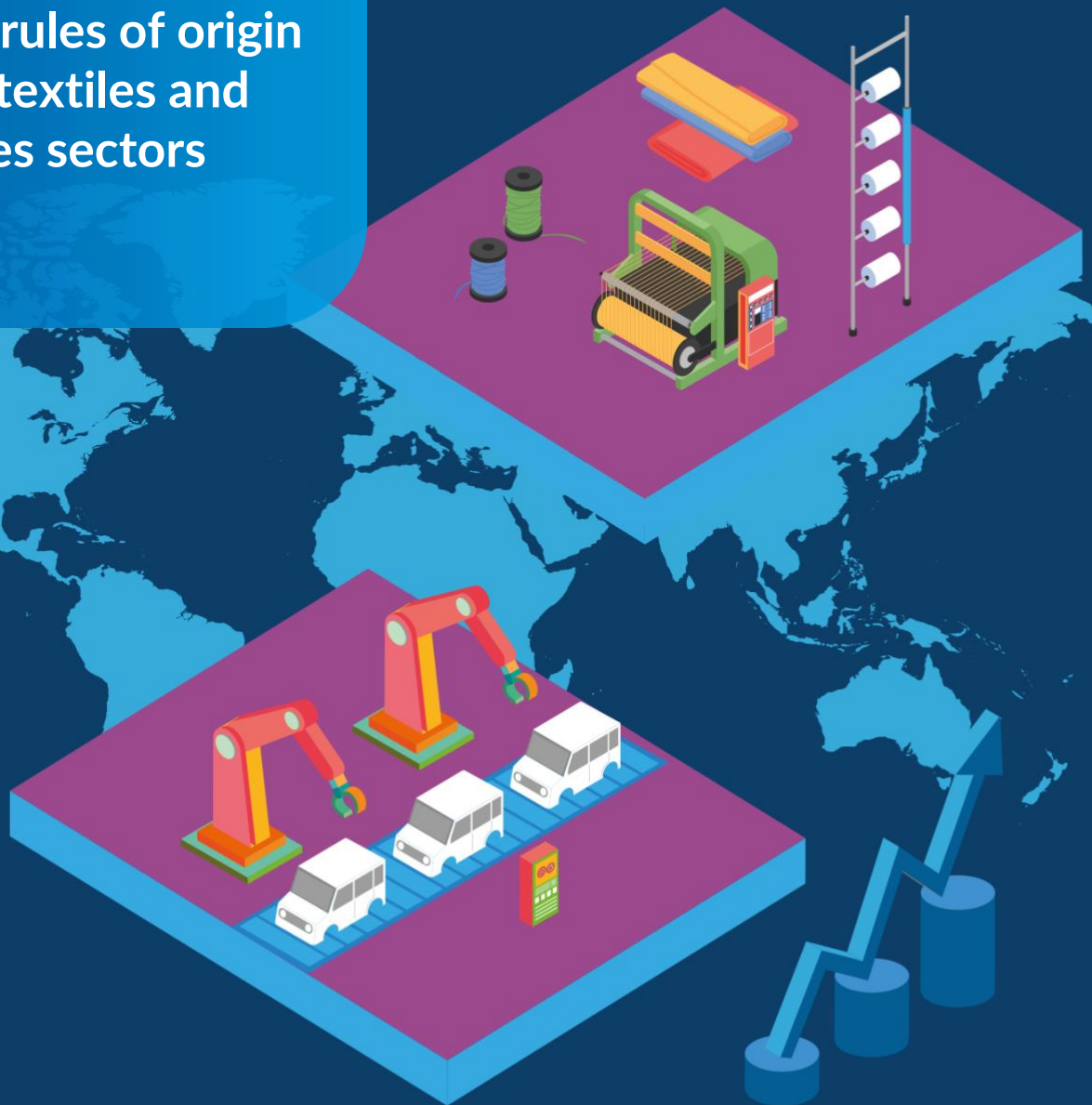




World Customs
Organization

A comparative study of the rules of origin in the textiles and vehicles sectors





DISCLAIMER

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August 2024



Contents

Acronyms	8
1. Introduction	9
1.1. Background	9
1.2. Objective of the study	9
2. Methodology.....	12
2.1. Constitution of the dataset.....	12
2.2. Analytical approach.....	12
2.3. Limitation.....	13
3. Results.....	13
3.1. Statistical description	13
3.2. Analytical results	16
3.3. Sectoral analyses.....	17
3.3.1. Textiles.....	17
3.3.1.1. Knitted or crocheted apparel.....	19
3.3.1.2. Not knitted or crocheted apparel.....	20
3.3.1.3. Other made-up textile articles	21
3.3.2. Vehicles	21
4. Discussion	23
4.1. What does the DCI show?	23
4.1.1. HS 61.....	23
4.1.2. HS 62.....	23
4.1.3. HS 63.....	25
4.2. Are there any impacts?.....	26
4.2.1. Social effects.....	26
4.2.2. Environmental effects.....	27
5. Preliminary conclusions.....	27
5.1. Main takeaways.....	27
5.2. Recommendations	28
5.3. Works cited	29
Annex 1 – Transposition report.....	30
Annex 2 – Technical report on the statistical description of PSRs	32

Annex 3 – Sub-heading level drafting complexity scores33

Figure 1: FTA memberships 11

Figure 2: Distribution of PSR criteria at the chapter level 15

Figure 3: Complexity score by agreement and by chapter 17

Figure 4: Repartition of PSRs by number of parameters 17

Figure 5: Textiles PSR complexity score by agreement and by chapter 18

Figure 6: Repartition of textiles PSRs by number of parameters 18

Figure 7: Textiles scores by chapter and agreement against the chapter average 18

Figure 8: Vehicles PSR complexity score 22

Figure 9: Repartition of Vehicles PSRs by number of parameters 22

Figure 10: Vehicles scores against the chapter average 22

Figure 11: Gender-based DCIs, HS Chapters 61 & 62 26

Table 1: Used RoO instruments for each agreement 12

Table 2: Subheading distribution for the goods under study 13

Table 3: The distribution of PSRs in the textiles sector, by agreement 14

Table 4: The distribution of PSRs in the automotive sector, by agreement 14

Table 5: Average drafting complexity score by agreement and by chapter 17

Table 6: Average drafting complexity score by agreement and by heading (HS 61) 19

Table 7: Average drafting complexity score by agreement and by heading (HS 62) 20

Table 8: Average drafting complexity score by agreement and by heading (HS 63) 21

Table 9: Average drafting complexity score by agreement and by heading (HS 87) 23

Table 10: Comparison of the explanations for differential treatment under HS 6108.2x 23

Table 11: Comparison of PSRs for products classified under 62.13, 62.14 and 62.17 under the EAC and EAC-EU EPA 24

Table 12: PSRs for products classified under HS 63.03 25

Table 13: PSRs for products classified under 63.05 under the PEM 26

Table 14: Gender-based DCI, chapters 61 & 62 26

Table 15: Gender-based DCI, by agreement.....	27
Table 16: Amendments of HS 2007 affecting CTH-based rules.....	31

Acronyms

AfCFTA	African Continental Free Trade Area
CC	Change of chapter
CTC	Change of tariff classification
CTH	Change of tariff heading
DCI	Drafting complexity index
EAC	East African Community
EAC-EU EPA	East African Community – European Union Economic Partnership Agreement
HS	Harmonized Commodity Description and Coding System (HS)
MERCOSUR	Southern Common Market
PEM	Regional Convention on Pan-Euro-Mediterranean Preferential Rules of Origin
PSRs	Product-Specific Rules
RCEP	Regional Comprehensive Economic Partnership
RoO	Rules of origin
SADC	Southern African Development Community
SP	Specific process
USMCA	United States-Mexico-Canada Agreement
WCO	World Customs Organization

1. Introduction

1.1. Background

Typically, negotiations in the textiles and automotive sector are most contentious, difficult, and lengthy. This is notably due to their effect on the domestic political economy.¹ Likewise, this is also the case under the African Continental Free Trade Area (AfCFTA) product-specific rules of origin (PSR) negotiations.²

To that end, it was decided that the study would focus on two industrial sectors, namely the downstream segments of the textiles value chains – products classified under chapters 61 through 63 of the Harmonized Commodity Description and Coding System (HS) – and the motored vehicle value chains – classified under headings HS 87.01 through 87.05.³

The choice was made to compare the PSRs under the agreements listed below:

- The African Continental Free Trade Area (AfCFTA) Agreement;
- The East African Community (EAC);
- The East African Community – European Union Economic Partnership Agreement (EAC-EU EPA);
- The Regional Comprehensive Economic Partnership (RCEP);
- The Regional Convention on Pan-Euro-Mediterranean Preferential Rules of Origin (RoO) (PEM);
- The Southern African Development Community (SADC);
- The Southern Common Market (MERCOSUR for its Spanish initials); and,
- The United States-Mexico-Canada Agreement (USMCA).

