynamic ethnic and/or tribal groups. Nellis (1986, page 13) notes that "most of (the) commercial agricultural and manufacturing base (that) existed was in the hands of aliens...This created deep resentments and sparked calls for controls and nationalization. In many countries across the region, one often encountered - and still encounters - attitudes which cannot be termed expressions of a coherent socialist position, but which nonetheless reveal a strong strain of anti-capitalism, a pronounced mistrust of the market and the profit motive."

5.94 This has led to the creation of public sector institutions and a desire to regulate private exchange across national borders. For example, rather than working out arrangements to induce existing development and commercial banks to finance regional projects and regional trade, the PTA chose to set up a PTA Bank. Even where there is legitimate scope for government intervention, as in the case of the PTA Clearinghouse, insufficient attention is paid to devising incentives that would induce the use of the facilities and excessive efforts are put in devising regulations.

5.95 The PTA appears to be ready to respond to the private sector. The PTAFCI (Federation of Chambers of Commerce and Industry) attempts to influence government policy to the PTA through its national members and the exchange of views between Ministers and businessmen is an important part of PTA trade fairs. Nevertheless, the PTA, like ECOWAS, places ownership restrictions on firms that can qualify for preferential trade. This is a major point of contention between CEAO members of ECOWAS, particularly Cote d'Ivoire, and other members of ECOWAS, particularly Nigeria. It is also noteworthy that in the case of ECOWAS the private sector set up a bank (ECO-Bank) to finance regional trade instead of the public sector.

9. Insufficient Willingness to Promote Institutions such as the Clearinghouse

5.96 There is insufficient effort to designing incentives that would induce the private sector to use official channels for facilitating trade, as mentioned in D.ii.8 above. The PTA Clearing House is handling transactions equivalent to about 60 percent of the trade between the countries despite the intention that it should handle not only all the trade but also the service payments. The West Africa Clearinghouse of ECOWAS handled an average of 23 percent of transactions in its first six years but defaults and payments imbalances have driven this figure down to 9 percent in the most recent five year period. The ECCAS Clearinghouse is also experiencing similar problems in attracting transactions.

5.97 Too much reliance is placed on administrative decisions or on collective goodwill without figuring out if desired objectives at the regional and national level coincide with private interest at the transaction level. Again, the pricing of transactions tends to be ignored.

10. Unwillingness to Open Up to Non-residents and Ethnic Minorities the Opportunities to Trade

5.98 The whole purpose of economic Unions is to make investment, including by foreigners and ethnic minorities, more attractive by providing a wider market. Restricting access to the wider market and discouraging investors at a time of net disinvestment by private capital makes no sense. Business confidence needs to be restored if SSA is to reverse current economic decline. This will require encouraging the ethnic minorities to participate more fully as part of a process of attracting foreigners. Without this neither regional integration nor integration into the world economy can succeed. Where there are legitimate concerns regarding uncompetitive practices, these have to be dealt with through effective government intervention and regulation, but this should not be used as a pretext to limit investment when SSA growth is suffering from a lack of investment.

VI. THE WAY AHEAD

A. What could be done

6.01 Securing an increase in efficient recorded regional trade will require action on several fronts simultaneously. It is likely that some increase in observed regional trade would occur from a combination of measures dealing with the market and bureaucratic failures and easing the impact of the natural constraints discussed in Chapter V. Nevertheless, this increase is unlikely to be significant without a resolution of the political problems. Most of the constraints could be dealt with by the national governments on a bi- or multi-lateral basis, within or outside the framework of existing organizations and without donor financial support. To justify external support, action on the political barriers will therefore be a pre-condition.

6.02 The experience to date suggests that some countries will have chronic trade deficits with their regional partners. Financing such deficits when the exchange rate is at an inappropriate level is not a sustainable policy and indeed contributed to the decline of the Central American Common Market which had generated the largest amount of internal trade of all unions in the developing world (see CODII, LAC & IDD, PPR (1989)). This is why increasing regional trade must be associated with the liberalization of capital and labor flows so that trade deficits can be at least partially offset with investment inflows or worker's remittances. ^{17/}

6.03 National and donor resources should be channelled where they have a direct impact on facilitating such liberalization instead of providing financing to keep regional organizations active. ^{18/} National governments need to concentrate on policy actions that will create the pre-

^{17/} A full offset or, more usefully, a sustainable regional deficit will require exchange rate adjustment. Regional trade which will remain a small part of total trade need not be in balance provided the overall balance of payments situation is strong enough to support regional deficits. Nevertheless, liberalizing non-trade current account and capital flows will contribute to make any given deficit level more sustainable.

^{18/} As argued by Berg (1989), donors should also encourage cooperation in specific areas such as fighting river blindness. Here, we ignore such issues and concentrate on actions that are most relevant to increased regional exchange. Also, it is not being suggested that financing be withheld from existing regional organizations. Rather, the point concerns the use of additional resources.

conditions for increased regional exchange identified in Chapter V. Donors could support such efforts through technical assistance and by underwriting risk sharing schemes in addition to the continued financing of relevant infrastructure. There may also be a case for program lending to finance purchases outside SSA that may be required to sustain regional activity by private economic agents.

6.04 There is a growing feeling in SSA that current efforts at regional integration have not proceeded as rapidly as hoped for. Thus the Organization of African Unity states that "Five years after the adoption of the Lagos Plan of Action and the Final Act of Lagos, very little progress has been achieved in the implementation of the Plan and the Act" (OAU, 1985). This is why the regional organizations are increasingly turning to the Bank and other donors for support. Thus the Bank has received specific requests from PTA, ECOWAS, CEAO, UDEAC and SADCC. There is thus a need for African governments, regional organizations and donors to develop a framework for responding to such requests in a manner supportive of the basic objectives of integration and of national adjustment efforts. This framework should build on the desire of Africans for cooperation and the increasing, though by no means universal realization in Africa that new approaches are needed.

6.05 Specific details and problems have to be resolved in a more concrete context, such as the proposed regional SAL with UDEAC and possible Bank operations with the CEAO and PTA/SADCC. Nevertheless a general framework is required to ensure that integration contributes to improve growth prospects in SSA by strengthening and deepening ongoing national adjustment efforts. It is in this context that the following suggestions should be seen as a first step towards achieving a consensus on the critical elements.

B. Main Elements of a New Approach

6.06 Regional integration should provide an additional means of moving groups of African countries towards overall economic liberalization by improving conditions for a more active role by private agents across the frontiers of Africa. The approach needs to be consistent with and promote liberalization efforts at the national level and not set back programs that any individual country may want to undertake on its own.

6.07 In view of the strong interests that resist liberalization, it may be difficult, especially initially, to find many SSA countries that are willing or able to embark on such a course. This is especially true if the strategy adopted is aimed at strengthening and deepening the adjustment process by making it possible to liberalize the economy more rapidly and/or more extensively. There might, therefore, be a temptation to focus on the relatively easier issues concerning the rationalization of existing tariffs and, especially, the granting of regional tariff preferences. This would be unfortunate as the main justification for donors to support African requests would be to provide national authorities with the necessary leverage (arising from technical expertise and financial resources) to overcome political obstacles that would not otherwise be removed and which hinder economic progress.

6.08 Closer economic links should be based on existing and potential complementarities and trade flows. In this respect, existing Regional Economic Groupings in SSA, set up for a variety of, sometimes non-economic, reasons, are not necessarily optimal. This is especially true of the smaller ones (see Chapter III). However, given that they exist and given the commitment of the member governments to them, it is not useful to question their existence.

6.09 Instead, to the extent possible, any new initiatives should work with and through the existing sub-regional organizations, in particular ECOWAS, PTA, UDEAC and SADCC. Any arrangements for ECOWAS would

automatically cover CEAO and MRU countries which are all members of ECOWAS. In turn, if the ECCAS does become active, it may present a more attractive vehicle for Central African countries than UDEAC given the membership of Zaire and the bridge to the PTA provided by Burundi and Rwanda. Nevertheless, new initiatives should promote factor mobility and the free movement of goods and services within the group as well as generalized trade liberalization with the rest of the world; they should not aim at reversing the failure to activate customs unions with high barriers against non-members including those on the continent.

6.10 This means that specific provision will have to be made for inter-union liberalization and to avoid excluding non-member African trading partners that may have more liberal trading arrangements and/or have extensive trade relations with some group members, such as Botswana and Zimbabwe in the context of the PTA and Zaire and Congo in the case of UDEAC. This is why it is important to establish a structure that is open to all SSA countries but where each is allowed to proceed at its own pace. Also it may be preferable (and practically it will be easier) for a few committed countries to voluntarily agree on far-reaching mutual liberalization rather than for these countries to wait for action by a large disparate collection.

6.11 To reconcile these elements, it is proposed that the starting point should be the existing undertakings and agreements by the member states. To date these have generally amounted to little more than declarations of intent to reduce tariffs. It would be desirable to encourage all the member States to implement mutual liberalization rapidly and in unison. However, there may be difficulties for some members to proceed faster than already agreed. Therefore, existing organizations should allow and indeed encourage sub-groups of states to implement more rapid and extensive elimination of trade barriers and obstacles to labor and capital mobility between them, while recognizing that some members would not want to proceed further than already agreed. To support these efforts, donors could assist those individual member States that are prepared to relax controls on cross-border flows of factors of production and goods and services.

6.12 There are many possible options that could be pursued by donors and African governments and regional organizations. Indeed, many of these will not be mutually exclusive and different forms of intervention will be more effective in different circumstances. One approach that would be operationally consistent with the objectives suggested above would be to establish a blueprint defining the various steps that would eventually result in a regional agreement on the free movement of goods and services and factors of production while achieving a generalized lowering of barriers against imports from third parties. This blueprint could be turned into predetermined Articles of Agreement which would be structured so that, following voluntary negotiations between them, SSA Governments could select which the sequence of clauses to adhere to on a reciprocal basis at any given time. ^{19/} Preparing these Articles will require discussions involving key national governments, organization secretariats and interested donors.

6.13 Donors, including the Bank, would have to ensure that the Articles of Agreement are consistent with their objectives if they are to provide financial support to encourage implementation of the various liberalization measures to be defined by the Articles. Once this is done, however, any negotiations would involve only SSA governments on a bi-or multi-lateral

^{19/} To avoid the danger of establishing a "crazy quilt" of preferences, the proposed Articles will have to envisage a clear sequence of steps leading to the free flow of factors and products amongst participating countries. It should also be envisaged that the agreements will gradually be multi-lateralized, as the number of bi-lateral deals achieving a given level of liberalization increases.

basis to decide which liberalization measures to implement at any given time. Indeed, where genuine mutual self-interest is involved, there may be no need for donor involvement, even though donors can facilitate the process by providing resources to get the process going. The blueprint is already more or less defined by the steps envisaged in the Lagos Plan of Action and reflected in the various treaties setting up the existing sub-groupings.

6.14 No country would be required to agree on any of the measures envisaged in the Articles of Agreement and in exchange the States wanting to proceed only at the pace envisaged in current agreements would agree not to veto more extensive or rapid measures of liberalization amongst others; for example the liberal trading and investment agreement between Malawi and Zimbabwe could be reactivated under such a scheme.

C. Consistency with the Aims of the Existing Regional Groupings

6.15 The groupings usually acknowledge, as in the case of the PTA, that "unless simultaneously with the reduction and eventual elimination of tariffs, non-tariff barriers are also eliminated, the effort of eliminating tariffs can be easily nullified" (PTA 88-017, page 4). Therefore, it would be consistent with the agreed objectives to concentrate efforts on eliminating non-tariff obstacles to trade.

6.16 Similarly, the proposed emphasis on factor mobility is fully consistent with the broad objectives of the major economic groupings in SSA that see the current agreements "as a first step towards the establishment of a Common Market and eventually of an Economic Community ... to promote co-operation and development in all fields of economic activity particularly in the fields of trade, customs, industry, transport, communications, agriculture, natural resources and monetary affairs with the aim of raising the standard of living of its peoples, of fostering closer relations among its Member States, and to contribute to the progress and development of the African continent." (PTA Treaty, Chapter 2).

6.17 The major area of divergence concerns the granting of regional preferences. The objective of existing unions is to pursue import substituting industrialization behind high barriers against third parties, while the Bank would argue for a lowering of external barriers. Fortunately, in practice regional preferences to date have been few and generally insignificant. Further, given the increasing emphasis on adjustment programs by African governments, it does not seem difficult to envisage a new consensus where the previous objectives of high Common External Protection could be de-emphasized.

D. Consistency with Ongoing Bank Efforts

6.18 The Bank is supporting the efforts of SSA countries geared to the elimination of economic distortions and greater integration into the World Trading System. Amongst other measures, this involves:

- (a) greater reliance on market clearing prices for the allocation of resources, including foreign exchange;
- (b) efforts geared at rationalizing and reducing effective protection through tariff reform coupled with the elimination of quantitative restrictions; and
- (c) measures designed to increase private sector economic activity.

6.19 The main elements required to ensure that a regional operation reinforces these actions will be summarized here based on the more extensive discussion in Chapter II.

6.20 Any proposed operation should be formulated to provide another channel for those that may be unable to move far or fast on their own and

not be articulated as an alternative to current efforts at the national level. In particular, for the strategy to be effective, regional efforts will need to offset the smaller number of partners affected with a bolder and faster dismantling of barriers than envisaged in current national programs. Ideally, it will involve complete non-tariff liberalization of trade and capital flows as well as full labor mobility with regional partners.

6.21 At the very least all non-tariff trade barriers should be removed and firms from any partner country within the group should be treated as domestic firms rather than as foreign firms, with provision for the free flow of inputs and dividends across the national boundaries within the group. Freer market access and greater factor mobility is needed to attract the foreign private investment that is sorely lacking in the region. Therefore, current discrimination in the preferences according to ownership of firms or according to the nature of the traded good or service must end, at least for those countries to benefit from Bank financial assistance. Where there are legitimate concerns over uncompetitive behavior, this must be dealt with by appropriate regulation without excluding potentially dynamic actors from contributing to increased regional economic activity.

6.22 Securing trade and investment flows that contribute to lasting growth will involve, amongst other measures, establishing some market clearing price mechanism for regional activity whenever it is not possible to move the exchange rate sufficiently to sustain a non-restrictive payments system. It will therefore be an important pre-requisite to allow free pricing of all transactions by the private sector including the principle of free trading of regional currencies against each other.

6.23 The value of the regional approach lies in its potential to immediately bring competition to firms that would otherwise be sheltered because of the extremely small market size of all African economies (except for Nigeria and possibly Cameroon). But limited competition from neighbors only makes sense if it is a step on the way to more open competition from the Rest of the World.

E. Some General Modalities

6.24 It is too early to be specific about the tranching of reforms, but the main elements to be embodied in any Articles of Agreement would involve the following:

- (a) the implementation of non-tariff liberalization measures already agreed to by the member 20/;
- (b) recognition that not all countries would be able and willing to liberalize at the same rate and therefore allowing those that want to move faster to do so without being subject to the veto of those not wishing to proceed further than existing agreements;
- (c) treating any regional currency (of a participant in the proposed scheme) as domestic currency for purposes of exchange control and therefore allowing any such currency to be freely held and disposed of within the participating member States on the understanding that such funds can not be used to request foreign exchange from any participating Central Bank;
- (d) the creation of a "second window" at the relevant Clearinghouse where private agents, acting through their commercial bank, can

20/ Donor support for tariff discrimination against non-members would be hard to justify and in any case tariffs are not the major problem in generating official intra-African trade.

freely trade the currencies of participating members against each other;

- (e) abolition of all import and export restrictions for intra-group trade carried out through the second window and therefore not necessitating foreign exchange from the Central Bank;
- (f) the abolition of exchange controls for all intra-group investment undertaken through the second window and provision for the free repatriation of dividends through the same mechanism;
- (g) adoption of legislation and regulations that would treat any firm operating in the participating member States, regardless of ownership, as a national firm in any participating country that it operates in through the second window. This implies repeal of ownership and other eligibility requirements;
- (h) implementing, on a phased basis, mobility for skilled, semi-skilled and unskilled labor;
- (i) agreement to limit intra-group preferences to an effective protection differential of no more than, say 20 percent at the end of, say, five years ^{21/};
- (j) extending preferences to all goods and services instead of a restricted common list.

F. Compensation

6.25 Evidence from the US and the EC suggests that the creation of large economic units results in increased specialization with significant dispersion of per capita income to be expected. An issue for research, is whether income dispersion is actually increased through integration and if the outcome is dependent on the degree of factor mobility.

6.26 African integration efforts tend to want to go against this reality: they aim at sharing industrialization "fairly" and equalizing per capita income. Efforts at industrial planning have failed not only in SSA but also elsewhere, most spectacularly in the Andean Pact. Other compensation mechanisms have been unsatisfactory, probably reflecting the conflict between these policies and natural economic forces.

6.27 The purpose of integration should be to improve resource allocation and this will raise absolute incomes. Relative incomes of some partners may diverge and certainly the emergence of a few poles of industrialization should be expected. Any set of countries pursuing regional integration will have to accept this as a starting point.

6.28 This is not to say that there is no room for compensation mechanisms. However, the primary objective of compensation should be to equalize benefits to private economic agents rather than to national Governments. This can best be achieved by extending employment and investment opportunities and opening up goods and services markets in the more advanced countries to those from the economically weaker ones. Nevertheless, since successful regional integration will depend on the assent of Governments, there will also have to be workable means of transferring compensation between governments. In implementing any such

^{21/} Any tariff preferences should be reasonable, and no particular significance should be attached to the suggested 20 percent. The main point is that tariff differentials have to be limited, preferably by lowering the external tariff rates.

scheme, it will be essential to avoid negating the benefits that should accrue to the private sector.

6.29 Compensation schemes should move away from the existing pattern in SSA with emphasis on the financing of supposedly 'regional' projects in the poorer countries. In practice, it has been hard to find viable regional projects that could not have been financed by donors such as the World Bank or the ADB. The danger is that funds specifically set aside for regional projects could be spent for political reasons on schemes with a low or even negative rate of return. There is also a danger that such funds would finance plant and equipment that would be incompatible with a rational deployment of resources from a regional perspective.

6.30 A more attractive option would be a direct transfer to the budget of the weaker economies, on the model of the Southern Africa Customs Union (SACU). SACU shares revenues with deliberate over-compensation to the weaker members and this seems to be a useful path to follow. Similarly, in the US, economic specialization has not created excessive tensions largely because it is accepted that solidarity requires the provision of resources to the poorer parts of the nation to allow them to support similar levels of public services as in the wealthier parts of the country.

6.31 SACU shares trade taxes. To avoid conflicts between external trade liberalization and fiscal revenue, it may be preferable to share total revenue or sales taxes (on the model of the EC which shares VAT receipts). This also has the advantage of moving from a "mercantilistic" view of compensation for losses of income arising from tariff concessions to a more broad based view of the benefits of integration and the need to maintain regional solidarity. This is even more relevant in the sort of framework advocated here which emphasizes increased competition and factor mobility instead of tariff concessions to partners while maintaining high barriers against third parties.

6.32 African governments should avoid reliance on donors to finance compensation schemes to discourage countries from participating mainly to benefit from foreign aid and to ensure that the mechanism is sustainable. This should not preclude donors from financing regional projects or infrastructure, but such financing should be provided on the merit of the projects and not as a means of providing compensation. With budgets remaining severely constrained for the foreseeable future, the temptation to renege on regional responsibilities may be difficult to resist. This suggests some urgency in devising a mechanism with some automaticity in the transfers to weaker states.

G. The nature of possible Bank intervention

6.33 Intervention along the proposed lines would be a new undertaking for the Bank and raises questions regarding the most practical approach to adopt. The most straightforward way of proceeding would be to make lines of credit available to individual governments as part of a project with a regional grouping, such as the proposed UDEAC SAL. Under the sort of scheme envisaged, there would be no need for providing foreign exchange to finance intra-group trade or investment since regional currencies could be freely held and exchanged by the private sector through the proposed "second window". However, in line with achieving the objective of encouraging factor mobility and achieving the rationalization of industry through mergers, acquisitions and joint ventures, there is room for providing foreign exchange that would be used for inputs and machinery that has to be imported from outside the region by joint ventures or in the context of regional operations of regionally based firms.

6.34 The financing of the regional currency component of such schemes would be through legalizing the second window and the foreign currency component would be by donors such as the Bank. There would, therefore, be no justification for requiring import licenses or inhibiting the outflow of

investment funds to other participating regional partners, and so full liberalization of exchange controls could be justified for such undertakings.

6.35 This approach has the merit that it reinforces the liberalization being undertaken under structural adjustment programs while not requiring complicated new types of lending arrangements involving many partners since each country would be responsible for the drawing down of the line of credit that benefits firms resident within its borders. It also has the advantage that conditionality would be predetermined and that countries would freely, according to what is politically feasible, decide how far and fast they would want to proceed. This avoids the pitfalls of requiring joint agreement by several governments simultaneously which risks either getting bogged down or just limiting progress by all to the rate of the slowest. Finally, it solves the problem that some SSA countries qualify for IDA credits while others would benefit from IBRD loans.

6.36 An alternative approach would be to lend to regional financial institutions and the Bank has actually received requests to help activate the government created PTA Bank; to support FOSIDEC (the development fund of CEAO), to finance the ECOWASFUND and to participate, through IFC, in the expansion of the privately owned ECO-Bank serving ECOWAS. The advantages of acceding to such requests reside, on the one hand, in the precedents for the Bank to lend to regional development banks and, on the other hand, the liability would be held by one well identified agent. However there are offsetting disadvantages that suggest that this avenue should be avoided.

6.37 The agreement to set up such financial institutions typically results from pressure by the weaker states to have a mechanism where they could secure some direct benefits in the form of projects. This raises questions of susceptibility to political pressure to undertake projects that neither the World Bank nor ADB find justified and that other donors will not finance.

6.38 The most important objection, however, arises from questioning if public money should be used to support such institutions. These institutions could, as just outlined, duplicate the role of the Bank and the ADB or might duplicate the role of the commercial banks in financing trade and investment or in the limit would duplicate the role of national Development Finance Institutions.

6.39 The strongest case for such institutions arises from the reluctance of commercial banks to finance cross-border operations that reflects real risks that Central Banks may not release foreign exchange at the requisite time. Resolving this problem is crucial and should be addressed in the course of either a regional integration project or through other Bank operations. However, unless it can be shown that existing institutions cannot perform the required tasks, the creation of new institutions should be discouraged.

6.40 It would be more effective and less costly to encourage national Governments to reform their financial sector to allow private commercial banks to compete and to set up an arrangement for the public sector to carry sovereign risk while the commercial banks evaluate and carry commercial risk. Such a partnership in risk sharing would allow financing of trade and investment with limited additional resources required from donors.

6.41 In this respect, there is no compelling case to favor institutions such as the ECO-Bank, just because they want to specialize in serving a

regional group 22/ Instead, efforts should be directed at all the established commercial banks, some of whom have approached the ADB concerning risk sharing.

6.42 Some regional financial institutions in SSA, such as BOAD (West Africa Development Bank) do have a positive track record and are certainly worth supporting. However, BOAD has been successful because it has operated on sound financial principles and not because of its regional vocation. Thus, for example, less than 16 percent of its loans have been for regional projects. The experience of BOAD highlights the dangers of directing financial institutions to specifically lend for regional projects. The key message is that financial support should be extended where it will improve efficiency and resource allocation and not according to the vocation of the institution to serve regional needs. If institutions exist or emerge that appear able to do this while also specializing on regional projects, they should certainly be supported by national governments and donors. However, there is no compelling reason to channel scarce resources into creating regional public sector financial institutions where none exist and where existing private and public entities could be enticed or allowed to served the regional market.

H. Coordination with other efforts

6.43 The ADB is actively seeking ways to promote economic integration in Africa, a mission which is part of its mandate. In this context the ADB has undertaken or financed regional studies, financed multinational projects and provided lines of credit to regional financial institutions. More recently, the ADB has sought to promote regional integration by spearheading the creation of Africa wide institutions in the field of housing, insurance and consultancy services and has been considering various options for increasing intra-regional exchange, including the possible creation of an Export-Import Bank. Thus there should be interest and likely areas for cooperation and possibly co-financing with the Bank.

6.44 The EC under its Lome agreement has made provision for financial support to regional integration efforts in Africa and funds earmarked under Lome III have not been fully used up, partly for lack of suitable projects. Preliminary informal contacts with the EC suggest room for joint efforts including, possibly, co-financing.

6.45 The ITC has been actively involved in identifying the trade potential in the region and bringing buyers and sellers together. They have helped organize 4 trade fair since 1987 that have generated US \$ 70 million of pro-forma invoices. Actual trade has been constrained by restrictive import licencing and difficulties at the firm level in meeting contracts, although no detailed information is available. There is scope for cooperating with ITC, perhaps by participating in the financing or organization of more frequent contacts between businessmen.

6.46 USAID has been actively seeking to find ways to enhance regional cooperation, especially in Southern Africa. They have abandoned a proposal to set up a regional export revolving fund (of the type operating in Zimbabwe with great success and set up with Bank support), on the grounds that the need for this reflects bad exchange rate policies whose continuance would not allow the fund to revolve. Unlike national schemes such as the one in Zimbabwe, a regional fund would earn non-convertible currencies while supplying convertible foreign currency. It is therefore likely that USAID could be induced to support a regional operation that is well conceived and obtains significant policy reforms that allow private agents to invest and

22/ The initiative by private businessmen to set up the ECO-Bank should be welcomed. But there is no compelling reason to single it out just because it intends to serve all of ECOWAS.

trade freely. This is even more likely if the discrimination against foreign ownership is ended.

