



MINISTRY OF ECONOMIC
DEVELOPMENT AND TRADE
OF UKRAINE

STUDY

CROSS-SECTOR EXPORT STRATEGY 2019-2023



TRANSPORTATION AND TRADE FACILITATION



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Positions, conclusions and/or recommendations laid down in this Strategy may not conform wholly or partially with the official position of an organization, which representatives contributed to the text of the Strategy, as well as the position of the International Trade Centre and Non-Governmental Union “Foundation for Support of Reforms in Ukraine” and German government through Deutsche Gesellschaft für internationale Zusammenarbeit (GIZ) GmbH.

The document benefited particularly from the inputs and guidance provided by the members of the TFL cross-sector core team that steered the formulation of the sector Strategy, namely:

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The full list of public and private stakeholders who contributed to the design of this Strategy is detailed in Appendix 1.

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EXECUTIVE SUMMARY

Trade facilitation and efficient trade logistics (the “TFL”) play key roles in a country’s export competitiveness. Efficient export and import procedures, competitive transport and logistics services and predictable and transparent rules and procedures reduce uncertainty and costs for businesses. TFL reforms aim to reduce costs and improve efficiency of trade for a country’s enterprises. An effective TFL system is also now a critical prerequisite for a country’s businesses’ participation in Global Value Chains.

Ukraine’s geographic position offers the country a considerable potential to position itself as a transit point between the EU and countries to its east. As with most countries, the development of Ukraine’s logistics sector has broadly followed economic developments, which saw a downward trend after the 2007/08 financial crisis, but has recently shown signs of stabilisation and some improvement. Freight volumes have been increasing, with the road network accounting for most of the increase in transport. Railways have seen some decrease.

Compared with regional countries, Ukraine performs relatively well in trade facilitation topics such as consultations and appeals, although it needs to strengthen border cooperation, automation, procedures, advance tax rulings and information. The WTO Trade Facilitation Agreement (the “TFA”) is currently the principal driver of TF reform in developing and emerging market countries, with Ukraine ratifying its participation in the agreement in 2015.

The implementation of TFA measures will on average reduce trade costs by between 13.7% and 17.4%¹. Uniform forms and documents, risk management and single window are seen as the most important measures being implemented under the TFA, while those such as customs brokers, rights of appeal and detention are among those assigned the lowest priority. Paperless trade measures are currently particularly popular, offering significant potential for reducing trade costs and improving efficiency.

Ukraine’s TFL integration with the EU, both in respect of physical infrastructure and legislation and regulations is one of the key objectives of reform in this sector. A number of transport and TF policy and strategic initiatives have been proposed in the country in recent years, to address barriers to TFL. However, there has been limited implementation of some projects. As a result, TFL reform has been usually ad hoc and limited in scope and impact, with major pieces of legislation in areas such as customs reform stalling or progressing very slowly through Parliament. For some questions, there is a limited coordination and no shared vision among the different ministries and agencies of the government, leading to disagreements on the direction of reform.

The following key interventions are priorities in order to ease further trade facilitation:

- Improving institutional coordination between government agencies, as well as with external border agencies to develop a more coherent approach to support exporters;
- Strengthening human resource capacity of agencies and ministries and improving infrastructure at borders and within the country to facilitate transit of export goods;
- Implementing necessary legislation and regulations to improve efficiency and reduce processing costs for exporters.

The following is a delineation of the proposed vision and strategic objectives of this Strategy. The vision statement was agreed upon by all stakeholders of the Trade Facilitation and Logistics cross-sector in Ukraine:

A transparent, coordinated, simplified and integrated trade facilitation and logistics system that supports the delivery of quality services

The strategic Plan of Action (PoA) responds to this vision by addressing key constraints and leveraging opportunities in a comprehensive manner. Particular efforts will be made in the following strategic and operational objectives:

¹ OECD (2015). Implementation of the WTO Trade Facilitation Agreement: The Potential Impact on Trade Costs. OECD Trade Policy Note.



Coordinating activities, monitoring progress and mobilizing resources for implementation will be critical to successful achievement of these targets.

DEFINITIONS USED IN THIS DOCUMENT

Trade facilitation (the "TF") is defined with varying focus by different international organizations, based on their mandate. One of the most prevalent definitions is that produced by WTO, as being *"the simplification and harmonization of international trade procedures"; with trade procedures being "the activities, practices and formalities involved in collecting, presenting, communications and processing data required for the movements of goods in international trade"*². Wider definitions, which are being increasingly adopted, include transport, banking (e.g. trade finance) and insurance, business practices and telecommunications. The aim of TF measures is to simplify, harmonize, standardize and increase the transparency of international trade procedures.

General Agreement on Trade in Services (the "GATS") defines **trade facilitation services** by their modes of supply:

- Mode 1: pure cross-border (e.g., cross-border supply of services through the internet);
- Mode 2: movement of consumer (e.g., tourism);
- Mode 3: commercial presence (e.g., supply of banking services through foreign branches);
- Mode 4: temporary movement of service providers (e.g., IT workers on work permit).

Mode 3 is typically the preferred channel of services trade delivery, although Mode 1 is becoming increasingly important³.

The World Bank describes **logistics** as "a network of services that support the physical movement of goods, trade across borders, and commerce within borders. It comprises an array of activities beyond transportation, including warehousing, brokerage, express delivery, terminal operations, and related data and information management"⁴.

OECD - Organization for Economic Co-operation and Development

TFI - Trade Facilitation Indicators

WTO - World Trade Organization

UNCTAD - United Nations Conference on Trade and Development

TRASECA - Transport Corridor Europe-Caucasus-Asia

NCTS - NewCustomTransitSystem

BCP - Border Crossing Points

TFL - Trade Facilitation and Logistics

TEN-T - Trans-European Transport Network

² "Trade Facilitation in the WTO Context". Powerpoint presentation by Zoran Jolevski.

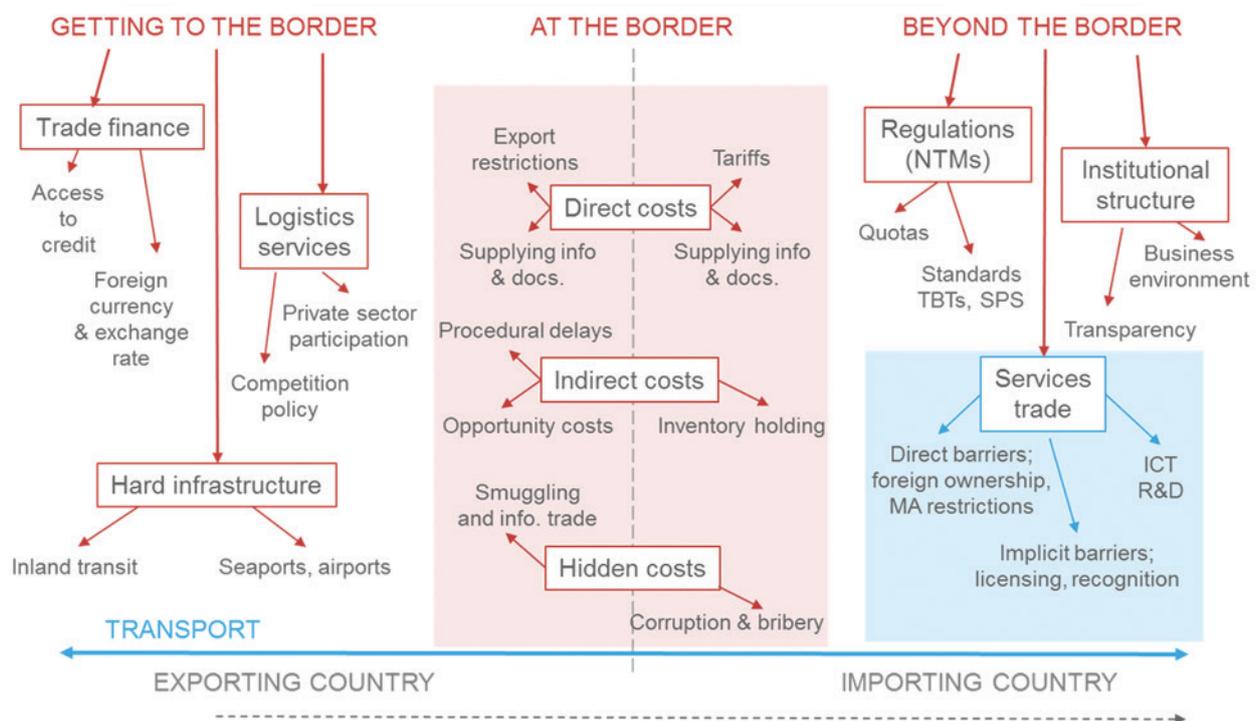
³ Aid for Trade at a Glance 2015: Reducing Trade Costs for Inclusive, Sustainable Growth. OECD/WTO. 2015.

⁴ Connecting to Compete 2018: Trade Logistics in the Global Economy. World Bank. 2018

TRADE FACILITATION AND LOGISTICS: INCREASING COMPETITIVENESS BY REDUCING DIRECT AND INDIRECT TRADE COSTS

Trade facilitation and efficient trade logistics play key part in a country's export competitiveness. Efficient export and import procedures, competitive transport services, predictable and transparent rules and procedures reduce the cost of doing business for companies. The key aim of the TFL reforms is to reduce costs and improve the efficiency of trade in business and services. These costs are incurred within, at and beyond a country's borders (see Figure 1).

Figure 1. Trade-related costs faced by exporters



Source: Trade costs: What have we learned? A synthesis report. OECD Trade Policy Paper No. 150. Evdokia Moïse and Florian Le Bris. April 2013

The main areas of trade costs relate to transport, border procedures and network infrastructure. According to a 2015 OECD survey, countries identified the main goods-related trade costs as transport infrastructure; border procedures/TF; non-tariff measures (including standards); access to trade finance; network infrastructure (ICT, power, telecoms); and tariffs, fees and other charges. Trade costs related to services can be higher than those in goods, and the most important ones highlighted were network infrastructure; transport infrastructure; non-recognition of professional qualifications, poor regulatory environment; and low skill levels. Restrictions on movements of people and in commercial presence were also identified as important⁵.

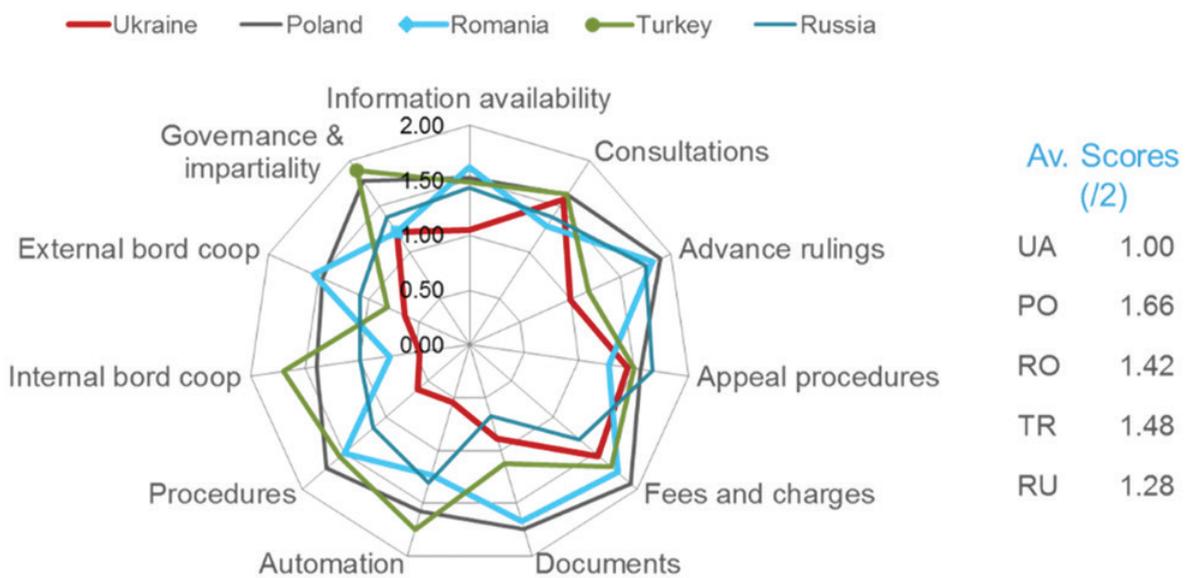
⁵OECD/WTO Aid for Trade monitoring exercise (2015)..