1.2. Objective of the study

This study aims to inform on in the textiles and vehicles sectors. It will examine the similarities and differences between different regions and provide insights into potential areas of agreement for standardising the rules of origin.

This study aims to provide technical insights into key regional trade agreements and compare the drafting style used across the rules in the textiles and vehicles sectors. This comparison will support the ongoing AfCFTA rules of origin negotiations. It is to be noted that the comparisons with the AfCFTA rules of origin are, therefore, incomplete and are only intended to illustrate the similarities between AfCFTA rules of origin and seven other reciprocal preferential trade regimes.

¹ Cf. (Fox, et al., 2008; Bjuggren, et al., 2012; Yang, 2022)

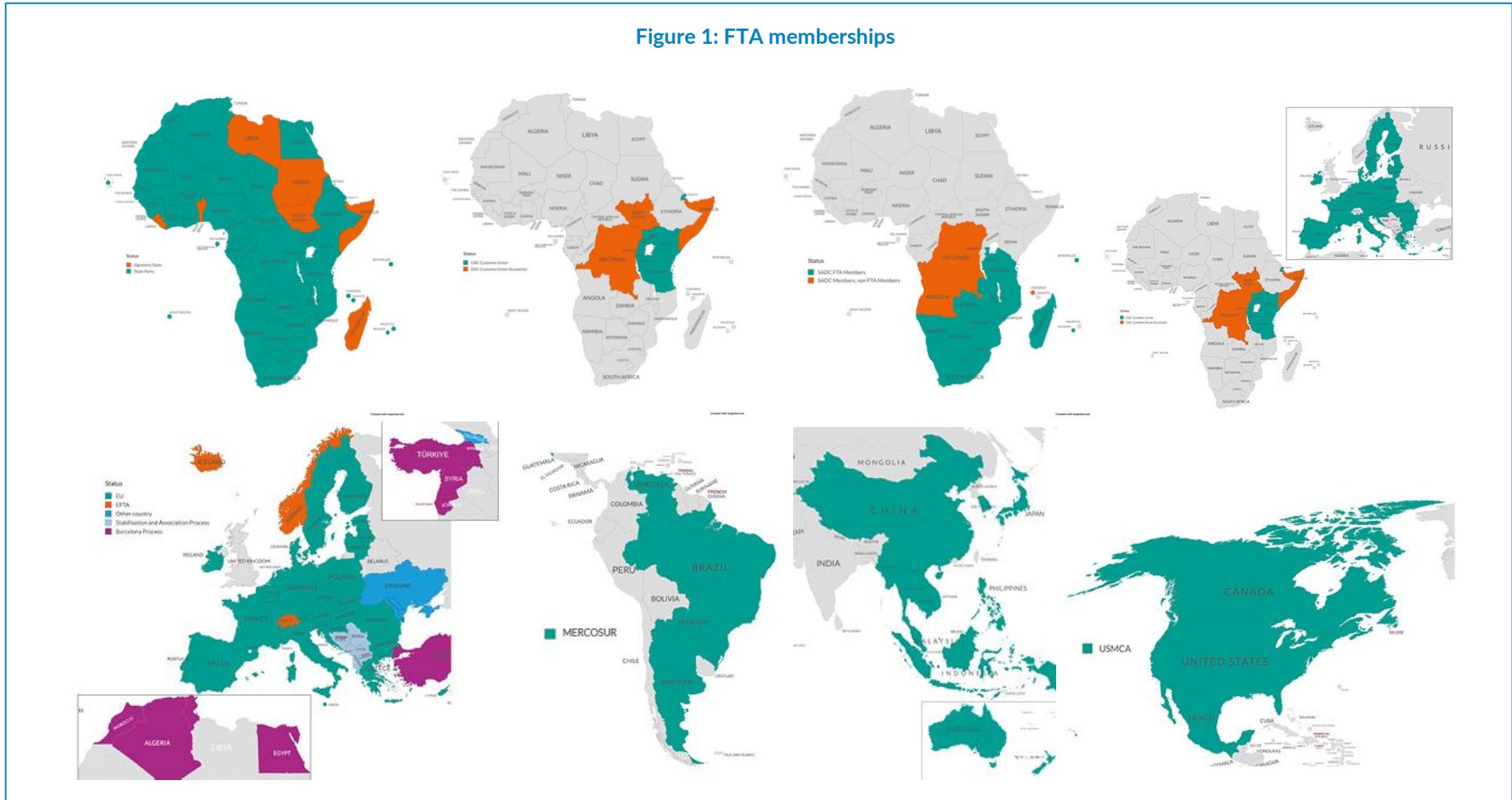
² Cf. (Issoufou, 2024 pp. 4-6)

³ These products cover:

- knitted and crocheted and not knitted and crocheted made-up apparel and accessories (respectively HS 61 and 62),
- tractors (HS 87.01),
- vehicles for the transport of people (HS 87.02 and 87.03),
- vehicles for the transport of merchandise (HS 87.04) and
- special vehicles for the transport of people or merchandises such as crane lorries or fire fighting vehicles (HS 87.05).

The study is funded under the comprehensive program on implementing and applying Rules of Origin for enhanced intra-African trade. This initiative was launched in December 2021 by the WCO and the European Union (EU).

Figure 1: FTA memberships



Note: AfCFTA, EAC, SADC, EAC-EU EPA, PEM, MERCOSUR, RCEP and USMCA

2. Methodology

2.1. Constitution of the dataset

Given the geographical and sectoral scopes, this work builds on eight (8) RoO instruments, per the list below.

Table 1: Used RoO instruments for each agreement

Agreement	RoO instrument	Source
AfCFTA Agreement	Appendix IV of Annex 2 to the Protocol on Trade in Goods	AfCFTA Secretariat
EAC Treaty	First Schedule of Annex 3 to the Protocol on the establishment to the East African Customs Union	Legal Notice No. EAC/139/2022 amending the First Schedule of the EAC RoO
EAC-EU EPA	Annex II of Protocol 1 concerning the Definition of the Concept of “Originating Products” and Methods of Administrative Cooperation	European Commission
SADC	Appendix I of Annex 1 to the SADC Protocol on Trade	WCO
PEM	Regional Convention on pan-Euro-Mediterranean preferential rules of origin	Decision No 1/2023 of the Joint Committee of the Regional Convention on Pan-Euro-Mediterranean Preferential RoO
RCEP	Annex 3A of Chapter 3 – Rules of Origin	RCEP Secretariat
MERCOSUR	Seventy-seventh Additional Protocol	WCO
USMCA	Annex 4B of Chapter 4	USTR

A noteworthy consideration is to be made about the fact that the instruments do not use the same HS versions and do not necessarily indicate which version has served as a basis for negotiating and drafting the rules.

The amendments of the HS classification affect the determination of the origin and make it more complicated and time-consuming, where transposition is needed to ensure the goods are appropriately classified and the according PSR is used, especially where classification change-based rules are applied.⁴ Indeed, as the amendments may add new, delete or reallocate codes and descriptions, such changes may have an impact on the RoO.