6.47 It may be possible to convince donors supportive of such efforts to make special provisions to grant, in the context of international bids, a certain cost preference to regional undertakings based in participating countries. Further, donors and the Bank could also undertake, in parallel with the changes proposed earlier, to provide technical assistance and other aid to enable regional groupings to formulate sectoral strategies dependent on a regional approach. This may be most relevant for food security and infrastructure but could also be based on production and distribution of specific goods and services, such as fertilizer and transport services, for example.

6.48 The Foreign Investment Advisory Service (FIAS) set up by IFC and MIGA, has been trying to find ways to make SSA more attractive to foreign investment. Its efforts have tended to be focussed on the PTA/SADCC countries and in this context Martin Hartigan has formulated a SPURT proposal that has been informally circulated. SPURT diverges from the current proposals mainly in its view that liquidity is required to allow trade and investment by covering deficit positions, at least in the short term. Adoption of the second window eliminates the need for financing since it shifts the liabilities onto private agents who can sell these off at a market clearing price. Nevertheless there seems to be plenty of scope for coordinating these efforts with the proposed Bank approach.

I. Next steps

6.49 The most important task ahead is to evaluate potential interest and benefit from current thinking in SSA concerning new approaches to achieve efficient economic integration. Donor interest in developing and supporting such initiatives would also need to be more carefully assessed. To the extent that sufficient interest exists to justify an eventual Bank operation, it will become critical to undertake further research of several key issues raised by this report.

- (a) Understanding of the restraints to factor mobility and how harmonization of non-tariff barriers would impact on trade flows is crucial, given their importance in the scenario outlined by the report.
- (b) Regional preferences could only be justified as intermediate steps to generalized liberalization. It will, therefore, be necessary to devise mechanisms that ensure any Bank support to regional integration does lead to generalized liberalization.
- (c) Compensation may be a key issue for the political feasibility of any regional effort. It will be important to study how various compensation mechanisms have been implemented and their strong and weak points.
- (d) Understanding unrecorded trade better could be helpful in designing an eventual Bank operation. Given the high costs involved, it may be most productive to concentrate on specific countries and sectors that would be chosen on the basis of possible Bank intervention.
- (e) The institutional, as well as the practical, aspects of the payments arrangements needed to sustain interregional liberalization seem to require further exploration. In particular, it may be necessary to get the support of the IMF whose "primary responsibility" in this area has just been reaffirmed.
- (f) It needs to be determined whether there is any evidence that commercial banks are not providing adequate pre- and post-export

credit for African exporters. If this is the case, there may be large benefits from repairing the market failures and it would be useful to investigate the possibility of sponsoring the refinancing of commercial banks' export pre-financing and lines of supplier and buyer credit or the insurance thereof.

Annex 1

Active Regional Integration Organizations in Africa

ECOWAS - Economic Community of West African States (16 members - 15 initial but Cape Verde split from Guinea-Bissau). (Also known as CEDEAO - Communauté Economique des Etats de l'Afrique de l'Ouest).

Founded: 1975

Benin, Burkina, Cape Verde, Cote d'Ivoire, Gambia, Ghana, Guinea, Guinea-Bissau, Liberia, Mali, Mauritania, Niger, Nigeria, Senegal, Sierra-Leone and Togo. (Integrates the CEAO members and MRU members and Cape Verde, Gambia, Ghana, Guinea-Bissau, Nigeria, Togo).

PTA - Preferential Trade Area (16).

Formed: 1982. Started 1984 (July 1)

Burundi, Comoros, Djibouti, Ethiopia, Kenya, Lesotho, Malawi, Mauritius, Mozambique, Rwanda, Somalia, Sudan, Swaziland, Tanzania, Uganda, Zambia and Zimbabwe

CEAO - Communauté Economique de l'Afrique de l'Ouest (7)

Founded: 1972. Established: 1974

Benin, Burkina, Cote d'Ivoire, Mali, Mauritania, Niger and Senegal

IOC - Indian Ocean Commission (5)

Founded: 1964. Established: 1966

Cameroon, Central African Republic, Congo, Gabon, Chad and Equatorial Guinea.

UDEAC - Union Douaniere et Economique de l'Afrique Centrale (4)

Founded: 1964. Established: 1966

Cameroon, Central African Republic, Congo, Gabon, Chad and Equatorial Guinea

CEPGL - Communauté Economique des Pays des Grands Lacs (3).

Founded: 1976

Burundi, Rwanda and Zaire

MRU - Mano River Union (also known as Union du Fleuve Mano) (3).

Founded: 1973. Established 1974

Guinea, Liberia and Sierra-Leone

Guinea only joined in 1980

IMPORTS AND EXPORTS OF SSA COUNTRIES TO RWY

FTA	Food and live animals		Mineral products		Manufactures		Others		Total		Imports		Exports		Total							
	Imports	Exports	Imports	Exports	Imports	Exports	Imports	Exports	Imports	Exports	Imports	Exports	Imports	Exports	Imports	Exports						
ALGERIA	203	501	518	8575	8813	2084	12770	432	731	8184	381	484	2044	4888	1588	1298	4618	2677	7138	10443		
ANGOLA				10	131	26		8	108	9				371	28	9	134					
ARGENTINA				150	26			1						44	3	4	414					
AUSTRALIA	142			8488	872		4		14			483		88	40	708	281	188				
BANGLADESH				64	2632			3						17		3	158					
BENIN	21			8	4221		8	284			381			12	11	288	1888	138	8	8885		
BHARAT			8	8	8		17	118						21		28	288					
BHARAT	28			2841	1888		8	9	171	2114	188	1	888	1788	411	288	188	2878	7188	87		
BHARAT	13			18	18		18							181		8	88					
BHARAT		881		4	18		7							2874	8	28	2848	12		487		
BHARAT			7	88	232			8	44					488	288		818	88	1			
BHARAT			188	188	717												288			77		
BHARAT				188	188			8	28					478		28	8	128				
BHARAT	7			8888	38	8814	387		1					488		27	7	18				
BHARAT	28221		1884	18888	188	18731	1	28247	22881	174388	27341	37888	4888	182888	1788	2888	188487	188184	187714	1844		
BHARAT	271		8	11888	181	2444	1	28228	18428	8717	22488		4883	788	888	2888	118487	8718	188878	1828		
BHARAT	288			188	128			8						9		8	1888	88				
BHARAT				4	718			48						48		7	888	88		41		
BHARAT			8	11118	1888		27173	1348		11884				187	18	288	1887	2888	22888	2		
BHARAT				48	878			8						48	91	18	188					
BHARAT				88	22			8284	188	2418				8818	881	14	28	81888	88	1883		
BHARAT	12			287	482			28						18		91	88	188				
BHARAT				188	188			728	1	2871	2878			888	84	287	2218	21881	1211	88818		
BHARAT				888	1784			87	27	8887	28	8		288	72	24	11888	8887		18		
BHARAT				318	288			28	7	28				7	4	18	428	484				
BHARAT				488	1221			2	22	2881				278	88	4	2881	2888		18		
BHARAT				27	188			4	2888					1		1	7881	1298				
BHARAT	28888		1881	1	22378	87	8478	2488	22184	188888	4888	27378		188884	1188	288	8188	88814	8144			
BHARAT				87	127			28						28		188	188			718		
BHARAT				12	218			28						8	1888	88	747	1888				
BHARAT	48		28	1	17878		2341	188	28888	18881	2888			2777	121	1881	8888	2488				
BHARAT				48	178			18	28					84			1771	214				
BHARAT	28884		1482		12422		8888	888	881	141888	27	27378		188848	28	217	4878	88482	28			
BHARAT	88			1811	481		1881	481	1187					428	8	28						
BHARAT				22138	8812		278	728	278	1888		18	18878	4	141	18483	18224			417		
BHARAT				1882	2781		228	728	728	1888		1888		1888	4	41	2888	2888				
BHARAT				14	82			27						18		118		87				
BHARAT				88	88									8		8		1874		418		
BHARAT				4188	2317									8877		28		4823				
BHARAT				18741	1778							278		2888		488	18887	2883		1		
BHARAT				182	84			18					9	18 N.A.			288	818				
BHARAT				1184	888		248	478	2882					4781	1	98	2	2787		1888		
BHARAT	18			181	181		8	188	8					271		28	2	184				
BHARAT				18	18			18						181		2		28				
BHARAT				1184	222		288	2888	2888					4188	1	84		2888		1888		
BHARAT				48818	18741		2288	18888	819	121	787	27	1288	4	288	8881	888	188	28188	24428	2488	
BHARAT				14717	18831			8		21	28	4		7	2888		18	18874				
BHARAT					2278		177	819						8		122	1	22288	18			
BHARAT				284	28		481	118	8	4	1			2124	288		22871	8843		1288		
BHARAT				88	88													87				
BHARAT				488	267			884				1182		888	2	28	88	14				
BHARAT				48818	171		213	8	18	2	12			88	888	88	1888					
BHARAT																		1888				
BHARAT	28428	881	2882	48828	92488	12281	48288	13881	23888	24884	188117	28128	88788	7883	187848	8885	8884	218888	148414	118824	14311	2888

* Column headings are SITC codes. Products corresponding to SITC codes are listed at the end of the table. Read vertically for exporters and importers of a particular product.

Animal, veg oil, fat

Cheese

PTA	2024 VEG		2024 VEG		2025		2025		LIVE2025		LIVE2025		OVN		OVN		4234		GRM4234		GRM4234		PALM243		PALM243		CBC4243		CBC4243		PALM244		PALM244		FINE4249		FINE4249		ACYC4121		ACYC4145		ANM4145		P42M	
	Importe	Exporte	Importe	Exporte	Importe	Exporte	Importe	Exporte	Importe	Exporte	Importe	Exporte	Importe	Exporte	Importe	Exporte	Importe	Exporte	Importe	Exporte	Importe	Exporte	Importe	Exporte	Importe	Exporte	Importe	Exporte	Importe	Exporte	Importe	Exporte	Importe	Exporte	Importe	Exporte	Importe	Exporte	Importe	Exporte	Importe	Exporte				
BURUNDI	13114	4749	3423	4645	359	1408	2640	16820	143	6491	1107	1107	20	645	190	614	790	806																												
COMBES	2	2	73			18			25	4	9	9		1																																
ETHIOPIA	12719		75		8	1			44																																					
GHANA	42	140	244	3822	26		290	82		308			1071																																	
INDIA	143	2726	438	904	140	415	806	14415	1	63479																																				
INDONESIA	1		89	1	2		76						18																																	
IRAN	136		101	1	10	9	119			2642			18																																	
ISRAEL		918	148		3	897	108	808	7				22																																	
JAPAN	4		72				12						22																																	
KENYA	30	764	1109	83			193	1617	8																																					
LIBERIA			236				3	132																																						
NETHERLANDS	1		845		7		698																																							
NEW ZEALAND	14	3	268	67	45		268																																							
RUSSIA	421	2255	4994	121	841	4304	7836	1261	1053	112009	130620	18766	718	15490	8849	28980	4287	4428	12634	4804	2730																									
USA	114	1887	1083	120	144	2428	1114	117	238	104366	10448	10428	19	15490	110	11884	1211	4413	2651	2848	874																									
UK	3		8				64		17																																					
USA F		44	62		1		46																																							
IVORY COAST	73	1606	221	129	26	2428	263	81	1				8781	18498		8668	148	2841	1297	2087	296																									
INDONESIA		3	61		6		51		5	609	721																																			
INDONESIA			9						132	736																																				
INDONESIA		178			11		682	86	60	9	4780																																			
INDONESIA			178				682	86	60	9	4780																																			
INDONESIA	28	28	644	1	81		78		N A	103747	2968																																			
INDONESIA	3	60	122		16	88	371	668	73		120	3333																																		
INDONESIA		5	92		1	4					83	830																																		
INDONESIA	3		23		10	37	129	17	1		37	2486																																		
INDONESIA		84	7				247	846	24		8																																			
INDONESIA	208	502	2691	1	487	743	8388	281	745	7644	119837	8	899	8781	14682	2833	7	10399	2184	3168																										
INDONESIA			3																																											
INDONESIA	9		9				18		2	7644	240																																			
INDONESIA		494	2844		487		1723	287	821		839																																			
INDONESIA			8				3		N A																																					
INDONESIA	292	1	828	1			4893	14	189		118888	8	806	1842	12782	787																														
INDONESIA	2	13	2				743				186																																			
INDONESIA		218	2984	1126	168	7	1923	1723	889	243	14	2148																																		
INDONESIA	27	2988	178		21	7	1484	1723	20	243	8	2148																																		
INDONESIA			15		14		89		15		16																																			
INDONESIA	166	2	2				64		24																																					
INDONESIA	11		15				267		242																																					
INDONESIA	11		923		57		98		478																																					
INDONESIA									N A																																					
INDONESIA	8	6212	168		25	868	288	888	87		148	878	22																																	
INDONESIA		206					78		88		138																																			
INDONESIA		918	148		2	897	108	898	7																																					
INDONESIA	5	5088	28		23	1	155	228	20																																					

	0412	07ED412	07ED431	RICED471	RICED440	NAIZ0460	NAIZ0481	07ED489	07ED482	LEJ00842	LEJ00845	07ED045	07ED048	EDIB048	EDIB0578	08NO0573	08NO0577	NAJ00677	NAJ00679	PRJ10079	PRJ00805	PRJ10086	PRJ1		
	Imports	Exports	Imports	Exports	Imports	Exports	Imports	Exports	Imports	Exports	Imports	Exports	Imports	Exports	Imports	Exports	Imports	Exports	Imports	Exports	Imports	Exports	Imports	Exports	
PTA	99127		6369	1479	15649	26268	2181	322	8719	31948	1976	21471	4585	167	298	17742	426	23008	2034	6479	1732	7606			
BURUNDI	2431			1426							2						1	16	16	2	4				
COMBES	4261				129				82		96			8			3	16	1		12				
GUINEA			653		74		642		1082	27	917		46		28		14		661		122				
ETHIOPIA	81802		3		1781		7	7	59	6581	44	379	232		170		2	46	284	28	741				
INDIA	4102		3417	2		9407	1141	318	164	17038	1	20941	1048			88	31	6908	13	4967	279	7620			
INDONESIA			37						17	1813		8					3	109		2	61				
ISRAEL	5		13		4142		8		3125	1	826	107	161				222	2	403	41	482				
JAMAICA									101		2	2	110												
JAPAN			324		1079		116		480		7		8			17649	4	28	221	6	28				
KENYA	2085		789		7781		347		117	6330	8	1	288	4		1	6	26008	261	4	11				
KHMER	1748				652				1854		84	4	81	1		12				237	44				
LIBERIA	4907		1246						14		2	29	190	8						9	81	7			
LIBERIA	11728		4		28981		8			192			2248							123			78		
LIBERIA	184558	39	13659		96142	4	27116	27	2020	101	20874	8620	10707	186	1448	90883	7184	11288	2290	76616	4485	1648			
LIBERIA	37877	39	2328		2168	4	21721	28	814	9	11869	8469	1528	28	1648	26780	4972	6067	1886	75882	1216	1304			
LIBERIA	8113		2531		183		38		1		29	8	228						124	11	86	28			
LIBERIA	5328		789		8	4	2800		96		11	2866	878						4	44	1158	28			
LIBERIA	26481		28		762		8		158		667	46	208	28	1	26780	144	8818	719	87878	273	1477			
LIBERIA	4653				1189		2777	18	48		8	84	68			388		2279	9	2644	31				
LIBERIA	7412				8		1120		17		1064		51						16	398	4	84	4		
LIBERIA	148	26			19		616		8		188	4	178			6	2204	2	497		161	23			
LIBERIA	2847				2		14367	11	488	9	2988	4751	49		1188				278	18	888	2823	618		
LIBERIA	4845		84		647		17		189		2981	19	18	2					104	8	222	484	709		
LIBERIA			17		16		16		4		178	12	2						12	2	424	53			
LIBERIA	3892		57		114				98		1168		18							77	198	8	858		
LIBERIA	1252				838		2		29		1966								14	6	22	84	101		
LIBERIA	84023		10277		83316		5878	1	2879	92	6678	48	8168	128			288	2878	2178	183	789	2760	41		
LIBERIA	964				2306				223		31						244			1	9	63			
LIBERIA	48421		188		72172		2878		1120		882	8	228	2					4	14	69	636	228		
LIBERIA			3		2171		24		18		198		2						4	1982		2			
LIBERIA	12253		1898		12742		2288	1	478	88	4882	21	8807	128			1	1887	121	98	3	2320	27		
LIBERIA	4396		8428		1928		124		199		91	21	16						10	81	27	60	56		
LIBERIA	41871		10061		2168		1758	8	214	7	8789	2382	1848	8			21789	98	842	2198	1117		1		
LIBERIA	22701		2		1389		1034	8	124		685	2278	1997	8					21782	28	123	2064	193		
LIBERIA			78						9		24	2	16							2	24	4	16		
LIBERIA	673		2220		644		722		11		8										8	5			
LIBERIA	1842		2782		2		8		22		808	1	148						7	13	88	121	602		
LIBERIA	6679		4843		172				82	7	4868		698							61	141	8	814		
LIBERIA			4						1														1		
LIBERIA	8888		172	1426	1297				120		884	18	888							18	28	13	60		
LIBERIA	2432			1426							2									1	16	3	6		
LIBERIA									101		2	2	110								5				
LIBERIA	4467		172		1297				24		282	14	98							29	9	10	58		
LIBERIA	42977	1984	218		21824	1813	4368	2208	27720	2112	1766	108	72	21889	1	291	846	18888	872	2388	984		2		
LIBERIA	14884		13		18618	3	1377		15108	26	428									244	240	1	284		
LIBERIA	3419				8		8		1	2784		108	12							291	1	899	20		
LIBERIA	22184	1984	204		18228	1518	2978		8637	290	141		28	2						6	17778	43	11	19	2
LIBERIA					30				106		1											3			
LIBERIA					37				145		274		2												
LIBERIA	638		102		810		8	2708	8826		213		20	11884	1						44	284			
LIBERIA	246017	2002	2549	1428	144792	27885	26422	2881	27718	24188	29428	22880	17272	12196	1788	78788	8888	82934	8264	88842	8585	9148			

1221	1222	1223	1224	1225	1226	1227	1228	1229	1230	1231	1232	1233	1234	1235	1236	1237	1238	1239	1240	1241	1242	1243	1244	1245	1246	1247	1248	1249	1250	1251	1252	1253	1254	1255	1256	1257	1258	1259	1260	1261	1262	1263	1264	1265	1266	1267	1268	1269	1270	1271	1272	1273	1274	1275	1276	1277	1278	1279	1280	1281	1282	1283	1284	1285	1286	1287	1288	1289	1290	1291	1292	1293	1294	1295	1296	1297	1298	1299	1300
1221	1222	1223	1224	1225	1226	1227	1228	1229	1230	1231	1232	1233	1234	1235	1236	1237	1238	1239	1240	1241	1242	1243	1244	1245	1246	1247	1248	1249	1250	1251	1252	1253	1254	1255	1256	1257	1258	1259	1260	1261	1262	1263	1264	1265	1266	1267	1268	1269	1270	1271	1272	1273	1274	1275	1276	1277	1278	1279	1280	1281	1282	1283	1284	1285	1286	1287	1288	1289	1290	1291	1292	1293	1294	1295	1296	1297	1298	1299	1300

SITC COMMODITY CODES

TOTAL	ALL COMMODITIES	R2	0001	0430	BARLEY UNMILLED	R2	0081
0	FOOD AND LIVE ANIMALS	R2	0002	044	MAIZE UNMILLED	R2	0082
00	LIVE ANIMALS FOR FOOD	R2	0003	0440	MAIZE UNMILLED	R2	0083
001	LIVE ANIMALS FOR FOOD	R2	0004	048	CEREALS NES UNMILLED	R2	0084
0011	BOVINE SPECIES LIVE	R2	0005	0481	RYE UNMILLED	R2	0085
00111	-- PURE BRED FR BREEDING	R2	0006	0482	OATS UNMILLED	R2	0086
00119	-- OTHR THAN FR BREEDING	R2	0007	0488	OTHER CEREALS UNMILLED	R2	0087
0012	SHEEP AND GOATS LIVE	R2	0008	04881	MILLET UNMILLED	R2	0088
00121	SHEEP LIVE	R2	0009	04882	SORGHUM UNMILLED	R2	0089
00122	GOATS LIVE	R2	0010	04888	OTH CEREALS UNMILLED NES	R2	0090
0013	SWINE LIVE	R2	0011	048	WHEAT ETC MEAL OR FLOUR	R2	0091
0014	LIVE POULTRY	R2	0012	0480	WHEAT ETC MEAL OR FLOUR	R2	0092
00141	LIVE POULTRY LESS 188 GR	R2	0013	04801	FLOUR OF WHEAT OR MESLIN	R2	0093
00148	LIVE POULTRY OVER 188 GR	R2	0014	04802	MEAL GOATS OF WHEAT ETC	R2	0094
0018	EQUINE SPECIES LIVE	R2	0018	047	OTHER CEREAL MEALS FLOUR	R2	0095
0018	LIVE ANIMALS FR FOOD NES	R2	0018	0470	OTHER CEREAL MEALS FLOUR	R2	0096
01	MEAT AND PREPARATIONS	R2	0017	04701	CEREAL FLOUR(NON-WHEAT)	R2	0097
011	MEAT FRESH CHILLED FROZEN	R2	0018	04702	MEAL OR GOATS NON-WHEAT	R2	0098
0111	BOVINE MEAT FRESH FROZEN	R2	0018	048	CEREAL ETC PREPARATIONS	R2	0099
01111	BOVINE MEAT WITH BONE IN	R2	0020	0481	PREPO BREAKFAST FOOD ETC	R2	0100
01112	BOVINE MEAT BONELESS	R2	0021	04811	CEREAL FLAKED ROLLED ETC	R2	0101
0112	MUTTON ETC FRSH CHLD FRN	R2	0022	04812	CEREAL ROASTED PUFFED	R2	0102
0113	PIG MEAT FRESH CHLD FRZN	R2	0023	0482	MALT INCLUDING FLOUR	R2	0103
0114	POULTRY FRESH CHLD FRZN	R2	0024	0483	MACARONI SPAGHETTI ETC	R2	0104
0115	HORSE MEAT FRSH CHLD FRN	R2	0025	0484	BAKERY PROD COMM VAFERS	R2	0105
0118	EDIBLE OFFAL FRESH CH FR	R2	0028	04841	BREAD BISCUIT COM VAFERS	R2	0106
0118	MEAT NES FRESH CHLD FRZN	R2	0027	04842	PASTRY BISCUITS CAKES ETC	R2	0107
01181	POULTRY LIVER FRESH ETC	R2	0028	0488	OTH CEREAL PREPS MALT EX	R2	0108
01188	OTHER MEAT NES FRESH ETC	R2	0029	05	VEGETABLES AND FRUIT	R2	0109
012	MEAT DRIED SALTED SMOKED	R2	0030	054	VEG ETC FRSH SIMPLY PRSVD	R2	0110
0121	PIG MEAT DRIED SLTD SHKD	R2	0031	0541	POTATOES FRSH EXCL SWEET	R2	0111
0129	MEAT NES DRIED SLTD SHKD	R2	0032	0542	LEGUMINOUS VEGETABLES DRY	R2	0112
014	MEAT PREPO PRSVD NES ETC	R2	0033	0544	TOMATOES FRESH	R2	0113
0141	MEAT FISH EXTRACTS JUICES	R2	0034	0548	OTHER FRESH VEGETABLES	R2	0114
0142	SAUSAGES INCLUDING TINNED	R2	0038	05481	ALLIACEOUS VEGTBL FRESH	R2	0115
0148	OTH PREPARD PRESRVO MEAT	R2	0038	05489	FRESH VEGETABLES NES	R2	0116
02	DAIRY PRODUCTS BIRDS EGGS	R2	0037	0548	VEGETABLES SIMPLY PRSVD	R2	0117
022	MILK AND CREAM	R2	0038	05481	VEGETABLES FROZEN	R2	0118
0223	MILK AND CREAM FRESH	R2	0038	05482	VEG PRSVD UNFRZN UNTINNED	R2	0119
0224	MILK CREAM PRESERVED ETC	R2	0040	0548	EDIBLE VEG NES FRESH DRY	R2	0120
02241	WHEY	R2	0041	05481	ROOTS TUBERS FRESH DRY	R2	0121
02242	MILK DRY 1 5% FAT OR LES	R2	0042	05482	SUGAR BEET FRSH DRY CANE	R2	0122
02243	MILK DRY OVER 1 5% FAT	R2	0043	05484	HOP CONES AND LUPULIN	R2	0123
02248	MILK(EX DRY) PRSVD SWEET	R2	0044	05488	VEG PROOTS NES FRESH DRY	R2	0124
023	BUTTER	R2	0048	058	VEGTBL ETC PRSVD PREPO	R2	0125
0230	BUTTER	R2	0048	0581	VEG DRIED EXC LEGUMINOUS	R2	0126
024	CHEESE AND CURD	R2	0047	0584	FLOUR ETC OF FRUIT VEGET	R2	0127
0240	CHEESE AND CURD	R2	0048	05843	POTATO FLOUR MEAL FLAKES	R2	0128
025	EGGS BIRDS FRESH PRSVD	R2	0048	05848	TAPIOCA SAGO ETC	R2	0129
0251	-- IN SHELL	R2	0080	05848	FLOURS OF OTH VEG FRUITS	R2	0130
0252	-- NOT IN SHELL	R2	0081	0588	VEGTBL PRSVD PREPO NES	R2	0131
03	FISH AND PREPARATIONS	R2	0082	05881	VEGTBL FRUIT IN VINEGAR	R2	0132
034	FISH FRESH CHILLED FROZEN	R2	0083	05888	OTH VEG PRSVD PREPO NES	R2	0133
0341	FISH FRSH CHLD EX FILLET	R2	0084	087	FRUIT NUTS FRESH DRIED	R2	0134
0342	FISH FROZEN EXCL FILLETS	R2	0088	0871	ORANGES TANGERINES ETC	R2	0135
0343	FISH FILLETS FRESH CHLD	R2	0088	08711	ORANGES FRESH OR DRIED	R2	0136
0344	FISH FILLETS FROZEN	R2	0087	08712	TANGERINES ETC FRSH DRY	R2	0137
038	FISH SALTED DRIED SMOKED	R2	0088	0872	LEMONS GRAPEFRUIT ETC	R2	0138
0380	FISH SALTED DRIED SMOKED	R2	0088	08721	LEMONS LINES FRESH DRIED	R2	0139
03801	FISH MEAL PIT FOR FOOD	R2	0080	08722	GRAPEFRUITS FRESH DRIED	R2	0140
03802	COO(NOT IN FILLETS)DRIED	R2	0081	08729	CITRUS NES FRESH DRIED	R2	0141
03803	FISH(EX COO)DRIED SALTED	R2	0082	0873	BANANA PLANTAIN FRSH DRY	R2	0142
03804	FISH SMOKED	R2	0083	0874	APPLES FRESH	R2	0143
038	SHELL FISH FRESH FROZEN	R2	0084	0875	GRAPES FRESH OR DRIED	R2	0144
0380	SHELL FISH FRESH FROZEN	R2	0085	08751	GRAPES FRESH	R2	0145
037	FISH ETC PREPO PRSVD NES	R2	0086	08752	GRAPES DRIED(RAISINS)	R2	0146
0371	FISH PREPARD PRESRVO NES	R2	0087	0878	FIGS FRESH OR DRIED	R2	0147
0372	SHELL FISH PREPO PRSVD	R2	0088	0877	NUTS EDIBLE FRESH DRIED	R2	0148
04	CEREALS AND PREPARATIONS	R2	0089	08771	COCONUTS FRESH OR DRIED	R2	0149
041	WHEAT ETC UNMILLED	R2	0070	08772	BRAZIL NUTS FRESH DRIED	R2	0150
0411	DURUM WHEAT UNMILLED	R2	0071	08773	CASHEW NUTS FRESH DRIED	R2	0151
0412	OTHER WHEAT ETC UNMILLED	R2	0072	08774	ALMONDS FRESH OR DRIED	R2	0152
042	RICE	R2	0073	08775	HAZELNUTS FRESH OR DRIED	R2	0153
0421	RICE IN HUSK OR HUSKED	R2	0074	08779	NUTS EDIBLE FRSH DRY NES	R2	0134
04211	RICE IN THE HUSK	R2	0075	0879	FRUIT FRESH OR DRIED NES	R2	0155
04212	RICE SEMI-MILLED	R2	0076	08782	PEARS QUINCES FRESH	R2	0156
0422	RICE SEMI-MILLED MILLED	R2	0077	08783	STONE FRUIT FRESH NES	R2	0157
04221	RICE MILLED UNBROKEN	R2	0078	08794	BERRIES FRESH	R2	0158
04222	RICE BROKEN	R2	0079	08795	PINEAPPLES FRESH DRIED	R2	0159
043	BARLEY UNMILLED	R2	0080	08796	DATES FRESH OR DRIED	R2	0160