GLOBAL AND REGIONAL TF DEVELOPMENTS AND UKRAINE

◇ OECD Trade Facilitation Indicators

The OECD Trade Facilitation Indicators (TFI), which identify areas of potential TF reform action, highlight trends and differentiation between regions and countries of different income groupings. There is generally a direct correlation between countries' income levels and the effectiveness of their TF measures. Sub-Saharan Africa scores lowest in most TFI measures, whereas Europe and Central Asia scores the highest, the latter partly affected by streamlined European Union border procedures. Within the TFI indicators, border cooperation (particularly internal, but also external) typically scores the lowest, whilst areas such as fees and charges and procedures, which have been subjects of focus of recent reforms, score the highest⁶. Compared with regional countries, Ukraine needs to strengthen, in particular, border cooperation, automation, procedures, advance tax rulings and information availability (see Figure 2)⁷.

Figure 2. OECD Trade Facilitation Indicators 2017 Ukraine and neighbouring countries



Source: OECD

◇ Trading Across Borders

The TFI assessment is also reflected in Ukraine's relative position compared with regional countries in the World Bank Group Trading Across Borders (TAB) indicators, which measure the time and cost (excluding tariffs) associated with documentary compliance, border compliance and domestic transport. Ukraine was ranked 119 out of 189 countries in the 2018 TAB rankings, but progressed significantly to 78 in 2019. This progress reflects, inter alia, material improvements in reported border clearance efficiencies. Of its neighbours, in 2019 the Russian Federation ranked 99 and Turkey 42. The time and costs associated with documentary compliance for Ukraine's exporters were in 2018 highlighted as particular areas that required improvement. These have seen significant reductions in the 2019 TAB indicators. The respective time and costs have reduced between 2018 and 2019 from 96 to 66 hours and US \$ 292 to US \$ 192⁸.

◇ WTO Trade Facilitation Agreement and TF reform implementation

An important development in TF in recent years has been the WTO-led Trade Facilitation Agreement, which came into force in February 2017 upon ratification by two-thirds of WTO's

⁶ Aid for Trade at a Glance 2017: Promoting Trade, Inclusiveness and Connectivity for Sustainable Development - OECD / WTO 2017.

⁷ The average TFI scores (maximum 2) were: Ukraine 1.00, Russia 1.28, Romania 1.42, Turkey 1.48 and Poland 1.66.

⁸ <https://www.doingbusiness.org/content/dam/doingBusiness/country/u/ukraine/UKR.pdf>

164 members, although implementation of its measures had started earlier in many countries. With 39 technical measures, grouped into 12 articles, the TFA covers the spectrum of TF that its participants have agreed to strengthen. The TFA provides for technical assistance and capacity building (TACB) for developing and less developed country members, who are also offered the flexibility of implementing some activities during and after a transition period (Category B and C provisions, respectively). The OECD estimates that low and middle-income countries such as Ukraine will on average reduce trade costs by between 13.7% and 17.4% by implementing the TFA measures, the biggest contributions coming from streamlining border procedures (3.9%); harmonizing and streamlining trade documents (3.5%); and automation (2.9%)⁹. Implementation of TFA provisions has provided a major impetus for TF improvements in most developing and emerging market countries in recent years. Ukraine ratified its participation in the TFA in December 2015. The highest and lowest priority of TFA measures globally were published in an UNCTAD survey in 2014 (see Box 1)¹⁰.

Box 1. TFA Measures Ranked by Priority for Implementation

Top 10 Highest Priority Measures	Top 10 Lowest Priority Measures
1. Uniform Forms and Documents re Clearance	1. Customs Brokers
2. Risk Management	2. Declaration on Transhipped/In-Transit Goods
3. Single Window	3. Expedited Shipments
4. Post-clearance Audit	4. Detention
5. Border Agency Cooperation	5. Separation of Release from Final Determination and Payment
6. Publication of Information	6. Inward Outward Processing
7. Reduction of Form and Documents	7. Interval between Publication and Entry into Force
8. Use of International Standards	8. Review of Formalities and Documents
9. Enquiry Points	9. Right of Appeal
10. Test Procedures	10. Disciplines on Fees and Charges

Source: UNCTAD

Implementation of TF reforms and the need to reduce trade-related cost are essential for companies to integrate in Global Value Chains. The TFA priorities highlighted by countries are reflected in actual implementation of TF reform measures globally, although this varies significantly between regions (and between countries within a region). In addition to the TFA, the need to reduce trade-related costs as a key pre-requisite for participating in Global Value Chains (GVCs) continues to provide motivation for TFL reforms.

The average implementation rate of TF reform measures is 60%, with South and East Europe, Caucasus and Central Asia's implementation rate at 57%, Ukraine's implementation rate at 49%. The FYR Macedonia had the highest regional implementation rate, at 82%¹¹.

Transparency measures (e.g., publication of regulations, appeal mechanisms) have the highest implementation rates (average 74%) followed by transit facilitation measures (72%). Measures aimed at improving formalities (70%) are also popular, while measures on acceptance of paper or electronic copies of supporting documents and Separation of Release from final determination of customs duties, taxes, fees and charges (approximately 79%) have seen the highest implementation rates. With respect to institutional arrangement and cooperation (63% implementation), 92% of the surveyed countries have implemented measures on national legislative framework and institutional arrangements for border agency cooperation and 86% have established national trade facilitation committees.

Global implementation of "paperless trade" measures, which is an increasing area of focus in TF reform, is nearly 60%, although implementation of individual measures varies greatly. For example, while internet connections availability to customs and other agencies at border-crossings and electronic/automated customs system are partially or fully implemented

⁹ Implementation of the WTO Trade Facilitation Agreement: The Potential Impact on Trade Costs. OECD Trade Policy Note. June 2015.

¹⁰ The new frontier of competitiveness in developing countries: Implementing trade facilitation. UNCTAD. 2014. Survey covered 26 countries diversified by income level, size and geography.

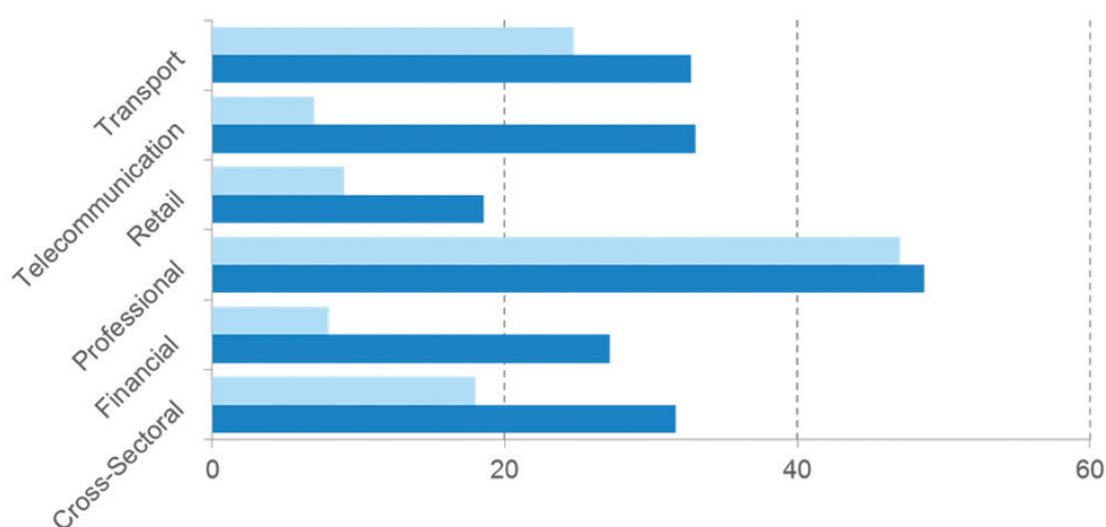
¹¹ The UN Global Survey on Trade Facilitation and Paperless Trade Implementation 2017.

in nearly all countries, electronic application for customs refunds and electronic application and issuance of preferential certificate of origin have been implemented in only 31% and 42% of the countries surveyed, respectively. The average implementation level for “Cross-border paperless trade” is still low, at 33%. A joint OECD/WTO 2015 survey found the TF actions that achieved the most positive results in reducing trade costs for goods and services were: customs reform (69% of respondents); upgrading transport infrastructure (55%); upgrading network infrastructure (48%); other border agency reforms (40%); and support for compliance with non-tariff measures (35%)¹².

◇ Trade in Services

Whilst the main focus of TF reforms is typically on the trade in goods, services have been increasingly important, both on a stand-alone basis as well as integrated with the supply of goods. The OECD Services Trade Restrictiveness Index (STRI) assesses regulatory changes that affect the trade in services. Certain sectors, such as those relating to the supply of professional services, tend to be more restrictive than others, and typically developing countries have higher barriers to trade in services than more developed ones (see Figure 3).

Figure 3. STRI Scores for Developing and Developed Economies, by Sector



Source: Aid for Trade at a Glance 2017: Promoting Trade, Inclusiveness and Connectivity for Sustainable Development - © OECD / WTO 2017

Although there has been progressive liberalization in services trade, in recent years there has been increasing restrictions. This has been prominent in 2017 in increased barriers to temporary movement of professionals. In addition, some countries have introduced limits on cross-border data flows, increased barriers to competition in local markets, stricter conditions to access public procurement contracts and restrictions on foreign investment. Nevertheless, liberalising reforms in some countries have partially offset restrictions and these have included simplifying procedures for couriers and logistics firms, easing of foreign ownership limitations and lifting of restrictions on capital transfers. The highest net liberalisations have been implemented in constituent sectors of the digital network and transport and logistics chain, whilst the telecommunications sector has seen the largest increase in restrictions¹³.