For this reason, and to merely ensure comparability for this study’s purpose, the rules were transposed from their initial HS version to HS 2022. The transpositions only affected the PSRs under MERCOSUR and RCEP.⁵

Once the transpositions were completed, the study relied on the methodology used for the comprehensive comparative study on the applicable rules of origin in the Eastern and Southern Africa Region.⁶

2.2. Analytical approach

Drawing from the above-mentioned methods, the present report proposes a new indicator – a drafting complexity index (DCI) – to assess how elaborate the PSR drafting is. This was done by counting the number of parameters provided for under any given rule. The key differences with the other indicators

⁴ Cf. (WCO, 2022)

⁵ See Annex 1 for more details.

⁶ Cf. (WCO, 2024)

are as follows:

- It does not seek to compare the economic impact of the RoO on economic operations of the various criteria;
- It allows to identify the degree of elaboration of a given rule. The higher the DCI, the more technical knowledge required to interpret.

The parameters are counted as follows:

- A single criterion without any additional qualifier⁷ is considered as one parameter;
- A single criterion with an additional qualifier or with an extra reference to another rule, or a combination of two criteria, are considered as two parameters;
- Two criteria with an additional qualifier or with an extra reference to another rule, or a combination of three criteria, are considered as three parameters;
- Three criteria with an additional qualifier, an extra reference to another rule, or a combination of two criteria with extra references to two other rules, are considered four parameters.

2.3. Limitation

The DCI only counts the number of parameters provided for under the PSRs and does not take into account the regime-wide rules or any additional criteria specified outside the PSRs.

3. Results

3.1. Statistical description

The product coverage includes goods classified under HS 61 through 63 and HS 87.01 through 87.05, respectively, representing a total of 309 subheadings and distributed as follows:

Table 2: Subheading distribution for the goods under study

HS code	Number of subheadings
61	106
62	112
63	52
87.01 through 87.05	39

The PSRs applicable to these subheadings can be categorised as follows:

- Ad valorem criteria. These are rules expressed in value-added or value of non-originating material terms;
- Change of tariff classification (CTC) criteria. These rules are expressed in CC or CTH, as well as variations of CC or CTH with exceptions;
- Specific process (SP) criteria. These rules are expressed in terms which describe the

⁷ In the sense of Goudon et al. (2021)

manufacturing process;

- Alternative criteria. These are rules offering the choice between two or more different methods of acquisition of the originating status, expressed in ad valorem, CTC or SP criteria;
- Combination criteria. These are rules providing for cumulative requirements to acquire the originating status. These cumulative requirements can be expressed in ad valorem, CTC or SP criteria;
- Split criteria. These rules specify different treatments for origin acquisition purposes within a given subheading. These can be expressed in any of the above criteria; and,
- Not applicable (n.a.) criteria. These refer to cases where the negotiations are ongoing or where a choice has been made to exclude the goods from preferential treatment.

The distribution of PSRs by sector and by agreement is shown in Table 3 and Table 4.

Table 3: The distribution of PSRs in the textiles sector, by agreement

	AfCFTA	EAC	EAC-EU EPA	MER- COSUR	PEM	RCEP	SADC	USMCA
Ad valorem	1.1%	1.1%	0.0%	5.6%	0.0%	0.0%	0.0%	0.0%
Alternatives	0.0%	0.0%	1.1%	0.0%	17.0%	1.5%	3.3%	0.0%
CTC	5.6%	1.1%	1.1%	94.4%	1.1%	98.5%	1.1%	0.0%
n.a	57.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
SP	36.3%	40.7%	40.7%	0.0%	2.6%	0.0%	17.8%	1.1%
Combina- tion	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	98.5%
Split	0.0%	57.0%	57.0%	0.0%	79.3%	0.0%	77.8%	0.4%
All	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

Table 4: The distribution of PSRs in the automotive sector, by agreement

	AfCFTA	EAC	EAC-EU EPA	MER- COSUR	PEM	RCEP	SADC	USMCA
Ad valorem	12.8%	0.0%	100.0%	23.1%	100.0%	94.9%	100.0%	0.0%
Alternatives	0.0%	0.0%	0.0%	0.0%	0.0%	5.1%	0.0%	0.0%
CTC	0.0%	0.0%	0.0%	76.9%	0.0%	0.0%	0.0%	0.0%
n.a	87.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
SP	0.0%	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Combina- tion	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	38.5%
Split	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	61.5%
All	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

Despite possible clusterisation, each sector has high variability in the rules.

For textiles:

- The PSRs provide for many SP-based splits in the chapter rules-based agreements, except AfCFTA, because the majority of the rules are yet to be adopted;
- Other agreements mainly used CTC-based rules.



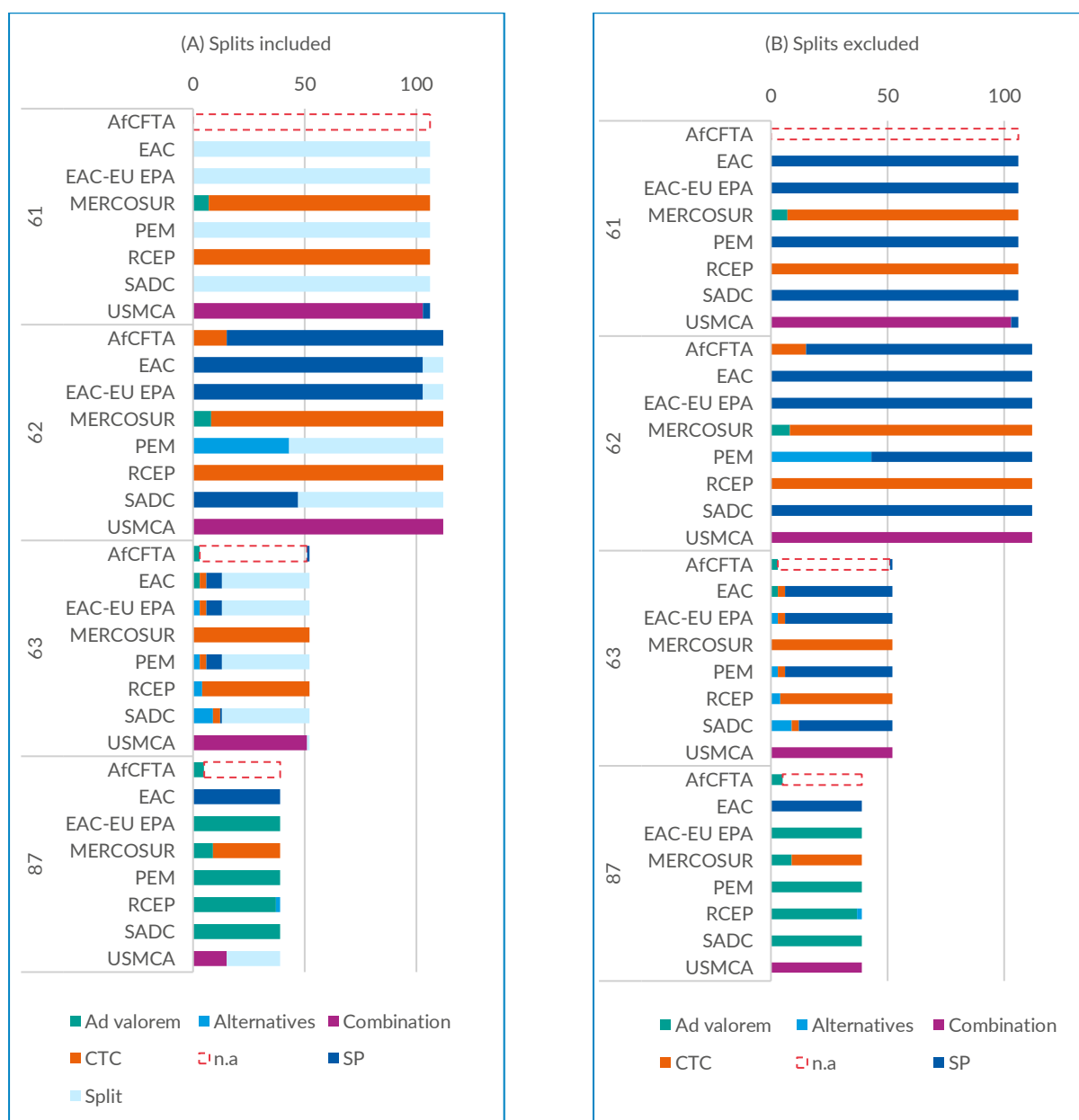
For vehicles:

- EAC-EU EPA, PEM, SADC & RCEP mainly use ad valorem criteria, either expressed in value addition or VNOM terms;
- USMCA shows a high degree of complexity and ramifications along the entire value chain;
- EAC provides for CKD and MERCOSUR for CTC-based rules mainly; and,
- Most rules are still being negotiated under the AfCFTA.