08787	OTH TROP FRUIT FRESH DRY	R2	0181	08141	MEAT MEAL FOODER	R2	0241
08788	OTHER FRESH FRUIT	R2	0182	08142	FISH MEAL FOODER	R2	0242
08789	OTHER DRIED FRUIT	R2	0183	0818	FOOD WASTE AND FEED NES	R2	0243
088	FRUIT PRESERVED, PREPARED	R2	0184	08182	COCOA WASTES	R2	0244
0882	FRUIT PRESERVED BY SUGAR	R2	0185	08183	BEEF-PULP BAGASSE ETC	R2	0245
0883	FRUIT JAMS, JELLIES ETC	R2	0186	08184	VINE LEES ARGOL	R2	0246
0885	FRUIT OR VEGETABLE JUICE	R2	0187	08188	FOODER NES INCL SWEETENED	R2	0247
08851	ORANGE JUICE	R2	0188	08	MISC EDIBLE PRODUCTS	R2	0248
08852	GRAPEFRUIT JUICE	R2	0189	081	MARGARINE AND SHORTENING	R2	0249
08853	OTHER CITRUS FRUIT JUICE	R2	0170	0813	PIG POULTRY FAT RENDERED	R2	0250
08854	PINEAPPLE JUICE	R2	0171	0814	MARGARINE EDIBLE FAT NES	R2	0251
08855	TOMATO JUICE	R2	0172	08141	MARGARINE	R2	0252
08857	JUICE OF OTHER FRUIT, VEG	R2	0173	08148	OTH PREPARED EDIBLE FATS	R2	0253
08858	MIXTURES OF DIFF JUICES	R2	0174	088	EDIBLE PRODUCTS, PREPS NES	R2	0254
0886	FRUIT TEMPORARILY PRESVD	R2	0175	0880	EDIBLE PRODUCTS, PREPS NES	R2	0255
08861	FRUIT, FRZN WITHOUT SUGAR	R2	0176	08801	HOMOGENIZED COMPOSITE FOOD	R2	0256
08862	FRUIT, FRZN WITH SUGAR	R2	0177	08802	TEA, ETC EXTRACT, ESSENCE	R2	0257
08863	FRUIT TEMP PRESVD UNFROZD	R2	0178	08803	MUSTARD PREPD OR FLOUR	R2	0258
08864	FRUIT PEEL, FRZ, FRZN PRSD	R2	0179	08804	SAUCES MIXED SEASONINGS	R2	0259
0889	FRUIT PREPD, PRESRVO NES	R2	0180	08808	SOUPS AND BROTHS	R2	0260
08891	NUTS ROASTD (INCL PEANUT)	R2	0181	08808	YEASTS, BAKING POWDERS	R2	0261
08899	FRUIT NUTS NES, PRESERVED	R2	0182	08807	VINEGAR AND SUBSTITUTES	R2	0262
08	SUGAR AND PREPS, HONEY	R2	0183	08808	EDIBLE ANIML PRODUCTS NES	R2	0263
081	SUGAR AND HONEY	R2	0184	08809	MISC FOOD PREPRTIONS NES	R2	0264
0811	RAW BEET AND CANE SUGAR	R2	0185	1	BEVERAGES AND TOBACCO	R2	0265
0812	REFINED SUGAR ETC	R2	0186	11	BEVERAGES	R2	0266
0813	MOLASSES	R2	0187	111	NON-ALCOHL BEVERAGES NES	R2	0267
0816	NATURAL HONEY	R2	0188	1110	NON-ALCOHL BEVERAGES NES	R2	0268
0818	SUGARS AND SYRUPS NES	R2	0189	11101	WATERS, ICE AND SNOW	R2	0269
082	SUGAR PREPS NON-CHOCOLATE	R2	0190	11102	FLAVORED WATERS NON-ALCO	R2	0270
0820	SUGAR PREPS NON-CHOCOLATE	R2	0191	112	ALCOHOLIC BEVERAGES	R2	0271
07	COFFEE TEA COCOA SPICES	R2	0192	1121	WINE OF FRESH GRAPES ETC	R2	0272
071	COFFEE AND SUBSTITUTES	R2	0193	11211	GRAPE MUST	R2	0273
0711	COFFEE GREEN ROASTED SUB	R2	0194	11212	WINE OF FRESH GRAPES	R2	0274
07111	COFFEE GREEN HUSKS, SKINS	R2	0195	11213	VERMOUTHS ETC	R2	0275
07112	COFFEE ROASTED	R2	0196	1122	CIDER, PERRY, MEAD ETC	R2	0276
07113	COFFEE SUBST INCL COFFEE	R2	0197	1123	BEER, ALE, STOUT, PORTER	R2	0277
0712	COFFEE EXTRACTS, ESSENCES	R2	0198	1124	DISTILLED ALCOHOLIC BEVS	R2	0278
072	COCOA	R2	0199	11241	WHISKY	R2	0279
0721	COCOA BEANS RAW ROASTED	R2	0200	11242	DISTILLED WINE GRAPE MARC	R2	0280
0722	COCOA POWDER, UNSWEETENED	R2	0201	11248	OTH ALCOHOLIC BEVS, CHMPNS	R2	0281
0723	COCOA BUTTER AND PASTE	R2	0202	12	TOBACCO AND MANUFACTURES	R2	0282
07231	COCOA PASTE	R2	0203	121	TOBACCO UNMNFCTRD, REFUSE	R2	0283
07232	COCOA BUTTER	R2	0204	1211	TOBACCO NOT STRIPPED	R2	0284
073	CHOCOLATE AND PRODUCTS	R2	0205	12111	-- VIRGI TYPE, FLUE-CURED	R2	0285
0730	CHOCOLATE AND PRODUCTS	R2	0206	12118	-- OTHER TYPES	R2	0286
074	TEA AND MATE	R2	0207	1212	TOBACCO STRIPPED OR PART	R2	0287
0741	TEA	R2	0208	12121	-- VIRGI TYPE, FLUE-CURED	R2	0288
0742	MATE	R2	0208	12128	-- OTHER TYPES	R2	0289
075	SPICES	R2	0210	1213	TOBACCO REFUSE	R2	0290
0751	PEPPER AND PIMENTO	R2	0211	122	TOBACCO, MANUFACTURED	R2	0291
0752	SPICES EX PEPPER, PIMENTO	R2	0212	1221	CIGARS, CHERROOTS, ETC	R2	0292
07521	VANILLA	R2	0213	1222	CIGARETTES	R2	0293
07522	CINNAMON, ETC	R2	0214	1223	OTH MANUFACTURED TOBACCO	R2	0294
07523	CLOVES	R2	0215	2	CRUDE MATERLS, EXCL FUELS	R2	0295
07524	NUTHEG MACE, CARDAMOMS	R2	0216	21	HIDES, SKINS, FURS UNDRSSD	R2	0296
07525	SEEDS OF ANISE, CUMIN, ETC	R2	0217	211	HIDES, SKINS, EXC FURS, RAW	R2	0297
07526	GINGER, EXCEPT IN SWEET	R2	0218	2111	BOVINE, EQUINE HIDES, RAW	R2	0298
07528	OTHER SPICES, THYME ETC	R2	0219	2112	CALF AND KIP SKINS, RAW	R2	0299
08	FEEDING STUFF FOR ANIMAL	R2	0220	2114	GOAT AND KID SKINS, RAW	R2	0300
081	FEEDING STUFF FOR ANIMAL	R2	0221	2118	SHEEP SKIN COMMON W/WOOL	R2	0301
0811	HAY FOODER GREEN DRY	R2	0222	2117	SHEEP SKIN WITHOUT WOOL	R2	0302
08111	CEREAL STRAW ETC UNPREPD	R2	0223	2119	SKIN NES WASTE, USED LTHR	R2	0303
08112	FOODER ROOTS, HAY ETC	R2	0224	21191	WASTE AND USED LEATHER	R2	0304
08119	FOODER OF VEG ORIGIN NES	R2	0225	21198	HIDES AND SKINS NES RAW	R2	0305
0812	BRAN POLLARD SHARPS ETC	R2	0226	212	FURSKINS, RAW	R2	0306
08121	BRAN ETC MAIZE OR RICE	R2	0227	2120	FURSKINS, RAW	R2	0307
08122	BRAN ETC OTHER CEREALS	R2	0228	21201	MINK SKINS RAW	R2	0308
08123	BRAN ETC LEGUMINOUS VEG	R2	0229	21208	OTHER FURSKINS RAW	R2	0309
0813	OILCAKE AND OTH RESIDUES	R2	0230	22	OIL SEEDS, OLEAGINOUS FRT	R2	0310
08131	-- OF SOYA BEANS	R2	0231	222	SEEDS FOR SOFT/FIXED OIL	R2	0311
08132	-- OF GROUNDNUTS	R2	0232	2221	GROUNDNUTS GREEN	R2	0312
08133	-- OF COTTON SEEDS	R2	0233	2222	SOYA BEANS	R2	0313
08134	-- OF LINSEED	R2	0234	2223	COTTON SEEDS	R2	0314
08135	-- OF SUNFLOWER SEEDS	R2	0235	2224	SUNFLOWER SEEDS	R2	0315
08136	-- OF RAPE OR COLZA SEED	R2	0236	2225	SESAME SEEDS	R2	0316
08137	-- OF COCONUT, COPRA	R2	0237	2226	RAPE AND COLZA SEEDS	R2	0317
08138	-- OF PALM NUTS, KERNELS	R2	0238	223	SEEDS FOR OTH FIXED OILS	R2	0318
08139	-- OF OTH OIL SEEDS ETC	R2	0239	2231	COPRA	R2	0319
0814	MEAT OR FISH MEAL FOODER	R2	0240	2232	PALM NUTS AND KERNELS	R2	0320

2234	LINSEED	R2	0321	2851	FLAX RAMIE TOW AND WASTE	R2	0401
2238	CASTOR OIL SEEDS	R2	0322	28511	FLAX RAW OR RETTED	R2	0402
2238	OIL SEEDS AND FRUITS NES	R2	0323	28512	FLAX BROKEN SCUTCHED ETC	R2	0403
2238	OIL SEED FLOUR AND MEAL	R2	0324	28513	FLAX TOW WASTE ETC	R2	0404
23	RUBBER CRUDE, SYNTHETIC	R2	0325	28514	RAMIE NOILS WASTE ETC	R2	0405
232	NATURAL RUBBER, GUMS	R2	0326	2852	TRUE HEMP TOW WASTE ETC	R2	0406
2320	NATURAL RUBBER, GUMS	R2	0327	2854	SISAL AGAVE FIBRES WASTE	R2	0407
23201	NATURAL RUBBER LATEX	R2	0328	2858	MANILA FIBRE TOW WASTE	R2	0408
23202	OTHER NATURAL RUBBER	R2	0328	2859	VEG TEXT FIBRE WASTE NES	R2	0409
23203	BALATA, GUTTA-PERCHA, GUMS	R2	0330	28591	COIR FIBRE WASTE ETC	R2	0410
233	RUBBER, SYNTHETIC, RECLAIMED	R2	0331	28599	OTH VEG TEXT FIBRE WASTE	R2	0411
2331	RUBBER, SYNTHETIC, LATEX	R2	0332	286	SYNTHETIC FIBRES TO SPIN	R2	0412
23311	POLYBUTADIENE-STYRENE LATEX	R2	0333	2865	DISCON SYNTH FIBRE UNCOMB	R2	0413
23312	OTH RUBBER SYNTHETIC LATEX	R2	0334	28651	-- POLYAMIDE	R2	0414
23313	POLYBUTADIENE RUBBER (BR)	R2	0335	28652	-- POLYESTER	R2	0415
23314	POLYCHLOROBUTADIENE (CR)	R2	0336	28653	-- ACRYLIC	R2	0416
23315	POLYBUTADIENE-STYRENE (SBR)	R2	0337	28659	-- OTHER	R2	0417
23316	BUTYL RUBBER (IIR)	R2	0338	2866	CONTIN FILAMNT TOW SYNTH	R2	0418
23318	OTH SYNTH RUBBER, FACTICE	R2	0339	28661	-- OF POLYAMIDE FIBRES	R2	0419
2332	RECLD SCRAP UNHARDENED RUB	R2	0340	28662	-- OF POLYESTER FIBRES	R2	0420
23321	RECLAIMED RUBBER	R2	0341	28663	-- OF ACRYLIC FIBRES	R2	0421
23322	SCRAP UNHARDENED RUBBER	R2	0342	28669	-- OF OTH SYNTHETIC FIBRES	R2	0422
24	CORK AND WOOD	R2	0343	2867	DISCON SYNTH FIBRE COMBO	R2	0423
244	CORK, NATURAL, RAW WASTE	R2	0344	28671	-- POLYAMIDE	R2	0424
2440	CORK, NATURAL, RAW WASTE	R2	0345	28672	-- POLYESTER	R2	0425
24401	CORK UNWORKED WASTE	R2	0346	28673	-- ACRYLIC	R2	0426
24402	CORK SIMPLY WORKED	R2	0347	28679	-- OTHER	R2	0427
245	FUEL WOOD AND CHARCOAL	R2	0348	287	OTHER MAN-MADE FIBRES	R2	0428
2450	FUEL WOOD AND CHARCOAL	R2	0348	2871	REGENERATO FIBRE TO SPIN	R2	0429
24501	FUEL WOOD IN LOGS, ETC	R2	0350	28711	DISCON REGEN FIBRE UNCOMBO	R2	0430
24502	WOOD CHARCOAL	R2	0351	28712	CONTIN FILAMNT TOW REGEN	R2	0431
245	PULPWOOD CHIPS, WOODWASTE	R2	0352	28713	DISCON REGEN FIBRE COMBO	R2	0432
2450	PULPWOOD CHIPS, WOODWASTE	R2	0353	2872	WASTE OF MAN-MADE FIBRES	R2	0433
24501	PULPWOOD ROUGH OR SPLIT	R2	0354	28721	-- SYNTHETIC	R2	0434
24502	PULPWOOD CHIPS, PARTICLES	R2	0355	28722	-- REGENERATED	R2	0435
24503	WOOD WASTE (INCL SAWDUST)	R2	0356	288	WOOL AND ANIMAL HAIR	R2	0436
247	OTH WOOD ROUGH, SQUARED	R2	0357	2881	WOOL GREASY, FLEECE-WASHED	R2	0437
2471	SAW- VENEER-LOGS CONIFER	R2	0358	2882	WOOL DEGREASED, UNCOMBED	R2	0438
24711	-- IN THE ROUGH	R2	0359	2883	FINE ANIMAL HAIR, UNCOMBO	R2	0439
24712	-- ROHLY OR HALF SQUARED	R2	0360	2885	COARSE HAIR UNCOMBED	R2	0440
2472	SAW- VENEER-LOGS NON-CON	R2	0361	28851	HORSEHAIR UNCOMBED WASTE	R2	0441
24721	-- IN THE ROUGH	R2	0362	28859	COARSE HAIR NES UNCOMBED	R2	0442
24722	-- ROHLY OR HALF SQUARED	R2	0363	2886	WASTE OF WOOL, HAIR NES	R2	0443
2479	PTPROPS, POLES, PILING, ETC	R2	0364	28861	-- NOT PULLED OR GARNETTED	R2	0444
248	WOOD SHAPED, SLEEPERS	R2	0365	28862	-- PULLED OR GARNETTED	R2	0445
2481	RAILWAY SLEEPERS, TIES	R2	0366	2887	WOOL OR HAIR COMBED ETC	R2	0446
2482	LUMBER SHAPED CONIFER	R2	0367	288	WASTE OF TEXTILE FABRICS	R2	0447
24821	LUMBER SAWN ETC CONIFER	R2	0368	2890	WASTE OF TEXTILE FABRICS	R2	0448
24822	LUMBER PLANED ETC CONIFER	R2	0369	28901	BULK TEXT WSTE, OLD CLTHG	R2	0449
2483	LUMBER SHAPED NON-CONIFER	R2	0370	28902	RAGS, WASTE, CORDAGE ETC	R2	0450
24831	LUMBER SAWN ETC NON-CON	R2	0371	27	CRUDE PERTLZR, MINRLS NES	R2	0451
24832	LUMBER PLANED ETC NONCON	R2	0372	271	FERTILIZERS, CRUDE	R2	0452
25	PULP AND WASTE PAPER	R2	0373	2711	ANIMAL VEG PERTLZR, CRUDE	R2	0453
251	PULP AND WASTE PAPER	R2	0374	2712	NATURAL SODIUM NITRATE	R2	0454
2511	WASTE PAPER, PPRBOARD ETC	R2	0375	2713	NAT CALCM PHOSPHATES ETC	R2	0455
2512	MECHANICAL WOOD PULP	R2	0376	27131	-- UNGROUND	R2	0456
2516	CHEM WOOD PULP DISSOLVING	R2	0377	27132	-- GROUND	R2	0457
2517	SODA, SULPHATE WOOD PULP	R2	0378	2714	NTRL POTASSIC SALTS, CRDE	R2	0458
25171	-- UNBLEACHED	R2	0379	273	STONE, SAND AND GRAVEL	R2	0459
25172	-- BLEACHED, NONDISSOLVING	R2	0380	2731	BLOG, DIMENSION STONE	R2	0460
2518	SULPHITE WOOD PULP	R2	0381	27311	SLATE, ROUGHLY WORKED	R2	0461
25181	-- UNBLEACHED	R2	0382	27312	MARBLE, ETC BLOG STONE	R2	0462
25182	-- BLEACHED, NONDISSOLVING	R2	0383	27313	GRANITE, SANDSTONE, ETC	R2	0463
2519	OTHER CELLULOSIC PULPS	R2	0384	2732	CALCAREOUS STONE	R2	0464
25191	SEMI-CHEMICAL WOOD PULP	R2	0385	27322	CALCAREOUS STONE NES	R2	0465
25192	PULP OTHR THAN WOOD PULP	R2	0386	27323	GYPSUM AND ANHYDRITE	R2	0466
26	TEXTILE FIBRES, WASTES OF	R2	0387	27324	CALCINED GYPSUM PLASTERS	R2	0467
261	SILK	R2	0388	2733	SAND, EXCL METAL-BEARING	R2	0468
2613	RAW SILK NOT THROWN	R2	0389	2734	GRAVEL, CRUSHED STONE, ETC	R2	0469
2614	SILK WORM COCOONS, WASTE	R2	0390	274	SULPHUR UNRSTD IRN PYRTE	R2	0470
26141	SILK WORM COCOONS	R2	0391	2741	SULPHUR EX SULP IN 52219	R2	0471
26142	SILK COCOON WASTE, ETC	R2	0392	2742	IRON PYRITES UNROASTED	R2	0472
263	COTTON	R2	0393	277	NATURAL ABRASIVES NES	R2	0473
2631	RAW COTTON EXCL LINTERS	R2	0394	2771	INDUSTRIAL DIAMONDS	R2	0474
2632	COTTON LINTERS	R2	0395	2772	NATURAL ABRASIVES NES	R2	0475
2633	COTTON WASTE, UNCOMBED	R2	0396	27721	DUST AND POWDER OF GEMS	R2	0476
2634	COTTON CARDED OR COMBED	R2	0397	27722	OTHER NAT ABRASIVES NES	R2	0477
264	JUTE, OTH TEX BAST FIBRES	R2	0398	278	OTHER CRUDE MINERALS	R2	0478
2640	JUTE, OTH TEX BAST FIBRES	R2	0399	2782	REFRACTORY MINERALS NES	R2	0479
265	VEG FIBRE, EXCL COTN, JUTE	R2	0400	27821	CLAY ETC	R2	0480