◇ Trade logistics

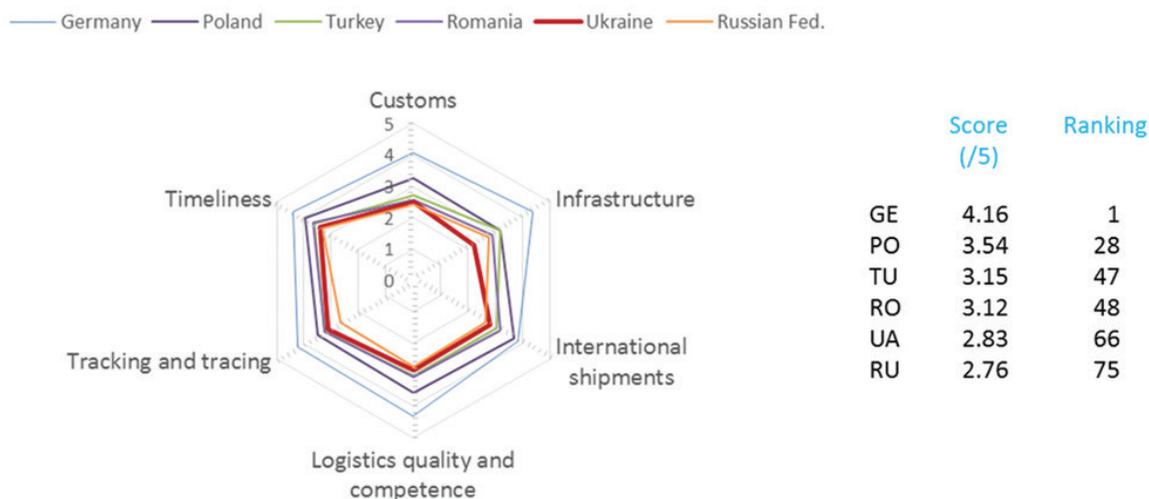
Whilst customs and other border procedures tend to be focus of TF implementation, weaknesses in countries’ transport and logistics infrastructure are consistently highlighted as the most important sources of trade costs. For example, EU logistics costs are estimated at 10-15% of final value of products¹⁴. The World Bank Group’s Logistics Performance Index (LPI) assesses countries’ trade logistics across six dimensions: customs, infrastructure, international shipments, logistics, tracking and trading and timeliness.

¹² Joint OECD/WTO Aid for Trade monitoring exercise (2015).

¹³ OECD Services Trade Restrictiveness Index: Policy Trends up to 2018. OECD. January 2018.

¹⁴ https://ec.europa.eu/transport/themes/logistics-and-multimodal-transport/logistics_en

Figure 4. World Bank Group Logistics Performance Index 2018 of Ukraine and neighbouring countries



Source: World Bank

Germany is the best global LPI performer, and there is a strong correlation between country income levels and LPI performance. Typically, areas such as customs, logistics quality and competence and infrastructure tend to be relative underperformers in the LPI. Of the key 2018 LPI indicators¹⁵:

- **Other than in the best performing ones, physical infrastructure has continued to be a major weakness in most countries, although there have been small improvements in recent years.** This remains the case in particular for railway infrastructure. ICT infrastructure, on the other hand, is considered to be comparatively strong in most countries, with a relatively narrow gap between the best and more modest performers. Among Europe and Central Asian (ECA) countries, ports and airports were rated the highest, with roads significantly behind and rail infrastructure scoring zero satisfaction.
- **There is a significant gap in the perception of the quality of logistics service providers between the best and weakest LPI performers.** Freight forwarders are generally rated among the highest, while rail transport service providers are generally the lowest (mirroring poor rail infrastructure performance). Among Ukraine's peer group (between second and third quantile of LPI rankings) freight forwarders are rated relatively highly, while services provided by trade and transport associations are perceived as being weaker. Air transport, ports as well as warehouse, transload and distribution services have seen the highest improvements in recent years.
- **Weaknesses in supply chain reliability and shipment delivery predictability can significantly impair logistics performance.** This is particularly important as supply and value chains become more integrated within and across borders. Compulsory warehousing, preshipment inspections and corrupt 'informal' payments are seen to be among the most frequent causes of delays in the weaker LPI performers. In other than the worst performers, incidences of delays have been increasing in recent years. The timeliness of shipment deliveries also shows a marked contrast, with the poorest quantile of performers scoring around half of the top performing countries.
- **In addition, an OECD/WTO survey¹⁶ of private sector operators found important regulatory and business environment constraints.** The most important regulatory factors identified included: lack of transparency in regulatory environment; domestic service licensing requirements; national vehicle standards (and lack of mutual recognition thereof); transit rules; visa regimes; and service pricing restrictions.

As with other TF areas, technology is a key driver for reform in logistics performance, with e-commerce, supply-chain management and participation in GVCs in particular providing

¹⁵ Survey results summarised are those presented in Connecting to Compete 2018: Trade Logistics in the Global Economy. World Bank Group. 2018. Non-trade facilitation-related dimensions have been considered in this section.

¹⁶ Aid for Trade and Value Chains in Transport and Logistics. Ben Shepherd. WTO/OECD. 2013.

impetus for reforms in most countries. The need for significant investment over extended periods in improving, for example, infrastructure, and the involvement of multiple public and private agencies typically results in slow progress in this area. Successful countries are establishing sustainable inter-ministerial and inter-agency coordination and implementation structures, usually under the overall responsibility of one ministry, to ensure effective transformation of policy into action.

There is a number of factors influencing developments in logistics. These include inter alia logistics skills shortages, restructuring Global Value Chains, supply chain resilience, digital transformation and sustainability, logistics property and infrastructure, and collaborative business models¹⁷. Whilst development and modernization of physical infrastructure continues to be a core ingredient of country logistics strategies, there has been increasing focus on matters such as intermodality and international linkages and standardization. Development of logistics skills and human capacity is also an area of increased focus. In the less advanced countries, standardization and reduction in administration burden (such as duplication of licensing, certification or information submission requirements to different agencies) continues to be important. Logistics strategies are addressing the needs of the move to 3PL and increasingly, 4PL¹⁸. Other areas often included in logistics policies comprise development of logistics clusters; focus on key industries; research; and environmental impact. Additionally, TF and ICT related objectives are typically core areas of focus.

NATIONAL CONTEXT

◇ Logistics and transportation

The development of the logistics market of any country, including Ukraine, depends on the state of its economy. Logistics operators facilitate the interaction of participants in economic transactions, linking production chains and enabling goods to find buyers. The volumes of services provided in the field of logistics directly depend on the level of activity of their consumers, the dynamics of production and domestic and foreign trade. In this context, the following factors influence the development of the Ukrainian logistics sector at present:

- Trends in Ukrainian industrial production. In the period 2016-2018 there has been an increase in total production volumes, although this recovery has not been experienced by all groups of products.
- Volumes of domestic wholesale and retail trade have also tended to increase in recent times.
- Condition of foreign trade. Post the 2007/8 financial crisis, as a result of a fall in production, a depreciation of the Hryvnia and an aggravation of relations with Russia, there has been a reduction in exports. At the same time, since 2015 imports have begun to increase.
- A general reduction of income and profit levels has also contributed to reduced demand for logistic services.

The above factors have influenced the current trends in the Ukrainian logistics sector. Freight volumes have been increasing since 2016-2017 due to increased economic stability, after a period of crisis. In the first half of 2018 a redistribution of the share of cargo transportation between modes of transport was noted. In this period, compared to the first half of 2017, there was a decrease by 2.5% of the share of the railroad, and the share of automobile transport increased by 3.8%¹⁹. The major decrease during this period was in the water transport – by 20.8%. The stagnation of the railroad sector is due to an increase in tariffs for these services, combined with technical depreciation of rolling stock²⁰. The hardships of the water transport are due to lack of infrastructure. Loading capacity of pipelines is dependent on the volumes of trade in gas and oil products in a given year.

¹⁷ As quoted in Connecting to Compete 2018: Trade Logistics in the Global Economy. World Bank Group. 2018.

¹⁸ 3PL: Third Party Logistics, e.g., outsourced logistics services provider. 4PL: Logistics services provider and consultants, e.g., for entire supply chain management,

¹⁹ http://www.ukrstat.gov.ua/operativ/operativ2018/tr/vp/vp_u/vp1118_u.htm

²⁰ Previous increase of tariffs was in July 2018. Due to this most recent decision of Ukrzaliznytsya, the rates for the use of railroads of the monopoly will be raised and the coefficients will be upgraded to zero mileage rates. For a rolling stock that is in greatest demand, prices will increase by 37-48%.

Ukraine has 100 automobile Border Crossing Points (BCP) with its neighboring countries, among which 51 BCPs have the status of being international. Within these 51 BCPs, 8 are with Poland, 2 with Slovakia, 5 with Hungary, 3 with Romania, the rest are with the CIS countries (Moldova, Belarus and Russia). BCP Grushiv is among the newest and most innovative BCP's, where the joint control of Polish and Ukrainian customs and border guards is conducted. However, this BCP is also among the least used, because of the low quality of road leading to it. Another example is the Krakovets BCP, which is expected to become one of the most modernized BCPs. However, lack of road infrastructure does not allow its optimum utilization.

Ukraine's geographic location clearly defines its position as a transit country, and highlights the critical importance of the transport industry for the Ukrainian economy. Ukraine has an extensive network of key components of a comprehensive logistics system, including roads, both local and international, railways, seaports, river ports and river roots, airports, customs terminals.

◇ Trade related procedure for exporters

Logistics is important in determining delivered cost and order fulfilment time. For example, in the manufacturing industry the cost of logistics is about 15%, while in the FMCG industry it is up to 25%. Depending on the forwarder and planned logistic the cost of delivery may differ considerably. The cost of logistics is also very dependent on the remoteness on the seaport and the availability of alternative modes of transportation. Commonly used trade and terms of payment in Ukraine are Ex-works, FOB and CFR/CIF. Among other most popular terms are DAP, DDU, DDP. Letter of credit also acceptable. Invoice, cash against documents is not as common and are mostly used by small businesses.

◇ Customs procedures

Currently, the primary role for the customs in Ukraine is revenue collection. This is because customs was merged with the tax administration in 2012. However, there is a significant possibility that customs will be separated from tax administration in 2019, in such case it is very likely that the goals for customs would be broader and more balanced, and be more in line with the definitions of the Customs Code of the European Union. The key performance measure to monitor customs effectiveness is revenue targets. There are additionally some secondary indicators, such as the percentage of cargo inspected and average clearance time, which are published by the SFS on its website.

Customs in Ukraine has a relatively well developed IT system. Virtually all documents can be submitted and processed electronically by the customs, through the system called ASMO. According to the Customs Code of Ukraine, customs has the responsibility to coordinate other control agencies, such as State Service of Ukraine for Food Safety and Consumer Protection. After the adoption of the most recent law on Single Window, customs not only manages the joint web portal for the single window, but also performs some of the functions of the other authorities during the customs clearance. Imports in Ukraine are mostly cleared within the inland customs facilities premises, which are not regulated by law. This leads to discretion in policies applied by such facilities to the businesses.

◇ TFL related legislation and policies

There are currently several proposals to overcome the impediments in trade procedures and logistics:

- National Transport Strategy of Ukraine for the period up to 2030, adopted by the Cabinet of Ministers of Ukraine on 30 May 2018 No. 430-p (the "National Transport Strategy 2030");
- Export Strategy of Ukraine, adopted by the Cabinet of Ministers of Ukraine on 27 December 2017 No. 1017-p;
- The Law on Single Window dated 6 September 2018 No. 2530-VIII;
- Draft law on Authorized Economic Operators as of 3 June 2016 No. 4777 and Draft Law N 7473 on Amendments to the Customs Code of Ukraine (regarding same), dated 29 December 2017 No. 7473;
- Action plan for implementation of WTO trade facilitation agreement, adopted by the Cabinet of Ministers of Ukraine on 19 June 2019 No. 444-p;

- Association Agreement (the “AA”) with the EU and relevant implementation efforts (implementation efforts are not published additionally);
- IMF recommendations for SFS reform (including customs reform);
- Proposed establishment of a new law enforcement institution that would exclusively deal with economic crimes (including ones involving customs criminal violations) – draft Law on the National Financial Security Bureau, dated 20 March 2018 No. 8157-1;
- Draft customs reform plan developed by the Ministry of Finance of Ukraine (the “MoF”).