Whereas many splits were counted, unpacking the rules mostly shows SP criteria for textile products and vehicle combinations (see Figure 2).



Figure 2: Distribution of PSR criteria at the chapter level



The distribution in each agreement is detailed in Annex 1. Nevertheless, these observations merely inform on the drafting of the rule, not its stringency.

3.2. Analytical results

For most textiles and automotive PSRs, agreements have an average score of 0.2 and 0.3. This means a low level of drafting complexity, except for PEM and USMCA which have higher DCI scores (see Figure 3a).

At the chapter level, chapters 61, 62, and 87 have a DCI range between 0.3 and 0.5 (see Figure 3b). This can be explained by the fact that the vast majority of the PSRs are drafted using only one parameter (see Figure 4).

Figure 3: Complexity score by agreement and by chapter

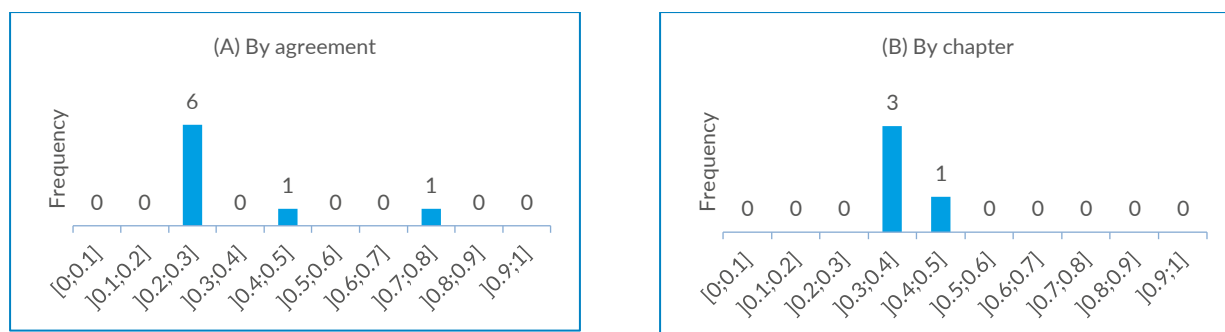
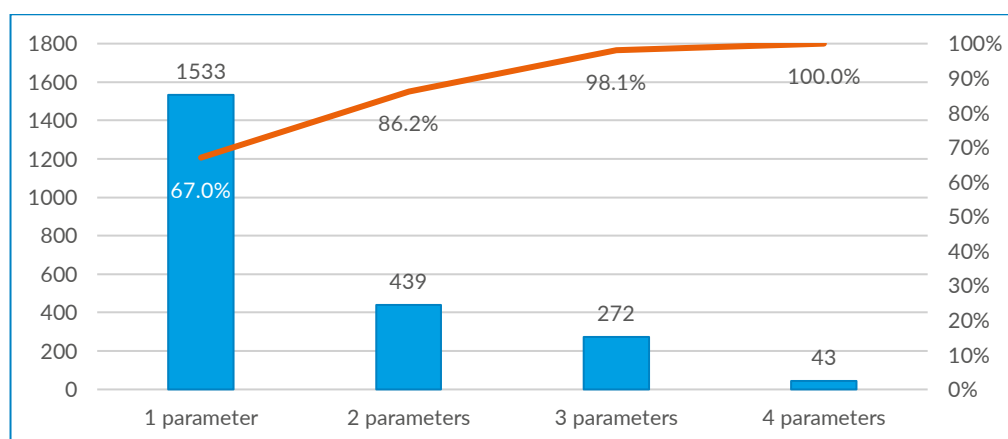


Figure 4: Repartition of PSRs by number of parameters



On average, PSRs under HS 63 have higher DCI scores than other textiles chapters, with only MERCOSUR, RCEP, and SADC having lower or equal scores for HS 61 and 62 than for HS 63. Regarding HS 87, only two out of the eight have scored higher than the average (see Table 5).

Table 5: Average drafting complexity score by agreement and by chapter

Chapter	AfCFTA	EAC	EAC-EU EPA	MERCOSUR	PEM	RCEP	SADC	USMCA	Total
61		0.25	0.25	0.27	0.50	0.27	0.25	0.76	0.36
62	0.25	0.27	0.27	0.27	0.50	0.27	0.25	0.75	0.35
63	0.31	0.47	0.47	0.25	0.50	0.25	0.25	0.75	0.42
87	0.25	0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
Total	0.25	0.29	0.29	0.26	0.47	0.26	0.28	0.78	0.37

3.3. Sectoral analyses

3.3.1. Textiles



For most textiles PSRs, the agreements' DCI scores show a wider distribution between 0.2 and 0.8. Chapters 61, 62 and 87 range between 0.3 and 0.5 (see Figure 5).

Again, this can be explained by the fact that most PSRs are drafted using only one parameter (see Figure 6).

As indicated above, whereas HS 61 and 62 have average complexity scores close to one another, the average complexity score for HS 63 is significantly higher. This is notably due to the difference observed under the EAC and EAC-EU EPA (see Figure 7).