27822	NATURAL GRAPHITE	R2	0481	282	CRUDE VEG MATERIALS NES	R2	0561
27823	DOLOMITE	R2	0482	2822	NAT GUMS RESINS LACS ETC	R2	0562
27824	MAGNESITE	R2	0483	2823	VEG PLAITING MATERIALS	R2	0563
2783	COMMON SALT ETC	R2	0484	2824	VEG USED IN PHARMACY ETC	R2	0564
2784	ASBESTOS CRDE SMLY WRKD	R2	0485	2825	SEEDS ETC FOR PLANTING	R2	0565
2785	QUARTZ MICA FELSPAR ETC	R2	0486	2826	LIVE PLANTS BULBS ETC	R2	0566
27851	NATURAL QUARTZ QUARTZITE	R2	0487	28261	BULBS TUBERS CORMS ETC	R2	0567
27852	MICA MICA WASTE	R2	0488	28268	LIVE PLANTS NES	R2	0568
27853	CRYOLITE CHIOLITE NTRL	R2	0489	2827	CUT FLOWERS FOLIAGE	R2	0569
27854	FELSPAR FLOURSPAR ETC	R2	0490	28271	CUT FLOWERS	R2	0570
2786	SLAG SCALINGS CROSS ETC	R2	0491	28272	CUT FOLIAGE	R2	0571
27861	SLAG ETC FRM IRON STL MF	R2	0492	2829	OTH CRUDE VEG MATERIALS	R2	0572
27862	SLAG ASH NES (INCL KELP)	R2	0493	28291	VEGETABLE SAPS EXTRACTS	R2	0573
2789	MINERALS CRUDE NES	R2	0494	28292	VEGET PADDING MATERIALS	R2	0574
27891	CHALK	R2	0495	28293	VEG BRUSH BROOM MATERIAL	R2	0575
27892	NAT BARIUM SULPHATE CARB	R2	0496	28298	OTH CRD VEG MATERIAL NES	R2	0576
27893	TALC NATURAL STEATITE	R2	0497	3	MINERAL FUELS ETC	R2	0577
27894	CRUDE NATURAL BORATES	R2	0498	32	COAL COKE AND BRIQUETTES	R2	0578
27895	SILICEOUS EARTHS ETC	R2	0499	322	COAL LIGNITE AND PEAT	R2	0579
27896	NATURAL ASPHALT BITUMEN	R2	0500	3221	ANTHRACITE NOT AGGLOMRD	R2	0580
27899	MINERAL SUBSTANCES NES	R2	0501	3222	OTH COAL NOT AGGLOMERATO	R2	0581
28	METALLIFEROUS ORES SCRAP	R2	0502	3223	LIGNITE NOT AGGLOMERATED	R2	0582
281	IRON ORE CONCENTRATES	R2	0503	3224	PEAT NOT AGGLOMERATED	R2	0583
2814	ROASTED IRON PYRITES	R2	0504	323	BRIQUETTE COKE SEMI-COKE	R2	0584
2815	IRON ORE NOT AGGLOMERATO	R2	0505	3231	BRIQUETTES OVOIDS ETC	R2	0585
2816	IRON ORE AGGLOMERATES	R2	0506	32311	BRIQUETTES OF COAL	R2	0586
282	IRON AND STEEL SCRAP	R2	0507	32312	LIGNITE AGGLOMERATED	R2	0587
2820	IRON AND STEEL SCRAP	R2	0508	32313	PEAT AGGLOMERATED	R2	0588
28201	-- OF PIG OR CAST IRON	R2	0509	3232	COKE SEMI-COKE RTRY CRBN	R2	0589
28202	-- OF ALLOY STEEL	R2	0510	32321	COKE OF COAL RETORT CRBN	R2	0590
28208	-- OF OTHR IRON OR STEEL	R2	0511	32322	COKE OF LIGNITE PEAT	R2	0591
286	URANIUM THORIUM ORE CONC	R2	0512	33	PETROLEUM AND PRODUCTS	R2	0592
2860	URANIUM THORIUM ORE CONC	R2	0513	333	CRUDE PETROLEUM	R2	0593
287	BASE METAL ORES CONC NES	R2	0514	3330	CRUDE PETROLEUM	R2	0594
2871	CPR ORE ETC INC CEMNT CP	R2	0515	334	PETROLEUM PRODUCTS REFIN	R2	0595
28711	COPPER ORES EXCL MATTE	R2	0516	3341	GASOLINE OTH LIGHT OILS	R2	0596
28712	COPPER MATTE CEMENT	R2	0517	33411	MOTOR AVIATION SPIRIT	R2	0597
2872	NICKEL ORES CONCENTRATES	R2	0518	33412	SPIRIT TYPE JET FUEL	R2	0598
28721	NICKEL ORES EXCL MATTE	R2	0519	33419	OTH LIGHT PETROLEUM OILS	R2	0599
28722	NICKEL MATTE SINTERS ETC	R2	0520	3342	KEROSENE OTH MEDIUM OILS	R2	0600
2873	ALUMINIUM ORES ALUMINA	R2	0521	33421	KEROSENE INCL JET FUEL	R2	0601
28731	ALUMINIUM ORE CONCENTRATE	R2	0522	33429	OTH MEDIUM PETROLEUM OIL	R2	0602
28732	ALUMINA ALUMINIUM OXIDE	R2	0523	3343	GAS OILS	R2	0603
2874	LEAD ORES CONCENTRATES	R2	0524	3344	FUEL OILS NES	R2	0604
2875	ZINC ORES CONCENTRATES	R2	0525	3345	LUBS PETROLEUM OILS NES	R2	0605
2876	TIN ORES CONCENTRATES	R2	0526	33451	LUBS (HIGH PTRLM CNTNT)	R2	0606
2877	MANGANESE ORE CONCENTRTE	R2	0527	33452	LUBS (LOW PTRLM CNTNT)	R2	0607
2879	OTH NONFER ORE CONCENTRTE	R2	0528	335	RESIDUAL PETRLM PROD NES	R2	0608
28791	CHROMIUM ORE CONCENTRATE	R2	0529	3351	PETRLM JELLY MINERAL WAX	R2	0609
28792	TUNGSTEN ORE CONCENTRATE	R2	0530	33511	PETROLATUM	R2	0610
28793	VANADIUM MOLYBD ETC ORES	R2	0531	33512	MINERAL WAXES	R2	0611
28798	OTH NONFER ORE CONC NES	R2	0532	3352	MINERAL TARS AND PRODCTS	R2	0612
288	NON-FERROUS METAL SCRAP	R2	0533	33521	MINERAL TAR	R2	0613
2881	METALIFEROUS NONFER WSTE	R2	0534	33522	BENZOLE	R2	0614
2882	OTH NONFER MTL SCRAP NES	R2	0535	33523	TOLUOLE	R2	0615
28821	COPPER WASTE AND SCRAP	R2	0536	33524	XYLOLE	R2	0616
28822	NICKEL WASTE AND SCRAP	R2	0537	33525	OILS OTH PRODUCTS NES	R2	0617
28823	ALUMINIUM WSTE AND SCRAP	R2	0538	3353	MIN TAR PITCH PITCH COKE	R2	0618
28824	LEAD WASTE AND SCRAP	R2	0539	33531	PITCH FROM MINERAL TARS	R2	0619
28825	ZINC WASTE AND SCRAP	R2	0540	33532	PITCH COKE	R2	0620
28828	TIN WASTE AND SCRAP	R2	0541	3354	PETROLM BITUMEN COKE NES	R2	0621
289	PREC MTL ORES WASTE NES	R2	0542	33541	PETROLEUM BITUMEN	R2	0622
2890	PREC MTL ORES WASTE NES	R2	0543	33542	PETROLEUM COKE	R2	0623
28901	PRECIOUS METAL ORES CONC	R2	0544	33543	BITUMINOUS MIXTURES ETC	R2	0624
28902	PRECIOUS MTL SCRAP WSTES	R2	0545	34	GAS NATURAL AND MANUFCTD	R2	0625
29	CRUDE ANIMAL VEG MAT NES	R2	0546	341	GAS NATURAL AND MANUFCTD	R2	0626
291	CRUDE ANIMAL MTRIALS NES	R2	0547	3413	PETROLM GASES LIQUEFIED	R2	0627
2911	BONES IVORY HORNS ETC	R2	0548	34131	LIQUIFIED PROPANE BUTANE	R2	0628
29111	BONE HORN-CORR AND WASTE	R2	0549	34139	OTH HYDROCARBON GAS LOFD	R2	0629
29115	CORAL SHELL AND WASTE	R2	0550	3414	GAS NATURAL GASEOUS STAT	R2	0630
29116	IVORY TORTOISE-SHELL ETC	R2	0551	3415	GAS MANUFACTURED	R2	0631
2919	OTH ANIMAL MATERIALS NES	R2	0552	35	ELECTRIC ENERGY	R2	0632
29191	HUMAN HAIR UNWORKED ETC	R2	0553	351	ELECTRIC ENERGY	R2	0633
29192	BRUSH-MAKING HAIR ETC	R2	0554	3510	ELECTRIC ENERGY	R2	0634
29193	GUT BLADDERS ETC NONFISH	R2	0555	4	ANIMAL VEGETABLE OIL FAT	R2	0635
29194	FISH WASTE	R2	0556	41	ANIMAL OILS AND FATS	R2	0636
29195	BIRDS SKINS FEATHERS ETC	R2	0557	411	ANIMAL OILS AND FATS	R2	0637
29197	NATURAL SPONGES	R2	0558	4111	OILS OF FISH WHALES ETC	R2	0638
29198	AMBERGRIS CIVET MUCK ETC	R2	0559	41111	FISH LIVER OIL	R2	0639
29199	ANIMAL PRODUCTS NES	R2	0560	41112	OTHER FISH OILS AND FATS	R2	0640

41113	MARINE MAMMALS OILS, FATS	R2	0841	51381	MALEIC ANHYDRIDE	R2	0721
41113	ANIMAL OILS, FATS GREASES	R2	0842	51382	PHTHALIC ANHYDRIDE	R2	0722
41131	PIG, POULTRY FAT UNREFINED	R2	0843	51383	DIOCTYL ORTHOPHTHALATES	R2	0723
41132	FATS OF BOVINE SHEEP ETC	R2	0844	51384	TEREPHTHALIC ACID ESTERS	R2	0724
41133	LARD STEARIN AND OIL ETC	R2	0845	51389	OTH POLYACIDS ETC DERIVS	R2	0725
41134	WOOL GREASE ETC	R2	0846	5139	OXY-FUNCT ACIDS DERIVATVS	R2	0726
41138	ANIMAL OILS, FATS NES	R2	0847	514	NITROGEN-FUNCTN COMPOUNDS	R2	0727
42	FIXED VEGETABLE OIL, FAT	R2	0848	5145	AMINE-FUNCTION COMPOUNDS	R2	0728
423	FIXED VEG OILS, SOFT	R2	0849	5146	OXYGEN-FUNCT AMINO-COMPNOS	R2	0729
4232	SOYA BEAN OIL	R2	0850	5147	AMIDE-FUNCT CMPO, EXC UREA	R2	0730
4233	COTTON SEED OIL	R2	0851	5148	OTH NITROGH-FUNCTN CMPNOS	R2	0731
4234	GROUNDNUT (PEANUT) OIL	R2	0852	51481	QUAT AMMONIUM SALTS, ETC	R2	0732
4238	OLIVE OIL	R2	0853	51482	IMIDE-, IMIDE-FUNCT CMPNOS	R2	0733
4239	SUNFLOWER SEED OIL	R2	0854	51483	ACRYLONITRILE	R2	0734
4239	OTH FIXED VEG OILS, SOFT	R2	0855	51484	OTH NITRILE-FUNCTN CMPNOS	R2	0735
42391	RAPE, COLZA, MUSTARD OILS	R2	0856	51488	DIAZO-, AZO-, AZOXY-COMPNOS	R2	0736
42392	SESAME OIL	R2	0857	51488	HYDRAZINE ETC ORG DERIVS	R2	0737
424	FIXED VEG OIL NONSOFT	R2	0858	51489	NITROGEN-FUNCT CMPNOS NES	R2	0738
4241	LINSEED OIL	R2	0859	515	ORG-INORG COMPOUNDS ETC	R2	0739
4242	PALM OIL	R2	0860	5154	ORGANO-SULPHUR COMPOUNDS	R2	0740
4243	COCONUT (COPRA) OIL	R2	0861	5156	OTH ORG-INORG COMPOUNDS	R2	0741
4244	PALM KERNEL OIL	R2	0862	51561	ORGANO-MERCURY COMPOUNDS	R2	0742
4245	CASTOR OIL	R2	0863	51569	ORG-INORG COMPOUNDS NES	R2	0743
4249	FIXED VEGETABLE OILS NES	R2	0864	5156	HETEROCYCLIC CMPOS ETC	R2	0744
43	PROCESD ANML VEG OIL ETC	R2	0865	51561	LACTAMS	R2	0745
431	PROCESD ANML VEG OIL ETC	R2	0866	51569	OTH HETEROCYC CMPOS ETC	R2	0746
4311	PROCESD ANML VEG OIL NES	R2	0867	5157	SULPHONAMIDES, ETC	R2	0747
4312	HYDROGENATED OIL FAT	R2	0868	51571	SULPHONAMIDES	R2	0748
4313	FATTY ACIDS ETC OEGRAS	R2	0869	51572	SULTONES AND SULTAMS	R2	0749
43131	FATTY ACIDS, ACID OILS	R2	0870	518	OTHER ORGANIC CHEMICALS	R2	0750
43133	RESIDUES OF TREATING FAT	R2	0871	5181	ETHERS, EPOXIDES, ACETALS	R2	0751
4314	ANIMAL VEGETABLE WAXES	R2	0872	51811	ETHERS, ETHER-ALCOHOL, ETC	R2	0752
43143	VEGETABLE WAXES	R2	0873	51812	ACETALS, HEMIACETALS, ETC	R2	0753
43144	INSECT WAXES, SPERMACEY	R2	0874	51813	ETHYLENE OXIDE (OXIRANE)	R2	0754
5	CHEMICALS, RELATED PRODS	R2	0875	51814	PROPYLENE OXIDE	R2	0755
51	ORGANIC CHEMICALS	R2	0876	51818	OTHER EPOXIDES ETC	R2	0756
511	HYDROCARBONS NES DERIVS	R2	0877	5182	ALDEHYDE ETC FNCT CMPNOS	R2	0757
5111	ACYCLIC HYDROCARBONS	R2	0878	51821	OXYGEN-FUNCTION ALDEHYDE	R2	0758
51111	ETHYLENE	R2	0879	51822	OXY-FUNCT ALDEHYDE DERIVS	R2	0759
51112	PROPYLENE	R2	0880	51823	ACETONE	R2	0760
51113	BUTYLENES, BUTADIENES ETC	R2	0881	51824	ETHYL METHYL KETONE	R2	0761
51119	OTH ACYCLIC HYDROCARBONS	R2	0882	51829	OTHER KETONES ETC, DERIVS	R2	0762
5112	CYCLIC HYDROCARBONS	R2	0883	5183	INORGAN ESTERS, SALTS, ETC	R2	0763
51121	CYCLOHEXANE	R2	0884	51831	PHOSPHORIC ESTERS, ETC	R2	0764
51122	BENZENE, CHEMICALLY PURE	R2	0885	51839	OTH INORGANIC ESTERS ETC	R2	0765
51123	TOLUENE, CHEMICALLY PURE	R2	0886	5189	ORGANIC CHEMICALS, NES	R2	0766
51124	XYLENES, CHEMICALLY PURE	R2	0887	51891	ENZYMES	R2	0767
51125	STYRENE	R2	0888	51892	SUGARS, CHEM PURE ETC, NES	R2	0768
51126	ETHYLBENZENE	R2	0889	51899	OTH ORGANIC CHEMICALS NES	R2	0769
51129	OTH CYCLIC HYDROCARBONS	R2	0890	92	INORGANIC CHEMICALS	R2	0770
5113	HALOG DERIV OF HYDROCARB	R2	0891	922	INOG ELEMENTS, OXIDES, ETC	R2	0771
51131	VINYL CHLORIDE	R2	0892	9221	CHEMICAL ELEMENTS	R2	0772
51132	TRICHLOROETHYLENE	R2	0893	92211	GASES, EXCL HALOGENS	R2	0773
51133	TETRACHLOROETHYLENE	R2	0894	92212	METALLOIDS NES	R2	0774
51139	OTH HALOG HYDROCARB DERIV	R2	0895	92213	CHLORINE	R2	0775
5114	HYDROCARB DERIV NONHALOG	R2	0896	92214	FLUORINE, BROMINE, IODINE	R2	0776
512	ALCOHOLS, PHENOLS ETC	R2	0897	92218	SULPHUR, PURIFIED	R2	0777
5121	ACYCLIC ALCOHOLS DERIVS	R2	0898	92216	MERCURY	R2	0778
51211	METHYL ALCOHOL (METHANOL)	R2	0899	92217	ALKALI, RARE EARTH METALS	R2	0779
51212	PROPANOLS	R2	0700	92218	CARBON (INC CARBON BLACK)	R2	0780
51213	BUTYL ALCOHOLS (BUTANOLS)	R2	0701	9222	INORGANIC ACIDS ETC	R2	0781
51214	OCTYL ALCOHOLS (OCTANOLS)	R2	702	92221	HYDROCHLORIC ACID ETC	R2	0782
51215	ETHYLENE GLYCOL (ETHANOLS)	R2	0703	92222	SULPHURIC ACID, OILUM	R2	0783
51216	ETHYL ALG, DENATRO SPIRIT	R2	0704	92223	NITRIC, SULPHONITRIC ACID	R2	0784
51217	FATTY ALCOHOLS	R2	0706	92224	PHOSPHORIC ACIDS ETC	R2	0785
51218	GLYCEROL, GLYCEROL LYES	R2	0708	92225	BORIC OXIDE AND ACID	R2	0786
51219	ACYCLIC ALCOH NES DERIVS	R2	0707	92229	OTH INORGANIC ACIDS ETC	R2	0787
5122	CYCLIC ALCOHOLS DERIVATS	R2	0708	9223	HALOGEN SULPHR CMPO NONMET	R2	0788
5123	PHENOLS, PHEN ALCS, DERIVS	R2	0709	92231	HALOGEN CMPNOS NON-METAL	R2	0789
51234	PHENOL PURE, ITS SALTS	R2	0710	92232	SULPHUR CMPNOS NON-METAL	R2	0790
51235	CRESOLS, NES, THEIR SALTS	R2	0711	9224	METALLIC OXIDES	R2	0791
51238	OTH PHENOLS AND PHEN-ALC	R2	0712	92241	ZINC OXIDE PEROXIDE	R2	0792
51237	DERIVATVS OF PHENOL ETC	R2	0713	92242	CHROMIUM OXIDE HYDROXIDE	R2	0793
513	ORGANIC ACIDS ETC	R2	0714	92243	MANGANESE OXIDES	R2	0794
5137	MONOACIDS AND DERIVATIVES	R2	0715	92244	IRON OXIDES HYDROXIDES	R2	0795
51371	ACETIC ACID ITS SALTS	R2	0716	92245	COBALT OXIDES, HYDROXIDES	R2	0796
51372	ESTERS OF ACETIC ACID	R2	0717	92246	TITANIUM OXIDES	R2	0797
51373	METHACRYLIC ACID ETC	R2	0718	92247	LEAD OXIDES	R2	0798
51379	OTH MONOACIDS ETC DERIVS	R2	0719	9225	INORGANIC BASES ETC NES	R2	0799
5138	POLYACIDS AND DERIVATIVES	R2	0720	92251	AMMONIA ANHYDROUS ETC	R2	0800

92292	CAUSTIC SODA SOLID	R2	0801	54198	OTHR HORMONES DERIVS ETC	R2	0891
92293	CAUSTIC SODA IN SOLUTION	R2	0802	5419	GLYCOSIDES GLANDS SERA	R2	0892
92294	CAUSTIC POTASH ETC	R2	0803	54191	GLYCOSIDES AND DERIVATVS	R2	0893
92295	OXIDES ETC OF MG, SR, BA	R2	0804	54192	GLANDS ETC AND EXTRACTS	R2	0894
92296	ALUMINIUM HYDROXIDE	R2	0805	54194	ANTISERA MICROBIAL VCONS	R2	0895
92297	ARTIFICIAL CORUNDUM	R2	0806	54195	TOXINS MICROBIAL CULTURES	R2	0896
92298	OTR OXIDES BASES ETC NES	R2	0807	5417	MEDICAMENTS	R2	0897
923	OTHR INORGANIC CHEMICALS	R2	0808	54171	-- CONTAINING ANTIBIOTICS	R2	0898
9231	METAL CMPO OF INORG ACID	R2	0809	54172	-- CONTAINING HORMONES	R2	0899
92311	FLUORIDES ETC	R2	0810	54173	-- CONTAINING ALKALOIDS	R2	0900
92312	CHLORIDES, OXYCHLORIDES	R2	0811	54179	-- CONTNG OTR SUBSTANCES	R2	0901
92313	CHLORITES, HYPOCHLORITES	R2	0812	5418	PHARMACEUTICAL GOODS NES	R2	0902
92314	CHLORATES, PERCHLORATES	R2	0813	54191	BANDAGES PREPARED ETC	R2	0903
92315	SULPHIDES, POLYSULPHIDES	R2	0814	54199	OTR PHARMACEUTICAL GOODS	R2	0904
92316	DITHIONITE, SULPHOXYLATES	R2	0815	58	PERFUME, CLEANING ECT PRO	R2	0905
92317	SULPHITES, THIOSULPHATES	R2	0816	581	ESSENTL OIL, PERFUME, ETC	R2	0906
92318	SODIUM SULPHATE ETC	R2	0817	5813	ESSENTL OIL, RESINOID ETC	R2	0907
92319	OTR SULPHATES, PERSULPHTES	R2	0818	5814	MIXED PERFUME SUBSTANCES	R2	0908
9232	OTR MTL CMPO OF INORG ACID	R2	0819	583	PERFUMERY, COSMETICS, ETC	R2	0909
92321	NITRITES AND NITRATES	R2	0820	5830	PERFUMERY, COSMETICS, ETC	R2	0910
92322	PHOSPHITES, PHOSPHATES	R2	0821	584	SOAP, CLEANSING ETC PREPS	R2	0911
92323	NEUTRAL SODIUM CARBONATE	R2	0822	5841	SOAPS	R2	0912
92324	CARBONATE, PERCARBONATE NES	R2	0823	5842	WASHING PREPARATIONS ETC	R2	0913
92325	CYANIDES, COMPLEX CYANIDE	R2	0824	5843	POLISHES, CREAMS, ETC	R2	0914
92326	FULMINATES, CYANATES ETC	R2	0825	58	FERTILIZERS MANUFACTURED	R2	0915
92327	SILICATES	R2	0826	582	FERTILIZERS MANUFACTURED	R2	0916
92328	BORATES AND PERBORATES	R2	0827	5821	CHEM NITROGENOUS FERTILZR	R2	0917
92329	SALTS OF INORG ACIDS NES	R2	0828	58211	AMMONIUM NITRATE	R2	0918
9233	METALLIC ACID SALTS ETC	R2	0829	58212	AMMONIUM SULPHONITRATE	R2	0919
92331	SALTS OF METALLIC ACIDS	R2	0830	58213	AMMONIUM SULPHATE	R2	0920
92332	ALL PRECIOUS METAL CMPOS	R2	0831	58214	CALCIUM NITRATE NES ETC	R2	0921
9239	INORG CHEM PRODUCTS NES	R2	0832	58215	CALCIUM CYANAMIDE ETC	R2	0922
92391	HYDROGEN PEROXIDE	R2	0833	58216	UREA	R2	0923
92392	PHOSPHIDES	R2	0834	58218	CHEM NITROGEN FRTLZR NES	R2	0924
92393	CALCIUM CARBIDE	R2	0835	5822	CHEM PHOSPHATIC FERTILZR	R2	0925
92394	CARBIDES EXCL CALCIUM	R2	0836	58221	BASIC SLAG (THOMAS SLAG)	R2	0926
92395	HYDRIDES, NITRIDES ETC	R2	0837	58222	SUPERPHOSPHATES	R2	0927
92398	OTR INORG COMPOUNDS NES	R2	0838	58229	CHEM PHOSPH FERTILZR NES	R2	0928
924	RADIOACTIVE ETC MATERIAL	R2	0839	5823	CHEM POTASSIC FERTILIZER	R2	0929
9241	RADIOACTIVE ELEMENTS ETC	R2	0840	58231	POTASSIUM CHLORIDE	R2	0930
9249	OTR RADIOACTIVE ETC MTLs	R2	0841	58232	POTASSIUM SULPHATE NES	R2	0931
92491	STABLE ISOTOPES ETC	R2	0842	58239	CHEM POTASSIC FRTLZR NES	R2	0932
92492	OTR CHEMS ASSOC RADIOACT	R2	0843	5829	FERTILIZERS NES	R2	0933
93	DYES TANNING COLOUR PROD	R2	0844	58291	NIT-PHOS-POT FERTILZR NES	R2	0934
931	SYNT DYE NAT INDOGO LAKES	R2	0845	58292	NITROG-PHOS FERTILZR NES	R2	0935
9311	SYNTHIC ORGIC DYESTUFFS	R2	0846	58293	NITROG-POTAS FERTILZR NES	R2	0936
9312	SYNTH LUMIN INDOGO LAKES	R2	0847	58299	OTHER FERTILIZERS NES	R2	0937
93121	SYN ORG LUMIN ETC INDOGO	R2	0848	57	EXPLOSIVES PYROTECH PROD	R2	0938
93122	COLOUR LAKES	R2	0849	572	EXPLOSIVES, PYROTECH PROD	R2	0939
932	DYES NES TANNING PROD	R2	0850	5721	PREPARED EXPLOSIVES	R2	0940
9322	DYE TANN EXTRACTS, TANNINS	R2	0851	57211	PROPELLENT POWDERS	R2	0941
93221	VEG TANN EXTRACTS, TANNINS	R2	0852	57212	PREPARED EXPLOSIVES NES	R2	0942
93222	DYEING EXTRACTS VEG ANIMAL	R2	0853	5722	FUSES, PRIMERS, DETONATORS	R2	0943
9323	SYNTHETIC TANNING PRODUCTS	R2	0854	5723	PYROTECHNIC ARTICLES	R2	0944
933	PIGMENTS, PAINTS, ETC	R2	0855	58	PLASTIC MATERIALS ETC	R2	0945
9331	COLOURING MATERIAL NES	R2	0856	582	PRO OF CONDENSATION ETC	R2	0946
9332	PRINTING INKS	R2	0857	5821	PHENOPLASTS	R2	0947
9334	VARNISHES, DISTEMPERS ETC	R2	0858	58211	-- IN PRIMARY FORMS	R2	0948
93341	WATER-THINNED PAINTS	R2	0859	58212	-- PLATES, FILM STRIP ETC	R2	0949
93342	OTR PAINTS, VARNISHES ETC	R2	0860	58219	-- OTHER FORMS, INC WASTE	R2	0950
93343	PIGMENTS IN PAINT, ENAMEL	R2	0861	5822	AMINOPLASTS	R2	0951
93344	DISTEMPERS, DYES NES ETC	R2	0862	58221	-- IN PRIMARY FORMS	R2	0952
9335	GLAZES, DRIERS, PUTTY ETC	R2	0863	58222	-- PLATES, FILM STRIP ETC	R2	0953
93351	PREPRD PIGMENT GLAZE ETC	R2	0864	58229	OTHER FORMS INC WASTE	R2	0954
93352	ARTISTS COLOURS	R2	0865	5823	ALKYDS, OTHER POLYESTERS	R2	0955
93353	PREPARED DRIERS	R2	0866	58231	-- IN PRIMARY FORMS	R2	0956
93354	GLAZERS, PUTTY, OTR FILLING	R2	0867	58232	-- PLATES, FILM STRIP ETC	R2	0957
94	MEDICINAL PHARM PRODUCTS	R2	0868	58239	-- OTHER FORMS INC WASTE	R2	0958
941	MEDICINAL PHARM PRODUCTS	R2	0869	5824	POLYAMIDES	R2	0959
9411	PROVITAMINS AND VITAMINS	R2	0870	58241	-- IN PRIMARY FORMS	R2	0960
9413	ANTIBIOTICS IN BULK	R2	0871	58242	-- PLATES, FILM STRIP ETC	R2	0961
94131	PENICILLINS AND DERIVATVS	R2	0872	58249	-- OTHER FORMS, INC WASTE	R2	0962
94132	STREPTOMYCINS AND DERIVS	R2	0873	5825	POLYURETHANES	R2	0963
94133	TETRACYCLINES AND DERIVS	R2	0874	58251	-- IN PRIMARY FORMS	R2	0964
94139	OTHER ANTIBIOTICS	R2	0875	58259	-- OTHER FORMS INC WASTE	R2	0965
9414	VEG ALKALOIDS AND DERIVS	R2	0876	5826	EPOXIDE RESINS	R2	0966
9415	HORMONES, NAT SYN IN BULK	R2	0877	58261	-- IN PRIMARY FORMS	R2	0967
94151	INSULIN	R2	0878	58269	-- OTHER FORMS INC WASTE	R2	0968
94152	PITUITARY SIMILR HORMONE	R2	0879	5827	SILICONES	R2	0969
94153	ADRENAL CORTICAL HORMONE	R2	0880	5828	ION EXCH CONGEN ETC TYPE	R2	0970