Nevertheless, visions in respect of reforms differ between ministries and agencies, stalling progress in key reforms. An important example is in the area of customs reform. Current round of customs reform initiatives started in 2016 with a submitted reform plan by MoF and the SFS, that was published for first discussion and consultations in July 2017). At the same time, the Committee for Tax and Customs Policy of the Parliament declared its own approach to the customs reform, by officially supporting the law on National Customs Service (approved by committee on December 6th 2016).

As a result of this uncertainty, Ukraine is not implementing the TFA and AA with the EU in full, with the following demonstrable disadvantages:

- The Law on Authorized Economic Operator has not yet been voted on by the Parliament;
- Ukraine continues to rank low in trade related rankings of the WB Doing Business Indicators;
- The number of customs related laws passed by the Parliament is significantly low compared to other relevant fields, despite the urgent need for changes in the customs system;
- Ukraine has not progressed in exchange of information with the European Union, and the NCTS is still not implemented.

◇ Institutional perspective

Ukraine had for a long time quite strict and not business oriented model of foreign currency regulation. The Currency Regulation and Control Decree, active since 1993 was replaced in July 2018 (coming into force in February 2019) by a new law, which simplifies currency operations. At the moment Ukrainian residents must receive payment in foreign currency not later than 365 days from the time of delivery of goods or services. Purchasing of currency at inter-bank currency market is performed on the basis of agreements confirming obligations before foreign partners. Ukrainian law does not contain any restrictions on transfers to domestic banks.

For exports, there two types of licencing - automatic and manual. Automatic licensing applies to the goods for which quotas are not set, as distinct from manual licensing. Individual shipments of goods are free of taxation if the cost of such goods do not exceed €1000 in the Airports and €500 in other border checkpoints. Customs declaration are also obligatory in case of import or export of foreign currency exceeding €10,000 equivalent. Foreign individuals may export foreign currency exceeding €10,000 equivalent if they provide proof that such amount was previously imported to Ukraine.

The trade facilitation committee has been established in Ukraine, it is called ‘Council on International Trade’. The work of the Council is mainly concentrated on simplification of trade procedures, promotion of exports, formation of strategies for the development of international trade and analysis of their implementation, improvement of the system of customs-tariff regulation and trade defence.

◇ Freight Forwarders

Forwarders provide a wide range of services directly to businesses as well as through the third parties. Except arrangement of cargo carriage, forwarders perform transshipment from one mode of transport to another, accumulation, sorting, packing and marking of the cargo, provide necessary documentation and pay taxes and duties on behalf of their clients. Activity of forwarders is governed by the Civil Code of Ukraine (chapter 65), Commercial Code of Ukraine (article 316) and by the Law of Ukraine “On transport-forwarding activities”. This activity also is governed by international conventions and some industry acts like the Statute of the Railroads of Ukraine. Normally, the governmental control on the activity of forwarders does not affect the cost of their services.

The dominant providers of forwarding services are primarily local operators. According to information provided by the Association of International Freight Forwarders of Ukraine (AIFFU)²¹ local forwarders play a key role on Ukrainian market based on the results from 2017. In comparison, the position of multinational forwarders is stronger compared with local counterparts, due to the depth and breadth of their networks and presence in various jurisdictions. Such forwarders usually have widely known name and history.

◇ **Ukraine and EU relations in TFL**

Further development and deepening of Ukraine-EU relations, implemented on the principles of political association and economic integration, should contribute to the implementation of the best European standards in the field of infrastructure. Ukraine, since obtaining independence as a new European country, was from the beginning expected to become a reliable transcontinental transit partner for neighbouring countries and a business partner of the European Union. In this regard, Ukraine is particularly entrusted with the responsibility of preserving the existing and building new transport and logistic systems of communication with the countries of Central and Eastern Europe.

Over 25 years of work, more than 200 international agreements have been concluded, most of which have been signed with European partners. In particular, the European TACIS Program for the Newly Independent States of Europe and Asia²². When Ukraine joined the TRASECA, in 1993 the European Union proposed the construction of the Europe-Caucasus-Asia transport corridor (as an alternative to international transport corridors passing through the territory of Russia), in particular, to promote the development of a common policy on transit fees and tariffs and to simplify the procedure for Customs offices of participating countries TRASECA. Extension of the TEN-T map to neighbouring countries, which can be done through TRASECA, is the first step in ensuring consistency in infrastructure planning.

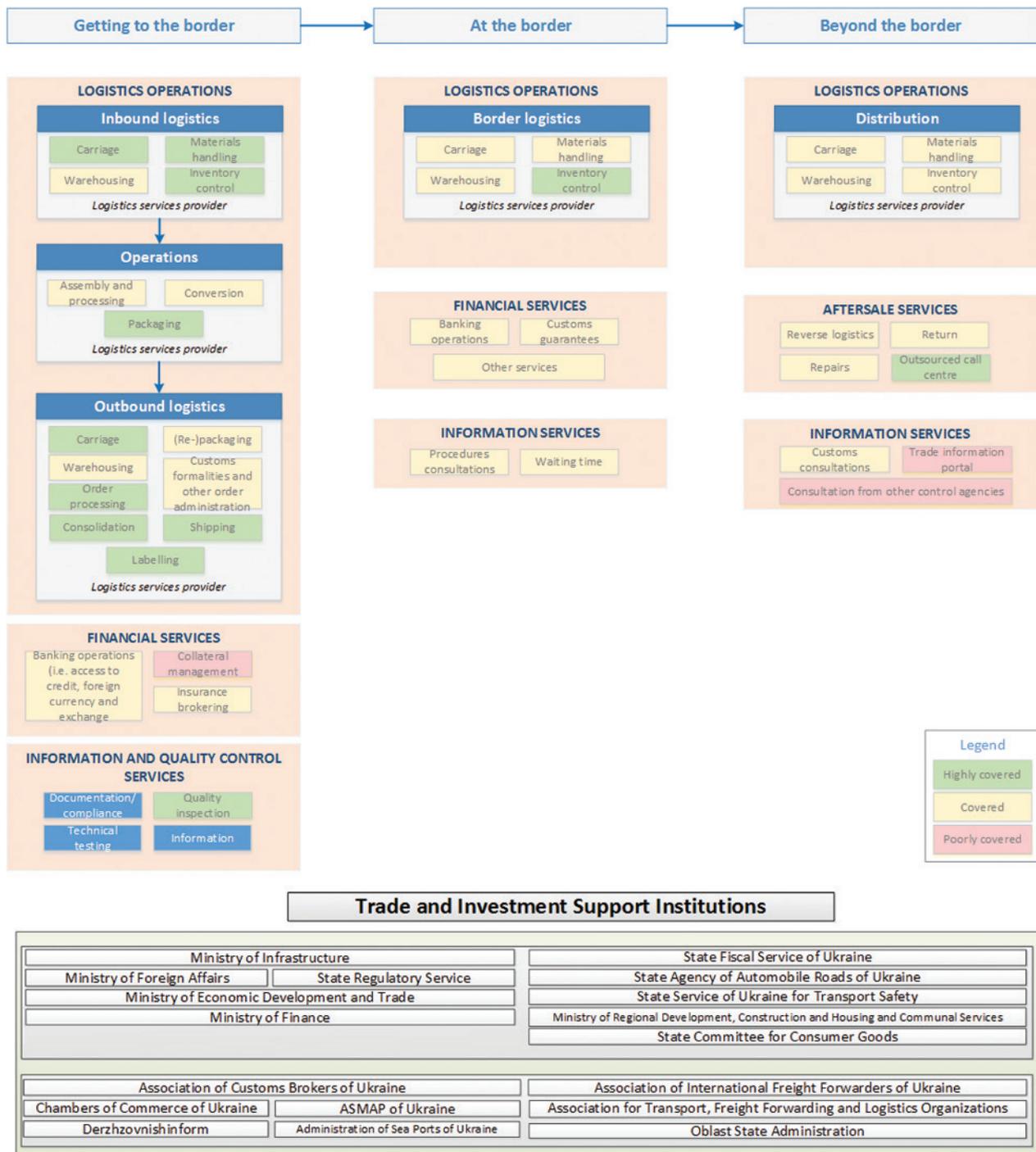
TRADE FACILITATION AND LOGISTICS SERVICES MAP

The Trade Facilitation and Logistics includes various services provided to domestic clients. The map of the logistics services (see Figure 5) consists of three components: getting to the border, at the border, beyond the border. The map's analysis enables a better understanding of the specific processes of logistics operations. Understanding the dynamics of logistics services is essential for identification of the issues affecting industry performance. Table 2 summarises the issues affecting performance of the Trade Facilitation and Logistics services.

²¹ <http://ameu.org.ua/en/news>

²² http://ec.europa.eu/europeaid/how/evaluation/evaluation_reports/reports/tacis/951417_en.pdf

Figure 5. Logistics services map in Ukraine



Source: ITC

Table 2. List of constraints faced in the area of trade facilitation and logistics in Ukraine

Getting to the border	At the border	Beyond the border
Lack of a single website to provide the information for exporters and importers due to limited coordination between the relevant support institutions results in exporters' limited awareness of export procedures, rules and regulation	Insufficient interaction of border management institutions and lack of a single system to unite and operate information results in duplication of efforts at the border (principally at checkpoints), which increases the risk of delays and limits border agency effectiveness	Lack of reciprocity and recognition of certification with EU and other countries results in double certification of products when exporting to these countries, increasing costs for exporters
No exchange of information between customs and road weight control leads to the duplication of efforts of the agencies and to repeating of control of big cargos on the roads (including abuse of rules, due to lack of control of weight restrictions above 40 tons)	Lack of road integration with the border infrastructure due to no planning for location and specialization of BCPs result in no alternative roads to change the point of entry across the border between BCPs	Burdensome requirements for international commercial contracts, not compatible with international practice, due to the outdated Ukrainian legislation makes it complicated to access new markets
Absence of strategy for customs systems development results in limited coordination between customs and other agencies and delays the implementation of TFA, the [Association] Agreement with EU and other national initiatives	Lack of unified standards and uniform requirements for installing, constructing and modernizing customs infrastructure, in particular for checkpoints due to absence of transparent regulation on inland customs facilities and no strategy for customs system development adopted deteriorates the conditions at the border and delays the border crossing procedures	The legislation on Authorized Economic Operator is not adopted due to non-implementation of TFA, which increases costs and time for exporters
Few operational measures have been taken to integrate Trans-European transport network due to inadequate implementation of the EU Association Agreement, which limits the expansion of export opportunities	Lack of international cooperation of Ukrainian customs with the customs authorities of other countries (including lack of customs attaches) leads to avoidable duplication and inefficiencies	Unfair competition practices, including IPR issues and patent trolling due to no mechanism of verification (of patents), non-certificated products and no possibility of choosing the origins of the products causes economic harm and disadvantage producers
Lack of transparency in non-tariff regulations due to outdated legislation increases trade costs and penalizes small exporters	Customs clearance procedures are impacted negatively by the regulatory framework	
	Weaknesses in non-tariff regulations and their implementation increase uncertainty and costs for businesses	
	Limited storage facilities and lack of cargo processing capabilities for air cargo result in limited quality services of the airport agents (congestion, losses, infrastructural issues), that are not fast and efficient enough to support cargo aircraft operations	
<p>Legend</p> <ul style="list-style-type: none"> <li data-bbox="353 1278 723 1302">Enterprise constraints <li data-bbox="353 1305 723 1329">Policy constraints <li data-bbox="353 1332 723 1356">Institutional constraints 		

TRADE SUPPORT FUNCTIONS' DIAGNOSTICS

◇ Focusing on the most pressing issues

A number of constraints in the TFL sector that challenge its short- and medium-term growth. In order to focus the TFL strategy, only the most critical bottlenecks are detailed below. As highlighted in the previous section, a number of major policy initiatives have been developed and are in course of implementation, especially in the transport and logistics sector. Activities that require major, long-term investments have been excluded from detailed consideration in respect of constraints and have been excluded from this Strategy and Plan of Action.

