



International
Trade
Centre



GOVERNMENT OF PAKISTAN
MINISTRY OF COMMERCE



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Stakeholder meeting on Non-Tariff Measures

NTM Business Survey in Pakistan 2019



What is ITC?



UNCTAD

The UN body for design of policy recommendations to achieve economic and social development through trade and investment.



WTO OMC

The forum to negotiate multilateral trade rules, monitor their implementation and handle trade disputes



ITC works with local and regional institutions and businesspeople to build trade capacity.

Our mission

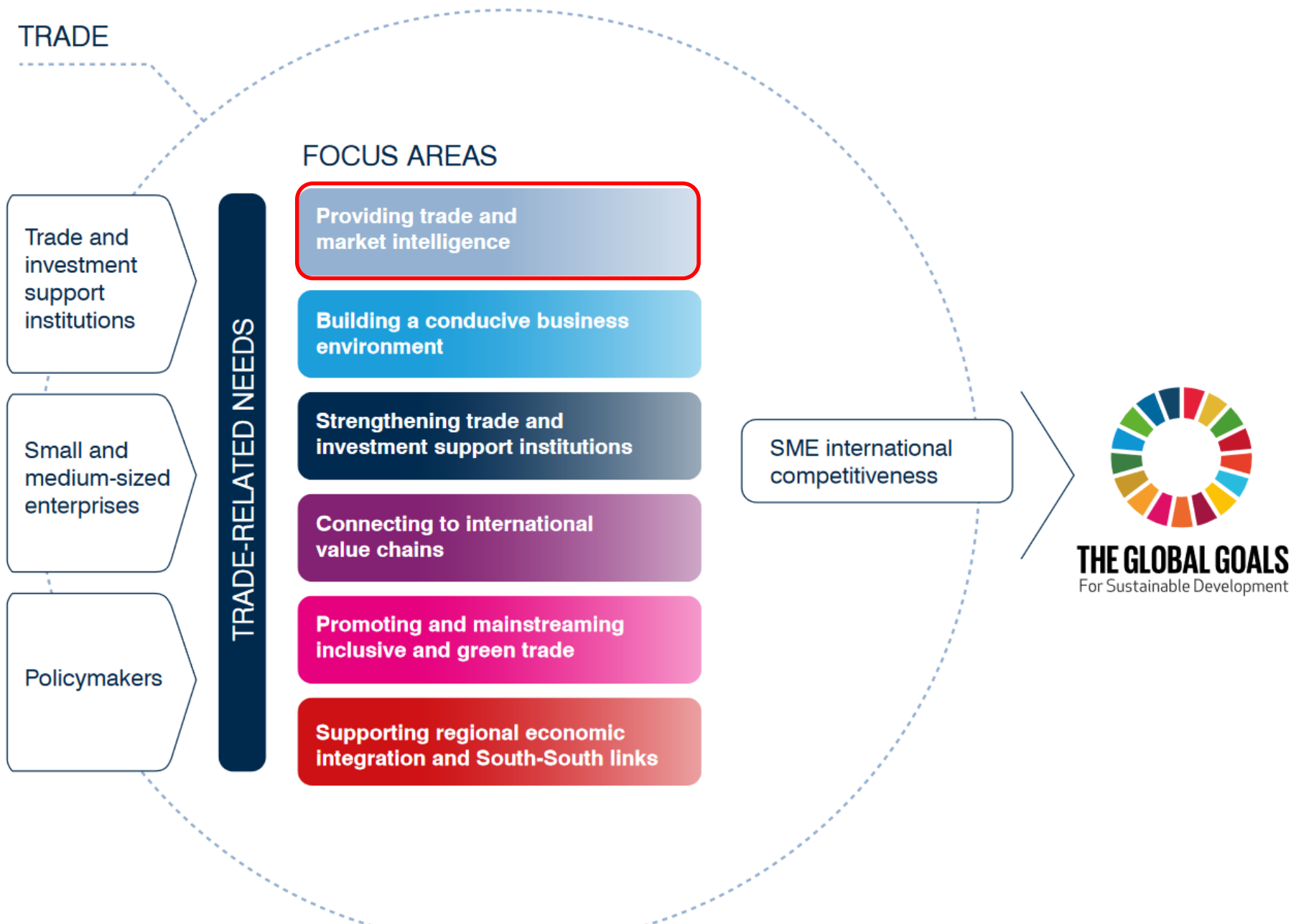
To foster inclusive and sustainable growth and development through trade and international business development.



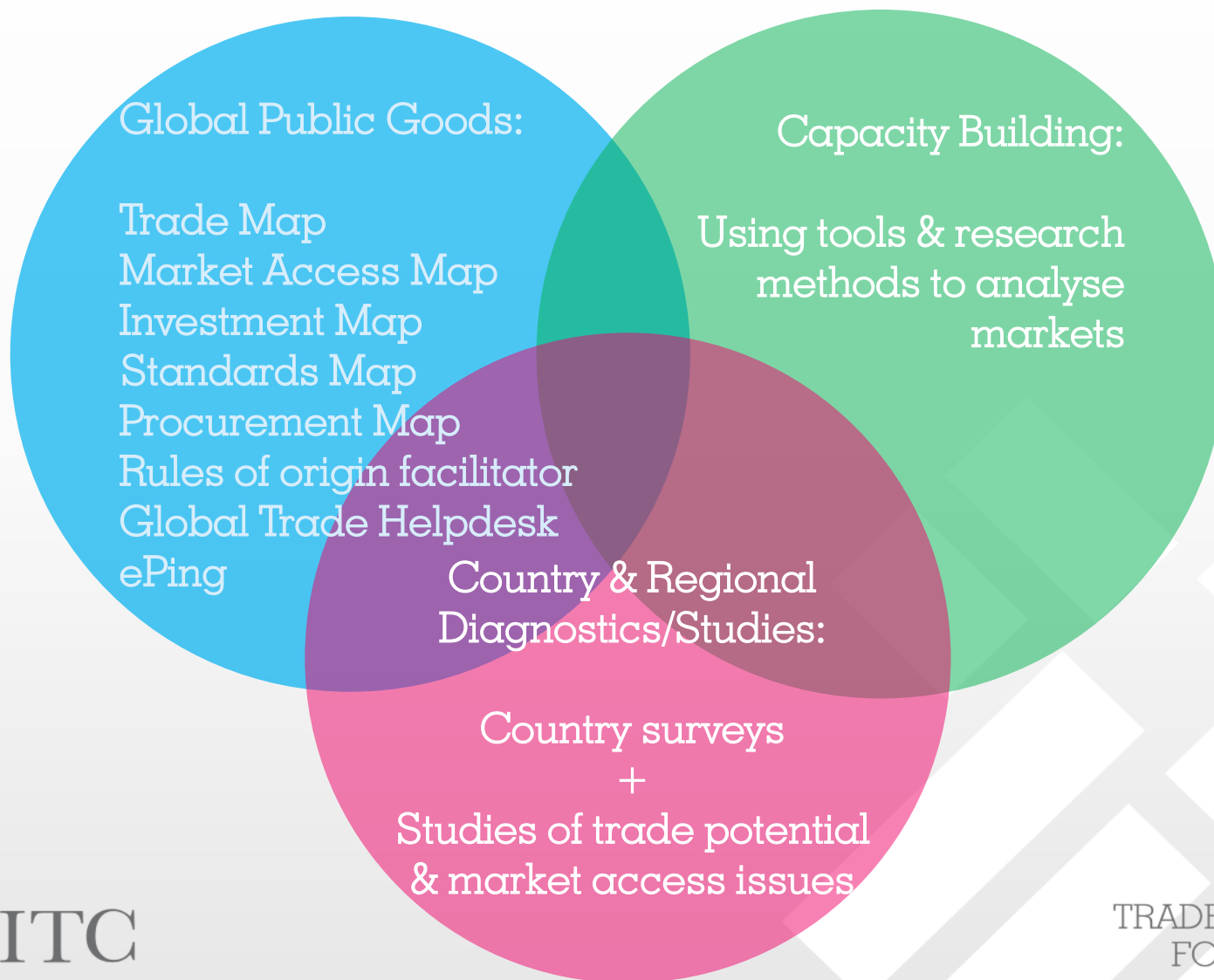
TRADE IMPACT
FOR GOOD

ITC's focus areas and goals

TRADE



ITC Market Analysis – Areas of work



Today's objective



Present first results of the survey

Get inputs from the public institutions



Discuss jointly with the public and private sector to identify and prioritize necessary action plan



Agenda

WEDNESDAY 17 JULY 2019,
ISLAMABAD, PAKISTAN

NATIONAL STAKEHOLDERS MEETING ON NON TARIFF MEASURES

Opening remarks (09:00)

Session 1 Background and overviews of results

- Overview on ITC project on non-tariff measures (NTMs) and implementation of survey in Pakistan
- Results of the survey: companies' perception on NTMs

Session 2 Thematic round tables

- Round table 1: Technical requirements, standards and conformity assessment.
- Round table 2: Rules of origin, customs procedures and other clearance issues

Understanding Non-Tariff Measures

What are non-tariff measures (NTMs)?



Official policy measures on export and import, other than ordinary customs tariffs, than can potentially have an effect on international trade in goods, changing quantities traded, or prices or both.

Mandatory requirements, rules or regulations legally set by the national authorities of the exporting, importing or transit country (in contrast to private standards which are not legally set)

Can affect both export and import

Include technical measures and standards, as well as regulations on customs procedures, para-tariff measures, financial measures, prohibition, etc.

Classification of NTMs

- International taxonomy used to classification different types of regulations related to trade in goods.

- Prepared in a multi-agency framework

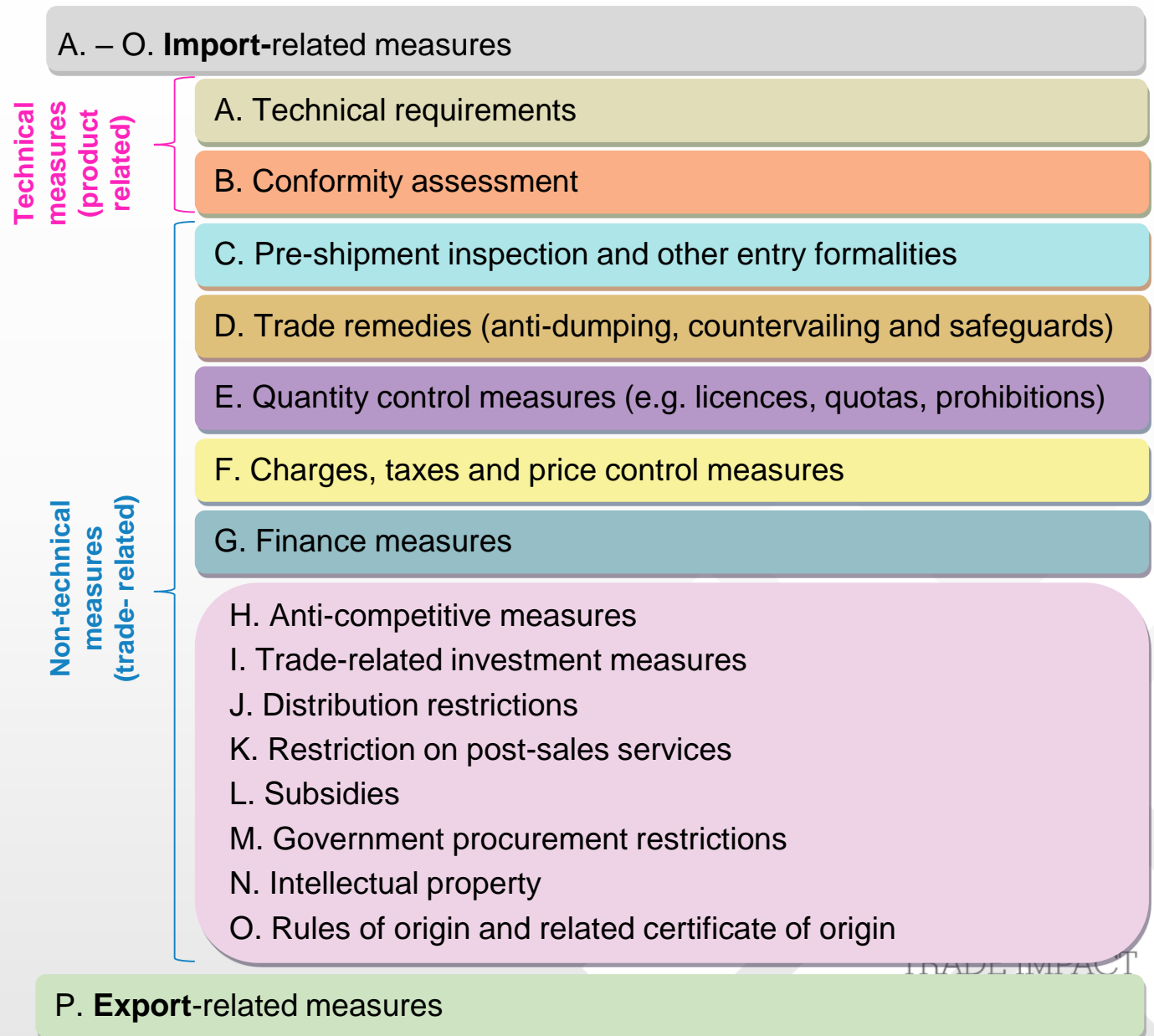
| Non-tariff measures classification for surveys | |
|--|--|
| A to O. Import related measures | |
| Measures imposed by the country importing the goods. From the perspective of an exporter, these are the measures applied by the destination country of his product. From the perspective of an importer, these are the measures applied by his own country on the goods that he imports. | |
| Technical measures | A. Technical requirements |
| | B. Conformity assessment |
| Non-technical measures | C. Pre-shipment inspection and other entry formalities |
| | D. Charges, taxes and other para-tariff measures |
| | E. Quantity control measures (e.g. licences, quotas, prohibitions) |
| | F. Finance measures |
| | G. Price control measures |
| | H. Anti-competitive measures |
| | I. Trade-related investment measures |
| | J. Distribution restrictions |
| | K. Restriction on post-sales services |
| | L. Subsidies |
| | M. Government procurement restrictions |
| | N. Intellectual property |
| | O. Rules of origin and related certificate of origin |
| P. Export related measures | |
| Measures imposed by the country exporting the goods. From the perspective of an exporter, these are the measures imposed by his own country on the goods he exports from his country. From the perspective of an importer, these measures are imposed by the country of origin on the goods he import from this country. | |
| PO. List of procedural obstacles | |
| This list provides a categorization of the problems related to NTMs that exporters and importers experience. | |



UNCTAD

- Covers
 - mandatory, government-imposed regulations:
 - both import and export of goods
 - technical and non-technical measures
- Trade in services not covered

NTM Classification for Surveys



ITC NTM Survey: NTMs and other trade obstacles

NTMs

Official regulations on trade other than ordinary customs tariff, that can potentially have an effect on international trade in goods, changing quantities traded, or prices or both.