8829	OTH CONDENSATION ETC PROD	R2	0861	38832	ARTIFICIAL ETC GRAPHITE	R2	1041
883	POLYMERIZATION ETC PRODS	R2	0862	38833	PREP RUBBER ACCELERATORS	R2	1042
8831	POLYETHYLENE	R2	0863	3888	CHEM PRODUCTS PREPS NES	R2	1043
88311	-- IN PRIMARY FORMS	R2	0864	38881	PREPO GLAZINGS DRESSINGS	R2	1044
88312	-- MONOFIL TUBES, ETC	R2	0865	38882	ACTIVTED MAT MINRL PROD	R2	1045
88313	-- PLATES, FILM, STRIP, ETC	R2	0866	38883	CULTURE MEDIA PREPARED	R2	1046
88319	-- WASTE AND SCRAP	R2	0867	38884	FIRE EXTINGUISHR CHARGES	R2	1047
8832	POLYPROPYLENE	R2	0868	38885	MOELLING COMPOUNDS	R2	1048
88321	-- IN PRIMARY FORMS	R2	0869	38886	FLUXES ETC	R2	1049
88322	-- PLATES, FILM, STRIP, ETC	R2	0870	38887	VARNISH SOLVENTS, THINNRS	R2	1050
88329	-- OTHER FORMS, INC WASTE	R2	0871	38888	COMPOUND CATALYSTS	R2	1051
8833	POLYSTYRENE, ITS COPOLYMR	R2	0872	38889	OTH CHEM PRODS, PREPS, NES	R2	1052
88331	-- IN PRIMARY FORMS	R2	0873	8	BASIC MANUFACTURES	R2	1053
88332	-- MONOFIL TUBES, ETC	R2	0874	81	LEATHER, DRESSED FUR, ETC	R2	1054
88333	-- PLATES, FILM, STRIP, ETC	R2	0875	811	LEATHER	R2	1055
88339	-- WASTE AND SCRAP	R2	0876	8112	LEATHER ARTIFICL, RECONST	R2	1056
8834	POLYVINYL CHLORIDE	R2	0877	8113	CALF LEATHER	R2	1057
88341	-- IN PRIMARY FORMS	R2	0878	8114	LEATHR BOVINE NES, EQUINE	R2	1058
88342	-- MONOFIL TUBES, ETC	R2	0879	8115	LEATHER FROM SHEEP LAMBS	R2	1059
88343	-- PLATES, FILM, STRIP, ETC	R2	0880	8116	LEATHER OF OTH WIDE SKIN	R2	1060
88349	-- WASTE AND SCRAP	R2	0881	81161	LEATHER FROM GOAT, KTG	R2	1061
8838	VYNIL CHLOR, ACET COPOLYM	R2	0882	81169	LEATHER NES	R2	1062
88381	-- IN PRIMARY FORMS	R2	0883	8116	LEATHER SPECIALLY FINSHD	R2	1063
88382	-- MONOFIL TUBES, ETC	R2	0884	81181	CHAMOIS-DRESSED LEATHER	R2	1064
88383	-- PLATES, FILM, ETC, NES	R2	0885	81183	LEATHER PATENT METALIZED	R2	1065
88389	-- WASTE AND SCRAP	R2	0886	812	LEATHER ETC MANUFACTURES	R2	1066
8838	ACRYLIC POLYMERS, ETC	R2	0887	8121	LEATHER BELTING ETC	R2	1067
88381	-- IN PRIMARY FORMS	R2	0888	8123	HARNES-MAKERS GOODS	R2	1068
88382	-- PLATES, FILM, STRIP, ETC	R2	0889	8123	PREPRO PARTS OF FOOTWEAR	R2	1069
88389	-- OTHER FORMS, INC WASTE	R2	0890	8129	LEATHER MANUFACTURES NES	R2	1070
8837	POLYVINYL ACETATE	R2	0891	813	FUR SKINS TANNED, DRESSED	R2	1071
8838	ION EXCH POLYMR ETC TYPE	R2	0892	8130	FUR SKINS TANNED, DRESSED	R2	1072
8838	OTH POLYMRZTION ETC PROD	R2	0893	82	RUBBER MANUFACTURES NES	R2	1073
884	CELLULOSE DERIVATVTS ETC	R2	0894	821	MATERIALS OF RUBBER	R2	1074
8841	REGENERATED CELLULOSE	R2	0895	8210	MATERIALS OF RUBBER	R2	1075
8842	CELLULOSE NITRATES	R2	0896	82101	SHEETS ETC RUBBER UNVULC	R2	1076
88421	-- NON-PLASTICIZED	R2	0897	82102	RUBBER UNVULCANIZD, SHAPED	R2	1077
88422	-- PLASTICIZED	R2	0898	82103	VULC RUBBER THREAD, CORD	R2	1078
8843	CELLULOSE ACETATES	R2	0899	82104	UNHARD VULC RUBBER, BASIC	R2	1079
88431	-- NON-PLASTICIZED	R2	1000	82105	UNHARD VULC RUBBER TUBES	R2	1080
88432	-- PLASTICIZED	R2	1001	82106	HROHD RUBBER SIMPLY FORMD	R2	1081
8848	OTH CELL DERIV, VULC FBRE	R2	1002	828	RUBBER TYRES, TUBES	R2	1082
88481	OTH CELL DERIVS, NON-PLAS	R2	1003	8251	TYRES NEW FOR MOTOR CARS	R2	1083
88482	OTH CELL DERIVS, PLASTIZD	R2	1004	8252	TYRES NEW, BUS OR LORRY	R2	1084
88483	VULCANIZED FIBRE	R2	1005	8253	TYRES NEW FOR AIRCRAFT	R2	1085
888	PLASTIC MATERIAL NES	R2	1006	8254	TYRES NEW, MTR OR BICYCLE	R2	1086
8881	MODIFIED NATL RESINS ETC	R2	1007	8255	OTH TYRES, TYRE CASES, ETC	R2	1087
8882	OTH ART PLASTIC MATS NES	R2	1008	82551	INNER TUBES	R2	1088
88821	HARDENED PROTEINS	R2	1009	82598	TYRES NES, TYRE CASES, ETC	R2	1089
88822	ALGINIC ACID, SALTS, ESTRS	R2	1010	829	RUBBER ARTICLES NES	R2	1090
88829	OTH HIGH POLYMRS ETC, NES	R2	1011	8281	HYGIENIC UNHARDD RUBBER	R2	1091
88	CHEMICAL MATERIALS NES	R2	1012	8282	RUBBER BELTING, VULC RUB	R2	1092
881	PESTICIDES, DISINFECTANTS	R2	1013	8288	OTH RUBBER ARTICLES NES	R2	1093
8811	INSECTICIDES, FOR RETAIL	R2	1014	82888	UNHARD RUBBER PRODS NES	R2	1094
8812	FUNGICIDES, FOR RETAIL	R2	1015	82889	HARDND RUBBER PRODS NES	R2	1095
8813	HERBICIDES, FOR RETAIL	R2	1016	83	WOOD, CORK MANUFACTRS NES	R2	1096
8814	DESINFECTANTS, ETC, FR RET	R2	1017	833	CORK MANUFACTURES	R2	1097
88141	DISINFECTANTS FOR RETAIL	R2	1018	8330	CORK MANUFACTURES	R2	1098
88148	RAT POISONS ETC FR RTAIL	R2	1019	83301	NATURAL CORK ARTICLES	R2	1099
882	STARCH, INULIN, GLUTEN ETC	R2	1020	83302	AGGLOMERATED CORK, ARTS O	R2	1100
8821	STARCH, INULIN, GLUTEN	R2	1021	834	VENEERS, PLYWOOD, ETC	R2	1101
88211	STARCHES, INULIN	R2	1022	8341	VENEER SHEETS	R2	1102
88212	WHEAT GLUTEN, DRY OR NOT	R2	1023	8342	PLYWOOD JP WOOD SHEETS	R2	1103
8822	ALUMINOIDAL SUBTS, GLUES	R2	1024	8343	IMPROVED, RECONSTIT WOOD	R2	1104
88221	CASEIN AND DERIVATVS, ETC	R2	1025	83431	IMPROVED WOOD	R2	1105
88222	ALBUMINS AND DERIVTS, ETC	R2	1026	83432	RECONSTITUTED WOOD	R2	1106
88223	GELATIN AND DERIVATS, ETC	R2	1027	8344	WOOD-BASED PANELS NES	R2	1107
88224	PROTEIN AND DERIVATS, ETC	R2	1028	83441	BLOCKBOARD, LAMINBOARD ETC	R2	1108
88225	DEXTRIN, STARCH GLUES ETC	R2	1029	83442	INLAID WOOD, MARQUETRY	R2	1109
88229	PREPARED GLUES NES, ETC	R2	1030	83443	CELLULAR WOOD PANELS	R2	1110
888	MISCEL CHEM PRODUCTS NES	R2	1031	8346	WOOD SIMPLY SHAPED NES	R2	1111
8881	CHEMCLS FROM WOOD, RESIN	R2	1032	83481	HOOPWOOD, SPLIT POLES ETC	R2	1112
88811	TALL OIL	R2	1033	83482	WOODEN BEADINGS, MOULDINGS	R2	1113
88812	CONCENTRATO SULPHITE LYE	R2	1034	83483	WOOD WOOL AND FLOUR	R2	1114
88813	SPIRITS OF TURPENTINE ETC	R2	1035	835	WOOD MANUFACTURES NES	R2	1115
88814	ROSIN RESIN ACIDS, ETC	R2	1036	8351	BOXES, CASES, CRATES, ETC	R2	1116
88819	WOOD TAR, VEG PITCH ETC	R2	1037	8352	COOPRAGE PROD, INC STAVES	R2	1117
8882	ANTI-KNOCK PREPARATNS ETC	R2	1038	8353	BUILDERS WOODWRK PREPARS	R2	1118
8883	ORGANIC CHEM PRODUCTS NES	R2	1039	8354	WOOD MNFTRS DOMESTIC ETC	R2	1119
88831	ARTIFICIAL, ETC WAXES	R2	1040	83541	WOOD PICTURE ETC FRAMES	R2	1120

83542	WOOD HOUSEHOLD UTENSILS	R2	1121	85144	-- TEXTRD CONT PLSTR	R2	1201
83548	WOOD MFRS DOMESTIC NES	R2	1122	85145	-- NONTXT ETC CONT PLSTR	R2	1202
8358	OTHER WOOD MANUFACTURES	R2	1123	85146	-- OTH NONTXT CONT PLSTR	R2	1203
83581	TOOLS HANDLES ETC WOOD	R2	1124	85147	-- OF OTH CONT SYN FIBRE	R2	1204
83582	SPOOLS BOBBINS ETC WOOD	R2	1125	85148	-- OF DISCONT SYN FIBRES	R2	1205
83588	OTHER WOOD ARTICLES NES	R2	1126	85149	SYNTH FIBRE MONOFIL ETC	R2	1206
84	PAPER, PAPERBOARD AND MFR	R2	1127	8515	YARN OF 8514 FOR RETAIL	R2	1207
841	PAPER AND PAPERBOARD	R2	1128	85151	-- OF CONTINUOUS FIBRES	R2	1208
8411	NEWSPRINT	R2	1129	85152	-- OF DISCONTIN FIBRES	R2	1209
8412	PRINTG WRITING PAPER NES	R2	1130	8516	DISCON SYN FIB BLENO YRN	R2	1210
84121	-- UNCOATED	R2	1131	85166	DISCON SYN FIB/COTTN YRN	R2	1211
84122	-- COATED IMPREGNATO ETC	R2	1132	85167	DISCON SYN FIB/WOOL YARN	R2	1212
8413	KRAFT PAPER, PAPERBOARD	R2	1133	85168	OTH DISC SYN BLENO YARN	R2	1213
84131	KRAFT LINER IN BULK	R2	1134	85169	YARN OF 8516 FOR RETAIL	R2	1214
84132	SACK KRAFT PAPER IN BULK	R2	1135	8517	REGEN FIBRE YARN MONOFIL	R2	1215
84138	KRAFT PAPER PAPERBO NES	R2	1136	85171	CONT VISCOSE RAYON YARN	R2	1216
8418	PAPER, PAPERBO BULK NES	R2	1137	85172	CONT ACETATE FIBRE YARN	R2	1217
84151	SEMI-CHEM FLUTING PAPER	R2	1138	85173	OTH CONT REGEN FIBRE YRN	R2	1218
84152	SULPHITE WRAP PAPER BULK	R2	1139	85174	DISCON REGEN FIBRE YARN	R2	1219
84153	GREASEPROOF ETC PAPER	R2	1140	85175	DISC REGEN FIB/COTTN YRN	R2	1220
84158	OTHER PAPER ETC BULK NES	R2	1141	85176	DISC REGEN FIB/WOOL YARN	R2	1221
8416	FIBREBOARD OF WOOD ETC	R2	1142	85177	OTH DISC REGN BLENO YARN	R2	1222
84161	--COMPRESSED (HARDBOARD)	R2	1143	85178	REGEN FIBRE MONOFIL ETC	R2	1223
84162	--NON COMP. INSULATING BRO	R2	1144	8518	YARN OF 8517 FOR RETAIL	R2	1224
8417	CORRUGATED PAPER ETC BLK	R2	1145	85181	-- OF CONTINUOUS FIBRES	R2	1225
84171	KRAFT PAPER CREPED ETC	R2	1146	85182	-- OF DISCONTIN FIBRES	R2	1226
84172	CREPED HSHOLD PAPER ETC	R2	1147	8518	TEXTILE FIBRE YARN NES	R2	1227
84173	OTHER CREPED ETC PAPER	R2	1148	85191	METALLIZED TEXTILE YARN	R2	1228
84174	PAPER ETC CORRUGATED ETC	R2	1149	85195	YARN OF GLASS FIBRE	R2	1229
8418	COATED ETC PAPER NES BLK	R2	1150	85196	FLAX, RAMIE YARN IN BULK	R2	1230
84181	PLASTIC COATED PAPER ETC	R2	1151	85197	FLAX, RAMIE YARN RETAIL	R2	1231
84182	TARRED ETC PAPER, PAPERBO	R2	1152	85198	YARN OF FIBRES OF 264 0	R2	1232
84189	COATED PAPER ETC NES	R2	1153	85199	VEG FIBRE YARN NES ETC	R2	1233
8419	CONVERTED PAPER ETC NES	R2	1154	852	COTTON FABRICS WOVEN	R2	1234
84192	COMPOSITE PAPER ETC BULK	R2	1155	8521	GREY WOVEN COTTON FABRIC	R2	1235
84196	PAPER PULP FILTERBLOCKS	R2	1156	85211	GREY COTTON GAUZE	R2	1236
84197	WALLPAPER, LINCRUSTA ETC	R2	1157	85212	UNBLEND COTTON TERRY FAB	R2	1237
842	PAPER, ETC. PRECUT, ARTS OF	R2	1158	85214	GREY WOVN COTTON NES	R2	1238
8421	PAPER ETC CONTAINERS	R2	1159	85215	GREY WOVN COTN BLEND NES	R2	1239
8422	CORRESPONDENCE STATIONRY	R2	1160	8522	WOVEN COTTON BLEACHD. ETC	R2	1240
8423	EXERCISE BOOKS ETC	R2	1161	85221	COTTON GAUZE BLEACHD. ETC	R2	1241
8424	PAPER ETC CT TO SIZE NES	R2	1162	85222	BLEND COTTON TERRY FABRC	R2	1242
84241	CIGARETTE PAPER PRECUT	R2	1163	85223	PILE ETC COTTON FABRICS	R2	1243
84242	COPYING PAPER CT TO SIZE	R2	1164	85224	BLECHD COTTON FABRIC NES	R2	1244
84243	TOILET PAPER CUT TO SIZE	R2	1165	85225	BLEND COTN BLENO FAB NES	R2	1245
84244	GUMMED PAPER STRIP ROLLS	R2	1166	853	WOVN MAN-MADE FIB FABRIC	R2	1246
84248	OTH PAPER CT TO SIZE NES	R2	1167	8531	CONT SYNT WEAVES NONPILE	R2	1247
8428	PAPER ETC ARTICLES NES	R2	1168	85314	CONT SYN TYRE CORD FABRC	R2	1248
84281	SPOOLS ETC OF PAPER ETC	R2	1169	85315	CONT SYN TXTL FABRIC NES	R2	1249
84282	PUNCHED CARD MACH CARDS	R2	1170	85316	CONT SYN BLEND FABRC NES	R2	1250
84283	PAPER DISHES CUPS ETC	R2	1171	8532	DISC SYN TXTL FABRIC NES	R2	1251
84284	PAPER TISSUES TOWELS ETC	R2	1172	8534	DISC SYN BLENO FABRC NES	R2	1252
84285	PAPER ETC DIAPERS ETC	R2	1173	85341	-- WITH COTTON FIBRES	R2	1253
84288	OTHER ARTICLES OF PAPER	R2	1174	85342	-- WITH WOOL, FINE HAIR	R2	1254
85	TEXTILE YARN FABRICS ETC	R2	1175	85343	-- W/CONT MAN-MADE FIBRE	R2	1255
851	TEXTILE YARN	R2	1176	85348	-- W/TEXTILE FIBRES NES	R2	1256
8511	SILK YARN	R2	1177	8538	CONT REGN WEAVES NONPILE	R2	1257
85111	SILK YARN NON WASTE BULK	R2	1178	85384	CONT REGEN TYRE CORD FAB	R2	1258
85116	SILK WASTE YARN IN BULK	R2	1179	85388	CONT REGN TXTL FABRC NES	R2	1259
85117	SILK YARN FOR RETAIL ETC	R2	1180	85389	CONT REG BLENO FABRC NES	R2	1260
8512	WOOL, HAIR YARN, INCL TOPS	R2	1181	8539	DISC REGN TXTL FABRC NES	R2	1261
85121	WOOL TOPS	R2	1182	8539	DISC REG BLENO FABRC NES	R2	1262
85122	CARDED WOOL YARN IN BULK	R2	1183	85381	-- WITH COTTON FIBRES	R2	1263
85123	COMBED WOOL YARN IN BULK	R2	1184	85382	-- WITH WOOL, FINE HAIR	R2	1264
85124	YARN OF FINE ANIMAL HAIR	R2	1185	85383	-- W/CONT MAN-MADE FIBRE	R2	1265
85125	HORSEHAIR ETC YARN BULK	R2	1186	85388	-- W/TEXTILE FIBRES NES	R2	1266
85126	WOOL ETC YARN AT RETAIL	R2	1187	8539	MAN-MADE PILE ETC FABRIC	R2	1267
85127	CARDED WOOL BLENOED YARN	R2	1188	85387	-- SYNTHETIC	R2	1268
85128	COMBED WOOL BLENOED YARN	R2	1189	85388	-- REGENERATED	R2	1269
85129	WOOL ETC BLENO YARN RETL	R2	1190	854	OTH WOVN TEXTILE FABRIC	R2	1270
8513	COTTON YARN	R2	1191	8541	SILK FABRICS WOVEN	R2	1271
85131	-- 14 KM/KG OR LESS	R2	1192	8542	WOVEN WOOL, HAIR NONPILE	R2	1272
85132	-- + 14 TO 40 KM/KG	R2	1193	85421	-- OF CARD WOOL, FINE HR	R2	1273
85133	-- + 40 BUT UNDR 80KM/KG	R2	1194	85422	-- OF COMB WOOL, FINE HR	R2	1274
85134	-- 80 KM/KG OR MORE	R2	1195	8543	WOVEN WOOL ETC W/FAB NES	R2	1275
85135	-- PUT UP FOR RETAIL	R2	1196	85431	-- W/CONT SYNTHTC FIBRES	R2	1276
8514	SYN FIB YRN BULK MONOFIL	R2	1197	85432	-- W/DISC SYNTHTC FIBRES	R2	1277
85141	-- TEXTRD CONT PLMOE	R2	1198	85433	-- W/OTH TEXT FIBRES NES	R2	1278
85142	-- NONTXT ETC CONT PLMOE	R2	1199	85434	PILE ETC FABRICS WOOL	R2	1279
85143	-- OTH NONTXT CONT PLMOE	R2	1200	8544	WOVEN FLAX RAMIE FABRICS	R2	1280