Constraints are identified along three phases of exports: getting to the border, at the border, beyond the border. They cross-classified by three dimensions - policy, institutional and enterprise constraints.

Policy constraints refer to legislative and regulatory bottlenecks that limit effective functioning of the trade support function in line with international best practice.

Institutional constraints refer to supply-side issues related to trade and investment support institutions' (TISIs) service delivery to enterprises; specifically in terms of the capacities and resources available to institutions to achieve effective service delivery.

Enterprise constraints refer to demand-side issues related to logistics infrastructure.

◇ Getting to the border

Lack of a single website to provide the information for exporters and importers due to limited coordination between the relevant support institutions results in exporters' limited awareness of export procedures, rules and regulation

Provision of export related information is a responsibility of multiple government agencies. Two key agencies in this area are the Ministry of Economic Development and Trade of Ukraine (the "MEDT", information regarding trade facilitation/trade restrictions and export markets) and the State Fiscal Services of Ukraine (the "SFS", customs rules and procedures). Trade related information dissemination is also the responsibility of other relevant authorities, such as the Ministry of Agriculture of Ukraine, Ministry of Ecology and Natural Resources of Ukraine, State Service of Export Control of Ukraine, etc. Each of these agencies publishes some of the relevant information on their respective websites, and some of the information is available to businesses via paid services for customs brokers (e.g. 'MD Office' and 'Diamond Bridge'). Customs officials have the most complete information via their internal comprehensive customs clearance system 'Inspector 2006'. In addition, there is very little information of Ukrainian origin available in English and there is currently no single portal for information on trade available for local and international traders.

These constraints are addressed in PoA: 2.1.1, 2.1.2

No exchange of information between customs and road weight control leads to the duplication of efforts of the agencies and to repeating of control of big cargos on the roads (including abuse of rules, due to lack of control of weight restrictions above 40 tons)

Customs of SFS performs weight control within the territories of customs control, while similar control for the purposes of truck weight limits of 40 tons is conducted by the Ukrtranssecurity. While they conduct control for different purposes, Customs of SFS and Ukrtranssecurity still duplicate their efforts and do not exchange information efficiently. Lack of exchange of information and joint risk management in this area reduces the speed flow of trucks, impairs control capabilities of both agencies and increases the expenses for both the government and for legitimate private businesses.

These constraints are addressed in PoA: 1.1.2, 1.2.3

Absence of strategy for customs systems development results in limited coordination between customs and other agencies and delays the implementation of TFA, the EU Association Agreement and other national initiatives

All relevant government agencies and a Parliamentary Committee for Tax and Customs Policy agree that customs systems are overdue for reform. However, they differ in their visions for

customs systems development. As a result, customs related changes to the legislation lack a single approach and a schedule for implementation. All this leads to uncertainty among businesses and relevant customs officials, who cannot anticipate the direction in which the system is moving and plan appropriately.

These constraints are addressed in PoA: 1.1.1, 1.2.1

Few operational measures have been taken to integrate Trans-European transport network due to inadequate implementation of the EU Association Agreement, which limits the expansion of export opportunities

Ukrainian authorities in the recent years stressed that the country is ready to present a number of initiatives aimed at improving the efficiency of the TRACECA corridor, including the development of a joint action plan for multimodal transport solutions through the TRACECA corridor, the introduction of the electronic logistics system for the TRACECA transport corridor, the initiative on new EU technical assistance projects within the TRACECA program, the enhancement of the connectivity of the TRACECA corridor and the Trans-European Transport Network (TEN-T). Extension of the TEN-T map to neighbouring countries is the first step in ensuring consistency in infrastructure planning and promoting the use of EU standards. Ministry of Infrastructure of Ukraine also emphasized that will move towards the development of strong ties with the leading countries of the region and the effective work of the project of the New Silk Road. Consequently, legislative framework was created to allow the implementation of up to 70% of the EU norms in the relevant fields in the short term.

Although it is highlighted upon publishing the National Transport Strategy 2030 that the priority of the Ministry of Infrastructure of Ukraine is to integrate the transport network of Ukraine into the pan-European TEN-T, this is yet to be accomplished. This lack of progress in implementation increases transport costs and reduces overall efficiency of transport operations.

These constraints are addressed in PoA: 1.1.1, 1.2.1

Lack of transparency in non-tariff regulations due to outdated legislation increases trade costs and penalizes small exporters

Ukraine lacks a TARIC analogue that is available for businesses operating in the European Union. Non-tariff rules and regulations oversee Ukrainian requirements for goods entering and leaving the country, as well as procedures that are followed by the government in the course of controlling those goods. These regulations and procedures are a responsibility of multiple government agencies that lack coordination and integration. Many of these problems were expected to be resolved as the result of the adoption of the Law on Single Window. We will need to see first the results of Law introduction before making any analysis of its implementation and effects. However, outside of the single window application, the procedures of control agencies are expected to remain inefficient if no additional measures are taken.

A separate obstacle to international trade is non-tariff regulations. Being within the scope of various agencies, these regulations lack a complete and comprehensive revision. In some cases, these regulations create uncertainty and unnecessary burden for international trade.

These constraints are addressed in PoA: 3.1.1, 3.1.2

◇ At the border

Insufficient interaction of border management institutions and lack of a single system to unite and operate information results in duplication of efforts at the border (principally at checkpoints), which increases the risk of delays and limits border agency effectiveness

There is no high-level group in place to coordinate activities of Customs, State Border Guards and the Ministry of Internal Affairs to steer border issues and coordinate necessary improvements of BCP and Integrated Border Management (IBM) processes. It is often unclear which Ukrainian entity is responsible for urgent changes and this results in very limited accountability for shortcomings. Most improvements are made ad hoc, at an operational level, rather than at the strategic ministerial level. Coordination and planning improvements are typically implemented in a very complicated, extremely bureaucratic manner, in many cases lacking transparency, and often without sufficient financing. For these reasons, Ukraine often does not meet financial expenditure deadlines, even when potential donors are willing to pay the bills²³. Additionally, some BCPs need significant improvements. Responsibilities are often not

²² Case with Krakovets BCP, EU and Poland

clear and the involved agencies wait long time until decisions are finalised before starting planning procedures for implementation and constructions, which creates very high risks of not meeting financial deadlines. Many of the problems are expected to be resolved due to adoption of the Law on Single Window. However, outside of the single window application, the procedures and documentary requirements of control agencies are expected to remain inefficient if no additional measures are taken.

These constraints are addressed in PoA: 1.1.1, 1.1.2, 1.2.1, 1.2.3, 2.2.1, 2.2.2, 2.2.3

Lack of road integration with the border infrastructure due to no planning for location and specialization of BCP result in no alternative roads to change the point of entry across the border between BCPs

Significant investment has been made in improving selected BCPs, but weak or insufficient road infrastructure leading to them leads to their sub-optimal utilization. Another obstacle to free flow of goods and individuals across the border is the lack of capabilities to switch BCPs and drive between the BCPs along the border. Border infrastructure and the relevant roads infrastructure are within the remit of different government agencies, leading to a lack of coordination in planning the location of relevant infrastructure. In addition, Ukraine has many small land border checkpoints, staffed or monitored 24 hours every day, without adequate equipment for sufficient customs control and examinations. It was recommended by the CBP in 2016 to free up valuable resources and better secure the Ukrainian border to reduce hours for truck traffic, or eliminate truck traffic altogether, at under-equipped checkpoints and checkpoints with minimal truck traffic, relegating them to passenger vehicle and pedestrian traffic only. Small border crossings that do not have proper equipment for sufficient truck cargo control should be closed to truck traffic.

These constraints are addressed in PoA: 1.2.3, 2.2.2, 2.2.3

Lack of unified standards and uniform requirements for installing, constructing and modernizing customs infrastructure, in particular for checkpoints due to absence of transparent regulation on inland customs facilities and no strategy for customs system development adopted deteriorates the conditions at the border and delays the border crossing procedures

Upon merging tax and customs under the Ministry of Revenue and Duties of Ukraine (now SFS) in 2010-2012, there was insufficient attention dedicated to the development of customs and border infrastructure. Currently this issue is regulated by the Law on State Border and implementing resolution of the Cabinet of Ministers of Ukraine from 17 August 2002 #1142. This resolution was last amended in 2009 and provides only general requirements for the BCPs, without providing needed standardization requirements. As a result, BCPs differ significantly in their capabilities, and investments in BCPs usually lack clear vision on the outcomes.

Another significant drawback is the lack of regulation of inland customs facilities. While there are present rules with regards to customs terminals in the Customs Code of Ukraine (Chapter 64 of the Customs Code of Ukraine), a gap in the law allows them to operate outside of the regulations of the Customs Code of Ukraine. Inland customs terminals are therefore essentially operated as private unregulated lands with customs posts. There are no clear rules on location, requirements and pricing policies of the customs terminals. As a result, most customs terminals charge for services that contradict best international practices, most notable charge being so-called 'entry fees' for each truck entering its premises, leaving businesses with no free customs clearance options. Moreover, many of these customs terminals do not publicize such policies. This has led to numerous notable antimonopoly disputes between businesses and customs terminals. In an IMF memorandum Ukraine committed to reduce the number of customs terminals by one-third in 2017, and a CBP assessment mission in 2016 recommended shutting down all terminals. None of these recommendations were implemented by the government.

These constraints are addressed in PoA: 2.2.3.

Lack of international cooperation of Ukrainian customs with the customs authorities of other countries (including lack of customs attaches) leads to avoidable duplication and inefficiencies

There is a lack of joint BCPs with neighbour countries (two customs working together), which should lead to more efficient processes and less corruption. There is also a lack of exchange of information with the neighbour countries and other trade partners, which could expedite the trade flow and reduce the level of fraud significantly.

These constraints are addressed in PoA: 1.2.2

Customs clearance procedures are impacted negatively by the regulatory framework

Customs clearance procedures are not sufficiently automated and there are many obligations placed on the customs that could be more efficiently dealt with at other stages of supply chain. The two most significant ones are the absence of the law on Authorized Economic Operators, which means that customs have to treat many large businesses with the full scale control, and another issue being a lack of control of goods flow within the country. Thus, the customs system has to control the goods during the clearance with more scrutiny than in EU countries. On average, Ukrainian customs clear the goods within a time frame between 1 hour and 3 hours 38 minutes for importation, depending on the region, while the relevant procedures in developed countries take only few minutes on average. Export declarations take between 30 minutes and 2 hours²⁴. Additionally, Ukrainian customs does not have the investigative powers, thus customs procedures are often interrupted by various law enforcement agencies, which increases time loss and costs for businesses. As most recently was indicated in American Chambers of Commerce in Ukraine (further - ACC) research, 80% of businesses who responded to their request, "identified customs formalities issues to be "very important" or "important"

These constraints are addressed in PoA: 3.2.2

Weaknesses in non-tariff regulations and their implementation increase uncertainty and costs for businesses

Ukraine lacks transparency in non-tariff regulations due to outdated legislation. This increases trade costs and penalizes small exporters. The country lacks a TARIC analogue that is available for businesses operating in the European Union. Non-tariff rules and regulations govern requirements for the goods entering and leaving the country, as well as procedures for control of those goods. These regulations and procedures are a responsibility of multiple government agencies that lack coordination. Additionally, non-tariff regulations need a complete and comprehensive revision as they fall within the authority of various agencies. In many cases these regulations create uncertainty and unnecessary burden for international trade.