Private Standards

Additional voluntary, non-public standards demanded by buyers for a variety of purposes including quality, social, environmental and ethical reasons

Excessively strict/ complex requirements

The requirements are too strict or complex to comply with.

Procedural Obstacles

Practical challenges or administrative hurdles which make compliance to NTMs difficult.

Trade Obstacles

Business Environment

Obstacles that are not related to NTMs but hinder international trade.

ITC's Programme on NTMs

Motivation, projects and methodology



ITC's Programme on Non-tariff measures

Pillar 1

NTM Regulatory Mapping

Codifying and classification of national trade-related regulations

Data dissemination through Market Access Map (MAcMap)



Pillar 2

Business Surveys

Large-scale surveys of businesses on their experiences with government regulations when exporting or importing



Pillar 3

Solution Packages

Design and implementation of actions to address companies' difficulties with NTMs

E.g.: Trade Obstacle Alert (TOA) mechanism



Surveys Methodology: Scope

Goods

- Covers companies involved in international trade in goods.
- Products from all sectors included except minerals and arms.
- Sectors with more than a 2% share in total exports are included
- Cumulatively, sectors covered account for at least 90% of country's total export value

Services

- The survey does not cover companies involved in cross-border trade in services such as tourism, banking, finance, telecommunication and BPO.
- A survey on trade in services requires a different methodology

NTM Survey covers the following sectors:

1. Fresh food and raw agro-based products
2. Processed food and agro-based products
3. Wood, wood products and paper
4. Yarn, fabrics and textiles
5. Chemicals
6. Leather
7. Metal and other basic manufacturing
8. Non-electric machinery
9. Computers, telecommunications; consumer electronics
10. Electronic components
11. Transport equipment
12. Clothing
13. Miscellaneous manufacturing

Two-step interview process

Step 1 Phone Screens (PS)

- 6-8 min per interview
- Identify products exported by the company and partner countries
- Identify if the company face problems with burdensome regulations



Step 2 Face-to-Face interviews (FTF)

- Companies facing problems with NTMs as identified in PS interviewed
- 40-60 min per interview
- All details of the problem faced by the company recorded



Type of data: Telephone interviews

1. Phone screen data gathering company level information (representative sample by sector) on:

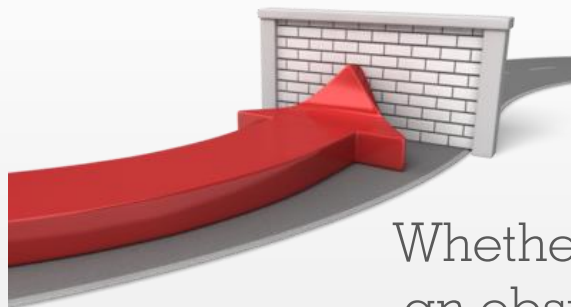
Main
exported/imported
product (HS6)



Destination/origin
markets (at region
level)



Number of
employees



Whether or not
an obstacle is
faced

Gender information
(firm management /
ownership / employment)



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Type of data: Face-to-face interviews

2. Face-to-face data gathering company-level information (only those facing trade obstacles) on:

All affected trade flows



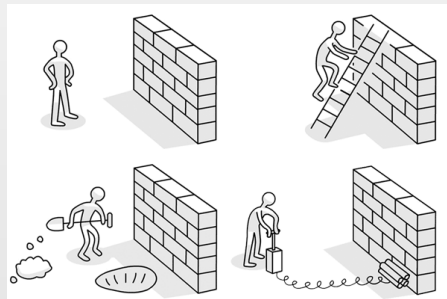
Burdensome regulations
(description, official name, category of NTM, implementing body, applying country)



All traded products and partner countries



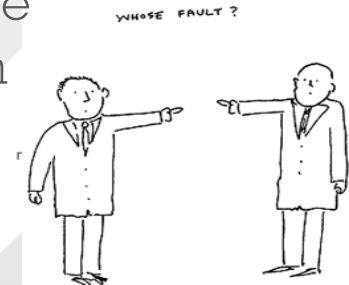
Recommendations to overcome the obstacles



Related obstacles
(description, category of obstacles, implementing agency, location)



Where the problem occurs

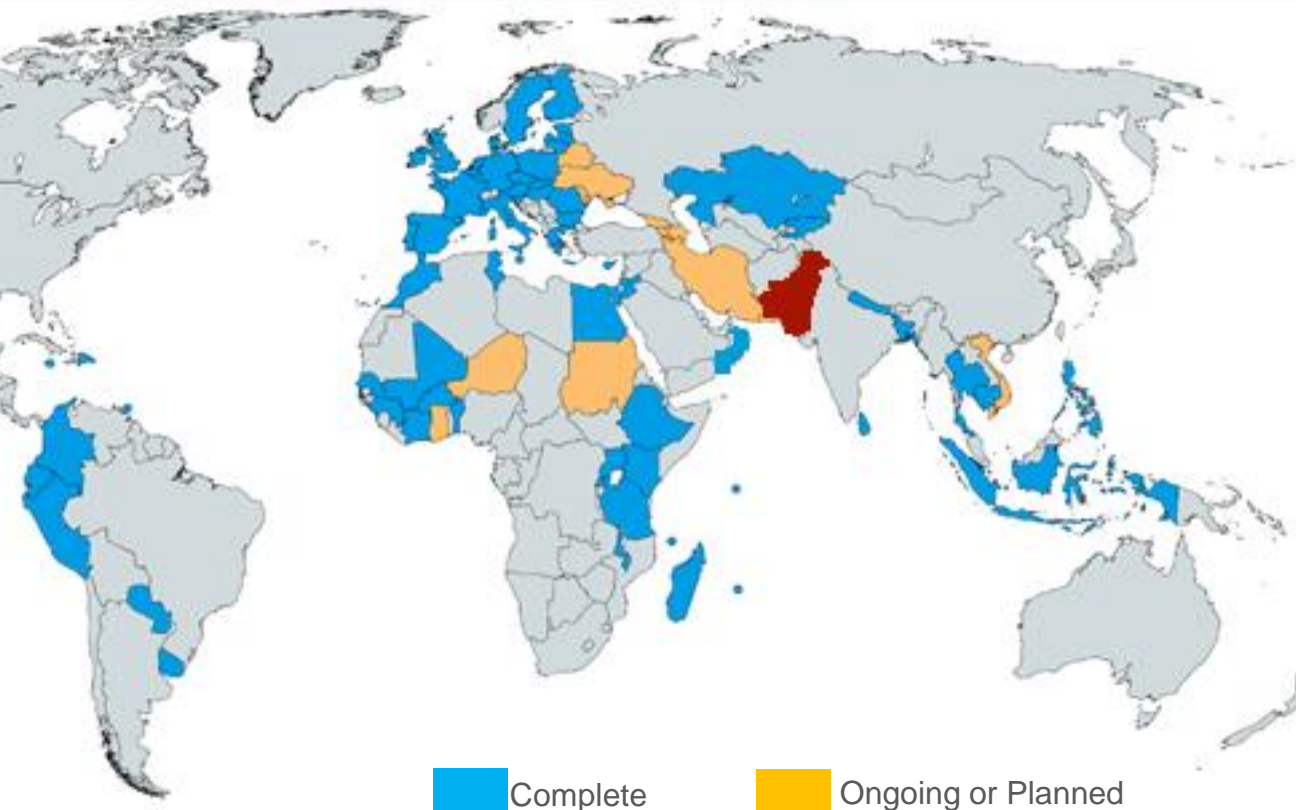


NTM Business Surveys in numbers

 **30,000**
Phone Interviews

8,600 
Face-to-face interviews

From over
developing
countries **40**
+ **28** EU countries



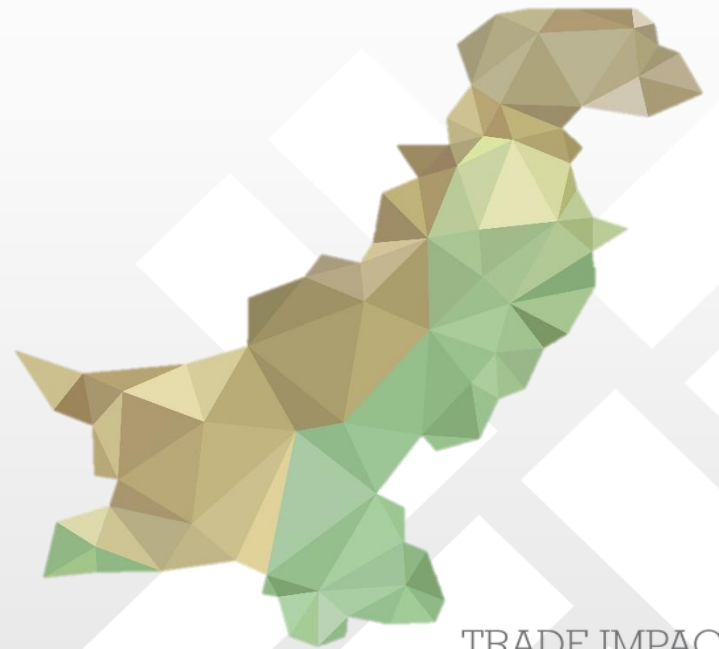
More than
30,000 
reported trade obstacles...

...concerning
trade with
partner countries **185**

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Survey Implementation in Pakistan

Profiles of interviewed companies



In close collaboration with national and international partners



GOVERNMENT OF PAKISTAN
MINISTRY OF COMMERCE



Australian Government
Department of Foreign Affairs and Trade



Survey Implementation Partners

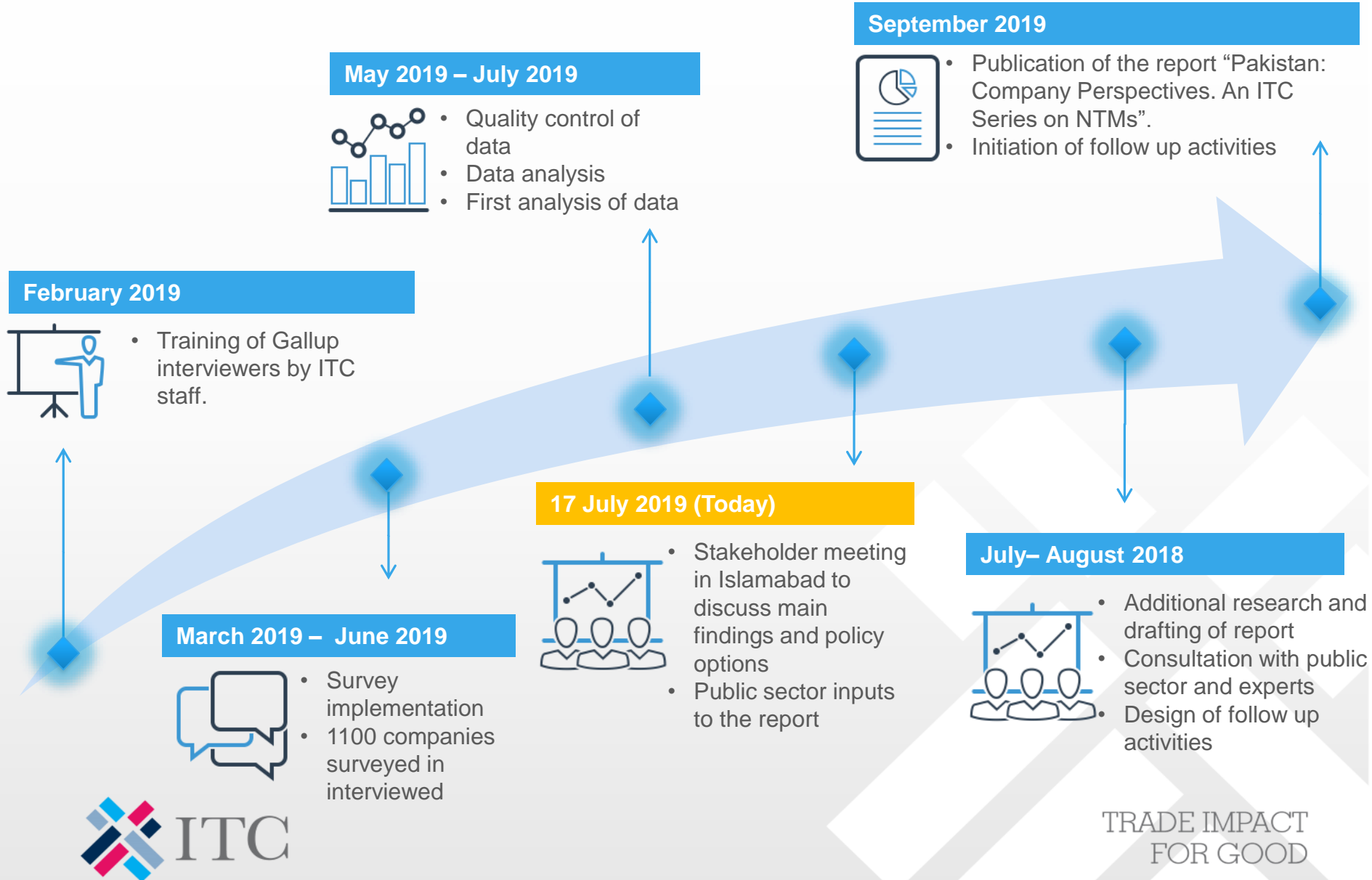


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NTM Survey Implementation: Timeline



Why a survey in Pakistan? And for whom?