6548	WEAVES OF FIBRES OF 2640	R2	1281	65949	-- OTHR THAN KNOTTED ETC	R2	1261
6548	GLASS FIBRE FABRIC	R2	1282	6595	HAND-MADE TXTL CARPTS NES	R2	1257
6548	WOVEN FABRICS NES	R2	1283	65951	-- TUFTED	R2	1261
65481	WEAVES OF METALLIZED YARN	R2	1284	65952	-- WOVEN	R2	1264
65482	COARSE HAIR WOVEN FABRIC	R2	1285	65959	-- OTHR THAN KNOTTED ETC	R2	1265
65486	VEG TXTL FABRIC NES ETC	R2	1286	6596	OTH TXTL CARPTS ETC NES	R2	1266
65489	PILE CHENILLE FABRIC NES	R2	1287	65961	-- TUFTED	R2	1267
655	KNITTED ETC FABRICS	R2	1288	65962	-- OTHR THAN KNOTTED ETC	R2	1268
6551	KNIT ETC SYNTH FAB NONEL	R2	1289	65963	FLOOR COVERINGS OF FELTS	R2	1269
6552	OTHER KNIT ETC FAB NONEL	R2	1290	6597	PLAITS, PLAITED PRODUCTS	R2	1270
65521	-- OF WOOL OR FINE HAIR	R2	1291	66	NONMETAL MINERAL MFS NES	R2	1271
65522	-- OF COTTON	R2	1292	661	LIME CEMENT BLDG PRODS	R2	1272
65523	-- OF REGENERATED FIBRES	R2	1293	6611	LIME, QUICK, SLKD, HYDRAULC	R2	1273
65529	-- OF OTHER FIBRES	R2	1294	6612	CEMENT	R2	1274
6553	KNIT ETC FABRIC, ELASTIC	R2	1295	6613	BUILDING STONE ETC WORKD	R2	1275
6553	LACE, RIBBONS, TULLE, ETC	R2	1296	66131	FLAGSTONES ETC NAT STONE	R2	1279
6560	LACE, RIBBONS, TULLE, ETC	R2	1297	66132	BUILDING STONE WORKED	R2	1277
65601	NARROW FABRICS NES	R2	1298	66133	SLATE, WORKED, ARTICLES OF	R2	1278
65602	WOVEN LABELS ETC NES	R2	1299	6618	MINRL BLDG PRO UNFRD NES	R2	1279
65603	TAPES ETC NOT ELASTIC	R2	1300	66181	ASPHALT ETC PRODUCTS	R2	1280
65604	NET FABRICS, PLAIN	R2	1301	66182	MIXED VEG-MINRL BLDG PROD	R2	1281
65606	NET FABRICS NES, LACE	R2	1302	66183	ASBESTOS- FIBRE-CONT PRO	R2	1282
65606	EMBROIDERY	R2	1303	662	CLAY, REFRACTORY BLDG PRO	R2	1283
657	SPECIAL TEXTILE ETC PROD	R2	1304	6623	REFRACTORY BUILDING PROD	R2	1284
6571	FELT AND ARTICLES NES	R2	1305	66231	SILICIOUS EARTHS, BRICKS	R2	1285
6572	BCHORD FIBRE TEXTLS NES	R2	1306	66232	REFRACTORY BRICK NES	R2	1286
6573	COATED ETC TEXTILES NES	R2	1307	66233	REFRACTORY CEMENT, MORTAR	R2	1287
65731	GUM ETC COATED TEXTILES	R2	1308	6624	BRICKS ETC NONREFRACTORY	R2	1288
65732	PLASTIC COATED TEXTILES	R2	1309	66241	BUILDING BRICKS	R2	1289
65733	RUBBERIZED TEXT NOT KNIT	R2	1310	66242	ROOFNG TILES ETC, CERAMIC	R2	1290
65739	OTH COATED TEXTILES ETC	R2	1311	66243	PIPING ETC, CERAMIC	R2	1291
6574	ELASTIC FAB ETC NOT KNIT	R2	1312	66244	UNGLAZD CERAMIC SETTS ETC	R2	1292
6575	CORDAGE AND MANUFACTURES	R2	1313	66246	GLAZED CERAMIC SETTS ETC	R2	1293
65751	CORDAGE, CABLE, ROPE, TWINE	R2	1314	663	MINERAL MANUFACTURES NES	R2	1294
65752	NETTING OF ROPE TWINE	R2	1315	6631	GRINDING STONES ETC	R2	1295
65759	ARTICLES OF CORDAGE NES	R2	1316	6632	ABRASIVE CLOTHS ETC	R2	1296
6576	HAT BOODIES	R2	1317	6633	MINRL MFS NES NONCERAMIC	R2	1297
65761	WOOL, FUR FELT HAT BOODIES	R2	1318	66331	ARTICLES OF PLASTER	R2	1299
65762	HAT BOODIES NES	R2	1319	66332	CEMENT, ARTYCL STONE PROD	R2	1298
6577	TEXTILES FOR MACHINERY	R2	1320	66333	NICA, WORKED, ARTICLES OF	R2	1400
65771	TEXTILE WADDING NES ETC	R2	1321	66339	OTH MINRL MFS NONCERAMIC	R2	1401
65772	TEXTILE WICKS ETC	R2	1322	6638	MINRL INSULATNG PROD NES	R2	1402
65773	TEXTLS FOR MACHINES NES	R2	1323	6637	REFRACTORY WARE NONBLDG	R2	1403
6578	SPECL TEXTILE PRODS NES	R2	1324	6638	ASBESTOS, FRICTION MATRLS	R2	1404
65781	TEXTILE HOSEPIPING ETC	R2	1325	66381	ASBESTOS MFS NONFRICTION	R2	1405
65792	MACHINERY BELTS ETC TEXT	R2	1326	66382	FRICTION MATERIALS	R2	1406
658	TEXTILE ARTICLES NES	R2	1327	6638	CERAMIC ARTICLES NES	R2	1407
6581	BAGS SACKS OF TEXTILES	R2	1328	66391	CERAMIC APPARAT NONFRACT	R2	1408
6582	MADE-UP CANVAS GOODS	R2	1329	66392	OTH CERAMIC ARTICLES NES	R2	1409
65821	-- OF COTTON	R2	1330	664	GLASS	R2	1410
65829	-- OTHER THAN OF COTTON	R2	1331	6641	GLASS NONOPTICAL, PLAIN	R2	1411
6583	BLANKETS ETC NON ELECTRC	R2	1332	66414	GLASS IN MASS NONOPTICAL	R2	1412
65831	-- OF WOOL OR FINE HAIR	R2	1333	66416	GLASS NES ROOS ETC UNWRKD	R2	1413
65832	-- OF COTTON	R2	1334	6643	OPTICAL GLASS UNWRKD ETC	R2	1414
65833	-- OF SYNTHETIC FIBRES	R2	1335	6643	DRAWN, BLOWN GLASS UNWRKD	R2	1415
65839	-- OF OTHER FIBRES	R2	1336	6644	GLASS SURFACE-GROUND ETC	R2	1416
6584	LINENS ETC	R2	1337	6646	CAST, ROLLED GLASS UNWRKD	R2	1417
65841	BED LINEN OF COTTON	R2	1338	6646	GLASS CONSTRUCTION PRODS	R2	1418
65842	BED LINEN OF OTHR FIBRES	R2	1339	6647	SAFETY GLASS CUT OR NOT	R2	1419
65843	TABLE LINEN OF COTTON	R2	1340	6648	SHEET GLASS METAL-COATED	R2	1420
65844	TABLE LINEN OF OTH FIBRE	R2	1341	6649	GLASS NES	R2	1421
65846	OTHER LINEN OF COTTON	R2	1342	66491	GLASS IN SHAPES	R2	1422
65846	OTHER LINEN OF OTH FIBRE	R2	1343	66492	LAMP ETC ENVELOPES GLASS	R2	1423
65848	OTH FURN ARTIC OF COTTON	R2	1344	66493	CLOCK, WATCH GLASSES ETC	R2	1424
65848	OTH FURN ART OF OTH FIBR	R2	1345	66494	GLASS FIBRE AND PRODUCTS	R2	1425
6589	OTH TEXTILE ARTICLES NES	R2	1346	666	GLASSWARE	R2	1426
65891	TAPESTRIES HAND-MADE ETC	R2	1347	6691	BOTTLES ETC OF GLASS	R2	1427
65896	KNITTED ETC ARTICLES NES	R2	1348	66911	GLASS BOTTLES ETC NONVAC	R2	1428
65899	OTH TEXTILE PRODUCTS NES	R2	1349	66912	INNERS FOR VACUUM VESSEL	R2	1429
660	FLOOR COVERINGS, ETC	R2	1350	6692	HOUSEHLD, HOTEL ETC GLASS	R2	1430
6601	LINOLEUM, FLOOR COVERINGS	R2	1351	6696	GLASS ARTICLES NES	R2	1431
66011	FLOOR COVER OF PAPER ETC	R2	1352	66961	LABORATORY ETC GLASS	R2	1432
66012	LINOLEUM ETC TXTLE BASED	R2	1353	66982	GLASS ORNAMENTS NES	R2	1433
6602	CARPETS ETC KNOTTED	R2	1354	66989	OTHER GLASS ARTICLES NES	R2	1434
66021	-- OF WOOL OR FINE HAIR	R2	1355	669	POTTERY	R2	1435
66029	-- OF OTHER TEXTILE MTLs	R2	1356	6694	PORCELN, CHINA HOUSE WARE	R2	1436
6603	KELEM, SCHUMACKS ETC RUGS	R2	1357	6696	COARSE CERAMIC HOUSEWARE	R2	1437
6604	WOOL CARPETS ETC NES	R2	1358	6698	CERAMIC ORNAMENTS ETC	R2	1438
66041	-- TUFTED	R2	1359	667	PEARL, PREC- SEMI-P STONE	R2	1439
66042	-- WOVEN	R2	1360	6671	PEARLS UNSET UNSTRUNG	R2	1440

8672	DIAMONDS MONINOUST UNSET	R2	1441	87484	-- OF OTHER ALLOY STEEL	R2	1521
86721	-- ROUGH UNSORTED	R2	1442	875	IRON STEEL HOOP STRIP	R2	1522
86722	-- SFTD ROUGH SIMPLY WKD	R2	1443	8750	IRON STEEL HOOP STRIP	R2	1523
86723	-- CUT ETC NOT SET	R2	1444	87501	--OF IRON OR SIMPLE STL	R2	1524
8673	PREC- SEMI-PR STONES NES	R2	1445	87502	--OF HIGH CARBON STEEL	R2	1525
8674	SYNTH PREC- SEMI-P STONE	R2	1446	87504	--OF STAINLESS ETC STL	R2	1526
87	IRON AND STEEL	R2	1447	87505	--OF OTHER ALLOY STEEL	R2	1527
871	PIG IRON ETC	R2	1448	878	RAILWAY RAILS ETC IRN STL	R2	1528
8712	PIG IRN SPIEGELEISEN ETC	R2	1448	8780	RAILWAY RAILS ETC IRN STL	R2	1529
8713	IRON STL POWDER SHOT ETC	R2	1450	87801	RAILWAY RAILS IRN STL	R2	1530
87131	IRON STL SHOT GRIT ETC	R2	1451	87802	RY TRACK EQU NES IRN STL	R2	1531
87132	IRON STEEL POWDERS	R2	1452	877	IRN STL WIRE (EXCL W ROD	R2	1532
87133	SPONGE IRON OR STEEL	R2	1453	8770	IRN STL WIRE (EXCL W ROD	R2	1533
8718	FERRO-ALLOYS	R2	1454	87701	--OF IRON OR SIMPLE STL	R2	1534
87181	FERRO-MANGANESE	R2	1455	87702	--OF HIGH CARBON STEEL	R2	1535
87182	FERRO-SILICON	R2	1455	87704	--OF STAINLESS ETC STL	R2	1536
87188	OTHER FERRO-ALLOYS	R2	1457	87705	--OF OTHER ALLOY STEEL	R2	1537
872	IRON STEEL PRIMARY FORMS	R2	1458	878	IRON STL TUBES PIPES ETC	R2	1538
8724	IRN STL INGOTS LUMPS ETC	R2	1458	8781	CAST IRON TUBES PIPES	R2	1539
87241	IRON SIMPLE STEEL INGOTS	R2	1460	8782	IRON STL SEAMLESS TUBES	R2	1540
87242	HIGH CARBON STEEL INGOTS	R2	1461	8783	IRON STL TUBES PIPES NES	R2	1541
87243	STNLESS STEEL ETC INGOTS	R2	1462	8784	STL HIGHPRESSURE CONDUIT	R2	1542
87244	OTHER ALLOY STEEL INGOTS	R2	1463	8785	IRON STEEL TUBE FITTINGS	R2	1543
87245	IRN STL BLOCKS LUMPS ETC	R2	1464	878	IRN STL CASTINGS UNWRKCD	R2	1544
8725	IRN STL BLOOMS SLABS ETC	R2	1465	8793	IRON STL FORGINGS ROUGH	R2	1545
87251	IRN SMPLE STL BLOOMS ETC	R2	1466	8794	IRON STL CASTINGS ROUGH	R2	1546
87252	HIGH CARB STL BLOOMS ETC	R2	1467	87941	IRON CASTINGS ROUGH	R2	1547
87254	STNLS STL ETC BLOOMS ETC	R2	1468	87942	STEEL CASTINGS ROUGH	R2	1548
87255	OTH ALLOY STL BLOOMS ETC	R2	1469	88	NON-FERROUS METALS	R2	1549
8727	IRN STL COIL FR REROLLNG	R2	1470	881	SILVER PLATINUM ETC	R2	1550
87271	IRON SIMPLE STEEL COILS	R2	1471	8811	SILVER UNWKO PARTLY WRKD	R2	1551
87272	HIGH CARBON STEEL COILS	R2	1472	8812	ROLLED SILVER	R2	1552
87274	STNLESS STEEL ETC COILS	R2	1473	8813	SILVER UNWROUGHT	R2	1553
87275	OTHER ALLOY STEEL COILS	R2	1474	8814	SILVER SEMI-MANUFACTURED	R2	1554
873	IRON STEEL SHAPES ETC	R2	1475	8815	METALS OF PLATINUM GROUP	R2	1555
8731	IRON STEEL WIRE ROD	R2	1476	8816	ROLLED PLATINUM ETC	R2	1556
87311	IRON SIMPLE STL WIRE ROD	R2	1477	8817	PLATINUM ALLOYS UNWRKCD	R2	1557
87312	HIGH CARBON STL WIRE ROD	R2	1478	8818	OTH PLAT GRP METAL UNWRT	R2	1558
87314	STNLESS STL ETC WIRE ROD	R2	1479	8819	PLAT GRP METALS SEMI-WRKD	R2	1559
87315	OTHER ALLOY STL WIRE ROD	R2	1480	882	COPPER EXC CEMENT COPPER	R2	1560
8732	IRON STEEL BARS ETC	R2	1481	8821	COPPER NES ALLOYS UNWRT	R2	1561
87322	-- OF HIGH CARBON STEEL	R2	1482	88211	COPPER UNREF EXC CEMENT	R2	1562
87324	-- OF STAINLESS ETC STL	R2	1483	88212	COPPER REFINED	R2	1563
87325	-- OF OTHER ALLOY STEEL	R2	1484	88213	MASTER ALLOY OF COPPER	R2	1564
87326	-- OTHER HOT-ROLLED ETC	R2	1485	88214	COPPER ALLOYS WORKED	R2	1565
87327	-- OTHER FORGED ETC	R2	1486	8822	COPPER BARS WIRE ETC	R2	1566
8733	IRON STEEL PROFILES ETC	R2	1487	88222	COPPER PLATE SHEET STRIP	R2	1567
87331	SMALL U I H SECTIONS ETC	R2	1488	88223	COPPER FOIL	R2	1568
87332	LARGE U I H SECTIONS ETC	R2	1489	88224	COPPER POWDERS FLAKES	R2	1569
87333	OTH PRFILES HOTROLLED ETC	R2	1490	88225	COPPER TUBES PIPES ETC	R2	1570
87334	OTH PRFILES COLDFRMD ETC	R2	1491	88226	COPPER TUBE FITTINGS	R2	1571
87335	OTH IRN SMPLE STL PRFILES	R2	1492	883	NICKEL	R2	1572
87336	IRN SMPLE STL SHEET PILING	R2	1493	8831	NICKEL ALLOYS UNWROUGHT	R2	1573
87337	HIGH CARBON STL PROFILES	R2	1494	8832	NICKEL ALLOYS WORKED	R2	1574
87338	STNLESS STL ETC PROFILES	R2	1495	8833	NICKEL BARS WIRE ETC	R2	1575
87339	OTHER ALLOY STL PROFILES	R2	1496	8834	NICKEL SHEET POWDER FOIL	R2	1576
874	IRN STL UNIV PLATE SHEET	R2	1497	8835	NICKEL TUBE PIPE ETC	R2	1577
8741	IRON OR STEEL UNIVERSALS	R2	1498	8836	NICKEL ELECTROPLAT AMODES	R2	1578
87414	IRN SMPLE STL UNIVERSALS	R2	1498	884	ALUMINIUM	R2	1579
87415	HIGH CARB ALLOY STL UNIV	R2	1500	8841	ALUMINIUM ALLOYS UNWRKCD	R2	1580
8744	IRN STL NYV PLATE ROLLED	R2	1501	8842	ALUMINIUM ALLOYS WORKED	R2	1581
87441	-- OF IRON OR SIMPLE STL	R2	1502	88421	ALUMINIUM BARS WIRE ETC	R2	1582
87442	-- OF HIGH CARBON STEEL	R2	1503	88422	ALUMINM PLATE SHEET STRIP	R2	1583
87443	-- OF STAINLESS ETC STL	R2	1504	88423	ALUMINIUM FOIL	R2	1584
87444	-- OF OTHER ALLOY STEEL	R2	1505	88424	ALUMINIUM POWDERS FLAKES	R2	1585
8745	IRN STL MED PLATE ROLLED	R2	1506	88425	ALUMINIUM TUBES ETC	R2	1586
87451	-- OF IRON OR SIMPLE STL	R2	1507	88426	ALUMINIUM TUBE FITTINGS	R2	1587
87452	-- OF HIGH CARBON STEEL	R2	1508	885	LEAD	R2	1588
87453	-- OF STAINLESS ETC STL	R2	1509	8851	LEAD ALLOYS UNWROUGHT	R2	1589
87454	-- OF OTHER ALLOY STEEL	R2	1510	88511	UNREFINED LEAD	R2	1590
8748	IRN STL THIN PLATE ROLLED	R2	1511	88512	REF LEAD EXC ALLOY UNWRT	R2	1591
87481	-- OF IRON OR SIMPLE STL	R2	1512	88513	LEAD ALLOYS UNWROUGHT	R2	1592
87482	-- OF HIGH CARBON STEEL	R2	1513	88514	LEAD ALLOYS WORKED	R2	1593
87483	-- OF STAINLESS ETC STL	R2	1514	88515	LEAD BARS WIRE ETC	R2	1594
87484	-- OF OTHER ALLOY STEEL	R2	1515	8852	LEAD PLATE SHEET STRIP	R2	1595
8749	TINNED PLATES SHEETS	R2	1516	88522	LEAD FOIL POWDER FLAKES	R2	1596
8749	OTH IRN STL PLATES SHEET	R2	1517	88524	LEAD TUBES FITTINGS ETC	R2	1597
87491	-- OF IRON OR SIMPLE STL	R2	1518	886	ZINC	R2	1598
87492	-- OF HIGH CARBON STEEL	R2	1519	8861	ZINC ALLOYS UNWROUGHT	R2	1599
87493	-- OF STAINLESS ETC STL	R2	1520	8862	ZINC ALLOYS WKD INC DUST	R2	1600

88631	ZINC BARS, RODS, WIRE, ETC	R2	1801	88743	-- OF ALUMINIUM	R2	1881
88632	ZINC SHEETS, STRIP, FOIL	R2	1802	8875	BASE MTL INCR SANIT WARE	R2	1882
88633	ZINC POWDERS, DUST, FLAKES	R2	1803	88751	-- OF IRON OR STEEL	R2	1883
88634	ZINC TUBES, FITTINGS, ETC	R2	1804	88752	-- OF COPPER	R2	1884
887	TIN	R2	1805	88753	-- OF ALUMINIUM	R2	1885
8871	TIN ALLOYS UNWROUGHT	R2	1806	8878	BASE MTL HOUSE EQUIP NES	R2	1886
8872	TIN ALLOYS WORKED	R2	1807	88781	DOMSTC FOOD MACH NONELEC	R2	1887
88721	TIN BARS, RODS, WIRE, ETC	R2	1808	88782	BASE MTL DECOR ARTICLES	R2	1888
88722	TIN SHEET, PLATE, STRIP	R2	1808	889	OTHER METAL MANUFACTURES	R2	1889
88723	TIN FOIL, POWDER, FLAKES	R2	1810	8881	LOCKSMITHS WARES, ETC	R2	1890
88724	TIN TUBES, FITTINGS, ETC	R2	1811	88811	LOCKS, KEYS AND PARTS	R2	1891
888	URANIUM, THORIUM, ALLOYS	R2	1812	88812	BASE METAL SAFES, ETC	R2	1892
8880	URANIUM, THORIUM, ALLOYS	R2	1813	88813	BASE MTL DOOR, ETC FITTING	R2	1893
888	NON-FER BASE METALS NES	R2	1814	8882	IRON, STL CHAIN AND PARTS	R2	1894
8881	TUNGST, MOLYB, TANTAL, MAGN	R2	1815	8883	PINS, HOOKS, EYES, ETC	R2	1895
88811	TUNGSTEN UNWROUGHT, WASTE	R2	1816	88831	PINS, NEEDLES, ETC	R2	1896
88812	MOLYBDENUM UNWROUGHT, WASTE	R2	1817	88832	IRON, STEEL HAIRPINS, ETC	R2	1897
88813	TANTALUM UNWROUGHT, WASTE	R2	1818	88833	BASE MTL HOOKS, EYES, ETC	R2	1898
88814	MAGNESIUM WASTE, SCRAP	R2	1819	8884	SPRINGS AND LEAVES	R2	1899
88815	MAGNESIUM UNWROUGHT	R2	1820	88841	IRON, STEEL SPRINGS, ETC	R2	1700
8888	BASE METALS NES, CERMENTS	R2	1821	88842	COPPER SPRINGS, LEAVES	R2	1701
88891	BERYLLIUM UNWROUGHT, WASTE	R2	1822	8888	BASE MTL MISC ARTICLES	R2	1702
88899	LASE MTL NES UNWRT WASTE	R2	1823	88881	BASE MTL FLEXIBLE TUBING	R2	1703
889	METAL MANUFACTURES NES	R2	1824	88882	BASE MTL BELLS, NON-ELECT	R2	1704
8891	STRUCTURES AND PARTS NES	R2	1825	88883	BASE METAL STOPPERS, ETC	R2	1705
88911	STRUCTURES, PARTS, IRN, STL	R2	1826	88884	BASE MTL NAME, ETC PLATES	R2	1706
88912	STRUCTURES, PARTS, ALUMIN	R2	1827	88888	BASE MTL SOLDERING RODS	R2	1707
8892	METAL TANKS, BOXES, ETC	R2	1828	8887	IRON, STEEL ARTICLES NES	R2	1708
88921	METAL STORAGE TANKS, ETC	R2	1829	88871	IRON, STEEL ANCHORS, PARTS	R2	1709
889211	STEEL STORAGE TANKS, ETC	R2	1830	88879	IRN, STL MANUFACTURES NES	R2	1710
889213	ALUMIN STORAGE TANKS, ETC	R2	1831	8888	MFRS NES OF CPR, NIKL, ETC	R2	1711
88924	MTL TRANSPORT BOXES, ETC	R2	1832	88881	COPPER MANUFACTURES NES	R2	1712
889241	STL TRANSPORT BOXES, ETC	R2	1833	88882	NICKEL MANUFACTURES NES	R2	1713
889242	ALUMIN TRNSPRT BOXES, ETC	R2	1834	88883	ALUMINIUM MANUFACT NES	R2	1714
889243	IRON COMP GAS CYLINDERS	R2	1835	88884	LEAD MANUFACTURES NES	R2	1715
889244	ALUMIN COMP GAS CYLINDERS	R2	1836	88888	ZINC MANUFACTURES NES	R2	1716
8893	WIRE PRODUCTS, NON ELECTR	R2	1837	88888	TIN MANUFACTURES NES	R2	1717
88931	WIRE CABLES, ROPES, ETC	R2	1838	8889	OTH BASE MTL MFRS, ETC	R2	1718
889311	-- OF IRON AND STEEL	R2	1839	88891	TUNGSTEN WROHT MFRS NES	R2	1719
889312	-- OF COPPER	R2	1840	88892	MOLYBDENM WROHT MFRS NES	R2	1720
889313	-- OF ALUMINIUM	R2	1841	88893	TANTALUM WROHT MFRS NES	R2	1721
88932	IRON, STEEL FENCING WIRE	R2	1842	88894	MAGNESIUM WROHT MFRS NES	R2	1722
88938	METAL FENCING, GALZE, ETC	R2	1843	88898	BERYLLIUM WROHT MFRS NES	R2	1723
889381	-- OF IRON OR STEEL	R2	1844	88899	BASE MTL NES WROHT MFRS	R2	1724
889382	-- OF COPPER	R2	1845	7	MACHINES, TRANSPORT EQUIP	R2	1725
8894	STL COPPR NAILS, NUTS, ETC	R2	1846	71	POWER GENERATING EQUIPNT	R2	1726
88940	STL COPPR NAILS, NUTS, ETC	R2	1847	711	STEAM BOILERS & AUX PLNT	R2	1727
889401	IRON, STEEL NAILS, ETC	R2	1848	7111	STEAM BOILERS, ETC	R2	1728
889402	IRN, STL NUTS, BOLTS, ETC	R2	1849	7112	AUXILIARY BOILER PLANT	R2	1729
889403	COPPER NAILS, BOLTS, ETC	R2	1850	7116	PTS NES OF APP OF 711	R2	1730
8895	TOOLS	R2	1851	71181	PTS NES OF BOILERS	R2	1731
88951	HAND TOOLS, AGRIC, FOREST	R2	1852	71188	PTS NES OF AUX BOIL PLNT	R2	1732
88953	OTHER HAND TOOLS	R2	1853	712	STEAM ENGINES, TURBINES	R2	1733
889531	HAND SAWS AND BLADES	R2	1854	7126	STEAM POWER UNITS, ENGIN	R2	1734
889532	WRENCHES AND SPANNERS	R2	1855	7129	STM ENGINE, ETC PARTS NES	R2	1735
889533	FILES AND RASPS	R2	1856	713	INTRNL COMBUS PSTN ENGIN	R2	1736
889534	PLIERS, PINCERS, SNIPS, ETC	R2	1857	7131	-- FOR AIRCRAFT AND PRTS	R2	1737
889539	HAND TOOLS, ETC NES	R2	1858	71311	---- AIRCRAFT	R2	1738
88954	BLADES, TIPS, ETC FR TOOLS	R2	1859	71319	---- PART NES OF 71311	R2	1739
889541	PARTS TO INSERT IN TOOLS	R2	1860	7132	-- FOR MOTOR VEHICLES	R2	1740
889542	CUTTING BLADES FOR MACHS	R2	1861	7133	-- FOR MARINE PROPULSION	R2	1741
889543	CARBIDE TOOL TIPS, ETC	R2	1862	71331	---- OUTBOARD	R2	1742
8896	CUTLERY	R2	1863	71332	---- OTHER THAN OUTBOARD	R2	1743
88960	CUTLERY	R2	1864	7138	-- ENGINES, NES	R2	1744
889603	RAZORS, RAZOR BLADES	R2	1865	7139	-- PARTS NES	R2	1745
889604	SCISSORS, SCISSOR BLADES	R2	1866	714	ENGINES AND MOTORS NES	R2	1746
889605	CLIPPERS, CLEAVERS, ETC	R2	1867	7144	REACTION ENGINES	R2	1747
889606	TABLEWARE	R2	1868	7146	GAS TURBINES NES	R2	1748
889607	BASE MTL CUTLERY HANDLES	R2	1869	71481	TURBO-PROPELLERS	R2	1749
889608	KNIVES AND BLADES NES	R2	1870	71488	OTHER GAS TURBINES NES	R2	1750
887	BASE MTL HOUSEHOLD EQUIP	R2	1871	7149	PRTS OF ENGINE, MOTOR NES	R2	1751
8873	DOMSTC HEATG, COOKG APPRYS	R2	1872	71491	PARTS NES OF 7144, 71481	R2	1752
88731	IRN, STL DOM COOKG APPRYS	R2	1873	71498	PARTS NES OF 71488, 71888	R2	1753
88732	IRN, STL DOM HEATG APPRYS	R2	1874	716	ROTATING ELECTRIC PLANT	R2	1754
88733	PTS NES OF APPAR OF 8873	R2	1875	7161	DC MOTORS AND GENERATORS	R2	1755
88734	COPPER DOMSTC STOVES, ETC	R2	1876	7162	AC MTRS, GENRYS, GEN SETS	R2	1756
88735	DOMSTC WATERHEATS NONELEC	R2	1877	71621	AC MTRS, INC UNIVRSL MTRS	R2	1757
8874	BASE MTL DOMSTC AAYC NES	R2	1878	71622	AC GENERATORS	R2	1758
88741	-- OF IRON OR STEEL	R2	1879	71623	GEN SETS WITH PISTN ENGN	R2	1759
88742	-- OF COPPER	R2	1880	7163	ROTARY CONVERTERS	R2	1760