Figure 5: Textiles PSR complexity score by agreement and by chapter

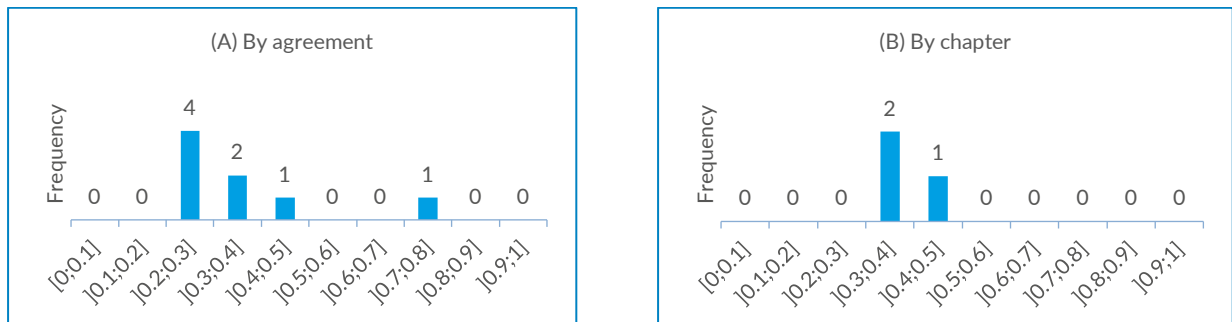


Figure 6: Repartition of textiles PSRs by number of parameters

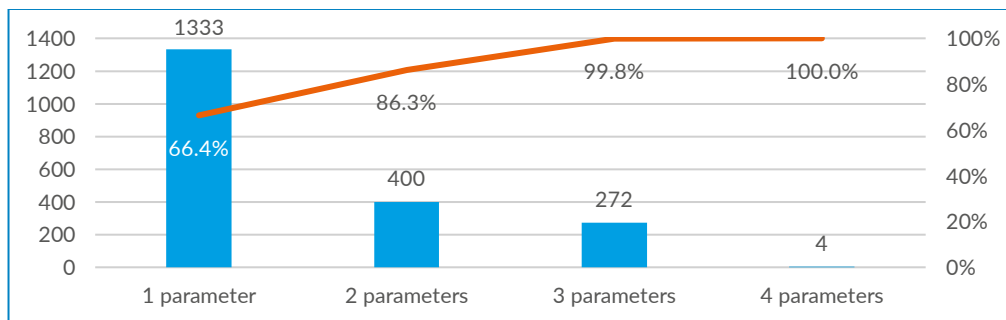
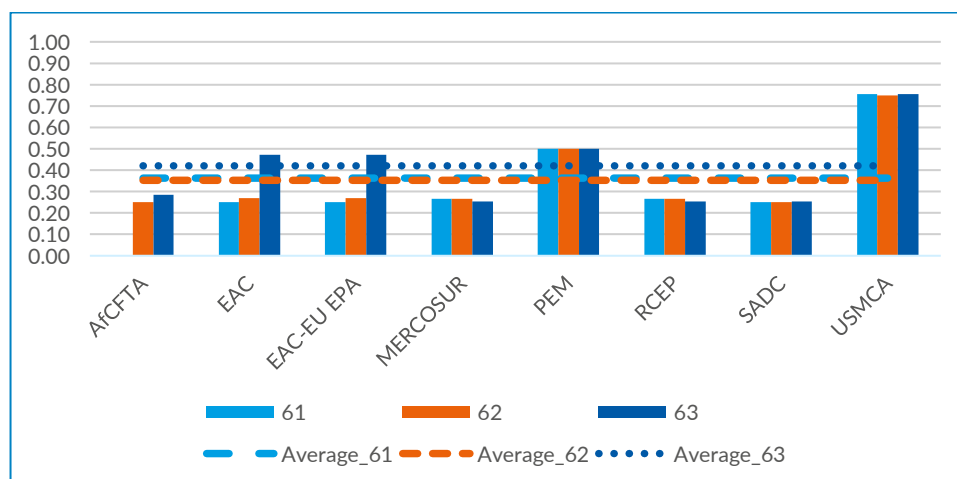


Figure 7: Textiles scores by chapter and agreement against the chapter average



3.3.1.1. Knitted or crocheted apparel



At the chapter level, higher scores are observed under MERCOSUR, RCEP and USMCA for:

- 61.08: Women's or girls' slips, petticoats, briefs, panties, nightdresses, pyjamas, negligees, bathrobes, dressing gowns and similar articles, knitted or crocheted
- 61.11: Babies' garments and clothing accessories, knitted or crocheted
- 61.13: Garments, made up of knitted or crocheted fabrics of heading 59.03, 59.06 or 59.07

The reasons for this are discussed in Section 4.

Table 6: Average drafting complexity score by agreement and by heading (HS 61)

Heading	AfCFTA	EAC	EAC-EU EPA	MER- COSUR	PEM	RCEP	SADC	USMCA	Total
6101		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
6102		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
6103		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
6104		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
6105		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
6106		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
6107		0.25	0.25	0.25	0.50	0.25	0.25	0.78	0.36
6108		0.25	0.25	0.32	0.50	0.32	0.25	0.80	0.38
6109		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
6110		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
6111		0.25	0.25	0.50	0.50	0.50	0.25	0.75	0.43
6112		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
6113		0.25	0.25	0.50	0.50	0.50	0.25	0.75	0.43
6114		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
6115		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
6116		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
6117		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
Total		0.25	0.25	0.27	0.50	0.27	0.25	0.76	0.36

3.3.1.2. Not knitted or crocheted apparel



At chapter level, higher scores are observed under EAC and EAC-EU EPA for:

- 62.13 (Handkerchiefs);
- 62.14 (Shawls, scarves, mufflers, mantillas, veils and the like);
- 62.17 (Other made-up clothing accessories; parts of garments or of clothing accessories, other than those of heading 62.12).

Additionally, similarly under MERCOSUR and RCEP for:

- 62.08 (Women's or girls' singlets and other vests, slips, petticoats, briefs, panties, nightdresses, pyjamas, negligees, bathrobes, dressing gowns and similar articles);
- 62.09 (Babies' garments and clothing accessories);
- 62.10 (Garments, made up of fabrics of heading 56.02, 56.03, 59.03, 59.06 or 59.07).

The reasons for this are discussed under Section 4.

Table 7: Average drafting complexity score by agreement and by heading (HS 62)

Heading	AfCFTA	EAC	EAC-EU EPA	MERCOSUR	PEM	RCEP	SADC	USMCA	Total
6201	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
6202	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
6203	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
6204	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
6205	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
6206	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
6207	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
6208	0.25	0.25	0.25	0.34	0.50	0.34	0.25	0.75	0.37
6209	0.25	0.25	0.25	0.50	0.50	0.50	0.25	0.75	0.41
6210	0.25	0.25	0.25	0.30	0.50	0.30	0.25	0.75	0.36
6211	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
6212	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
6213	0.25	0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.41
6214	0.25	0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.41
6215	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
6216	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
6217	0.25	0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.41
Total	0.25	0.27	0.27	0.27	0.50	0.27	0.25	0.75	0.35

3.3.1.3. Other made-up textile articles



Multiple variations are recorded:

- Under USMCA, 63.03 (Curtains (including drapes) and interior blinds; curtain or bed valances);
- Under PEM, 63.05 (Sacks and bags, of a kind used for the packing of goods);
- Under MERCOSUR and RCEP, 63.07 (Other made-up articles, including dress patterns);
- Under all except MERCOSUR, RCEP and USMCA, bump for 63.08 (Sets consisting of woven fabric and yarn, whether or not with accessories, for making up into rugs, tapestries, embroidered tablecloths or serviettes, or similar textile articles, put up in packings for retail sale).

The reasons for this are discussed in Section 4.

Table 8: Average drafting complexity score by agreement and by heading (HS 63)

Heading	AfCFTA	EAC	EAC-EU EPA	MERCOSUR	PEM	RCEP	SADC	USMCA	Total
6301		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
6302		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
6303		0.50	0.50	0.25	0.50	0.25	0.25	0.80	0.44
6304		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
6305		0.50	0.50	0.25	0.75	0.25	0.25	0.75	0.46
6306		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
6307	0.25	0.25	0.25	0.33	0.25	0.33	0.25	0.75	0.33
6308	0.50	0.50	0.50	0.25	0.50	0.25	0.50	0.75	0.47
6309	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.75	0.31
6310	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.75	0.31
Total	0.29	0.47	0.47	0.25	0.50	0.25	0.25	0.75	0.42

3.3.2. Vehicles



For most vehicle PSRs, the agreement scores show a wider distribution between 0.2 and 0.3, except for SADC and USMCA (see Figure 8).

Again, this can be explained by the fact that most PSRs are drafted using only one parameter (see Figure 9). Whereas most have scores below the average, the two aforementioned agreements are higher, with one being over twice as high as the average, showing a wide dispersion of the scores across the dataset (see Figure 10).