Who will benefit from the ITC survey on NTMs:

1. Exporters

- Channel for reporting the obstacles to trade they face in their daily business to raise awareness among other exports and importers, trade support institutions and policy makers
- Exchange of experiences with other exporters and importers
- → final beneficiaries of removal of NTM-related trade obstacles

2. Trade support institutions

- Better understanding of sector-specific needs;
- Better support for business sector; fostering of transparent and dynamic commercial activity

3. Policy makers

- Understanding specific needs of business sector; better formulation of national and regional strategies and policies
- Removal of procedural obstacles

4. Researchers

- Better understanding of the impact of NTMs on international trade – from the perspective of the business sector

Things to keep in mind



- Information collected from the survey is perception data
 - Respondents may have different scale for judging what constitutes an impediments.
 - Perceptions across countries can differ due to cultural, political, social, economic and linguistic differences.
- Companies may not have full understanding of the purpose of the regulation
- Scope of the survey limited to legally operating companies
 - Informal trade not covered

Objectives of the survey

The NTM survey

...studies the private sector perspective on NTM-related trade obstacles with a view to identify feasible options to overcome these.

...is per definition “biased” as it concentrates on the company perspective. In the analysis of survey results, the views of additional stakeholders will however be sought and taken into account.

...aims at identifying concrete actions that enable Pakistan to reach greater efficiency in the export process and reduced trade cost.

The NTM survey is NOT

...a collection of or platform for complaints.

...intended to single out specific institutions to blame for inefficiencies.

Survey Implementation

- Survey implemented in Pakistan by:



- Survey Questionnaire has 5 sections:
 - **Basic information**
 - **Business operation** – questions about the company
 - **Main products and partner countries** – products export/import and the origin and destination country or countries
 - **Barriers to Trade** – challenges faced with certain regulations or procedures
 - **Business environment** – problems with business environment
- Questionnaires in English and Urdu
- All interviews conducted in English and Urdu
- Extensive training to the Field Teams – given by ITC in February 2019
- Quality control of data – done by ITC

Results validation / stakeholder consultation

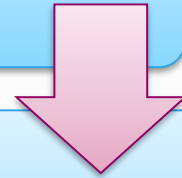
- The survey documents company experiences with NTMs → one side of the story
- This is complemented by stakeholders consultations, including
 - Public agencies (customs, standard agency, etc.)
 - Business associations
 - Development agencies
- Data quality control and analysis in collaboration with national experts
- Validation of results during a national stakeholder meeting
- Publication of survey findings
- Preparation for activities to tackle the challenges identified – in close collaboration with the Government of Pakistan and other development partners

NTM Survey in Pakistan: Sample



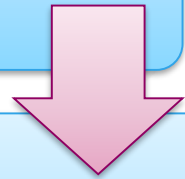
~12000

Active exporting
companies in Pakistan in
2019



~1200

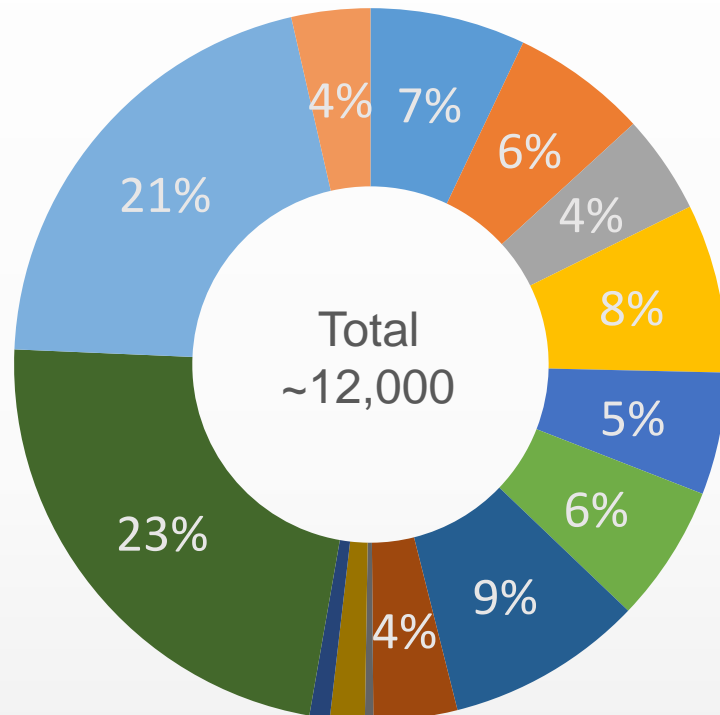
Companies interviewed by
phone



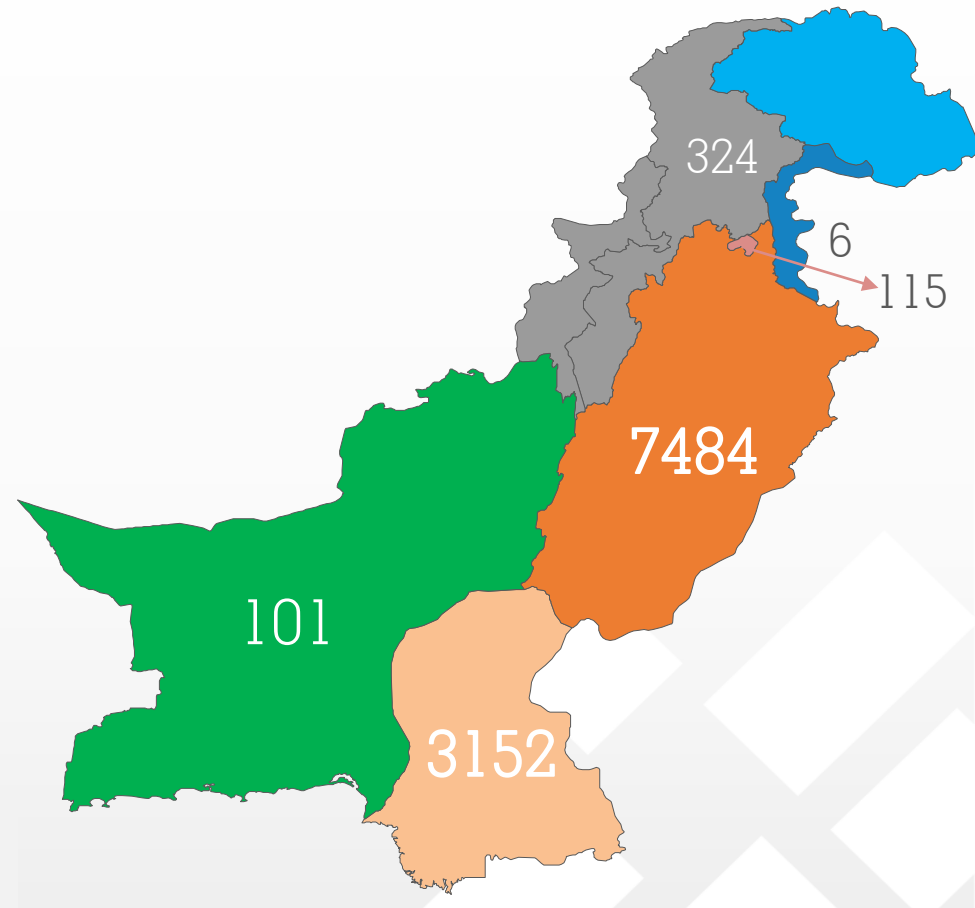
~300

Companies interviewed
face-to-face

Business Directory: By sector and location



- Fresh food and raw agro-based products
- Processed food and agro-based products
- Wood, wood products and paper
- Yarn, fabrics and textiles
- Chemicals
- Leather and leather products
- Metal and other basic manufacturing
- Non-electric machinery
- Computer, telecommunications, consumer electronics
- Electronic components
- Transport equipment
- Clothing
- Miscellaneous manufacturing
- Minerals



Company contacts obtained from:

- *Trade Development Authority of Pakistan: TDAP*

Additional contacts sourced from:

- *Various business associations and chambers of commerce*

Location of interviewed companies



Over 20 cities and towns covered

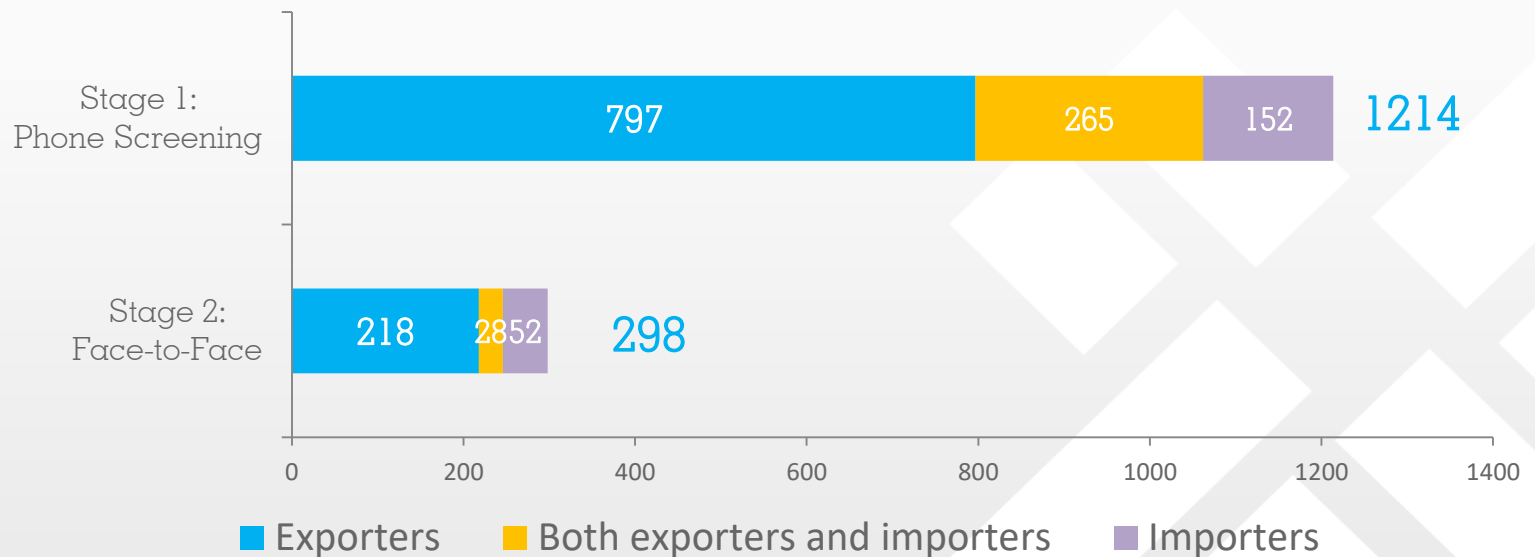
| | |
|------------|-------------|
| Bahawalpur | Faisalabad |
| Gujranwala | Gujrat |
| Islamabad | Jhang |
| Karachi | Khairpur |
| Lahore | Lasbela |
| Multan | Okara |
| Peshawar | Quetta |
| Rawalpindi | Sahiwal |
| Sargodha | Sheikhupura |
| Sialkot | Sukkur |