7188	PTS NES OF ROT ELEC PLNT	R2	1781	72832	PRINTING TYPE PLATES ETC	R2	1841
718	OTH POWER GENERATG MACHY	R2	1782	7284	PRINTING PRESSES	R2	1842
7187	NUCLEAR REACTORS PTS NES	R2	1783	72841	ROTARY PRINTING PRESSES	R2	1843
7188	WIND WATER ETC ENGINES	R2	1784	72842	PLATEN PRINTING PRESSES	R2	1844
71881	WATER TURBINES	R2	1788	7287	OTH PRINTG & ANCLL MACH	R2	1845
71882	OTH HYDRAULIC ENGRS MTRS	R2	1788	72871	PRINTING MACHINERY NES	R2	1846
71888	OTHER ENGINES MOTORS NES	R2	1787	72872	MACH ANCLLARY TO PRINTG	R2	1847
71888	PARTS NES OF 71881, 71882	R2	1788	7288	BOOKBINDING MACHRY PARTS	R2	1848
72	MACHS FOR SPCL INDUSTRS	R2	1788	72881	BOOKBINDING MACHINERY	R2	1849
721	AGRIC MACHY EXC TRACTORS	R2	1770	72888	PTS NES OF BOOKBIND MCHS	R2	1850
7211	CULTIVATING MACHINERY	R2	1771	7289	PTS NES OF MCH OF 7283/7	R2	1851
72111	PLOUGHS	R2	1772	72891	PTS NES OF MCHS OF 72831	R2	1852
72112	SEEDERS, PLANTERS ETC	R2	1773	72898	PRINTING MACHY PARTS NES	R2	1853
72113	CULTIVATORS, WEEDERS, ETC	R2	1774	727	FOOD MACHRY NON-DOMESTIC	R2	1854
72118	OTH AGRIC, HORTIC MACHRY	R2	1775	7271	GRAIN WORKING MCHY PARTS	R2	1855
72119	PTS NES OF MACHY OF 7211	R2	1778	72711	GRAIN ETC MILLING MACHRY	R2	1856
7212	HARVESTING ETC MACHINES	R2	1777	72719	PTS NES OF MCHY OF 72711	R2	1857
72121	LAWN MOWERS	R2	1778	7272	OTH FOOD PROC MCHY PARTS	R2	1858
72122	COMBINE HARVESTR-THRESHR	R2	1779	72721	ANMAL VEGET OIL FAT MCH	R2	1859
72123	OTH HARVSTER, MOWRS, BALER	R2	1780	72722	FOOD-PROCESSING MACH NES	R2	1860
72124	AGRIC CLEAN, GRADING MACH	R2	1781	72729	PTS NES OF MCHY OF 72722	R2	1861
72128	PTS NES OF MACHY OF 7212	R2	1782	728	OTH MACHY FOR SPCL INDUS	R2	1862
7213	DAIRY MACHINERY NES	R2	1783	7281	MACH-TOOLS FR SPCL INDUS	R2	1863
72131	MILKING MACHINES	R2	1784	72811	MACH-TOOLS TO WRK MINRLS	R2	1864
72138	OTH DAIRY MACHINERY NES	R2	1785	72812	MACH-TOOLS TO WORK WOOD	R2	1865
72138	PTS NES OF MACHY OF 7213	R2	1788	72819	PTS NES OF TOOLS OF 7281	R2	1866
7218	AGRICULTURE MACHINES NES	R2	1787	7283	OTHR MINERAL WORKG MACHY	R2	1867
72181	WINE-MAKING ETC MACHINERY	R2	1788	72831	MINRAL SORTING ETC MACHY	R2	1868
72187	OTH AGRIC ETC MACHINERY	R2	1789	72832	MINRL CRUSHING ETC MACHY	R2	1869
72188	PTS NES OF MCHY OF 72181	R2	1790	72833	MINRL MIXING, KNEADING MCH	R2	1870
72188	PTS NES OF MCHY OF 72187	R2	1791	72834	MINRL MOULDING ETC MACHY	R2	1871
722	TRACTORS NON-ROAD	R2	1792	72838	PTS NES OF MACHY OF 7283	R2	1872
7223	TRACK-LAYING TRACTORS	R2	1793	7284	MACHY FOR SPCL INDUS NES	R2	1873
7224	WHEELED TRACTORS NES	R2	1794	72841	GLASS-WORKING MACHINERY	R2	1874
723	CIVIL ENGINEERG EQUIP ETC	R2	1795	72842	RUBBER, PLASTICS WRKG MCH	R2	1875
7233	MECHANICAL ROAD ROLLERS	R2	1798	72843	TOBACCO WORKING MACH NES	R2	1876
7234	CONST MINING MACHINRY NES	R2	1797	72844	WOOD TREATING MACHNS NES	R2	1877
72341	SELF-PROPELLED DOZERS, ETC	R2	1798	72848	HTL ETC TREATING MACH NES	R2	1878
72342	SELF-PROP SHOVELS, EXCAV	R2	1798	72848	OTH MCHY WITH INDIV FNCT	R2	1879
72343	SLFRPR CONST ETC MCH NES	R2	1800	72848	PTS OF MACHS OF 7284 ETC	R2	1880
72344	BORING, SINKING MACHINERY	R2	1801	73	METALWORKING MACHINERY	R2	1881
72348	PILE DRIVERS, ETC	R2	1802	738	MACHINE TOOLS FOR METAL	R2	1882
72348	OTH CONST MINING MCH NES	R2	1803	7381	METAL CUTTING MACH-TOOLS	R2	1883
7238	PUBLIC WORKS MACHRY NES	R2	1804	73811	ULTRASNC ETC MTLWKG MCHS	R2	1884
7238	CONSTR ETC MACHY PTS NES	R2	1805	73812	GEAR-CUTTING MACHINES	R2	1885
724	TEXTILE LEATHER MACHRY	R2	1806	73813	LATHES, METALWORKING	R2	1886
7243	SEWING MACHS, NEEDLES ETC	R2	1807	73814	REAMING ETC MCHS MTLWRKG	R2	1887
72431	SEWING MACHINES	R2	1808	73818	DRILLING ETC MCH MTLWRKG	R2	1888
72438	SEW MCH NEEDLES, FURN ETC	R2	1808	73818	SAWING MACHS, METALWORKING	R2	1889
7244	SPINNING, EXTRUDG, ETC MCH	R2	1810	73817	PLANING MACHS, MTLWORKING	R2	1890
72441	TEXTILE EXTRUDING MACHS	R2	1811	73818	TAPPING, SCREW-CUTTING MCH	R2	1891
72442	FIBRE PROCESSING MACH NES	R2	1812	73819	OTH MTL CUTTING MCH-TOOLS	R2	1892
72443	SPINNING, REELING, ETC MCH	R2	1813	7382	METAL FORMING MACH-TOOLS	R2	1893
72448	PTS NES OF MACHS OF 7244	R2	1814	73821	FORGING ETC MCHS, MTLWRKG	R2	1894
7248	WEAVING, FELT MFG ETC MCH	R2	1818	73822	BENDING ETC MCHS, MTLWRKG	R2	1895
72481	WEAVING MACHINES (LOOMS)	R2	1818	73823	SHEARING ETC MCH, MTLWRKG	R2	1896
72482	KNITTING MACHINES	R2	1817	73828	OTH METALWORKING PRESSES	R2	1897
72483	GIMMING, WARPING ETC MCHS	R2	1818	7387	OTH METALWRKG MACH-TOOLS	R2	1898
72484	FELT MFG, FINISHING MACHS	R2	1818	7388	WORK TOOL HOLDERS ETC	R2	1899
7248	AUXIL TXTL MCH PARTS NES	R2	1820	7388	PTS NES OF TOOLS OF 738	R2	1900
72481	MACHY AUXIL TO 72481/83	R2	1821	737	METALWORKING MACHRY NES	R2	1901
72488	LOOM KNT MCH ETC PTS NES	R2	1822	7371	FOUNDRY EQUIPMNT PTS NES	R2	1902
7247	TEXTILE MACHINERY NES	R2	1823	73711	FOUNDRY EQUIPMENT NES	R2	1903
72471	INDUST LDRY WASHING MCHS	R2	1824	73718	PTS NES OF MCHY OF 73711	R2	1904
72472	DRY-CLEANING MACHINES	R2	1828	7372	ROLLING MILLS AND ROLLS	R2	1905
72473	INDUST DRYING MACHNS NES	R2	1828	73721	ROLLING MILLS	R2	1906
72474	OTH TEXTILE MACHINERY NES	R2	1827	73728	ROLL-MILL PTS NES, ROLLS	R2	1907
72478	TEXTILE MACHINRY PTS NES	R2	1828	7373	WELDING, BRAZING, ETC MCHS	R2	1908
7248	SKIN LEATHER WORKING MACH	R2	1828	73731	GAS OPERATED WELDERS ETC	R2	1909
725	PAPER ETC MILL MACHINERY	R2	1830	73732	ELECTRIC WELDERS ETC	R2	1910
7251	PAPER, PULP MAKING MACHRY	R2	1831	74	GENRL INDUSTRIL MACHY NES	R2	1911
72511	CELLULOSE PULP MFG MACHY	R2	1832	741	HEATING, COOLING EQUIPMNT	R2	1912
72512	PAPER ETC MAKING ETC MCH	R2	1833	7411	GAS GENERATORS	R2	1913
7252	PAPER ETC PROODT MF MACH	R2	1834	7412	BURNERS, MECH STOKERS ETC	R2	1914
7258	PTS NES OF MACHS OF 725	R2	1835	7413	INDUST FURNACES ETC PRTS	R2	1915
72581	PTS NES OF MACHS OF 7251	R2	1838	74131	INDUS FURNACES ETC ELECTR	R2	1916
72588	PTS NES OF MACHS OF 7252	R2	1837	74132	INDUST FURNACES NONELECTR	R2	1917
728	PRINTG, BKBINDG MACHY PTS	R2	1838	7414	NONDOM REFRIG EQUIPT, PTS	R2	1918
7283	TYPESET MCH ETC TYPE ETC	R2	1839	74141	REFRIG EQUIP NONDOMESTIC	R2	1919
72831	TYPE SET, FOUND ETC MACHY	R2	1840	74148	PTS NES OF REFRIG EQUIPT	R2	1920

7415	AIR-CONDITIONING MACHNRY	R2	1921	7811	COLOUR TV RECEIVERS	R2	200
7416	HEATING COOLING EQU NES	R2	1922	7812	MONOCHROME TV RECEIVERS	R2	20
742	PUMPS FOR LIQUIDS ETC	R2	1923	782	RADIO BROADCAST RECEIVERS	R2	20.
7421	RECIPROCATING PUMPS NES	R2	1924	7821	MTR VEHIC RADIO RECEIVERS	R2	2004
7422	CENTRIFUGAL PUMPS NES	R2	1925	7822	PORTABLE RADIO RECEIVERS	R2	2005
7423	ROTARY PUMPS NES	R2	1926	7828	OTHER RADIO RECEIVERS	R2	2006
7428	OTHER PUMPS FOR LIQUIDS	R2	1927	783	SOUND RECORDS PHONOGRPH	R2	2007
74281	GARAGE-TYPE FUEL PUMPS	R2	1928	7831	ELECTRIC GRAMOPHONES ETC	R2	2008
74288	PUMPS FR LIQUIDS NES ETC	R2	1928	78311	COIN-OP ELEC GRAMOPHONES	R2	2009
7429	PTS NES OF PUMPS OF 742	R2	1930	78318	OTH ELEC GRAMOPHONES ETC	R2	2010
743	PUMPS NES CENTRIFUGES ETC	R2	1931	7838	OTHR SOUND APPARATUS ETC	R2	2011
7431	PUMPS FOR GASES ETC	R2	1932	78381	MAGNETIC TV IMAGE SMO APP	R2	2012
7432	PUMP COMPRESSOR PRTS NES	R2	1933	78388	DICTATING MACHINES ETC	R2	2013
7433	FREE-PSTN GEN FR GAS TUR	R2	1934	784	TELECOM EQPT PTS ACC NES	R2	2014
7434	FANS BLOWERS ETC PARTS	R2	1938	7841	LINE TELEPHONE ETC EQUIP	R2	2015
7438	CENTRIFUGES	R2	1938	7842	MICROPH LOUDSPKR AMPLIFR	R2	2016
7438	GAS LIQUID FILTERS ETC	R2	1937	7843	TV RADIO TRANSMITTERS ETC	R2	2017
7438	PTS NES OF APP OF 7438.8	R2	1938	7848	TELECOMM EQUIPMENT NES	R2	2018
744	MECHANICAL HANDLING EQU	R2	1938	78481	RADIOTELEPHONE ETC RCVRS	R2	2019
7441	FORK LIFT TRUCKS ETC PTS	R2	1940	78482	TELEVISION CAMERAS	R2	2020
74411	FORK LIFT TRUCKS ETC	R2	1941	78483	RADAR APPARATUS ETC	R2	2021
74418	PTS NES OF VEHIC OF 74411	R2	1942	7848	PTS NES OF EQUIPMT OF 78	R2	2022
7442	LIFTING LOADING MACH NES	R2	1943	78481	PTS NES OF APPAR OF 7841	R2	2023
74421	PULLEY TACKLE WINCHS ETC	R2	1944	78482	PTS NES OF EQUIP OF 7842	R2	2024
74422	SHIP DERRICKS CRANES ETC	R2	1948	78483	TELECOMM EQUIPMT PTS NES	R2	2025
74423	PNEUMATIC ELEVATORS ETC	R2	1948	78488	PARTS ETC OF SOUND EQUIP	R2	2026
74424	LIFTS AND SKIP HOISTS	R2	1947	77	ELECTRIC MACHNRY NES ETC	R2	2027
74425	ESCALATOR MOVING PAVEMENT	R2	1948	771	ELECTRIC POWER MACHY NES	R2	2028
74428	OTH HANDLING ETC MCH NES	R2	1948	7711	TRANSFORMERS ELECTRICAL	R2	2029
7448	PTS NES OF MACHY OF 7442	R2	1950	77111	LIQUID DIELEC TRANSFORMRS	R2	2030
748	NONELEC MACHY TOOLS NES	R2	1951	77118	OTHER ELEC TRANSFORMERS	R2	2031
7481	POWER TOOLS NONELEC PTS	R2	1952	7712	OTH ELEC POWER MACHY NES	R2	2032
74811	POWER HAND TOOLS NONELEC	R2	1953	77121	STATIC CONVERTERS ETC	R2	2033
74818	PTS NES OF TOOL OF 74811	R2	1954	77122	INDUCTORS	R2	2034
7482	OTH NONELEC MCHS PTS NES	R2	1958	77128	ELEC POWER MACHY PTS NES	R2	2035
74821	CALCULATING MACHINES ETC	R2	1958	772	SWITCHGEAR ETC PARTS NES	R2	2036
74822	PACKAGING FILLING ETC MCH	R2	1957	7721	SWITCHGEAR ETC	R2	2037
74823	PACKING ETC MCHY PTS NES	R2	1958	7722	PRINTED CIRCUITS PTS NES	R2	20
74824	AUTOMATIC VENDING MACHS	R2	1958	7723	FIXED VARIABLE RESISTORS	R2	20
74825	WEIGHING MACHINERY	R2	1960	773	ELECTR DISTRIBUTING MACH	R2	2040
74826	WEIGHING MACH PTS PTS NES	R2	1961	7731	INSULATED WIRE CABLE	R2	2041
74827	SPRAYING MACHINERY	R2	1962	7732	ELECTRIC INSULATING EQUIP	R2	2042
748	NONELEC MACH PTS ACC NES	R2	1963	77321	ELECT INSULATED CONDUIT	R2	2043
7481	BALL ROLLER ETC BEARINGS	R2	1964	77322	GLASS ELECTRIC INSULATORS	R2	2044
7482	COOKS VALVES ETC NES	R2	1965	77323	CERAMIC ELECT INSULATORS	R2	2045
7483	SHAFT CRANK PULLEY ETC	R2	1966	77324	OTHER ELECTRIC INSULATORS	R2	2046
7488	OTH NONELEC MCHY PTS NES	R2	1967	77325	GLASS ELEC INSUL FIT NES	R2	2047
74881	FOUNDRY MOUNDS ETC NES	R2	1968	77326	CERAM ELEC INSUL FIT NES	R2	2048
74882	METAL-PLASTIC GASKETS	R2	1968	77327	OTH ELEC INSUL FITTG NES	R2	2049
74888	MACH PARTS NONELEC NES	R2	1970	774	ELECTRO-MEDCL XRAY EQUIP	R2	2050
75	OFFICE MACHNES ADP EQUIP	R2	1971	7741	ELECTRO-MEDICAL EQUIPMT	R2	2051
751	OFFICE MACHINES	R2	1972	7742	X-RAY APPARATUS	R2	2052
7511	TYPEWRITERS CHEQUE-WRTRS	R2	1973	775	HOUSEHOLD TYPE EQUIP NES	R2	2053
75111	ELEC TYPEWRITERS NORMAL	R2	1974	7751	HOUSEHOLD LDRY EQUIP NES	R2	2054
75112	NONELEC TYPEWRTRS NORMAL	R2	1975	77511	DOMESTIC WASHING MACHNES	R2	2055
75118	TYPEWRTRS NES CHEQUEWTR	R2	1976	77512	DOMESTIC DRYING MACH NES	R2	2056
7512	CALCULATING ACCTG ETC MCH	R2	1977	7752	DOM REFRIGERATRS FREEZRS	R2	2057
75121	CALCULATING MACHINES	R2	1978	77521	DOMESTIC REFRIGERATORS	R2	2058
75122	ACCOUNTING MACHINES	R2	1978	77522	DOMESTIC DEEP-FREEZERS	R2	2059
75123	CASH REGISTERS	R2	1980	7753	DOMSTC DISHWASHING MACHS	R2	2060
75128	POSTAGE-FRANKING ETC MCH	R2	1981	7754	ELECTRIC SHAVERS CLIPPERS	R2	2061
7518	OFFICE MACHINES NES	R2	1982	7757	DOMESTIC ELECTRIC EQU NES	R2	2062
75181	DUPLICAT MCH HECTO STNCL	R2	1983	77571	DOM ELEC VAC CLEANRS ETC	R2	2063
75182	PHOTO THERMOCOPY APPARAT	R2	1984	77572	DOM ELEC ROOM FANS ETC	R2	2064
75188	OTH OFFICE MACHINES NES	R2	1988	77573	DOM ELEC FOOD MIXERS ETC	R2	2065
752	AUTOMATIC DATA PROC EQUIP	R2	1988	77578	OTH DOMSTC ELEC APPL ETC	R2	2066
7521	ANALOG HYBRID COMPUTERS	R2	1987	77579	PTS NES OF EQUIP OF 7757	R2	2067
7522	DIGITAL COMPUTERS	R2	1988	7758	ELECTRO-THERMIC APPL NES	R2	2068
7523	DIGITL CENTRL PROCESSORS	R2	1988	77581	ELEC WATER ETC HEATERS	R2	2069
7524	DIGITL CENTRL STOR UNITS	R2	1990	77582	ELEC SOFL SPACE HEATERS	R2	2070
7528	ADP PERIPHERAL UNITS	R2	1991	77583	ELEC HAIR DRESSING APPAR	R2	2071
7528	OFF-LINE DATA PROC EQUIP	R2	1992	77584	ELECTRIC SMOOTHING IRONS	R2	2072
758	OFFICE ADP MCH PTS ACCES	R2	1993	77585	ELECTRIC BLANKETS	R2	2073
7581	OFFICE MACHINE PARTS NES	R2	1994	77586	ELECTROTHERM DOM APP NES	R2	207
75811	TYPEWRTR PTS ACCES NES	R2	1995	77587	NONCARE ELEC HEATG RESIS	R2	207
75818	OTH OFF MCH PTS ACC NES	R2	1998	77588	ELECTRTHMIC APPL PTS NES	R2	207b
75819	COPY MACH PARTS ACCES NES	R2	1997	776	TRANSISTORS VALVES ETC	R2	2077
7588	ACCTG ETC ADP MCH PTS AC	R2	1998	7761	TV PICTURE TUBES	R2	2078
78	TELECOMM SOUND EQUIPMENT	R2	1999	7762	OTH ELECTRONIC TUBES ETC	R2	2079
781	TELEVISION RECEIVERS	R2	2000	7763	DIODES TRANSISTORS ETC	R2	2080