These constraints are addressed in PoA: 3.1.1, 3.1.2

Limited storage facilities and lack of cargo processing capabilities for air cargo result in limited quality services of the airport agents (congestion, losses, infrastructural issues), that are not fast and efficient enough to support cargo aircraft operations

While Ukraine's Kyiv Boryspil airport processes around 25 thousand tons of cargo a year, top airports in the world process above 1 million tons of cargo a year. Thus, despite the significant transit potential of Ukraine due to its geographic location, Ukraine remains far behind leading cargo transportation airports, such as Istanbul airport that carries 1 million tons of cargo annually and is placed 10th in the world in this category (Hong Kong Airport that is placed first with 5 million tons of cargo annually).

Businesses highlight poor quality services and low capabilities of the airport agents for cargo processing and require the increase in quality of relevant services at key Ukrainian airports, especially at Boryspil. Transported goods by airways have significantly decreased during the period of first six months of 2018 compared to the same period the year before.

These constraints are addressed in PoA: 2.2.2, 3.1.3

◇ Beyond the border

Lack of reciprocity and recognition of certification with EU and other countries results in double certification of products when exporting to these countries, increasing costs for exporters

Businesses in Ukraine are facing the need to re-certify a product in the countries of the European Union that has already been properly certified in Ukraine. This significantly complicates the implementation of foreign economic activity. Article 6.3. of the WTO Agreement on Technical Barriers to Trade prompts states to enter into agreements on the mutual recognition of the results of the assessment of conformity. Such actions on the part of the state can receive a positive response from the business, as it will simplify the procedures of trade and facilitate access of Ukrainian goods to foreign markets, as well as imported goods to the Ukrainian market.

²⁴ <http://sfs.gov.ua/data/files/157600.jpg>

Export control procedures apply to importation of many high-tech components needed to produce goods with high added value. Moreover, procedures involving dealing with the 'dual used' goods are not efficient enough and lack clear guidelines. Consequently, exporters of value added and domestically produced goods, especially those with a high technology component, face uncertainty and barriers to trade.

These constraints are addressed in PoA: 3.1.1

Burdensome requirements for international commercial contracts, not compatible with international practice, due to the outdated Ukrainian legislation makes it complicated to access new markets

Ukrainian contract law is in many parts non-compatible with international standards. This is mostly the case concerning formalities and compliance related to commercial contracts. While the Civil Code of Ukraine is mostly liberal in regulating contracts and its requirement, other fields of law treat contract formalities with varying degrees of flexibility, but leave room for bureaucratic difficulties. For example, i) Articles 179-181 of the Commercial Code of Ukraine provide for procedures of signing and negotiating a contract that are incompatible with the freedoms of international contracting according to the best world practices; ii) banking practices remain conservative, despite liberalization of banking related legislation in recent years (especially after the adoption of new Law on Currency and Currency Transactions N 2473-VIII from 21 June 2018); iii) Article 264 of the Customs Code of Ukraine provides that the customs authorities may demand the originals of supporting documents or their certified copies, which are often unavailable in the form expected by Ukrainian authorities to local businesses doing transactions with large international companies; and iv) for tax purposes, according to accounting standards, Ukraine fails to implement substance over form principles, remaining among the few countries that follow form over substance principles in taxation.

These constraints are addressed in PoA: 2.1.3, 3.1.2.

The legislation on Authorized Economic Operator is not adopted due to non-implementation of TFA, which increases costs and time for exporters

In present, the Draft Law No. 4777 was returned by the Parliament for further improvement and the Draft Law N 7473 passed the first reading. The latter is important for the fulfillment of Ukraine's international obligations under the Association Agreement between Ukraine and the EU, as well as the WTO Agreement on Trade Facilitation. It envisages changes in the procedure for obtaining certificates for simplification of customs procedures and for safety and reliability. There will also be detailed criteria defined in Part 2 of Art. 13 of the Customs Code of Ukraine ("Submission of applications and issuance of a certificate of authorized economic operator"), which will positively influence the credibility of certificates issued by Ukraine. However, it remains uncertain when the law is to be adopted by the Parliament.

These constraints are addressed in PoA: 3.1.1

Unclear status of the EPZ and industrial parks limits commercial opportunities and benefits for exporters

Ukraine currently has a range of laws and regulations on special economic zones, all of which are in theory aimed at trade related activities. The existing EPZs are, in particular, Odesa seaport and Reni seaport, although until recently they existed mainly on paper. In May 2018 the local government in Odesa region announced that there are companies interested in investing and being in these free zones. Similarly, although there is a law on Industrial Parks, since key benefits for the members of the industrial parks are dependent on tax and customs code provisions (which are not yet implemented), industrial parks were not active yet. The draft of the relevant law was approved by the Tax and Customs Committee of the Parliament; however, its review was repeatedly postponed in May 2019. The lack of implementation of policy in these areas limits export potential as businesses cannot benefit from their potential advantages.

These constraints are addressed in PoA: 3.1.3

Unfair competition practices, including IPR issues and patent trolling due to no mechanism of verification (of patents), non-certificated products and no possibility of choosing the origins of the products causes economic harm and disadvantage producers

Businesses often encounter unreasonable difficulties in importing consumer goods that are protected by unscrupulous industrial patents in Ukraine ("patent trolling"), while the legiti-

mate owners of the trademarks for goods and services face unjustified restrictions on their rights of intellectual property. Thus, they cannot import and use the relevant goods or services because in Ukraine the corresponding trademark is unfairly registered by another person. The problem is important both for importers and exporters of Ukraine. This export problem is extremely relevant because these gaps in the field of intellectual property prevent rise of export-oriented enterprises with a high proportion of imported products (goods and services) in the production and supply cycle.

These constraints are addressed in PoA: 3.2.1

THE WAY FORWARD

◇ Vision

The following is a delineation of the proposed vision and strategic objectives of this Strategy. The vision statement was agreed upon by all stakeholders in Ukraine.

A transparent, coordinated, simplified and integrated trade facilitation and logistics system that supports the delivery of quality services

For this significant improvement in the different areas will be required.

◇ The strategic framework

The strategic objectives define the main thrusts that will guide Strategy implementation to achieve the vision laid out by the industry. The PoA will respond to the vision by addressing the sector's constraints and leveraging opportunities in a comprehensive manner. To this end, particular efforts will be made along the following strategic orientations.

Strategic objective 1:

▷ To strengthen interagency coordination and cooperation ensure the strategic development in the area of international trade

TFL is a complex and multi-dimensional cross-sector area, requiring co-ordinated action from a range of agencies and industries within Ukraine, at the border and beyond. Important constituents include physical and ICT infrastructure, logistics, customs, state border security and embassies abroad. Coordinated action is also required with overseas counterparts, to ensure smooth transit and delivery of exports. The aim of this strategic objective is to significantly improve the effectiveness of the way the various government ministries and agencies, as well as the private sector cooperate with each other across the boundaries of their immediate remit to strengthen the TFL system as a whole.

The strategic objective is intended to be achieved through the following operational objectives and supporting activities:

- Improved coordination and removal of duplication of procedures between domestic border management agencies, through, for example, introduction of single information desks at borders, development of unified information and operating systems at border agencies and removing barriers to the exchange of information between ministries and agencies.
- Increased cooperation and coordination with external border agencies, especially those of the European Union, through expediting the implementation of the customs organization and IT strategies and ensuring they facilitate interface and cooperation with external agencies as well as roll-outs of current joint Ukraine/EU border post pilots to a wider range of BCPs.
- Strengthened coordination between government agencies to develop a more coherent approach to support exporters, including a multi-ministry/multi-agency information portal for exporters, including customs representations in Trade Delegations in key Ukrainian diplomatic missions.

Strategic objective 2:

▷ To provide the necessary conditions for efficient trade-related services for companies in order to improve their ability to import and export more quickly and at a lower cost

The principal aims of this objective are to enhance the effectiveness of the TFL system. It complements the other two objectives (which are to strengthen the TFL framework and

improve interaction between its actors) by addressing barriers and weaknesses within the system. Such barriers include those that are information, capacity and implementation related. A TFL cross-sector that is not performing to its potential increases costs of export, impair export competitiveness, and impact on smaller exporters disproportionately. This strategic objective aims to achieve a better functioning TFL system by seeking to optimise the system's performance.

The operational objectives and related activities that support the above aim are:

- Improved system for generating and disseminating information on customs regulations and procedures for exporters. In addition to an information portal aimed at exporters, this will include other awareness generation initiatives.
- Strengthening human resource capacity of agencies and ministries and improving infrastructure at borders [and within the country] to facilitate transit of export goods. This would include export regulation toolkits for SMEs and one-stop-shops for exporters at regions. In addition, the implementation of the customs electronic single window would be expedited, staffing at BCPs increased, design of checkpoints standardized and infrastructure at BCPs (such as scanners) upgraded or installed.
- Implementing fully the strategy for EPZ and industrial parks.
- Strengthening enterprise capacity for exports and improving communication channels between customs and exporters, incorporating customs providing training to enterprises on relevant regulations, customs offering a nominated person of contact for larger exporters.

Strategic objective 3: 

To update and implement a more supportive legal and regulatory framework to facilitate international trade

The TFL system is governed by a range of legislation and regulations, promulgated by different ministries and agencies. It is critical that these are consistent and don't conflict with each other; do not overlap or leave gaps; are transparent, clear widely known; and are preferably harmonized with standards applied internationally and in particular in main trading partner countries (such as those in the EU). In the event these factors are not fully addressed, costs and inefficiency related to trade increase from uncertainty and inconsistent application, duplication of same or similar processes within the country, and create barriers to export as different standards and procedures need to be complied with in other countries. This strategic objective seeks to address the above barriers through the following operational objectives:

- Harmonizing standards enabling mutual recognition of certification for exports through the introduction of simplified procedures for mutual recognition of export certification, strengthening regulation of the issue of re-certification of imported products and enabling recognition of electronic certificates of origin.
- Developing and implementing necessary legislation and regulations to enable integration with the Trans-European transport network by expediting the development of a TEN-T integration action plan, strengthening as necessary, enacting and implementing legislation relating to Authorized Economic Operators and harmonizing documentation-related regulations with EU.
- Enacting and implementing legislation and regulations to improve efficiency and reduce processing costs for exporters through enhancing transparency and certainty related to non-tariff regulations.
- Strengthening enforcement of intellectual property regime by updating the Law on Utility Models and Law on Design to reflect international standards and to ease their enforceability, strengthening customs' powers to enforce IP rights and strengthening enforcement capacity in relevant agencies.

To achieve the vision and strategic objectives discussed, a robust, actionable and realistic strategic PoA is required. This is provided below, and constitutes the heart of this Strategy.

The PoA is structured along the three strategic objectives and their respective operational objectives. For each objective, the PoA outlines detailed activities and their implementation modalities, which include:

- Priority level: Priority 1 is the highest and priority 3 is the lowest.
- Start/end dates: The desired time frame of the activity.
- Targets: Quantifiable targets that allow completion monitoring of the activity during the implementation stage.
- Leading implementing partners: One single accountable lead institution per activity. (The institution can restrict itself to an oversight and coordination role but also can have a technical role.)
- Supporting implementing partners: Any institution that should be involved at any stage of an activity's implementation.
- Existing programmes or potential support: Existing initiatives ongoing in the specified area of the activity.