Pakistan NTM Business Survey

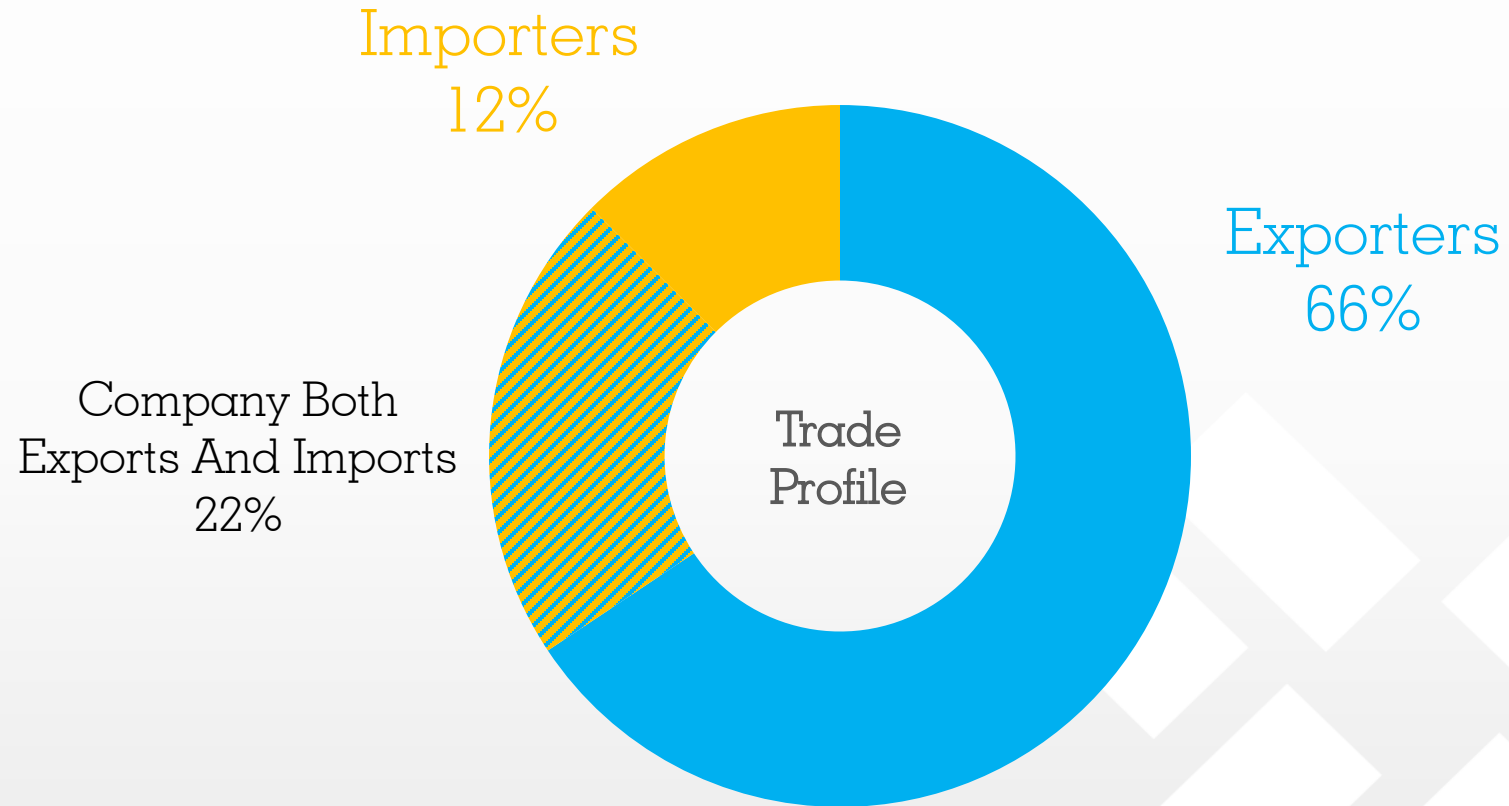


1214

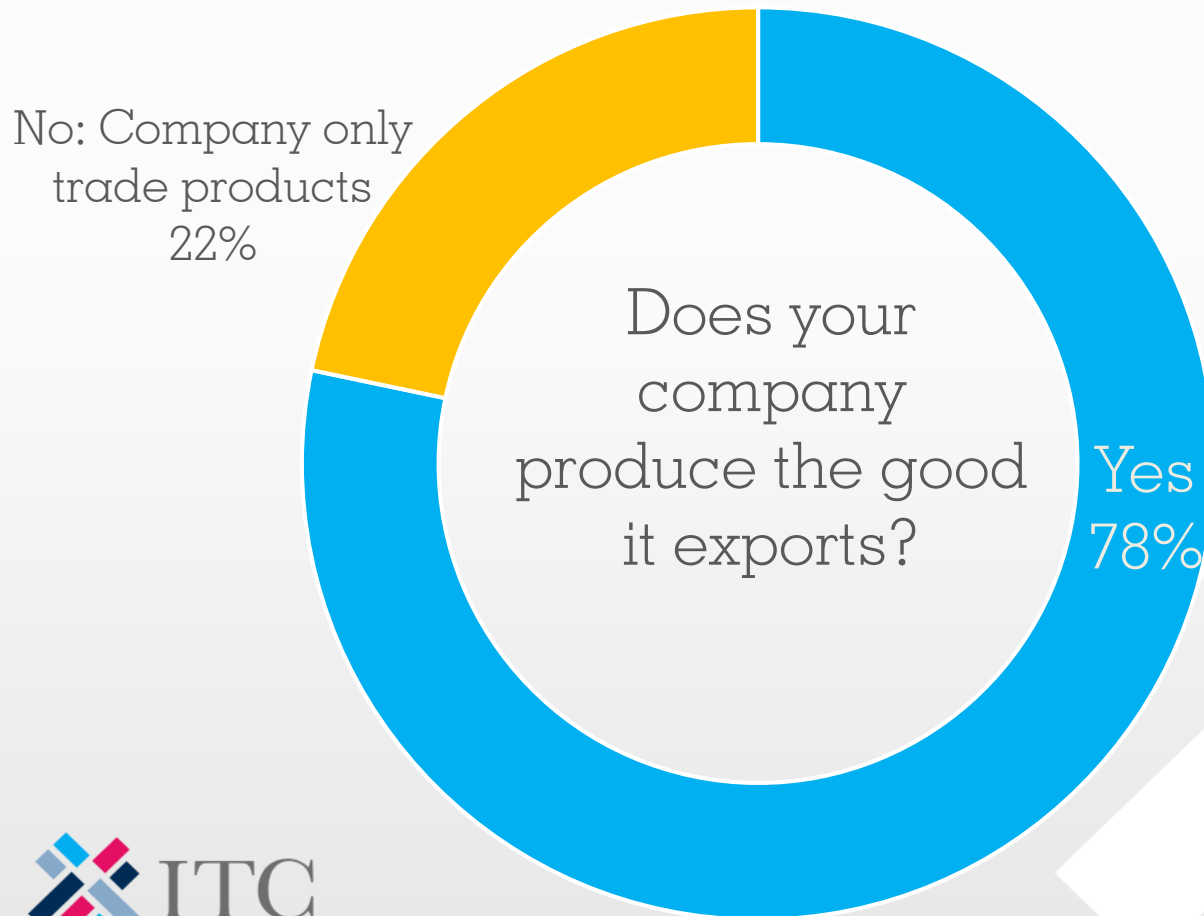
Companies interviewed



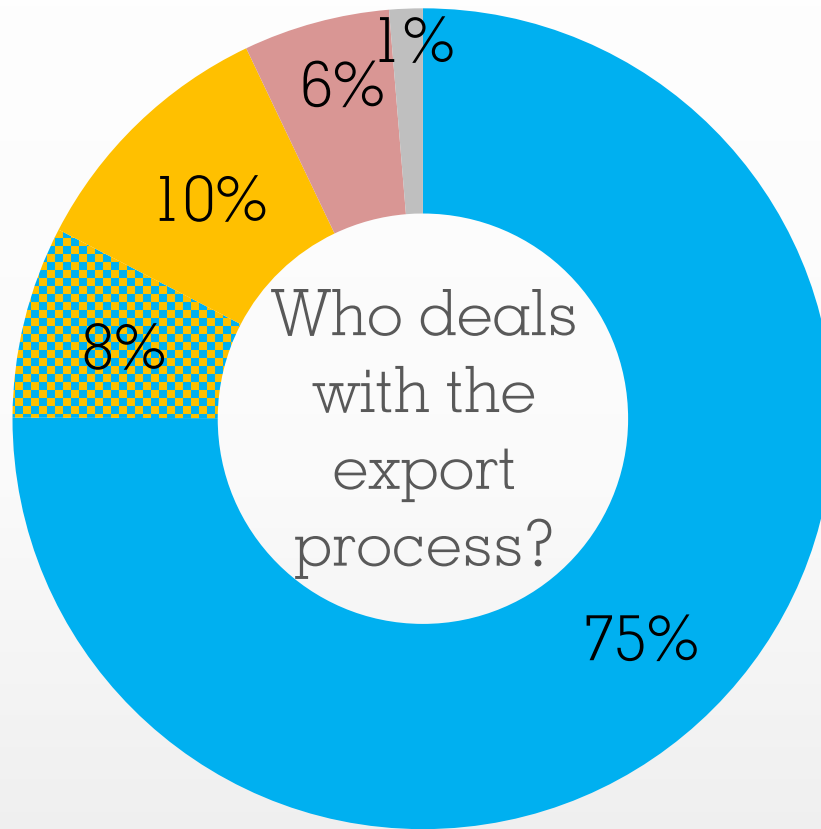
Pakistan NTM Survey: Company Profiles



Pakistan NTM Survey: Company Profile



Pakistan NTM Survey: Company Profile



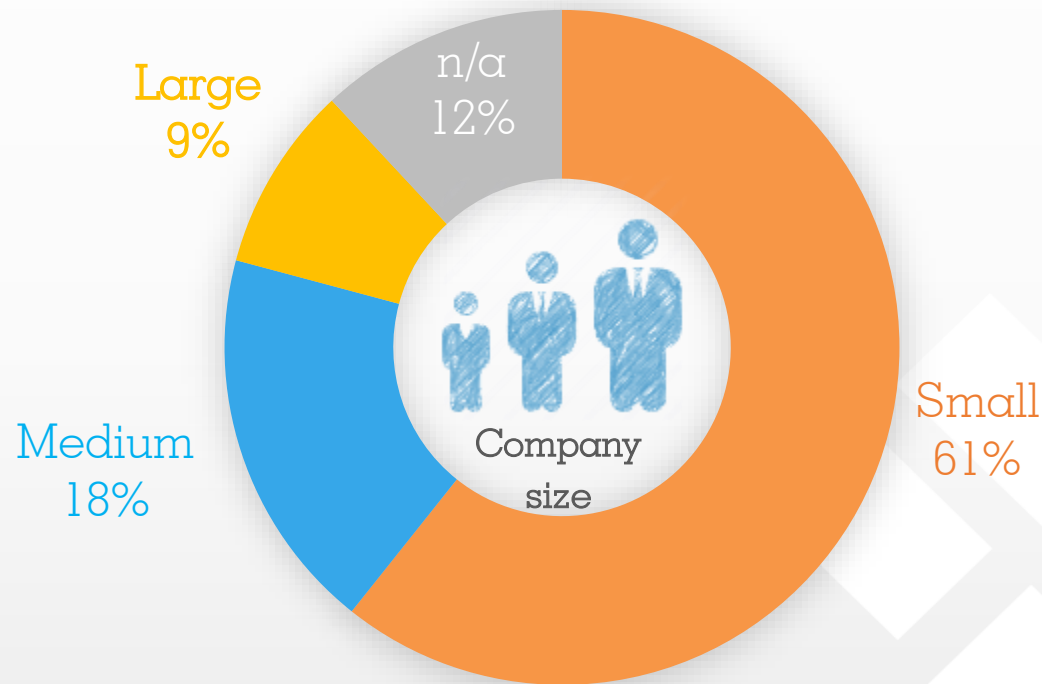
Most Pakistani exporters take care of the export procedures on their own



- Company itself
- Company itself + Specialized forwarding company
- Specialized forwarding company
- Partner company abroad
- Unspecified



Distribution of interviewed companies by size



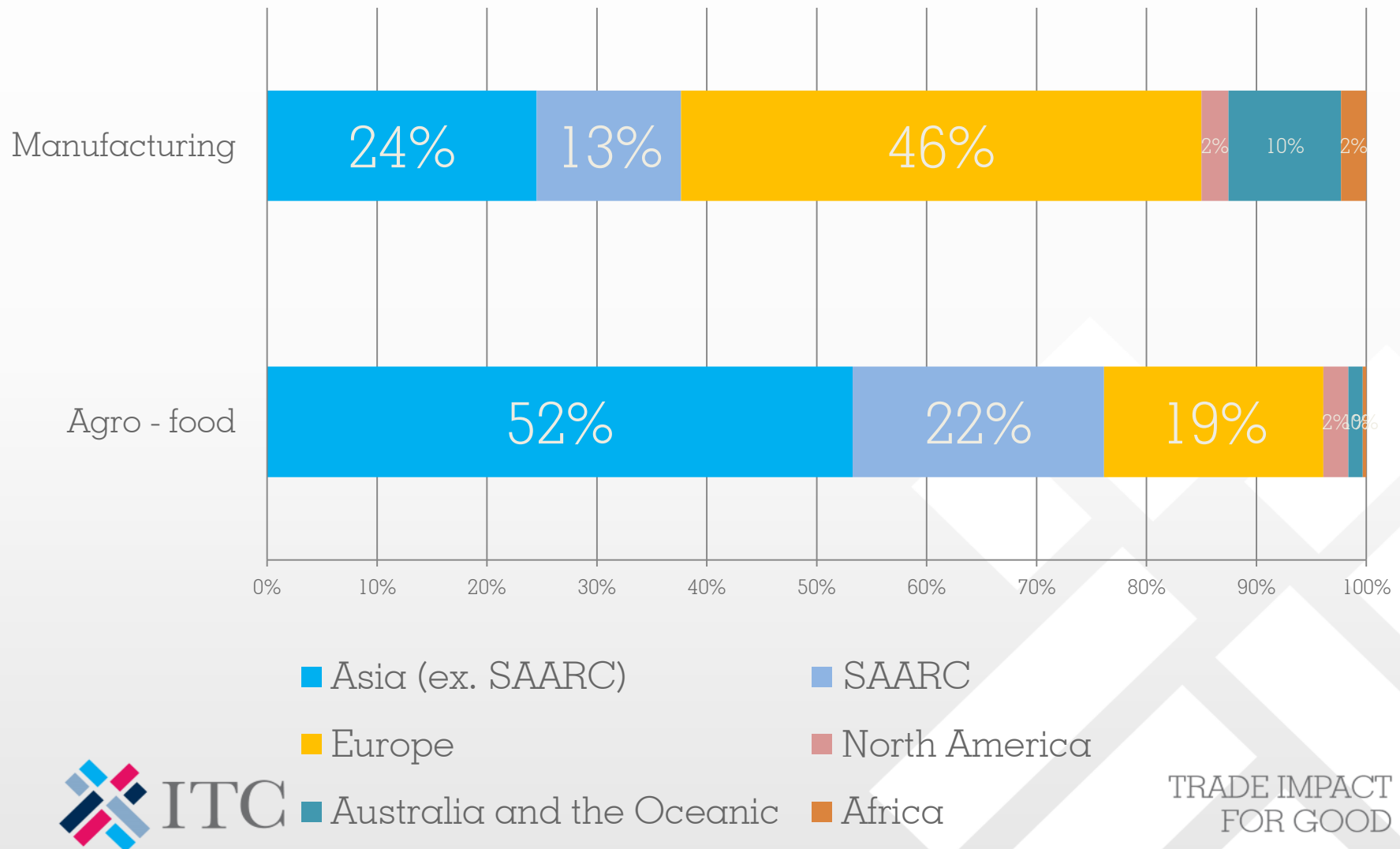
Company size determined
based on the number of
employees



Small: Up to 50 employees
Medium: Up to 250 employees
Large: +250 employees

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Exporters' main export destination: by sector