Figure 8: Vehicles PSR complexity score

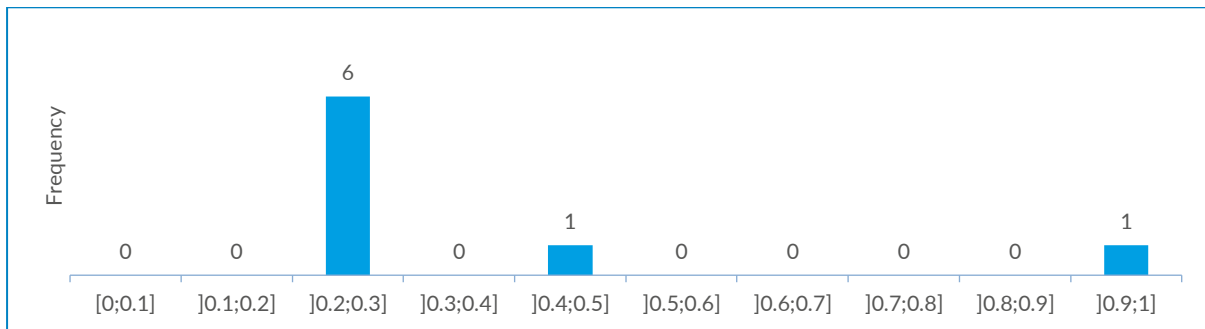


Figure 9: Repartition of Vehicles PSRs by number of parameters

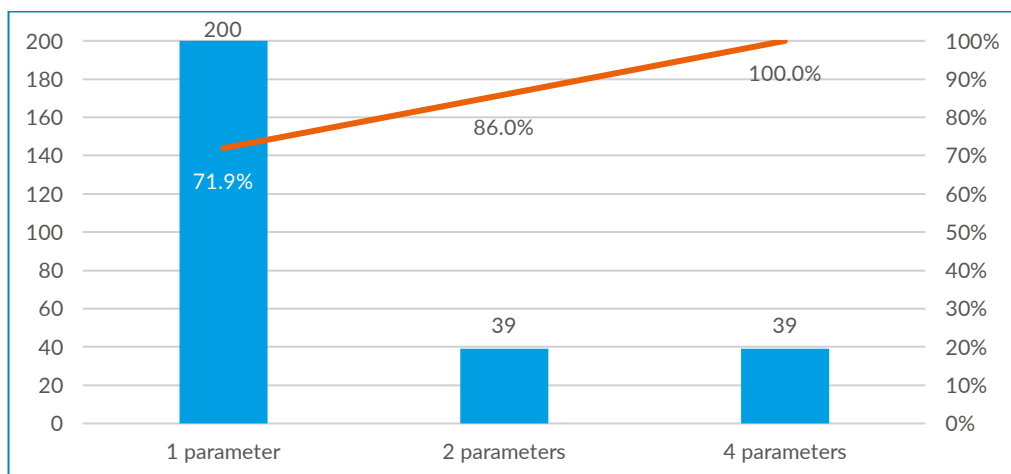


Figure 10: Vehicles scores against the chapter average

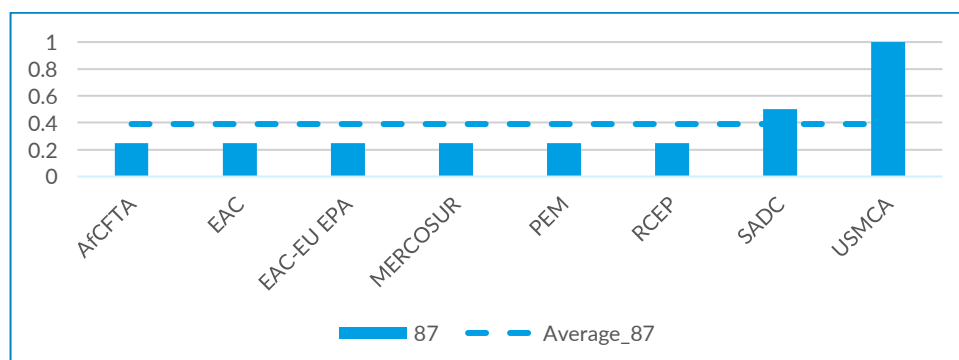


Table 9: Average drafting complexity score by agreement and by heading (HS 87)

Heading	AfCFTA	EAC	EAC-EU EPA	MER- COSUR	PEM	RCEP	SADC	USMCA	Total
8701		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
8702	0.25	0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.38
8703		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
8704		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
8705		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
Total	0.25	0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39

4. Discussion

4.1. What does the DCI show?

4.1.1. HS 61

The DCI score differences can be attributed to the PSRs under three agreements for briefs and panties made of any materials (i.e. all goods classified under 6108.2x). It is to be noted that under the USMCA, the difference is only observed for briefs and panties in cotton (HS 6108.21).

In detail, it is observed that for MERCOSUR and RCEP, the difference is merely induced by a technical update of the HS nomenclature. For the USMCA, the difference is due to the introduction of alternative criteria aimed at facilitating compliance rather than complexifying it (see Table 10). For methodological reasons, only the first criterion was considered in the statistical description. This, however, points to the fact that the high degree of precision of the rule increases the degree of complexity. For this reason, the interpretation of the rules might likely require a high level of sectoral knowledge from the economic operators, the certifying competent authorities, and the customs administrations.

Table 10: Comparison of the explanations for differential treatment under HS 6108.2x

	MERCOSUR	RCEP	USMCA
6108.21	Technical exclusion due to HS update	Technical exclusion due to HS update	Introduction of alternative rules: - SP or CC excl. + SP
6108.22	Technical exclusion due to HS update	Technical exclusion due to HS update	
6108.29	Technical exclusion due to HS update	Technical exclusion due to HS update	

In addition, as for 6108.2x, the differences under MERCOSUR and RCEP are to be attributed to the technical HS update. There is no difference for 61.11 and 61.13 compared to other intra-chapter PSRs under the USMCA.

4.1.2. HS 62

As for HS 61, the differences with the rest of the chapter under MERCOSUR and RCEP can be attributed to the technical HS update for:

- 62.08 (Women's or girls' singlets and other vests, slips, petticoats, briefs, panties, nightdresses, pyjamas, negligees, bathrobes, dressing gowns and similar articles);
- 62.09 (Babies' garments and clothing accessories);

- 62.10 (Garments, made up of fabrics of heading 56.02, 56.03, 59.03, 59.06 or 59.07).

Regarding the PSRs for 62.13, 62.14 and 62.17 under the EAC and EAC-EU EPA, they are exceptions to the chapter rules as follows:

Table 11: Comparison of PSRs for products classified under 62.13, 62.14 and 62.17 under the EAC and EAC-EU EPA

	EAC	EAC-EU EPA
ex Chapter 62	Manufacture from fabric	Manufacture from fabric
6213 & 6214	Weaving accompanied by making-up (including cutting) Or Manufacture from unembroidered fabric, provided that the value of the unembroidered fabric used does not exceed 47.5% of the ex-works price of the product Or Making-up preceded by printing accompanied by at least two preparatory or finishing operations (such as scouring, bleaching, mercerising, heat setting, raising, calendering, shrink resistance processing, permanent finishing, decatizing, impregnating, mending and burling), provided that the value of the unprinted fabric used does not exceed 47.5% of the ex-works price of the product	Weaving accompanied by making-up (including cutting) Or Making-up preceded by printing accompanied by at least two preparatory or finishing operations (such as scouring, bleaching, mercerising, heat setting, raising, calendering, shrink resistance processing, permanent finishing, decatizing, impregnating, mending and burling), provided that the value of the unprinted fabric used does not exceed 50% of the ex-works price of the product Or Manufacture from unembroidered fabric provided the value of the unembroidered fabric used does not exceed 40% of the ex-work price of the product
If embroidered		
If other	Weaving accompanied by making-up (including cutting) Or Making-up preceded by printing accompanied by at least two preparatory finishing operations (such as scouring, bleaching, mercerising, heat setting, raising, calendering, shrink resistance processing, permanent finishing, decatizing, impregnating, mending and burling), provided that the value of the unprinted fabric used does not exceed 47.5% of the ex-works price of the product	Weaving accompanied by making-up (including cutting) Or Making-up preceded by printing accompanied by at least two preparatory finishing operations (such as scouring, bleaching, mercerising, heat setting, raising, calendering, shrink resistance processing, permanent finishing, decatizing, impregnating, mending and burling), provided that the value of the unprinted fabric used does not exceed 50% of the exworks price of the product
6217	Weaving accompanied by making-up (including cutting) Or Manufacture from unembroidered fabric, provided that the value of the unembroidered fabric used does not exceed 47.5% of the ex-works price of the product	Weaving accompanied by making-up (including cutting) Or Manufacture from unembroidered fabric provided the value of the unembroidered fabric used does not exceed 40% of the ex-work price of the product
If : Embroidered		
If : Fire-resistant equipment of fabric covered with foil of aluminized polyester	Weaving accompanied by making-up (including cutting) Or Coating provided that the value of the uncoated fabric used does not exceed 47.5% of the ex-works price of the product accompanied by making-up	Weaving accompanied by making-up (including cutting) Or Coating provided that the value of the uncoated fabric used does not exceed 40% of the ex-works price of the product accompanied by making-up

	(including cutting)	(including cutting)
If : Interlinings for collars and cuffs, cut out	Manufacture from materials of any Heading, except that of the product	Manufacture from materials of any heading, except that of the product, and in which the value of all the materials used does not exceed 40% of the ex-works price of the product

The example demonstrates that the DCI alone cannot be deemed a proxy for restrictiveness as the rules have the same DCI, using identical wordings yet with different economic effects due to the differences in VNOM ceilings.

4.1.3. HS 63

As for HS 61 and 62, the differences with the rest of the chapter under MERCOSUR and RCEP can be attributed to the technical HS update for 6309.90 (Made up articles, including dress patterns, other than floor-cloths, dish-cloths, dusters and similar cleaning cloths; and life-jackets and life-belts).