PLAN OF ACTION 2019-2023

Operational objectives	Activity	Priority	Start	End	Target measures	Main implementation partners	Other implementation partners
Strategic objective 1: To strengthen interagency coordination and cooperation ensure the strategic development in the area of international trade.							
1.1. Implement strategic reforming of international trade to develop a more integrated, effective and efficient TFL system.	1.1.1. To improve coordination and eliminate duplication of procedures of domestic border control authorities . The following activities are required for this: <ul style="list-style-type: none"> – Adoption of unified plan of reform of custom authorities (inclusive with the plan of reorganization of SCS), according to the Recommendations of custom and frontier service of the USA, standards of EU and recommendations of IMF; – Implementation of Concept and corresponding plan of the integrated management of the border; – Implementation of the National Transport Strategy 2030; – Adoption of the plan of realization of Agreement of association with EU relating to the international trade; – Adoption and implementation of the Plan of tasks and events concerning implementation of WTO Agreement concerning simplification of trade procedures; – Implementation of the Export Strategy roadmap timeline of the Strategic Trade Development Roadmap for 2017-2021 and Action Plan in the area of international trade. 	1	01.03. 2019	31.12. 2023	<ul style="list-style-type: none"> – The forecast of the reforms ensured; – Plans of reforms with different departments implemented; – Protection of enterprises data realized 	Cabinet of Ministers of Ukraine(CMU), Ministry of Internal Affairs of Ukraine (MIA), Ministry of Finance of Ukraine (MoF), Ministry of Infrastructure of Ukraine (MiU), MEDT, SCS, State Border Guard Service of Ukraine	Ministry of Agrarian Policy and Food of Ukraine, Ukrainian Sea Ports Authority, Ukrzaliznytsia (Ukrainian Railroads)
	1.1.2. To develop and realize the incorporated informative and operating system that provides the necessities of all authorities of border control . For this, the following activities are required: <ul style="list-style-type: none"> – Approval of the IT strategy of custom authorities, that will provide: <ul style="list-style-type: none"> • Requirements to exchange the information with other involved authorities (in particular, with custom authorities of the EU countries); • Proper protection of custom data that contain commercial information concerning the transactions; • Realization of the independent detailed examination of the IT system with direct access to IT of code of the custom system; • Integration of the custom and border control bases with regards to functions which are duplicated; – Providing of the permanent monitoring by the IT system on the basis of commercial information; – Providing the implementation of the strategic documents concerning international trade. 	1	01.03. 2019	31.12. 2023	<ul style="list-style-type: none"> – IT strategy of custom authorities approved; – Protection of enterprises data base; – Quality improvement of the services 	CMU, MIA, MoF, SCS, State Border Guard Service of Ukraine, MEDT	Ministry of Agrarian Policy and Food of Ukraine, Ukrainian Sea Ports Authority, Ukrzaliznytsia

Operational objectives	Activity	Priority	Start	End	Target measures	Main implementation partners	Other implementation partners
1.2. Improve international coordination and strengthen European integration in the area of trade.	1.2.1. To strengthen the cooperation with EU countries concerning the exchanging of the custom information. For this, the following activities are required: <ul style="list-style-type: none"> – Determining the priority of international cooperation in regards of the custom data exchange; – Determining of the strategic goal of the totally complete exchange of the information with EU countries; – Implementation of the NCTS system; – Initiate the exchange of the information concerning the results of scanning and weighting with neighbor countries; – Determine mutual recognition of the Authorized Economic Operators (AEOs) with partner countries after acceptance of relevant law; – Involving the customs representatives to the key trade delegations and missions. 	1	01.03.2019	01.01.2023	<ul style="list-style-type: none"> – Speedup the procedures for business; – Reduce the underground turnover in international trade 	Ministry of Foreign Affairs of Ukraine (MFA), MoF, MIA, SCS, State Border Guard Service of Ukraine	MEDT, State Agency for E-Government of Ukraine (E-Government Agency), Government Office for the Coordination of European and Euro-Atlantic Integration
	1.2.2. To implement the system of joint custom and border control with EU countries . For this, the following activities are required: <ul style="list-style-type: none"> – Study the arrangements of the points of admission of the countries which has deep collaboration with EU (Norway and Switzerland), analysis of their advantages and disadvantages, and find the best model of implementation in Ukraine; – Realization of educational trips to the EU countries (e.g., border between Norway and Sweden and Swiss-German border); – Implementation of new rules concerning procedures and standards functioning of border infrastructure, which shall envisage the possibility of joint control with the EU countries; – Giving the proposals to EU concerning the formats of joint control as new unified standards. . 	3	01.01.2020	01.01.2023	<ul style="list-style-type: none"> – Speed up the procedures for business and individuals; – Integration of Ukraine with EU countries; – Improve the efficiency of funds spending 	MIA, MoF, MFA, Ministry of Infrastructure, State Border Guard Service of Ukraine, SCS	MEDT, Export Promotion Office of Ukraine
	1.2.3. To strengthen cooperation between government agencies in regards of the interagency exchange of information . For this, the following steps are required: <ul style="list-style-type: none"> – Exchange of the information concerning weighting results between Ukrtransbezpeka and custom authorities; – Automatic exchange of the information between State border control service and SCS at the border checkpoints; – Automatic access to the information of custom and border control authorities in airports, seaports, river ports; – Providing ownership rights of the Government concerning the functioning of the information process in ports. 	2	01.01.2020	01.01.2022	<ul style="list-style-type: none"> – Remove duplicative functions of the authorities; – Speed up the procedures and reduce their costs for business 	Ministry of infrastructure, MIA, MoF, Ukrtransbezpeka, State Border Guard Service of Ukraine, State Aviation Administration of Ukraine, SCS, Ukrainian Sea Ports Authority	MEDT, Ministry of Information Policy of Ukraine

Operational objectives	Activity	Priority	Start	End	Target measures	Main implementation partners	Other implementation partners
Strategic objective 2: To provide the necessary conditions for efficient trade-related services for companies in order to improve their ability to import and export more quickly and at a lower cost.							
2.1. Improve the system for generating and disseminating information on customs regulations and procedures for exporters.	<p>2.1.1. To implement the system that would explain current export and compliance procedures and customs rules for the enterprises. For this:</p> <ul style="list-style-type: none"> – Development, pilot start and distribution of «package of exporter». A main addressee on the initial stage are small and middle enterprises and certain sectors (a scale start will be carried out after the study of pilot experience). – The package of exporter is a collection of key information and reference to other information generators. Distribution of package of exporter through medias, industrial fairs and associations. <p>Customs authorities must give corresponding resources and personnel for greater comfort (e.g., grant of elucidations to the basic normative acts) and availability of the web page, and to provide regular updating.</p>	1	01.01.2020	31.12.2023	<ul style="list-style-type: none"> – Provide the productiveness and accessibility custom rules for business; – Improve quality of the services for business 	CMU, MEDT, MoF, MIA, Ministry of Infrastructure, E-Government Agency	Business associations, Ministry of Information Policy of Ukraine
	<p>2.1.2. To create a unified interdepartmental web-portal on trade. For this, the following activities are required:</p> <ul style="list-style-type: none"> – Formation of interdepartmental implementation working group; – Determining of the agency responsible for technical maintenance of the web page, and determine the obligations of all participating government bodies; – Distribution of information between different departments concerning type and volume for regular promulgation; – Update the web page, providing of the access to all users. 	1	01.03.2019	31.12.2023	<ul style="list-style-type: none"> – Provide the accessibility of the customs rules for business; – Improve the transparency of the system for business 	CMU, MEDT, MoF, MIA, Ministry of Infrastructure, State Border Guard Service of Ukraine, SCS, E-Government Agency	Business associations, Ministry of Information Policy of Ukraine
	<p>2.1.3. To give the access to information concerning international trade to international companies and potential investors. Namely:</p> <ul style="list-style-type: none"> – Placing the information about current legislation and consultations about custom rules on a web portal in Ukrainian and English. – Introduction of English language requirement and base knowledge of the language of the corresponding neighboring country for the custom and border control personnel, which provides consultation to the foreign companies on the border and inside the country. 	2	01.07.2019	31.12.2023	<ul style="list-style-type: none"> – Increase the authority and investment attractiveness of the Ukrainian trade 	CMU, MEDT, E-Government Agency, State Border Guard Service of Ukraine, SCS	MFA, business-associations

Operational objectives	Activity	Priority	Start	End	Target measures	Main implementation partners	Other implementation partners
2.2. Raise the quality of service for business in the points of infrastructure used in trade.	<p>2.2.1. To improve the system providing services at the border, executing the following steps:</p> <ul style="list-style-type: none"> – Implementation of Conception of the integrated management of the borders and corresponding plan of National Transport Strategy 2030; – Realization of the steps linked to infrastructure determined in section 1.1. of the Strategy; – Establishment of the unified detailed standards for customs and border control infrastructure (including the points of admission and custom terminals), including requirements for the amounts of personnel for every type of infrastructure; – Determining of the correspondence of the design of points of admission to a transport stream and requirements in base and auxiliary services (adequate equipment of ports, customs warehouses, customs terminals, points of admission, places of customs registration), and also concerning services of customs, tax authorities and banks authorities taking into account operating standards; – Development of mechanisms of defense and proper functioning of infrastructure and equipment; – Realization of pilot point of admission that meets the requirements described earlier. 	3	01.01.2020	01.01.2023	<ul style="list-style-type: none"> – Speeding up the procedures for business and individuals; – Integration of Ukraine with EU countries; – Rise the efficiency of draft on funds on infrastructure 	Ministry of Internal Affairs, Ministry of Infrastructure, SCS, State Border Guard Service of Ukraine, CMU	MEDT, Ministry of Finance, Ministry of Foreign Affairs, National Bank of Ukraine, Export Promotion Office of Ukraine
	<p>2.2.2. To renew the auxiliary infrastructure near checkpoints. For this:</p> <ul style="list-style-type: none"> – Establishment of the proper amount of stationary of scanners for verification of the motor vehicles and containers in the motor-car points of admission; – Same as establishment of stationary scanners for checking of railway carriages and containers for railheads on borders; – Separately for motor transport and for railway transport; – Determining of the “white spots” and building of the weighing systems in motion in the motor-car points of admission; – Establishment of the systems of the video inspection in the motor-car points of admission; – Training of the operators of the above-mentioned equipment. 	3	01.01.2020	31.12.2023	<ul style="list-style-type: none"> – Speed up of the procedures for business and individuals 	CMU, SCS, MEDT, State Border Guard Service of Ukraine	Export Promotion office of Ukraine, Ministry of Education and Science of Ukraine