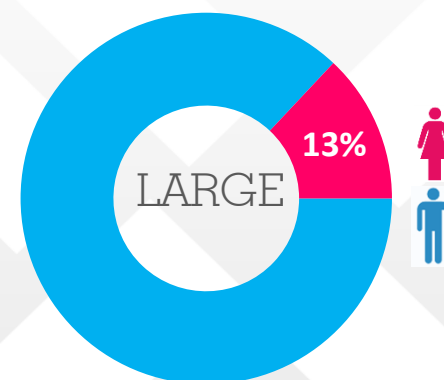
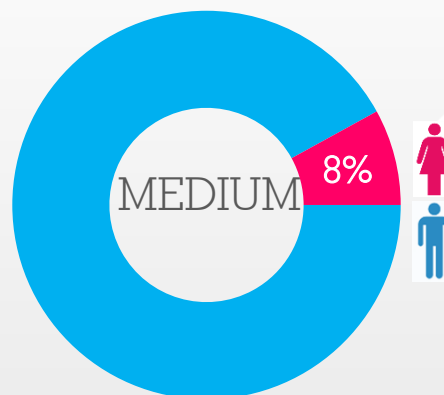
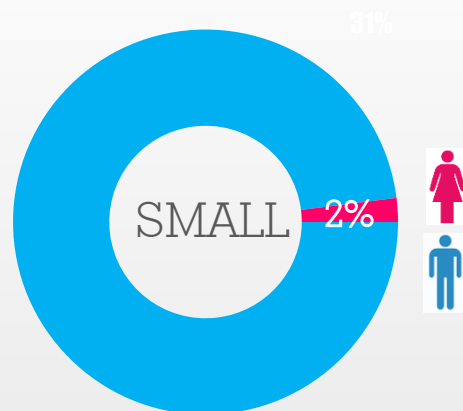


Company Profile: Women Employment



4%

Employees in trading companies are female



Company Profile: Women Employment

61%

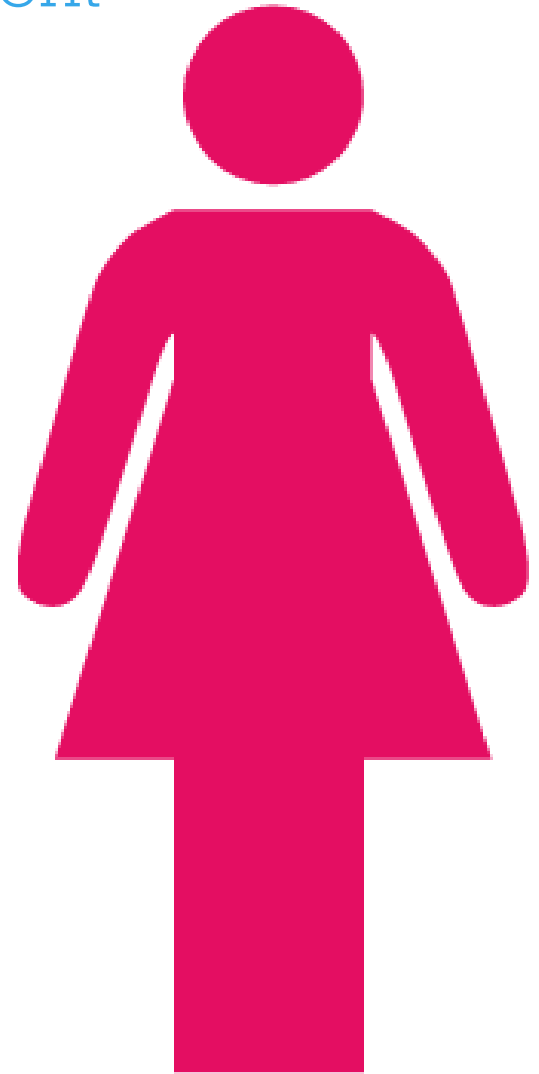
Companies employed no women

80%

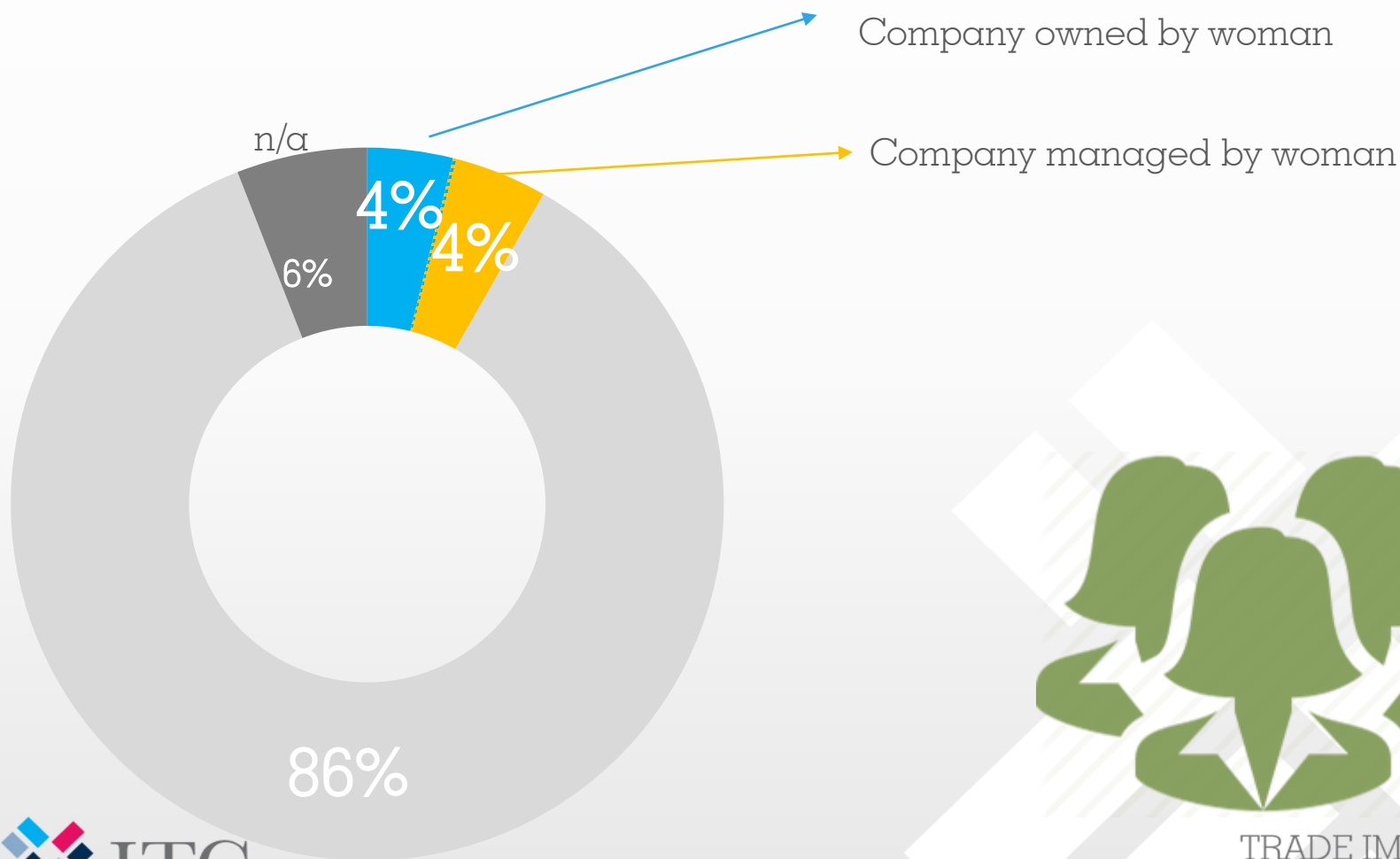
Companies with less than 10% of their workforce women

1%

Companies with more female employees than men



Company Profile: Women in leadership position

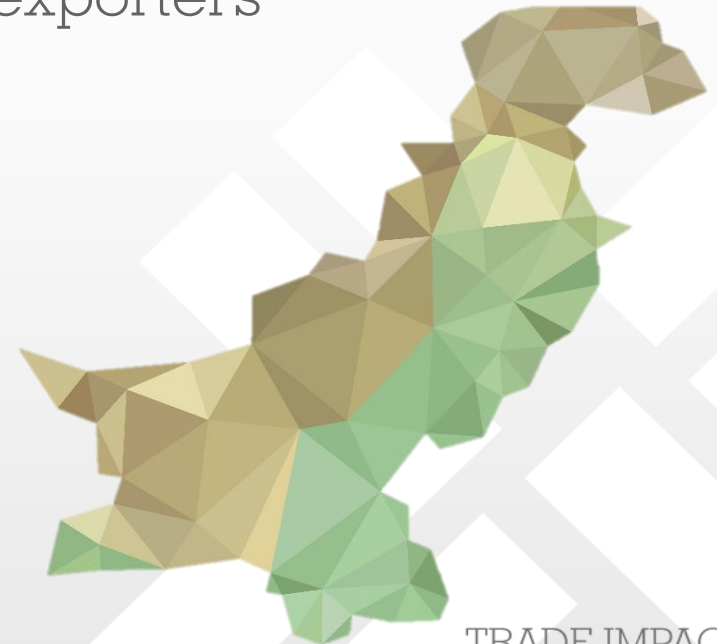


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Aggregate results

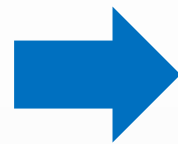
Trade barriers affecting Pakistani exporters



Existing Literature (1/2)



DOING BUSINESS



142

Rank of Pakistan out of 190 countries on Ease of Trading Across Borders

| Indicator | Pakistan (Lahore) | South Asia | OECD high income |
|--|-------------------|------------|------------------|
| Time to export: Border compliance (hours) | 75 | 62.9 | 12.5 |
| Cost to export: Border compliance (USD) | 356 | 347.2 | 139.1 |
| Time to export: Documentary compliance (hours) | 55 | 74.1 | 2.4 |
| Cost to export: Documentary compliance (USD) | 118 | 160.3 | 35.2 |
| Time to import: Border compliance (hours) | 120 | 95.8 | 8.5 |
| Cost to import: Border compliance (USD) | 476 | 504.6 | 100.2 |
| Time to import: Documentary compliance (hours) | 143 | 100.8 | 3.4 |
| Cost to import: Documentary compliance (USD) | 250 | 276.7 | 24.9 |



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Source: World Bank Doing Business

Existing Literature (2/2)



Pakistan 122nd / 136

Performance Overview Rank / 136 Sc

Enabling Trade Index 122

Subindex A: Market access 128

Pillar 1: Domestic market access 133

Pillar 2: Foreign market access 101

Subindex B: Border administration 105

Pillar 3: Efficiency and transparency of border administration 105

Subindex C: Infrastructure 99

Pillar 4: Availability and quality of transport infrastructure 70

Pillar 5: Availability and quality of transport services 64

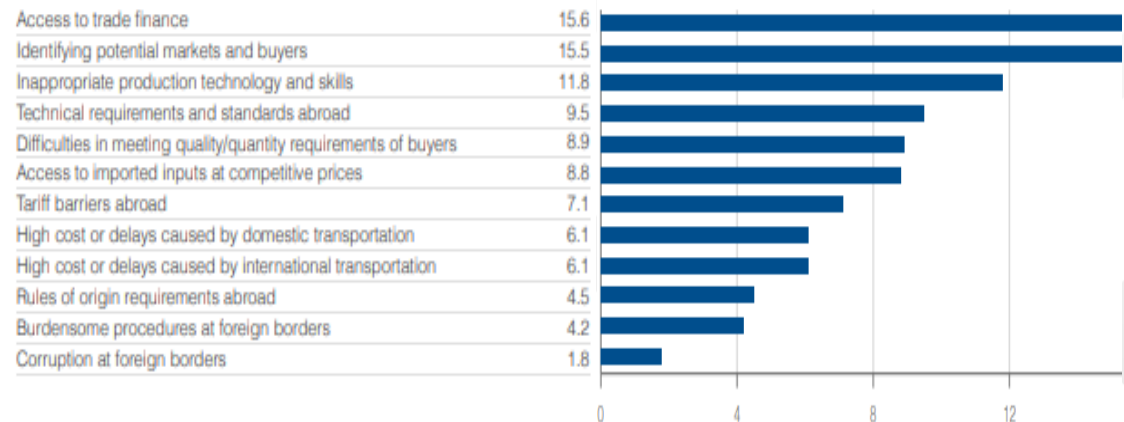
Pillar 6: Availability and use of ICTs 124

Subindex D: Operating environment 130

Pillar 7: Operating environment 130

The Global Enabling Trade Report 2016

Most problematic factors for exporting



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Source: The Global Enabling Trade Report 2016

Understanding companies' difficulties with NTMs: Three aspects

Affectedness

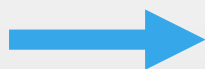
How many and which companies face difficulties

Type and Intensity

Which NTMs are experienced as challenging

Cause

Why NTMs are burdensome

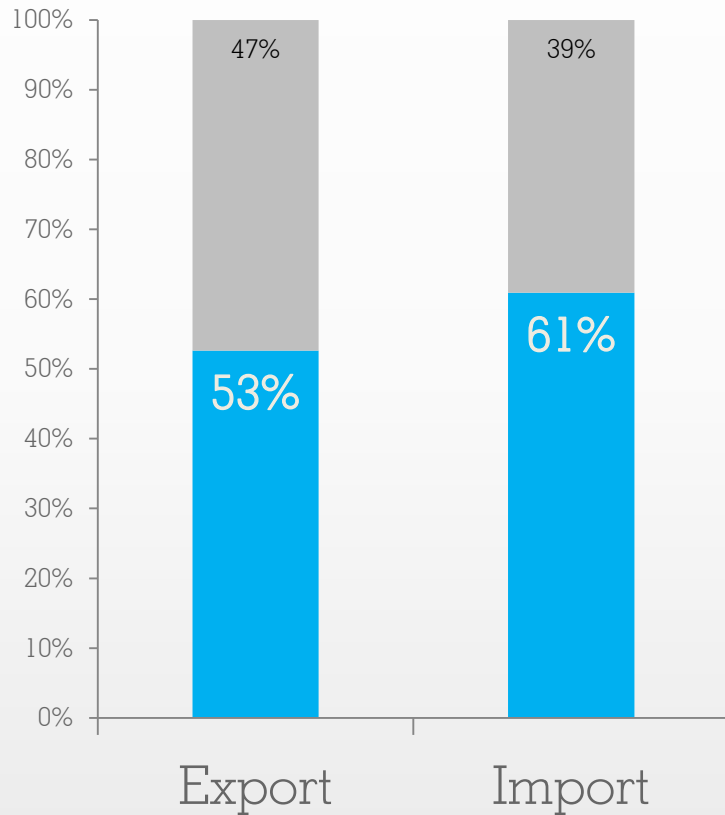


Insights on how to reduce NTM-related trade cost without undermining legitimate objectives that regulations serve