4.1.4. HS 6303

Under the USMCA, the slightly higher score for HS 63.03 is explained by a different rule for 6303.92 (not knitted or crocheted curtains (including drapes) and interior blinds; curtain or bed valances of synthetic fibres) (see Table 12).

Table 12: PSRs for products classified under HS 63.03

Subhead-ing	CC, excl. + SP	SP + SP	Total	Subhead-ing	CC, excl. + SP	SP + SP	Total
630312	1		1	630312	0.75		0.75
630319	1		1	630319	0.75		0.75
630391	1		1	630391	0.75		0.75
630392		1	1	630392		1.00	1.00
630399	1		1	630399	0.75		0.75
Grand Total	4	1	5	Grand Total	0.75	1.00	0.80

The main difference is that the curtains are to be processed from materials with given specifications, which makes the wording very specific and detailed.

4.1.5. HS 6305

For HS 63.05 under PEM, the rule for curtains uses the same criterion as for the rest of the chapter (i.e. an SP criterion). However, for goods of HS 63.05, the rule differs with more parameters than the rest of the chapter and a different economic effect (see Table 13).

Table 13: PSRs for products classified under 63.05 under the PEM

	PEM
ex Chapter 63	Manufacture from materials of any heading, except that of the product
6305	Extrusion of man-made fibres or spinning of natural and/or man-made staple fibres, combined with weaving or with knitting and making-up including cutting of fabric

4.2. Are there any impacts?

4.2.1. Social effects

As highlighted above, the transposition of the rules into new HS versions induced some differences in terms of complexity in some areas of the dataset, notably under Chapter 62.

A hypothesis emerging from this observation is that DCI differences exist between clothing items classified for women's use and those classified for men's use.

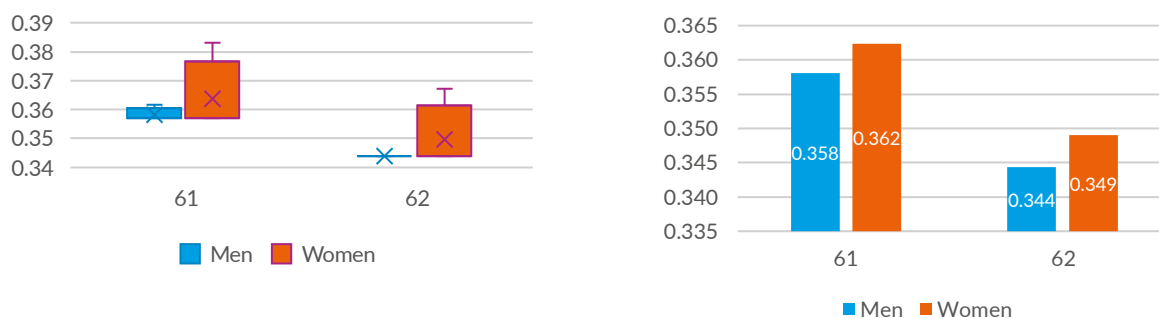
Following the reaggregation of goods explicitly classified based on gender use under HS chapters 61 and 62 (see Table 14), some gender-based DCI differences appear at the aggregate level (see Figure 11).

Table 14: Gender-based DCI, chapters 61 & 62

	Gender	61	62
xx.01	Men	0.3125	0.3125
xx.02	Women	0.3125	0.3125
xx.03	Men	0.3125	0.3125
xx.04	Women	0.316406	0.335227
xx.05	Men	0.34375	0.34375
xx.06	Women	0.34375	0.34375
xx.07	Men	0.34375	0.34375
xx.08	Women	0.34375	0.367188



Figure 11: Gender-based DCIs, HS Chapters 61 & 62



These differences are mainly explained by the rules' HS update-induced differences and the localised difference under the USMCA (see Table 15).

Table 15: Gender-based DCI, by agreement

Row Labels	Female	Male
61	0.319	0.314
AfCFTA		
EAC	0.250	0.250
EAC-EU EPA	0.250	0.250
MERCOSUR	0.269	0.250
PEM	0.500	0.500
RCEP	0.269	0.250
SADC	0.250	0.250
USMCA	0.763	0.760
62	0.348	0.344
AfCFTA		
EAC	0.250	0.250
EAC-EU EPA	0.250	0.250
MERCOSUR	0.268	0.250
PEM	0.500	0.500
RCEP	0.268	0.250
SADC	0.250	0.250
USMCA	0.750	0.750

4.2.2. Environmental effects

Following the same approach, the DCIs for textiles were aggregated by fibre types and for vehicles by engine types. However, no significant DCI differences were shown.

5. Preliminary conclusions

5.1. Main takeaways

- Echoing the 2017 WCO comparative analysis,⁸ the DCI scores match well with the significant origin systems

⁸ Cf. (WCO, 2017)

- DCI does not equate to stringency. However, some elements can be suspected to have some degree of correlation. More research is needed to ascertain whether there is any possible correlation with stringency
- Simpler language is likely to facilitate the rules' utilisation purposes by economic operators – notably MSMEs –, as well as for the competent authorities and customs administrations.

The research finds more sophisticated drafting styles for women's clothing items than men's. This can be explained by two main factors:

- Technical updates of the HS classification introduced additional parameters due to migration of a subset of goods under a different heading. For this reason, updating increased the DCI for some PSRs comprising of women's goods. The effect of this update thus introduced a gendered effect in CTC-based RoO
- In a very few instances, the gendered effect discussed above was already present in the original PSR instruments, suggesting very localised voluntary differentiation for these women's goods
- Additional plausible implications having a pink tax equivalent effect are plausible. More research is needed to ascertain it.

The research does not find any significant difference in sophistication drafting styles for:

- Textiles (analysed by fibre types (e.g. natural or man-made fibres)) or
- Vehicles (analysed by engine types (e.g. heat, hybrid or electric engines)).

This can be explained by the fact that the products considered only cover entire vehicles, though the PSRs applicable to the engines are found elsewhere.

It is possible that a more differentiated impact can be found in upstream segments of the value chain, notably tier 2 (e.g., engines, bodies, etc.). More research might be needed to investigate the matter.

5.2. Recommendations

- A balance should be struck between using plain, simple language which may ease of their use for non-sector specialist users, on the one hand, and technical, expert language which guarantees a higher level of precision and technical accuracy. In cases where agreements are drafted in technical or complex languages, parties are encouraged to have accompanying manuals that provide simpler explanations. It is also important to continually sensitize stakeholders on the agreements.
- To further enhance research on the DCI, it needs to be compared with other FTA indices, such as tariff structures. This comparison will help establish a possible relationship between language complexity and policy objectives. Another area of research is comparing the DCI with the cost of compliance index, AVE, to establish a link between language complexity and preference attractiveness.
- It is also recommended to expand the research to cover more FTAs and economic sectors.

- Finally, the research shows the effect of HS amendments on RoO and the importance of updating the RoO to ensure technically sound implementation of the agreements, as well as identify possible areas for simplification.

5.3. Works cited

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ANNEXES

Annex 1 – Transposition report

In the chapters under consideration for this study,

- the amendments to HS 2017 do not affect CTH rules. Indeed, all the amendments remain within the same headings, without any implications for other headings;
- the amendments to HS 2012 do not affect CTH rules. Indeed, all the amendments remain within the same headings, without any implications for other headings;
- the amendments to HS 2007 affect ‘Sanitary towels (pads) and tampons, napkins and napkin liners for babies and similar articles, of any material’, as follows. The other amendments remain within the same headings, without any implications for other headings. These affected the MERCOSUR and RCEP rules;

Table 16: Amendments of HS 2007 affecting CTH-based rules

HS 2007	HS 2012
6108.21	6108.21 ex9619.00
6108.22	6108.22 ex9619.00
6108.29	6108.29 ex9619.00
6111.20	6111.20 ex9619.00
6111.30	6111.30 ex9619.00
6111.90	6111.90 ex9619.00
6113.00	6113.00 ex9619.00
6208.91	6208.91 ex9619.00
6208.92	6208.92 ex9619.00
6208.99	6208.99 ex9619.00
6209.20	6209.20 ex9619.00
6209.30	6209.30 ex9619.00
6209.90	6209.90 ex9619.00
6210.50	6210.50 ex9619.00
6307.90	6307.90 ex9619.00

- the amendments of HS 2002 do not affect CTH rules. Indeed, all the amendments remain within the same headings, without any implications for other headings;
- the amendments of HS 1996 do not affect CTH rules. Indeed, all the amendments remain within the same headings, without any implications for other headings.