7784	ELECTRONIC MICROCIRCUITS	R2	2081	79322	TANKERS OF ALL KINDS	R2	2181
7788	ELECTRONIC COMP PTS CRYSTLS	R2	2082	79323	OTHER CARGO VESSELS	R2	2182
77881	PIEZO-ELEC CRYSTALS MNTD	R2	2083	79324	FISHING VESSELS ETC	R2	2183
77888	ELECTRONIC COMPON PTS NES	R2	2084	79328	OTHER SHIPS AND BOATS	R2	218
778	ELECTRICAL MACHINERY NES	R2	2085	7933	VESSELS FOR BREAKING UP	R2	2185
7781	BATTERIES ACCUMULATORS	R2	2086	7938	SHIPS AND BOATS NES	R2	2186
77811	PRIMARY BATTERIES CELLS	R2	2087	79381	TUGS	R2	2187
77812	ELECTRIC ACCUMULATORS	R2	2088	79382	SPECIAL PURPOSE VESSELS	R2	2188
77819	ELEC ACCUMULATOR PTS NES	R2	2089	79383	FLOATING STRUCTURES NES	R2	2189
7782	ELECTRIC LAMPS BULBS	R2	2090	8	MISC MANUFACTURED GOODS	R2	2190
77821	ELEC FILAMENT LAMPS NES	R2	2091	81	PLUMBG HEATING LGHTNG EQU	R2	2191
77822	ELEC DISCHARGE LAMPS NES	R2	2092	812	PLUMBG HEATING LGHTNG EQU	R2	2192
77824	ULTRAVIOLET AAC ETC LMPs	R2	2093	8121	CENTRAL HEATING EQUIPMNT	R2	2193
77829	PTS NES OF LAMPS OF 7782	R2	2094	8122	CERAMIC PLUMBING FIXTURES	R2	2194
7783	AUTOMOTIVE ELECTR EQUIP	R2	2095	8124	LIGHTING EQUIPMENT	R2	2195
77831	IGNITION STARTING EQUIP	R2	2096	81241	LIGHTING ETC GLASSWARE	R2	2196
77832	ELECT VEHICLE LGHTNG EQU	R2	2097	81242	LAMPS, FITTINGS BASE METL	R2	2197
7784	ELECTRO-MECH HAND TOOLS	R2	2098	81243	PORTABLE BATTERY LAMPS	R2	2198
7788	OTH ELEC MACHY EQUIP NES	R2	2099	82	FURNITURE PARTS THEREOF	R2	2199
77881	ELECTRY-MAGNETS ETC	R2	2100	821	FURNITURE PARTS THEREOF	R2	2180
77882	ELEC TRAFFIC CONTROL EQU	R2	2101	8211	CHAIRS SEATS AND PARTS	R2	2181
77883	ELEC SIGNALLING EQU NES	R2	2102	82111	CHAIRS AND OTHER SEATS	R2	2182
77884	ELECTRICAL CONDENSERS	R2	2103	82119	PTS NES OF CHAIRS ETC	R2	2183
77885	PARTICLE ACCELERATORS	R2	2104	8212	MED FURN STUFFD FURNSHGS	R2	2184
77888	OTH ELEC MACHINERY NES	R2	2108	82121	MEDICAL FURNITURE PARTS	R2	2185
77887	ELECTRICAL CARBONS	R2	2108	82122	MATTRESSES ETC	R2	2186
77888	ELEC MACHINERY PARTS NES	R2	2107	8219	FURNITURE AND PARTS NES	R2	2187
78	ROAD VEHICLES	R2	2108	82191	METAL FURNITURE NES	R2	2188
781	PASS MOTOR VEH EXC BUSES	R2	2109	82192	WOOD FURNITURE NES	R2	2189
7810	PASS MOTOR VEH EXC BUSES	R2	2110	82199	OTHR FURN FURN PARTS NES	R2	2190
782	LORRIES SPCL MTR VEH NES	R2	2111	83	TRAVEL GOODS HANDBAGS	R2	2191
7821	LORRIES TRUCKS	R2	2112	831	TRAVEL GOODS HANDBAGS	R2	2192
7822	SPECIAL MOTOR VEHCLS NES	R2	2113	8310	TRAVEL GOODS HANDBAGS	R2	2193
783	ROAD MOTOR VEHICLES NES	R2	2114	83101	HANDBAGS NES	R2	2194
7831	BUSES	R2	2115	83102	TRAVEL GDS TOILET-CASES	R2	2195
7832	TRACTORS FOR TR-TRAILERS	R2	2116	83103	SATCHELS AND BRIEF-CASES	R2	2196
784	MOTOR VEH PRTS ACCES NES	R2	2117	83108	OTHER TRAVEL BAGS CASES	R2	2197
7841	MOTOR VEHICLE CHASSIS	R2	2118	84	CLOTHING AND ACCESSORIES	R2	2198
7842	MOTOR VEHICLE BODIES	R2	2119	842	MENS OUTERWEAR NOT KNIT	R2	2199
7848	OTHER MOTOR VEHCL PARTS	R2	2120	8421	-- OVERCOATS OTHER COATS	R2	2200
785	CYCLES ETC MOTRZD OR NOT	R2	2121	84211	---- OF WOOL FINE HAIR	R2	2201
7851	MOTORCYCLES ETC	R2	2122	84219	---- OF OTHER FIBRES	R2	2202
7852	BICYCLES ETC NON-MOTOR	R2	2123	8422	-- SUITS	R2	2203
7853	INVAL CARR CYCLE ETC PTS	R2	2124	84221	---- OF WOOL FINE HAIR	R2	2204
78531	INVALID CARRIAGES	R2	2125	84222	---- OF COTTON	R2	2205
78538	PARTS ACCES NES OF 785	R2	2128	84223	---- OF MAN-MADE FIBRES	R2	2206
786	TRAILERS NONMOTR VEH NES	R2	2127	84229	---- OF OTHER FIBRES	R2	2207
7861	TRAILERS TRANSP CONTAINR	R2	2128	8423	-- TROUSERS BREECHES ETC	R2	2208
78611	HOUSING CAMPING TRAILERS	R2	2129	84231	---- OF WOOL FINE HAIR	R2	2209
78612	OTHER TRAILERS	R2	2130	84232	---- OF COTTON	R2	2210
78613	CONTAINERS INC ROAD-RAIL	R2	2131	84233	---- OF MAN-MADE FIBRES	R2	2211
7868	OTH NONMOTR VEHICLES ETC	R2	2132	84239	---- OF OTHER FIBRES	R2	2212
78681	OTH NONMOTORIZED VEHCLS	R2	2133	8424	-- JACKETS BLAZERS ETC	R2	2213
78688	PTS NES OF TRAILERS ETC	R2	2134	84241	---- OF WOOL FINE HAIR	R2	2214
79	OTHR TRANSPORT EQUIPMENT	R2	2135	84242	---- OF COTTON	R2	2215
791	RAILWAY VEHICLES	R2	2136	84243	---- OF MAN-MADE FIBRES	R2	2216
7911	ELEC LOCOM NON-SELF-GEN	R2	2137	84249	---- OF OTHER FIBRES	R2	2217
7912	OTH RAIL LOCOMOTIVES ETC	R2	2138	8429	-- OTHER OUTER GARMENTS	R2	2218
7913	MECHAN-PROPELLED RY CARS	R2	2139	84291	---- WATERPROOF	R2	2219
7914	PASSENGER CARS NOT POWRD	R2	2140	84292	---- OF WOOL FINE HAIR	R2	2220
7915	FRT MAINT CARS NOT POWRD	R2	2141	84293	---- OF COTTON	R2	2221
79151	RY SERV CARS NOT POWERD	R2	2142	84294	---- OF MAN-MADE FIBRES	R2	2222
79152	RAILWAY FREIGHT CARS NES	R2	2143	84298	---- OF OTHER FIBRES	R2	2223
7919	RY TRACK FIXT ETC PARTS	R2	2144	843	WOMENS OUTERWEAR NONKNIT	R2	2224
79191	RY TRACK FIXTURES ETC	R2	2145	8431	-- COATS AND JACKETS	R2	2225
79199	PARTS NES OF 7911-7915	R2	2148	84311	---- OF WOOL FINE HAIR	R2	2226
792	AIRCRAFT	R2	2147	84312	---- OF COTTON	R2	2227
7921	HELICOPTERS	R2	2148	84313	---- OF MAN-MADE FIBRES	R2	2228
7922	AIRCRAFT NES 2000KG OR LS	R2	2148	84319	---- OF OTHER FIBRES	R2	2229
7923	AIRCRAFT NES 2001-15000KG	R2	2150	8432	-- SUITS AND COSTUMES	R2	2230
7924	AIRCRAFT NES OVER 15000KG	R2	2151	84321	---- OF WOOL FINE HAIR	R2	2231
7928	AIRCRAFT NES ASSOC EQUIP	R2	2152	84322	---- OF COTTON	R2	2232
79281	GLIDERS KITES ROTOCHUTES	R2	2153	84323	---- OF MAN-MADE FIBRES	R2	2233
79282	BALLOONS ETC	R2	2154	84329	---- OF OTHER FIBRES	R2	2234
79283	AIRCRAFT LAUNCHERS ETC	R2	2159	8433	-- DRESSES	R2	2235
7929	PARTS OF AIRCRAFT OF 792	R2	2158	84331	---- OF WOOL FINE HAIR	R2	2236
793	SHIPS AND BOATS	R2	2157	84332	---- OF COTTON	R2	2237
7931	WARSHIPS	R2	2158	84333	---- OF MAN-MADE FIBRES	R2	2238
7932	SHIPS AND BOATS NON-WAR	R2	2159	84338	---- OF OTHER FIBRES	R2	2239
79321	YACHTS SPORTS VESSELS ETC	R2	2160	8434	-- SKIRTS	R2	2240

84341	---- OF WOOL FINE HAIR	R2	2241	8483	FUR ETC CLOTHES PRODUCTS	R2	2321
84342	---- OF COTTON	R2	2242	84831	ARTICLES OF FURSKIN NES	R2	232
84343	---- OF MAN-MADE FIBRES	R2	2243	84832	ARTIFCL FUR ARTICLES OF	R2	232
84348	---- OF OTHER FIBRES	R2	2244	8484	HEADGEAR	R2	2324
8435	-- BLOUSES	R2	2245	84841	HEADGEAR OF FELT	R2	2325
84351	---- OF COTTON	R2	2246	84842	HEADGEAR PLAITED	R2	2326
84352	---- OF MAN-MADE FIBRES	R2	2247	84843	HEADGEAR TEXTILE NONFELT	R2	2327
84358	---- OF OTHER FIBRES	R2	2248	84848	HEAD-BANDS LININGS ETC	R2	2328
8438	-- OTHER OUTER GARMENTS	R2	2249	84849	OTHER HEADGEAR	R2	2329
84381	---- WATERPROOF	R2	2250	85	FOOTWEAR	R2	2330
84382	---- OF WOOL FINE HAIR	R2	2251	851	FOOTWEAR	R2	2331
84383	---- OF COTTON	R2	2252	8510	FOOTWEAR	R2	2332
84384	---- OF MAN-MADE FIBRES	R2	2253	85101	FOOTWEAR RUBBER PLASTIC	R2	2333
84388	---- OF OTHER FIBRES	R2	2254	85102	FOOTWEAR LEATHER	R2	2334
844	UNDER GARMENTS NOT KNIT	R2	2255	85103	SHOES WOOD- CORK-SOLED	R2	2335
8441	-- MENS SHIRTS	R2	2256	85104	FOOTWEAR NES	R2	2336
84411	---- OF COTTON	R2	2257	85106	GAITERS LEGGINGS ETC	R2	2337
84412	---- OF SYNTHETIC FIBRES	R2	2258	87	PRECISION INSTRUMENTS NES	R2	2338
84418	---- OF OTHER FIBRES	R2	2259	871	OPTICAL INSTRUMENTS	R2	2339
8442	-- MENS OTHER THAN SHIRTS	R2	2260	8710	OPTICAL INSTRUMENTS	R2	2340
84421	---- OF COTTON	R2	2261	87101	TELESCOPE MONO-BINOCULAR	R2	2341
84422	---- OF SYNTHETIC FIBRES	R2	2262	87102	ASTRONOMICAL INSTR NES	R2	2342
84428	---- OF OTHER FIBRES	R2	2263	87103	ELECTRON ETC DIFFRACTN AP	R2	2343
8443	-- WOMENS	R2	2264	87104	MICROSCOPES COMPND OPTICAL	R2	2344
84431	---- OF COTTON	R2	2265	87108	OPTICAL INSTRUMENTS NES	R2	2345
84432	---- OF SYNTHETIC FIBRES	R2	2266	872	MEDICAL INSTRUMENTS NES	R2	2346
84438	---- OF OTHER FIBRES	R2	2267	8720	MEDICAL INSTRUMENTS NES	R2	2347
845	OUTERWEAR KNIT NONELASTC	R2	2268	87201	DENTAL INSTRUMENTS	R2	2348
8451	-- JERSEYS PULLOVERS ETC	R2	2269	87202	OTH MEDICAL INSTRUMENTS	R2	2349
84511	---- OF WOOL FINE HAIR	R2	2270	87203	MECHAN-THERAPY APPARAT	R2	2350
84512	---- OF COTTON	R2	2271	873	METERS AND COUNTERS NES	R2	2351
84513	---- OF SYNTHETIC FIBRES	R2	2272	8731	GAS SUPPLY METERS ETC	R2	2352
84514	---- OF REGENERTD FIBRES	R2	2273	8732	COUNTING DEVICES NONELEC	R2	2353
84518	---- OF OTHER FIBRES	R2	2274	874	MEASURING CONTROLLING INSTR	R2	2354
8452	-- WOMENS DRESSES ETC	R2	2275	8741	SURVEYING INSTRUMENTS	R2	2355
84521	---- OF WOOL FINE HAIR	R2	2276	87411	NAVIG INSTR NONELEC ETC	R2	2356
84522	---- OF COTTON	R2	2277	87412	SURVEY INSTR ETC NONELEC	R2	2357
84523	---- OF SYNTHETIC FIBRES	R2	2278	8742	MEASUR DRAW ETC INST PTS	R2	235
84524	---- OF REGENERTD FIBRES	R2	2279	87421	MEASURING DRAWING ETC INST	R2	235
84528	---- OF OTHER FIBRES	R2	2280	87428	PTS NES OF INST OF 87421	R2	2360
8455	-- OTHER CLTHG ACCESRY	R2	2281	8743	GAS LIQUID CONTROL INSTR	R2	2361
84551	---- OF WOOL FINE HAIR	R2	2282	8744	INSTR NON-MECH NON-ELECT	R2	2362
84552	---- OF COTTON	R2	2283	8748	MEAS CONTRL GCI INST NES	R2	2363
84553	---- OF SYNTHETIC FIBRES	R2	2284	87481	BALANCES NON-ELECTRIC	R2	2364
84554	---- OF REGENERTD FIBRES	R2	2285	87482	INSTRMNTS ETC PR DEMONSTR	R2	2365
84558	---- OF OTHER FIBRES	R2	2286	87483	MECHANCL TESTING APPARAT	R2	2366
846	UNDER GARMENTS KNITTED	R2	2287	87484	THERMOMETERS HYDRON ETC	R2	2367
8461	-- OF WOOL ETC NONELASTC	R2	2288	8748	ELEC MEAS CONTRL EQU NES	R2	2368
84611	---- PANTY HOSE (TIGHTS)	R2	2289	87481	ELECTRONIC REGULATORS	R2	2368
84618	---- OTHER	R2	2290	87482	RADIOACTIVITY COUNTRS ETC	R2	2370
8462	-- OF COTTON NON ELASTIC	R2	2291	87483	OTH ELECTRONIC MEAS ETC EQU	R2	2371
84621	---- MENS SHIRTS	R2	2292	87484	ELECTROMECHANICAL REGULATR	R2	2372
84625	---- OTHER	R2	2293	87488	ELEC MEASUR ETC INST NES	R2	2373
8463	-- OF SYNTH FBR NONELAST	R2	2294	8748	INSTR PARTS ACCESSORIES	R2	2374
84631	---- PANTY HOSE (TIGHTS)	R2	2295	88	PHOTO EQU OPTICAL GDS ETC	R2	2375
84632	---- MENS SHIRTS	R2	2296	881	PHOTO APPARAT EQUIPT NES	R2	2376
84633	---- MENS NES	R2	2297	8811	CAMERAS STILL FLASH APP	R2	2377
84634	---- WOMENS NES	R2	2298	88111	STILL CAMERAS	R2	2378
8464	-- OF OTH FIBRE NONELAST	R2	2299	88112	PHOTO FLASHLIGHT APPARAT	R2	2379
84641	---- OF REGENERTD FIBRES	R2	2300	88118	PTS NES OF APPAR OF 8811	R2	2380
84648	---- OF FIBRES NES	R2	2301	8812	CINEMA CAMERAS PROD ETC	R2	2381
8468	CORSETS GARTERS ETC	R2	2302	88121	-- FOR FILM UNDER 16MM	R2	2382
84681	BRASSIERES	R2	2303	88122	-- FOR FILM 16MM AND OVR	R2	2383
84682	CORSETS BRACES ETC	R2	2304	88128	PTS NES OF APPAR OF 8812	R2	2384
847	TEXTILE CLTHG ACCES NES	R2	2305	8813	OTH PHOTO CINE EQUIP NES	R2	2385
8471	-- NOT KNITTED	R2	2306	88131	PROJECTORS NONCINEMA ETC	R2	2386
84711	---- HANKERCHIEFS	R2	2307	88138	PHOTO CINE LAB EQUIP NES	R2	2387
84712	---- SHAWLS VEILS ETC	R2	2308	882	PHOTO CINEMA SUPPLIES	R2	2388
84713	---- TIES CRAVATS ETC	R2	2309	8821	CHEM PHOTO GOODS RETAIL	R2	2389
84714	---- GLOVES SOCKS ETC	R2	2310	8822	PHOTO FILM EXC DEV CINMA	R2	2390
84716	---- MADE UP ACCES NES	R2	2311	88221	PHOTO FILM FLAT UNEXPOSED	R2	2391
8472	-- KNITTED	R2	2312	88222	PHOTO FILM ROLL UNEXPOSED	R2	2392
84721	---- GLOVES ETC NONELAST	R2	2313	88223	PHOTO SENSITZD CLOTH ETC	R2	2393
84722	---- SOCKS ETC NONELASTC	R2	2314	88224	PHOTO FILM EXPOSED UNDEVELO	R2	239
84723	---- ARTICLES NES ELASTC	R2	2315	88225	STILL PHOTO FILM DEVELOPO	R2	231
848	NONXTL CLTHG ACCES HATS	R2	2316	883	DEVELOPED CINEMA FILM	R2	2396
8481	LEATHER CLOTHES ACCESSOR	R2	2317	8830	DEVELOPED CINEMA FILM	R2	2397
8482	PLAS RUBBR CLOTHES ACCES	R2	2318	884	OPTICAL GOODS NES	R2	2398
84821	-- OF ARTIF PLASTIC MATR	R2	2319	8841	OPTICAL ELEMENTS	R2	2399
84822	-- OF UNPRDNG VULC RUBBR	R2	2320	88411	OPTICAL ELMNTS UNMOUNTED	R2	2400

88412	OPTICAL ELEMENTS MOUNTED	R2	2401	89802	ORIGINAL PRINTS ETC	R2	2481
8842	SPECTACLES AND FRAMES	R2	2402	89803	ORIGINAL SCULPTURE ETC	R2	2482
88421	SPECTACLE FRAMES	R2	2403	89804	STAMPS FOR PHILATELY	R2	2483
88422	SPECTACLES ETC	R2	2404	89805	COINS NATURE COLLECTIONS	R2	2484
885	WATCHES AND CLOCKS	R2	2405	89806	ANTIQUES NES	R2	2485
8851	WATCHES MOVEMENTS CASES	R2	2406	897	GOLD SILVER WARE JEWELRY	R2	2486
88511	WATCHES	R2	2407	8972	IMITATION JEWELLERY	R2	2487
88512	CLOCKS WITH WATCH MVMNTS	R2	2408	8973	PREC JEWELRY GLO-SILVWARE	R2	2488
88513	WATCH MOVEMENTS ASSEMBLD	R2	2409	89731	PRECIOUS METAL JEWELLERY	R2	2489
88514	WATCH CASES CASE PARTS	R2	2410	89732	GOLD SILVER ETC WARE	R2	2490
8852	CLOCKS CLOCK WATCH PARTS	R2	2411	89733	JEWELLERY NES	R2	2491
88521	INSTR PANEL CLOCKS ETC	R2	2412	8974	PREC MTL INOUS LAB EQUIP	R2	2492
88522	CLOCKS NES	R2	2413	898	MUSICAL INSTRUMENTS PRYS	R2	2493
88523	TIME-CLOCKS ETC	R2	2414	8981	PIANOS OTH STRING INSTRU	R2	2494
88524	TIME SWITCHES	R2	2415	89811	KEYBOARD STRING MUS INST	R2	2495
88525	CLOCK MOVEMENTS ASSEMBLD	R2	2416	89819	STRING MUS INST MONKEYBD	R2	2496
88526	CLOCK CASES CASE PARTS	R2	2417	8982	MUSICAL INSTRUMENTS NES	R2	2497
88529	CLOCK WATCH PARTS NES	R2	2418	89821	PIPE AND REED ORGANS	R2	2498
89	MISC MANUFCTRD GOODS NES	R2	2419	89822	ACCORDIONS INC MOUTH ORG	R2	2499
892	PRINTED MATTER	R2	2420	89823	WIND MUSICAL INSTR NES	R2	2500
8921	PRINTED BOOKS GLOBES ETC	R2	2421	89824	PERCUSSION MUSICAL INSTR	R2	2501
89211	PRINTED BOOKS PAMPHLETS	R2	2422	89825	ELECTRICAL MUSICAL INSTR	R2	2502
89212	CHILDRENS PICTURE ETC BKS	R2	2423	89829	MUSICAL INSTRUMENTS NES	R2	2503
89213	MAPS CHARTS GLOBES ETC	R2	2424	8983	SOUND RECORDNG TAPE DISCS	R2	2504
8922	NEWSPAPERS PERIODICALS	R2	2425	89831	PREPD SNO RECORDNG MEDIA	R2	2505
8924	PICTURE POSTCARDS ETC	R2	2426	89832	RECORDED DISCS TAPES ETC	R2	2506
89241	DECALCOMANIAS	R2	2427	8989	MUSICAL INSTR PRYS ACCES	R2	2507
89242	PICTRE PST- GREETNG-CRDS	R2	2428	899	OTHER MANUFACTURED GOODS	R2	2508
8928	PRINTED MATTER NES	R2	2429	8991	CARVED MOULDED GOODS	R2	2509
89281	LABELS PAPER PAPERBOARD	R2	2430	89911	GOODS OF ANML CARVNG MTL	R2	2510
89282	PLANS ETC NOT PRINTED	R2	2431	89919	MOULDED CARVED GOODS NES	R2	2511
89283	UNISSUED BANKNOTES ETC	R2	2432	8993	COMBUSTIBLE PRODUCTS ETC	R2	2512
89284	CALENDARS ON PAPER	R2	2433	89931	CANOLS TAPERS ETC	R2	2513
89285	PRINTED MANUSCRIPT MUSIC	R2	2434	89932	MATCHES	R2	2514
89286	TRADE ADX MATRL CATALOGS	R2	2435	89934	MECHANICAL ETC LIGHTERS	R2	2515
89289	OTHER PRINTED MATTER	R2	2436	89935	SMOKING PIPES AND PARTS	R2	2516
893	ARTICLES OF PLASTIC NES	R2	2437	89939	COMBUSTIBLE PRODUCTS NES	R2	2517
8931	PLSTC PACKG CNTNRS LIDS	R2	2438	8994	UMBRELLAS CANES ETC	R2	2518
8932	PLSTC SANITRY TOILET ART	R2	2439	89941	UMBRELLAS SUNSHADES	R2	2519
8933	PLASTIC ORNAMENTS	R2	2440	89942	CANES RIDING-CRPS ETC	R2	2520
8935	PLASTIC ELEC LIGHT ARTICL	R2	2441	89949	PARTS OF 89941 89942	R2	2521
8939	MISC PLASTIC ARTICLES	R2	2442	8996	HEARING ORTHOPAEDIC AIDS	R2	2522
89391	PVC FLOORING TILES ETC	R2	2443	89961	HEARING AIDS	R2	2523
89392	PVC PVAC FLOOR TILES ETC	R2	2444	89962	ORTHOPAEDIC ETC GOODS	R2	2524
89393	PLASTIC BLINDS ETC	R2	2445	8997	BASKETWORK BROOMS ETC	R2	2525
89394	PLASTC OFFICE SCHOOL SUP	R2	2446	89971	BASKETWORK ETC	R2	2526
89399	OTHR PLASTC ARTICLES NES	R2	2447	89972	BRUSHES BROOMS MOPS ETC	R2	2527
894	TOYS SPORTING GOODS ETC	R2	2448	8998	SMALLWARES TOILETRY ETC	R2	2528
8941	BABY CARRIAGES PTS NES	R2	2449	89981	HAND SIEVES RIDDLES	R2	2529
8942	TOYS INDOOR GAMES	R2	2450	89982	POWDER-PUFFS ETC	R2	2530
89421	LARGE SIZE WHEELED TOYS	R2	2451	89983	BUTTONS STUDS ETC	R2	2531
89422	DOLLS	R2	2452	89984	SLIDE FASTENERS PARTS	R2	2532
89423	TOYS NES	R2	2453	89985	COMBS HAIR-SLIDES ETC	R2	2533
89424	INDOOR GAME EQUIPMENT	R2	2454	89986	SCENT ETC TOILET SPRAYS	R2	2534
89425	XMAS DECORATIONS ETC	R2	2455	89987	TAILORS DUMMIES ETC	R2	2535
8946	NON-MILITARY ARMS AMMO	R2	2456	8999	OTHER MANUF GOODS NES	R2	2536
89461	NON-MILITARY FIREARMS	R2	2457	89991	ARTICLES OF GUT ETC	R2	2537
89462	AIRGUNS TRUNCHEONS ETC	R2	2458	89992	FEATHER GOODS NES	R2	2538
89463	HUNTING SPORTING AMBLITION	R2	2459	89993	ARTIFICIAL FLOWERS ETC	R2	2539
8947	OTH SPORT GDS FAIR ANHSM	R2	2460	89994	HUMAN HAIR WORKED	R2	2540
89471	HUNTING SPORTING EQUIP	R2	2461	89995	WIGS FALSE BEARDS ETC	R2	2541
89472	OTH OUTDOOR SPORT GOODS	R2	2462	89997	VACUUM FLASKS ETC	R2	2542
89473	AMUSEMENTS ETC FOR FAIRS	R2	2463	89998	PARACHUTES PRYS ACCES OF	R2	2543
898	OFFICE SUPPLIES NES	R2	2464	9	GOODS NOT CLASSD BY KIND	R2	2544
8951	BASE MTL OFFICE SUPPLIES	R2	2465	91	MAIL NOT CLASSD BY KIND	R2	2545
89511	BSE MTL FILING CABNT ETC	R2	2466	9110	MAIL NOT CLASSD BY KIND	R2	2546
89512	SMALL STATIONERY BSE MTL	R2	2467	93	MAIL NOT CLASSD BY KIND	R2	2547
8952	PENS PENCILS FOUNTN PENS	R2	2468	931	SPECIAL TRANSACTIONS	R2	2548
89521	FOUNTAIN PENS ETC	R2	2469	9310	SPECIAL TRANSACTIONS	R2	2549
89522	PEN NIBS NIB POINTS	R2	2470	94	SPECIAL TRANSACTIONS	R2	2550
89523	PENCILS CRAYONS ETC	R2	2471	941	ZOO ANIMALS PETS	R2	2551
8956	OTHR OFFICE SUPPLIES	R2	2472	9410	ZOO ANIMALS PETS	R2	2552
89561	INK EXCL PRINTING INK	R2	2473	95	ZOO ANIMALS PETS	R2	2553
89562	SLATES FOR WRITING	R2	2474	951	WAR FIREARMS AMMUNITION	R2	2554
89563	HAND DATE ETC STAMPS	R2	2475	9510	WAR FIREARMS AMMUNITION	R2	2555
89564	TYPEWRTR RIBBON INK PADS	R2	2476	95101	WAR FIREARMS AMMUNITION	R2	2556
89565	SEALING WAX COPYING PASTE	R2	2477	95102	ARMORED FIGHTNG VEHICLES	R2	2557
896	WORKS OF ART ETC	R2	2478	95104	MILITARY FIREARMS NES	R2	2558
8960	WORKS OF ART ETC	R2	2479	95105	SIDEARMS AND PARTS NES	R2	2559
89601	HAND PAINTINGS ETC	R2	2480		REVOLVERS PISTOLS	R2	2560

88108	AMMUNITION NPS	R2	2561
88109	PARTS OF ARMS NES	R2	2562
88	COIN NONGOLD NONCURRENT	R2	2563
881	COIN NONGOLD NONCURRENT	R2	2564
8810	COIN NONGOLD NONCURRENT	R2	2565
87	GOLD NON MONETARY NES	R2	2566
871	GOLD NON MONETARY NES	R2	2567
8710	GOLD NON MONETARY NES	R2	2568
87101	NONMON GOLD UNWRT SEMIMP	R2	2570
87102	ROLLED GOLD UNWRT SEMIMP	R2	2571
87103	GOLD SWEEPINGS WASTE ETC	R2	2571

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