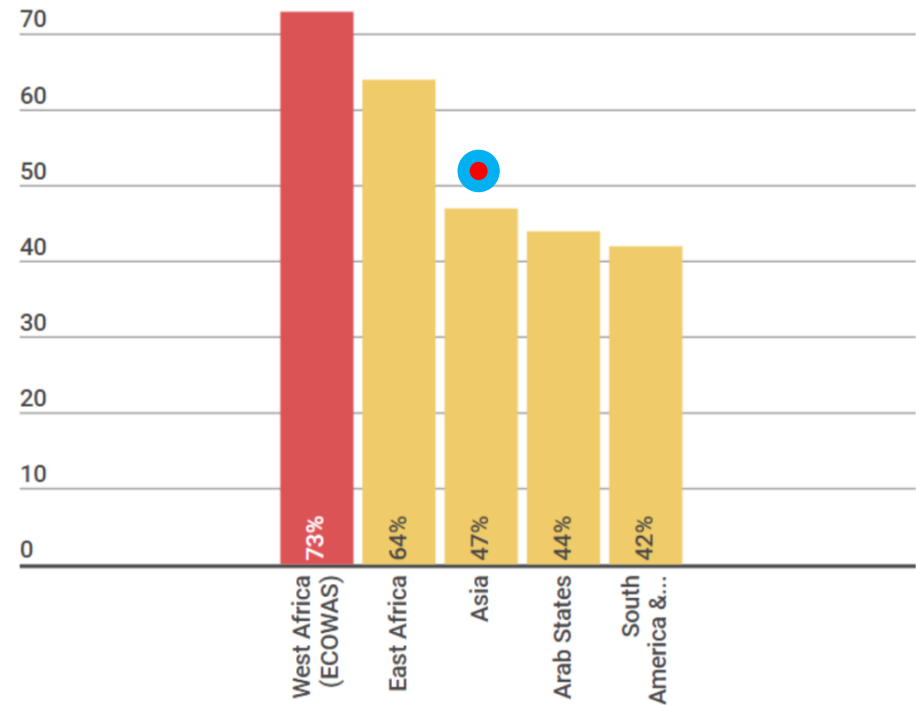


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Share of Pakistani companies facing difficulties with NTMs

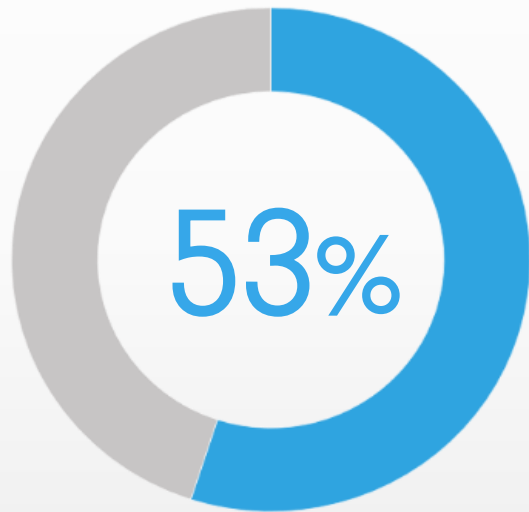


Share of companies affected by NTMs across different regions



Share of Pakistani exporters facing difficulties with NTMs

Affected exporters



1062

Exporters surveyed

58%

Agriculture

62%



Fresh food

52%



Processed food

48%

Manufacturing

50%



Clothing

49%



Textile products

45%



Leather products

What are the origins of burdensome NTMs that exporters face?

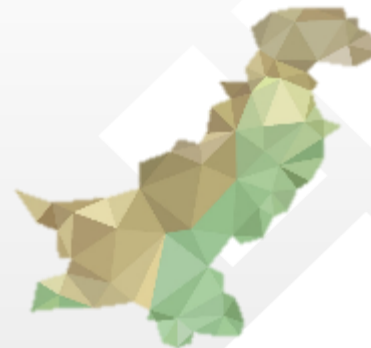
Share of the reported burdensome NTMs that are applied by partner countries and Pakistan

55%

45%



Foreign regulations



Pakistani regulations



NTM Business Surveys in The Asia-Pacific Region

Results from NTM Business Surveys in other Asia-Pacific Countries

6455

Companies
interviewed



9 Asian
countries



NTM Survey in other Asia-Pacific countries

Share of burdensome NTMs applied by partner and home country

Destination or Transit country (80%)

Home
(20%)



Foreign
regulations



Domestic
regulations

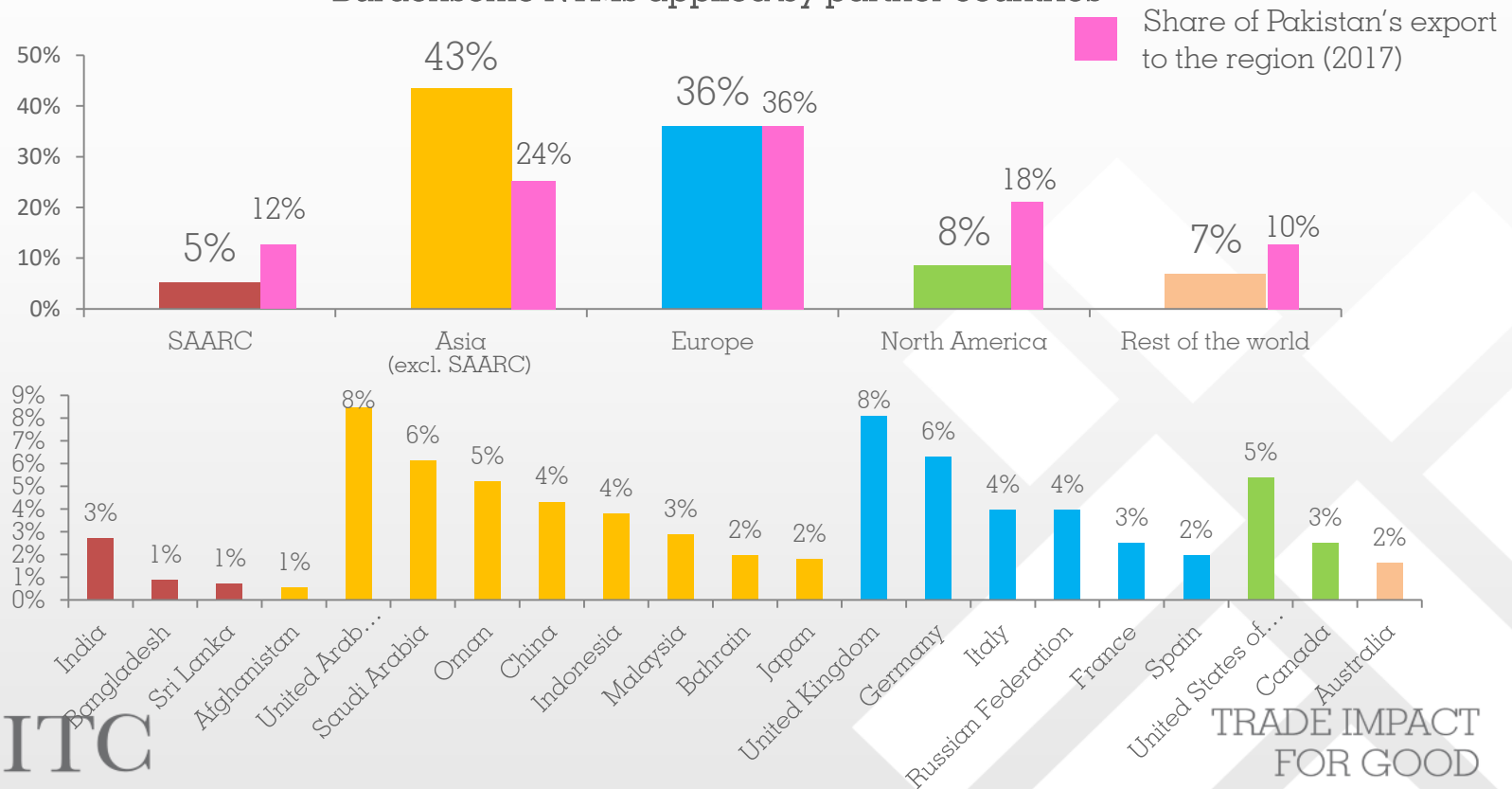
Most of the NTMs perceived as burdensome are Asian and European regulations and procedures

Share of burdensome NTMs applied by partner country and Pakistan

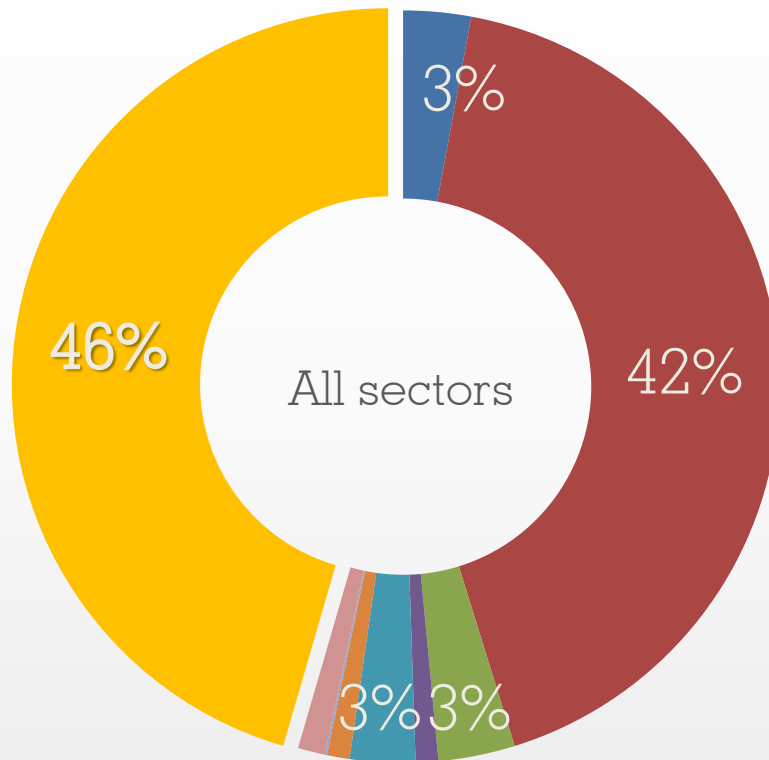
Foreign regulations 55%

Pakistan 45%

Burdensome NTMs applied by partner countries

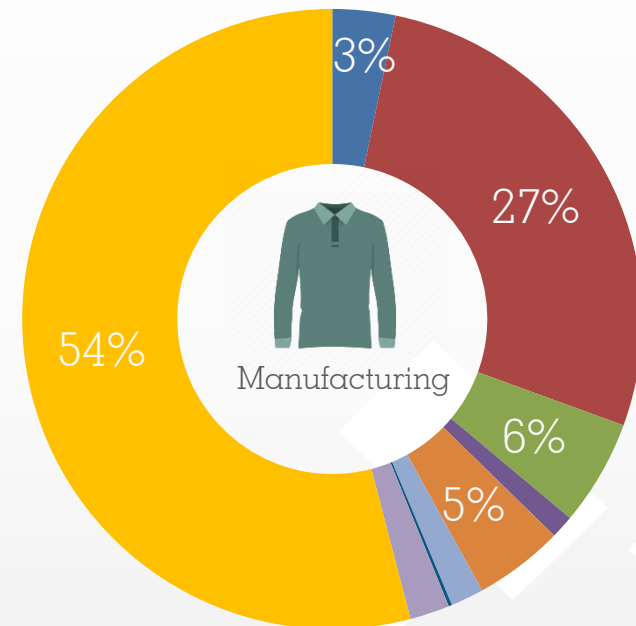
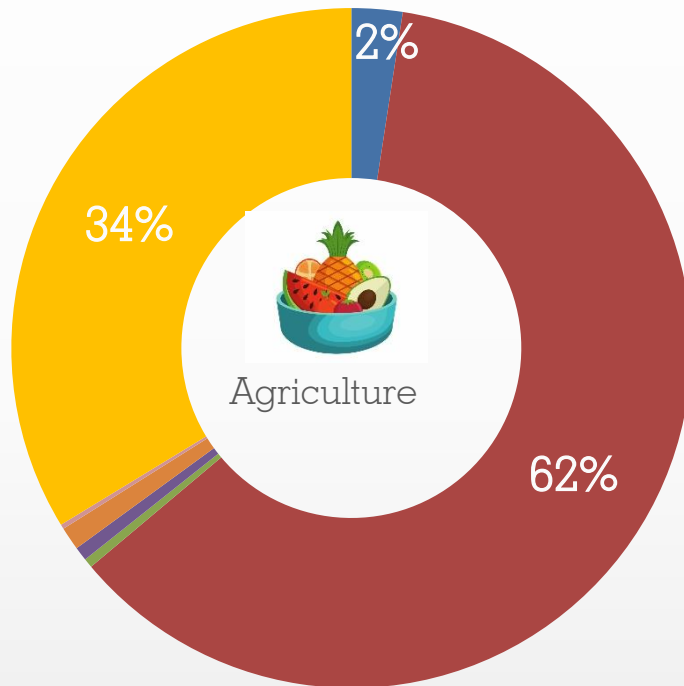