Annex 2 – Technical report on the statistical description of PSRs

Agreement	Textiles	Automotive		
AfCFTA	Row Labels	Count of Key	Row Labels	Count of Key
	Ad valorem	3	Ad valorem	5
	CTC	15	n.a	34
	n.a	154	Total	39
	SP	98		
	Total	270		
EAC	Row Labels	Count of Key	Row Labels	Count of Key
	Ad valorem	3	SP	39
	CTC	3	Total	39
	SP	110		
	Split	154		
	Total	270		
EAC-EU EPA	Row Labels	Count of Key	Row Labels	Count of Key
	Alternatives	3	Ad valorem	39
	CTC	3	Total	39
	SP	110		
	Split	154		
	Total	270		
MERCOSUR	Row Labels	Count of Key	Row Labels	Count of Key
	Ad valorem	15	Ad valorem	9
	CTC	255	CTC	30
	Total	270	Total	39
PEM	Row Labels	Count of Key	Row Labels	Count of Key
	Alternatives	46	Ad valorem	39
	CTC	3	Total	39
	SP	7		
	Split	214		
	Total	270		
RCEP	Row Labels	Count of Key	Row Labels	Count of Key
	Alternatives	4	Ad valorem	37
	CTC	266	Alternatives	2
	Total	270	Total	39
SADC	Row Labels	Count of Key	Row Labels	Count of Key
	Alternatives	9	Ad valorem	39
	CTC	3	Total	39
	SP	48		
	Split	210		
	Total	270		
USMCA	Row Labels	Count of Key	Row Labels	Count of Key
	Combination	266	Combination	15
	SP	3	Split	24
	Split	1	Total	39
	Total	270		

Annex 3 – Sub-heading level drafting complexity scores

Subheading	AfCFTA	EAC	EAC-EU EPA	MER- COSUR	PEM	RCEP	SADC	USMCA	Total
610120		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610130		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610190		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610210		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610220		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610230		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610290		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610310		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610322		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610323		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610329		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610331		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610332		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610333		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610339		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610341		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610342		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610343		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610349		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610413		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610419		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610422		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610423		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610429		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610431		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610432		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610433		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610439		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610441		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610442		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610443		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610444		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610449		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610451		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610452		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610453		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610459		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610461		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610462		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610463		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610469		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610510		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610520		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610590		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610610		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610620		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36

610690	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610711	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610712	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610719	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610721	0.25	0.25	0.25	0.50	0.25	0.25	1.00	0.39
610722	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610729	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610791	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610799	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610811	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610819	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610821	0.25	0.25	0.50	0.50	0.50	0.25	1.00	0.46
610822	0.25	0.25	0.50	0.50	0.50	0.25	0.75	0.43
610829	0.25	0.25	0.50	0.50	0.50	0.25	0.75	0.43
610831	0.25	0.25	0.25	0.50	0.25	0.25	1.00	0.39
610832	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610839	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610891	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610892	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610899	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610910	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
610990	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611011	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611012	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611019	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611020	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611030	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611090	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611120	0.25	0.25	0.50	0.50	0.50	0.25	0.75	0.43
611130	0.25	0.25	0.50	0.50	0.50	0.25	0.75	0.43
611190	0.25	0.25	0.50	0.50	0.50	0.25	0.75	0.43
611211	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611212	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611219	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611220	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611231	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611239	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611241	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611249	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611300	0.25	0.25	0.50	0.50	0.50	0.25	0.75	0.43
611420	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611430	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611490	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611510	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611521	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611522	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611529	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611530	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611594	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611595	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611596	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36

611599		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611610		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611691		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611692		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611693		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611699		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611710		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611780		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
611790		0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.36
620111	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620112	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620113	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620119	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620191	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620192	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620193	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620199	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620211	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620212	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620213	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620219	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620291	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620292	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620293	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620299	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620311	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620312	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620319	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620322	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620323	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620329	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620331	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620332	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620333	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620339	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620341	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620342	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620343	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620349	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620411	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620412	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620413	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620419	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620421	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620422	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620423	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620429	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620431	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620432	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620433	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620439	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34

620441	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620442	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620443	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620444	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620449	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620451	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620452	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620453	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620459	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620461	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620462	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620463	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620469	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620520	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620530	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620590	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620610	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620620	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620630	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620640	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620690	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620711	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620719	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620721	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620722	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620729	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620791	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620799	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620811	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620819	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620821	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620822	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620829	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
620891	0.25	0.25	0.25	0.50	0.50	0.50	0.25	0.75	0.41
620892	0.25	0.25	0.25	0.50	0.50	0.50	0.25	0.75	0.41
620899	0.25	0.25	0.25	0.50	0.50	0.50	0.25	0.75	0.41
620920	0.25	0.25	0.25	0.50	0.50	0.50	0.25	0.75	0.41
620930	0.25	0.25	0.25	0.50	0.50	0.50	0.25	0.75	0.41
620990	0.25	0.25	0.25	0.50	0.50	0.50	0.25	0.75	0.41
621010	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
621020	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
621030	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
621040	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
621050	0.25	0.25	0.25	0.50	0.50	0.50	0.25	0.75	0.41
621111	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
621112	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
621120	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
621132	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
621133	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
621139	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
621142	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34

621143	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
621149	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
621210	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
621220	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
621230	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
621290	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
621320	0.25	0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.41
621390	0.25	0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.41
621410	0.25	0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.41
621420	0.25	0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.41
621430	0.25	0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.41
621440	0.25	0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.41
621490	0.25	0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.41
621510	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
621520	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
621590	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
621600	0.25	0.25	0.25	0.25	0.50	0.25	0.25	0.75	0.34
621710	0.25	0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.41
621790	0.25	0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.41
630110		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630120		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630130		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630140		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630190		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630210		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630221		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630222		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630229		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630231		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630232		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630239		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630240		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630251		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630253		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630259		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630260		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630291		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630293		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630299		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630312		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630319		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630391		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630392		0.50	0.50	0.25	0.50	0.25	0.25	1.00	0.46
630399		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630411		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630419		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630420		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630491		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630492		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630493		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630499		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43

630510		0.50	0.50	0.25	0.75	0.25	0.25	0.75	0.46
630520		0.50	0.50	0.25	0.75	0.25	0.25	0.75	0.46
630532		0.50	0.50	0.25	0.75	0.25	0.25	0.75	0.46
630533		0.50	0.50	0.25	0.75	0.25	0.25	0.75	0.46
630539		0.50	0.50	0.25	0.75	0.25	0.25	0.75	0.46
630590		0.50	0.50	0.25	0.75	0.25	0.25	0.75	0.46
630612		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630619		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630622		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630629		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630630		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630640		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630690		0.50	0.50	0.25	0.50	0.25	0.25	0.75	0.43
630710	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.75	0.31
630720	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.75	0.31
630790	0.25	0.25	0.25	0.50	0.25	0.50	0.25	0.75	0.38
630800	0.50	0.50	0.50	0.25	0.50	0.25	0.50	0.75	0.47
630900	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.75	0.31
631010	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.75	0.31
631090	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.75	0.31
870110		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870120		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870130		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870191		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870192		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870193		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870194		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870195		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870210	0.25	0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.38
870220	0.25	0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.38
870230	0.25	0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.38
870240	0.25	0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.38
870290	0.25	0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.38
870310		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870321		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870322		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870323		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870324		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870331		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870332		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870333		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870340		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870350		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870360		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870370		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870380		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870390		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870410		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870421		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870422		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39

870423		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870431		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870432		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870490		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870510		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870520		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870530		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870540		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
870590		0.25	0.25	0.25	0.25	0.25	0.50	1.00	0.39
Total	0.25	0.29	0.29	0.26	0.47	0.26	0.28	0.78	0.37



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