Operational objectives	Activity	Priority	Start	End	Target measures	Main implementation partners	Other implementation partners
	<p>2.2.3. To improve availability of infrastructure for businesses, namely:</p> <ul style="list-style-type: none"> - Increase availability and amount of logistic infrastructure in airports for treatment of loads; - Realize the system TEN-T; - Automatic access to information of customs and border authorities in marine, river and aero ports; - Providing of property rights of the state in relation to functioning of information process in ports; - Provide an exchange of information between Ukrtransbezpeka and customs authorities in relation to the results of weighing of trucks in the on-line mode. 	2	01.01.2020	01.01.2021	<ul style="list-style-type: none"> - Remove doubling of functions by the authorities; - Speed up cost reduce of the procedures for business 	Ministry of Infrastructure, MIA, MoF, State Border Guard Service of UkraineSCS, Ukrtransbezpeka, State Aviation Administration, Ukrainian Sea Ports Authority	MEDT, CMU
Strategic objective 3: To update and implement a more supportive legal and regulatory framework to facilitate international trade.							
3.1. Enact and implement legislation and regulations to improve efficiency and reduce processing costs for exporters.	<p>3.1.1. To harmonize the standards and secure mutual recognition of certification for exports of goods and services in the area of international trade with the law of EU. For this, the following activities are required:</p> <ul style="list-style-type: none"> - Forming the interdepartmental working group; - Drafting and approving the plan of implementation of Association Agreement in the area of international trade; - Drafting, adopting and implementing new laws according to the ratified plan. As a result, there should be: <ul style="list-style-type: none"> • simplified mutual recognition of certificates with EU; • avoidance of necessity of double certification of goods; • mutual recognition of certificates of origin in an electronic form. - Adoption of AEO legislation. 	1	01.03.2019	31.12.2023	<ul style="list-style-type: none"> - Provide the anticipation of custom rules for business; - Implementation of the world best practices (mutual recognition of certificates with EU, mutual recognition of certificates of origin in an electronic form etc.) 	CMU, MEDT, MoF, SCS, Ministry of Infrastructure	Verkhovna Rada of Ukraine, Ministry of Education and Science of Ukraine
	<p>3.1.2. To review of the non-tariff regulations, namely (including export control) and artificial barriers to trade in services:</p> <ul style="list-style-type: none"> - Forming the interdepartmental supervisory group with engaging of the independent executor; - Revising the requirements concerning the commodities and importers on every UCCFEA in comparing to three leading EU countries; - Determining of the provisions, that worsen business climate in comparison to EU practices (id est where documents that is not required in EU are required, or where procedures are more burdensome in every certain case); - Drafting and implementing of laws concerning the non-tariff regulation harmonizing with practices in EU. 	1	01.07.2019	31.12.2023	<ul style="list-style-type: none"> - Provide the accessibilityof the custom rules for business; - Provide the transparencyof the system for the business 	CMU, MEDT, MoF, SCS	Business associations

Operational objectives	Activity	Priority	Start	End	Target measures	Main implementation partners	Other implementation partners
3.2. Strengthen certification and patent enforcement regime by providing protection of IP rights in international trade.	3.1.3. To make the industrial parks functioning. For this, the following activities are required: <ul style="list-style-type: none"> – Adopting the package of law on customs privileges for industrial parks; – Providing construction of such parks by local authorities; – Providing administration of privileges by tax and customs authorities. 	1	01.07.2019	31.12.2023	– The amount of innovative export oriented companies increased	Verkhovna Rada of Ukraine, CMU, MEDT, SCS	Local self-government authorities and local administrations
	3.2.1. To improve IP protection by updating the legislation, namely: <ul style="list-style-type: none"> – Adopting and implementing the Governmental draft of the Law No. 4614, developed in order to implement EU Regulation 608/2013 on 12 June 2013; – Improving legal mechanisms concerning avoidance of actions of “patent trolls”, appeal procedures. 	2	01.07.2019	01.01.2023	<ul style="list-style-type: none"> – Draft of the Law No. 4614 adopted; – Provide EU standards concerning IP rights protection; – Increase the investment attractiveness 	MEDT, SCS, Ministry of Justice	Verkhovna Rada of Ukraine, CMU, Export Promotion Office of Ukraine
	3.2.2. To strengthen the institutional capacities of SCS in the area of intellectual property rights protection, by: <ul style="list-style-type: none"> – Forming special department inside customs authorities. – Providing clear procedures of administrative appeal of “patent trolls” actions. – Developing of new detailed procedures for customs authorities for IP rights protection. 	1	01.03.2020	01.01.2021	– Speed up the procedures for business and individuals	MEDT, SCS	CMU, Ministry of Justice of Ukraine

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APPENDIX 1:

LIST OF PARTICIPANTS IN THE PUBLIC-PRIVATE CONSULTATIONS (NOT IN ALPHABETICAL ORDER)

Nº	Name	Organization
1	Sergiy Svistyl	Chamber of Commerce and Industry of Ukraine
2	Oleksiy Voloshyn	Association 4U, Directorate for Strategic Planning and Policy Coordination of the Cabinet of Ministers of Ukraine Secretariat
3	Andriy Todoshchuk	Association of professional customs intermediaries
4	Oleksandr Baldyniuk	Association "Ukrkondprom"
5	Larisa Matronich	State Statistics Service of Ukraine
6	Olena Avericheva	Association "Ukrkondprom"
7	Volodymyr Gryn'ko	Public Association "Refrigeration Association of Ukraine"
8	Jaryna Skorokhod	European Business Association
9	Valeriy Lugovets	Ukrainian National Committee of the International Chamber of Commerce (ICC Ukraine)
10	Nataliya Isakhanova	Chinese Commerce Association
11	Nataliya Gakhovich	State Entity "Institute of Economics and Forecast of the National Academy of Sciences of Ukraine"
12	Valentyna Golenko	Ministry of Economic Development and Trade of Ukraine
13	Svitlana Naydenko	Association "Ukrzovnishtrans"
14	Larysa Demidenko	Ministry of Ecology and Natural Resources of Ukraine
15	Olena Nikiforuk	State Enterprise "Institute of Economics and Forecast of the National Academy of Sciences of Ukraine"
16	Taras Filipchuk	"Bei-Trans" LLC
17	Iryna Tsykun	Ministry of Economic Development and Trade of Ukraine
18	Natalia Portnyagina	State Fiscal Service of Ukraine
19	Olexander Ishchenko	National School of Judges of Ukraine
20	Vitaly Dyachek	V.N. KarazinKharkiv National University
21	Vladyslav Primomanov	Office of effective regulation (BRDO)
22	Alexander Savenko	Public Association "National Organization of the Organization of Trade"
23	Olexander Zrajko	Ivano-Frankivsk Regional State Administration
24	Oleksandr Shulga	Ministry of Foreign Affairs of Ukraine
25	Denys Dzundza	Ministry of Economic Development and Trade of Ukraine

26	Grygoriy Gaydak	State Regulatory Service of Ukraine
27	Inna Yanul	Taras Shevchenko National University of Kyiv
28	Olesya Kryvetska	Chinese Commerce Association
29	Andriy Kohan	Poltava State Agricultural Research Station. E. Vavilov Institute of Pig Production and Agricultural Production of the National Academy of Agrarian Sciences of Ukraine
30	Tetyana Kvasha	State Scientific Entity "Ukrainian Institute of Science and Technology Expertise and Information"
31	Viktor Lysytskyi	Shipyards Association of Ukraine "Ukrsudprom"
32	Serhiy Lysenko	Shipyards Association of Ukraine "Ukrsudprom"
33	Valentyna Holubenko	State Fiscal Service of Ukraine
34	Valentyna Zhylenko	State Fiscal Service of Ukraine
35	Maryna Kozlovska	National Aviation University, Department of Educational Innovation Project Management/National Environmental Center of Ukraine
36	Viktoriya Olefirenko	Kyiv National Economic University named after Vadym Hetman
37	Sergiy Shcherbina	Association 4U
38	Yuri Klymuk	State Fiscal Service of Ukraine
39	Olena Koneva	LLC Association of Exporters and Importers "ZED"
40	Karen Mkrtumyan	State Enterprise "Derzhzovnishinform"
41	Yuri Petrovsky	State Enterprise "Derzhzovnishinform"
42	Volodymyr Kalita	State Fiscal Service of Ukraine
43	Sergiy Sushchenko	State Fiscal Service of Ukraine
44	Yuliya Bosa	Deutsche Gesellschaft für internationale Zusammenarbeit (GIZ) GmbH
45	Viktor Kruhlov	Ukrainian association of publishers and book distributors
46	Pavlo Kukhta	SAGSUR
47	Oleksandr Kava	State Road Agency of Ukraine
48	Roman Skilsky	Association of cement manufacturers "Ukrcement"
49	Jaroslav Haulyak	Public Association "Center of public advocacy"
50	Oleksandr Lazarev	European Business Association
51	Andriy Butin	Institute of Economic Studies and Political Counseling
52	Vitaliy Lucyak	Vinnitsia National Agrarian University

53	Tetyana Miskova	State Institution "Export Promotion Office of Ukraine"
54	Mykola Pugachov	National Science Center "Institute for Agricultural Economics"
55	Tetyana Filipovich	Assistant to the fiscal crime liaison officer HM Revenue and Customs
56	Nataliya Isakhanova	Chinese Trade Association
57	Evgenia Malikova	Office of Economic Growth USAID/Ukraine
58	Valentina Golubenko	State Fiscal Service of Ukraine
59	Oksana Gewak	State Fiscal Service of Ukraine
60	Volodymyr Homanets	Ministry of Foreign Affairs of Ukraine
61	Vadym Sydyachenko	Ministry of Foreign Affairs of Ukraine
62	Volodymyr Shemaev	State Enterprise "Administration of Seaports of Ukraine"
63	Valentyna Lugovenko	Ministry of Economic Development and Trade of Ukraine
64	Lyudmyla Dragunova	Department of Exporters Support Instruments Abroad, Export Development Department, Ministry of Economic Development and Trade of Ukraine
65	Dmytro Marchenko	Parliament of Ukraine (Committee on Industrial Policy and Entrepreneurship)
66	Kseniya Vakal	Association of Perfumery and Cosmetics of Ukraine
67	Yuliya Kislitska	Ministry of Finance of Ukraine
68	Larysa Nerush	State Enterprise "Administration of Seaports of Ukraine"
69	Vladyslav Sedik	Phytosanitary Association of Ukraine
70	Iryna Holyk	State Fiscal Service of Ukraine
71	Inna Irynychyna	Kyiv National Economic University named after Vadym Hetman
72	Lesya Chapil	Ministry of Economic Development and Trade of Ukraine
73	Yuri Klymiuk	State Fiscal Service of Ukraine
74	Irina Holik	State Fiscal Service of Ukraine
75	Oleksandr Pavlichenko	Ministry of Infrastructure of Ukraine
76	Larisa Demidenko	Ministry of Ecology and Natural Resources of Ukraine
77	Olena Zinchenko	National University of Food Technology
78	Oleksandr Rudolsky	State Fiscal Service of Ukraine
79	Serhiy Sushchenko	State Fiscal Service of Ukraine
80	Vitaliy Hofnung	State Border Guard Service of Ukraine

81	Volodymyr Chirnyi	Administration of the State Border Guard Service of Ukraine
82	Ulyana Ramazanova	National University of State Fiscal Service of Ukraine
83	Nataliya Grytsan	State Environmental Inspection of Ukraine
84	Oleksandr Frolov	National University of State Fiscal Service of Ukraine
85	Valentyna Gutnik	Secretariat of the Cabinet of Ministers of Ukraine
86	Oksana Fadeeva	State Fiscal Service of Ukraine
87	Ihor Lymarenko	Ministry of Economic Development and Trade of Ukraine
88	Vasyl Kostytsky	NGO "Ukrainian Union of Small and Medium Business Entrepreneurs"
89	Oleh Bondar	ECOVIS Bandar&Bondar Law Firm
90	Oksana Babiy	Ministry of Infrastructure of Ukraine
91	Viktoria Dubina	National University of State Fiscal Service of Ukraine
92	Valentyna Gutnik	Secretariat of the Cabinet of Ministers of Ukraine
93	Daryna Sichkar	European Business Association
94	Volodymyr Kyseliov	V. I. Vernadsky Taurida National University
95	Bohdan Dolynets	Institute of Management and Strategies
96	Svitlana Galko	Kyiv National University of Trade and Economics
97	Viktor Bereshchenko	Association of International Freight Forwarders of Ukraine

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