Types of NTMs faced by exporters



- Technical requirements
- Conformity assessment
- Pre-shipment inspection and border clearance
- Quantity control measures
- Charges, taxes and price control measures
- Finance measures
- Anti-competitive measures
- Rules/Certificate of origin
- Export related measures (Pakistani Regulations)

Types of NTMs faced by exporters: by sector

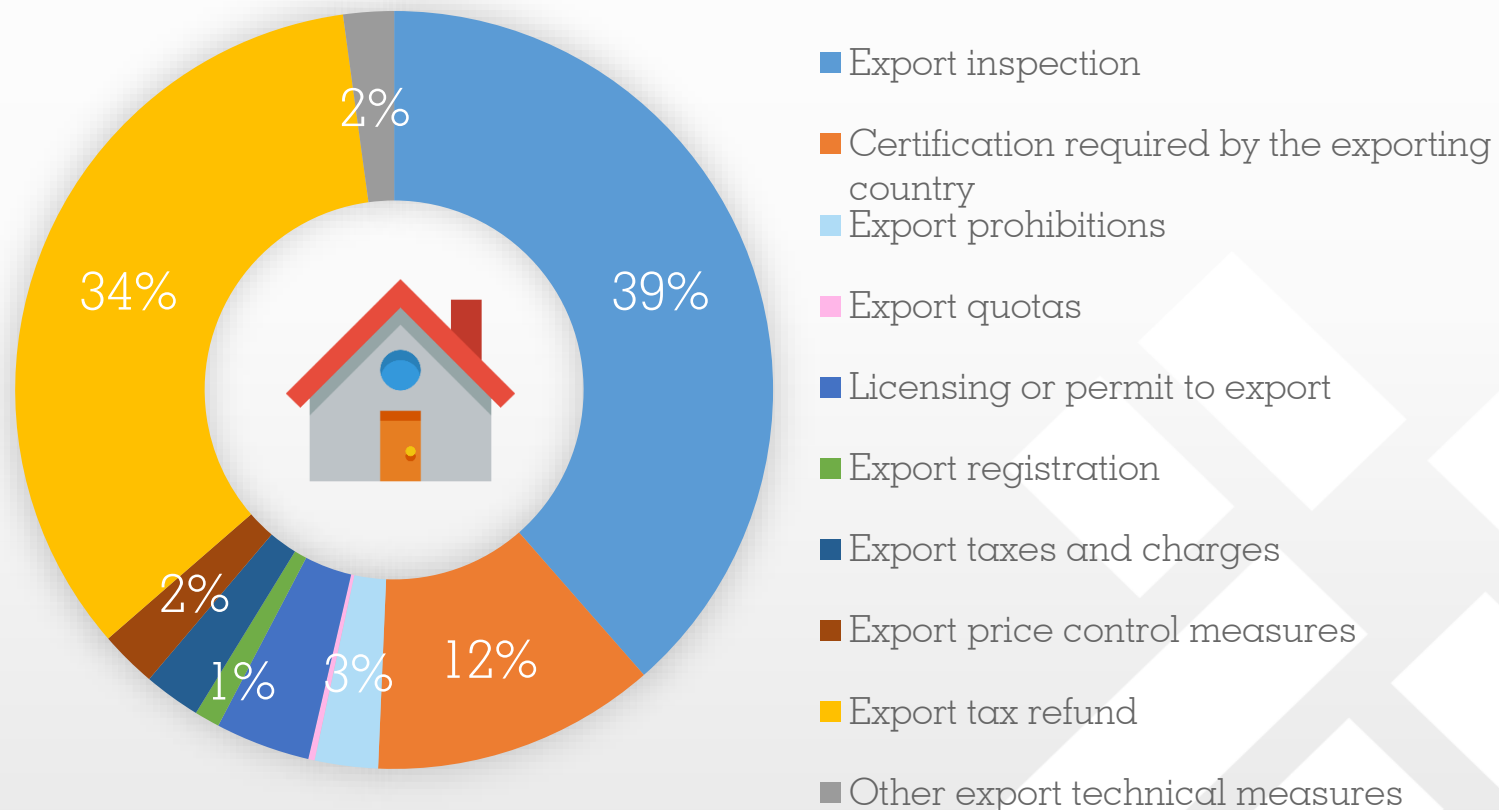


- Technical requirements
- Pre-shipment inspection and border clearance
- Charges, taxes and price control measures
- Price controls measures
- Subsidies
- Export related measures.

- Conformity assessment
- Quantity control measures
- Finance measures
- Anti-competitive measures
- Rules/Certificate of origin

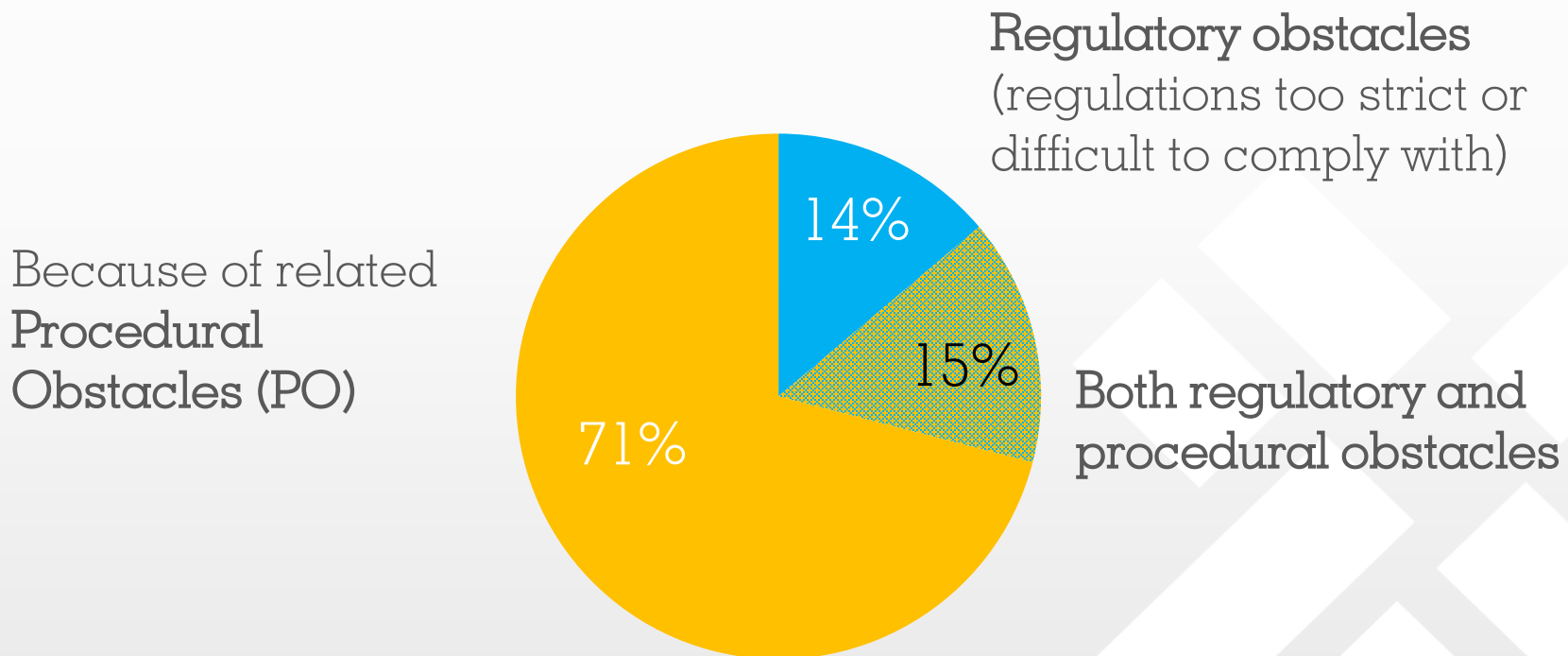
Types of NTMs applied by Pakistan

45% of reported burdensome NTMs by exporters are Pakistani regulations



Why exporters find NTMs burdensome

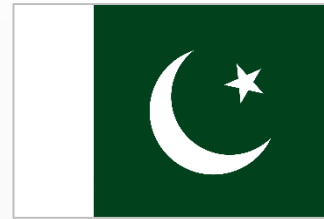
Procedural hinderances is a major concern to exporters that make compliance to regulations difficult



Where do the Procedural Obstacles (POs) occur?



Destination

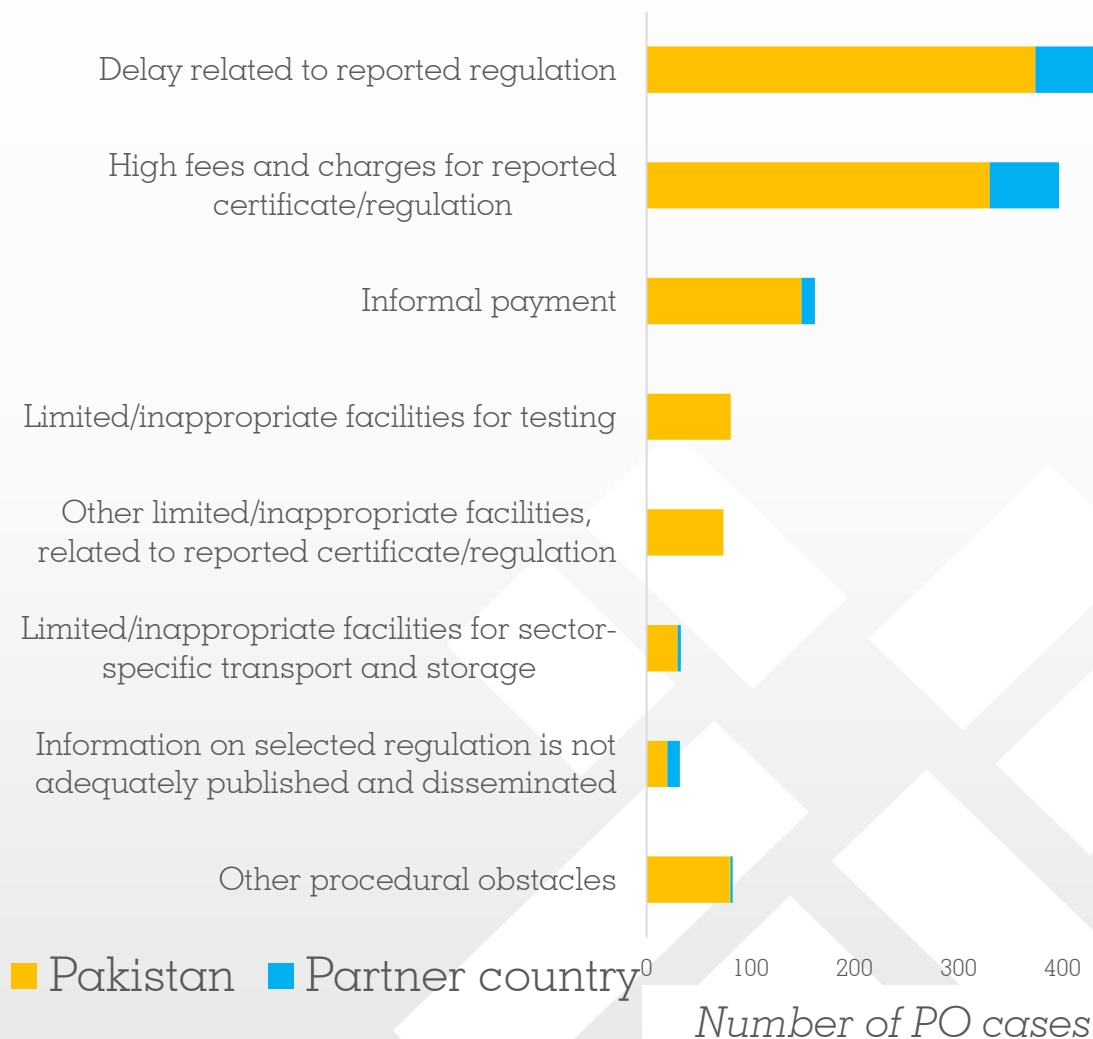
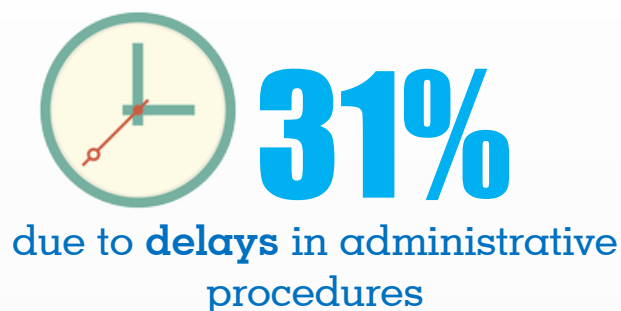


Pakistan

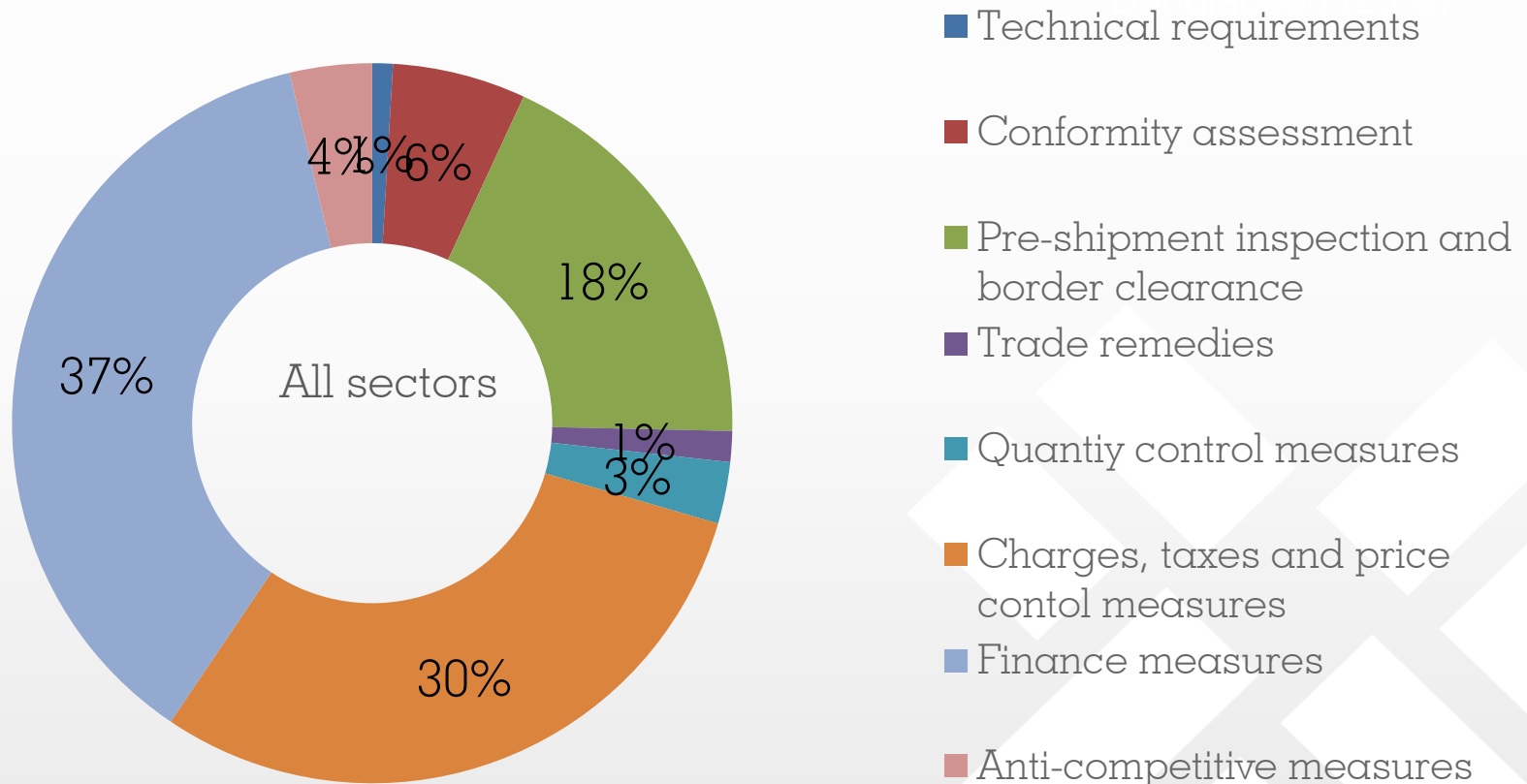
13%

87%

Types of POs experienced by exporters

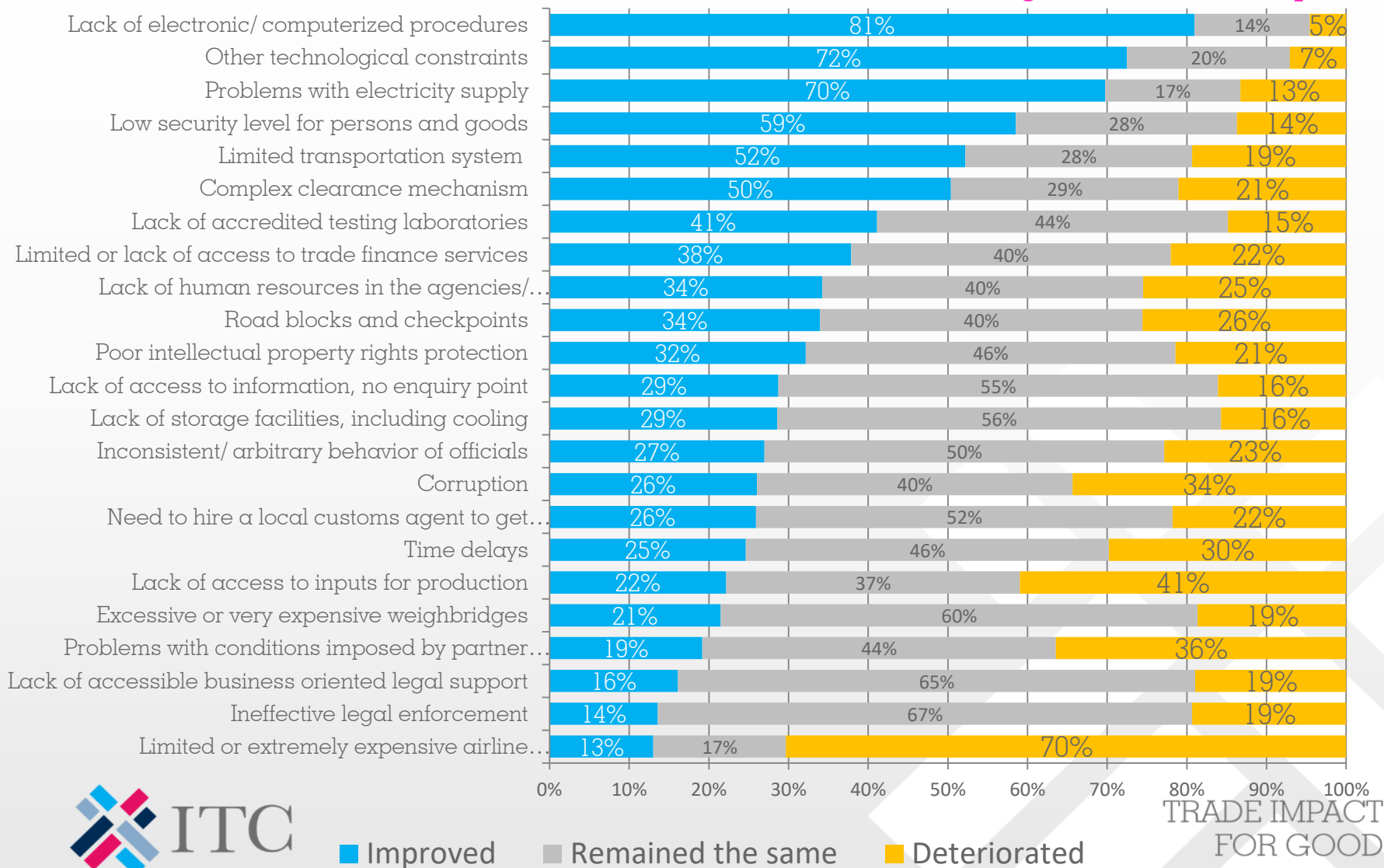


Types of NTMs faced by importers



Companies' perception on general business environment in Pakistan

How the business environment conditions have changed in the last 5 years



Concerns of agricultural sector

Difficulties with foreign regulations and requirements



Fruits and Vegetables



1. Maximum residue limit (MRL) testing / certifications

- Pakistan Council of Scientific and Industrial Research (PCSIR) labs issues MRL certification in Pakistan.
- Small exporters find the fees high (>PKR 25000). High costs especially when some countries require certificates for each containers.
- It also takes several days to get this MRL certificate - concerns due to perishability of the products.

2. Phyto-sanitary certificate issued by the Department of Plant Protection (DPP)

- DPP officials have first to make field visits to check the quality of the products.
- Long waiting time to DPP officers to come inspect.
- Companies feel that this is due to inadequate number of officers at DPP.

3. Difficulties to get hot water or irradiation treatment in Pakistan

- Requirement of many importing countries that mangoes should be hot water treated. Limited facilities are available in Pakistan to undergo these treatments.

Fruits and Vegetables



4. Conditions attached to duty free import of corrugated boxes

- Exporters benefit from duty free import of corrugated boxes with a condition that these be utilized within 12 months.
- As the season of Kinnow and mango are for a limited period limited, unused boxes can result in exporters facing additional costs.

5. Manual export inspection and lack of cold storages

- Manual inspection at the customs due to inadequate scanners is an issue for exporters, in particular exporters of fresh food "perishable products". Manual inspection can be a lengthy process.
- Unpacking and repacking of boxes can take a long time.
- Insufficient cold storage facilities is a concern

6. Constraints at the production level also needs to be addressed

- Cost of production, plant diseases and quality issues (Fruit Fly , Thyrips ,blemish , etc.), water constraints, insufficient information about demand in the international market, high air freight cost, availability of quality seed and adoption of modern technology.

7. Export restriction of certain products:

- Eg: Chillies, bitter gourd, eggplant, citrus, guava.
- Quality related

Rice



1. Difficulties to get the required minimum residue limit (MRL) certificates
 - Pakistan Council of Scientific and Industrial Research (PCSIR) issues MRL certification but is not able to cover all parameters on MRL testing.
 - Some countries require MRL analysis on parameters not covered by PCSIR.
 - Samples have to be sent abroad (usually US or EU) for necessary analysis.
 - Additional cost and time
2. Tests for Genetically Modified Organism (GMO)
 - Lack of suitable labs in Pakistan to undergo this test.
 - Samples sent abroad for testing.

Rice



4. Exporting to USA is an expensive process
 - FDA certification mandatory.
 - High fee and validity for one year only.
5. Third party inspection required by some countries lead to additional cost for exporters.
6. Concerns due to export inspection
 - Delays in shipment process – waiting time can be upto 10 days
 - Damaged packaging
 - Unhygienic conditions at warehouses where the packages are opened
7. Some instances of certification provided by Pakistani labs not being recognized
 - Eg: in China and Malaysia
 - Exporters usually have to go under additional test

Meat



1. High antibiotics residues

- Some meat exporters use antibiotics in their production.
- High antibiotic residues in the final product have resulted in unpleasant experiences and reputational loss.

2. Difficulties to get Halal certification

- Exporting to GCC countries require Halal certification.
- Fragmentation of halal certification laboratories in Pakistan. Different importing markets asks for a distinct halal certification from specific laboratory, which imposes an extra burden on exporter to acquire several halal certificates.

3. Health certificate for exports

- The certificate issued by the Animal Quarantine Department in Pakistan is only accepted in some of the neighbouring countries.
- Otherwise, countries like Canada and UAE do not recognize this certificate and ask to visit the slaughterhouses in Pakistan before allowing the entry of the product into their countries.

4. Export to EU and the US not realized due to strict meat traceability requirement

5. Lack of sufficient cold storage facilities in the airports and customs points.

Textiles & Garments

European requirement for Carpets to use AZO free dyes.

- European regulation
- Azofree dyes are becoming available in Pakistan but they are not readily available

Partner countries requires use of new environmentally friendly dyes

- These dyes are not readily available in Pakistan and importing them is expensive

To exporting towels to Europe, various certification such as OCO certificate, SA1400, BSCI is required.

- High costs of certificates with validity for these is only one year.

Pakistani carpets facing high tariff walls:

- For eg from China (inspite of the FTA), Turkey, Brazil, Russia

Textiles & Garments

Increasing number of certifications requirement for exports to EU and US.

- Costs are high to get all the required certificates
- Not all the tests can be done in Pakistan

Restriction on sending samples (Carpets)

- Weight limit of 12 kg
- Handmade carpets are usually heavy
- Payment required for "samples" that are heavier than 12 kg

Delays in receiving export subsidies (Woven fabrics)

Foreign exchange regulations

Surgical instruments

Obtaining certification (eg. FDA, ISO, ICE, MDR) required for exports is costly

Difficulties at the customs

- **Challenges related to customs valuation:**
 - Ambiguity among Pakistani companies on how customs officials determine the customs value of imported goods.
 - Customs surcharges (regulatory duties) imposed by the government on import of raw materials.
 - When the shipment is rejected abroad, customs in Pakistan imposes import tax on returned goods.
- Lack of adequate facilities at the customs such as warehouses and cold storages.
- Long delays and complaints about handling of goods during inspection

Other issues

- The **process of tax refund** is tedious and complicated. Despite providing all required documents, it can take several years to get the refund.
- **Advance payments restriction** is a real hindrance for Pakistani companies importing raw materials. According to the State Bank of Pakistan (SBP) regulations, traders are only allowed to make an advance payment up to \$10,000. This restriction is affecting Pakistani exporters who are unable to import the required raw materials.
- Due to fear of inability to meet high-quality requirements, the government of Pakistan **banned the exports** of many agriculture products, including fruits and vegetables.
- **Compulsory use of National Logistics Cell (NLC)** trucks. There is limited availability of national trucks and containers which causes long delays and high costs.

Difficulties of women entrepreneurs

- In general, women participation in exporting businesses is low.
- Women not yet able to achieve export success
 - Women businesses operate in informal sectors and on a much smaller-scale.
- Key challenges
 - Lack of access to trade-related information and market demands
 - Lack of access to Trade Finance
 - Lack of information on trade procedures and logistics.
 - Lack of information on government incentives for women entrepreneurs

Main burdensome NTMs reported by importers

| Measure | Share |
|---|-------|
| GD0. Regulations concerning terms of payment for imports | 31% |
| FD0. Customs surcharges | 12% |
| FH0. Customs valuations and reference pricing | 13% |
| CA0. Pre-shipment inspection | 9% |
| CZ0. Other pre-shipment inspection and other entry formalities | 5% |
| CD0. Import monitoring and surveillance requirements and other automatic licensing measures | 4% |
| GZ0. Other finance measures | 4% |
| HB0. Compulsory use of a national service (e.g. transport or insurance) | 4% |
| BA4. Inspection requirement | 3% |
| Others | 11% |

Note:

- The survey is complete but the study is not.
- ITC will continue to engage with public institutions and business associations
- Request for cooperation
- Final report expected in September 2019

Round Table

- What are the Public Sector Perspective / Constraints
- **The Way forward:**
 - What are the concrete actions necessary to alleviate the hurdles to trade?
 - Enhancing capacity of the exporters?
 - Enhancing domestic procedures and infrastructure?
Negotiations with partners?
 - What are the various initiative being taken or proposed?
 - What are the gaps that needs to be addressed?

Question / Comments?



All materials will be made available at:

www.ntmsurvey.org/pakistan

Thank you!



For further information:

www.ntmsurvey.org

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