



Direzione Dogane  
Ufficio regimi e procedure doganali

Protocollo: 207015/RU

Rif:

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### **Risoluzione n. 3**

Roma, 10 dicembre 2019

Alle Direzioni  
Interregionali/Regionali/  
Interprovinciale  
TUTTE

Agli Uffici delle Dogane  
TUTTI

Alla Direzione Accise  
SEDE

e p. c.  
Ministero delle Politiche  
Agricole Alimentari e  
Forestali  
Direzione generale delle  
politiche internazionali e  
dell'Unione europea  
Roma

Ministero dello Sviluppo  
Economico  
Direzione generale per la  
politica industriale e la  
competitività delle piccole e  
medie imprese  
Roma

**OGGETTO:** Perfezionamento attivo di alcool etilico – esame delle condizioni economiche – parere favorevole Gruppo esperti dogane – sez. procedure speciali

Si fa presente che nel corso della 20<sup>a</sup> riunione del Gruppo esperti dogane - sezione procedure speciali, che si è tenuta a Bruxelles l'8

novembre 2019, è stata sottoposta ad esame delle condizioni economiche, un'istanza di perfezionamento attivo, presentata dalla delegazione svedese, per la trasformazione di alcool etilico (CNC 2207 1000 90) in liquido per la pulizia dei vetri (CNC 3820 0000 90).

Il parere espresso nel corso della suddetta riunione è stato favorevole al rilascio dell'autorizzazione in quanto le condizioni economiche sono state ritenute soddisfatte.

Si evidenzia che, ai sensi dell'art. 259 parag. 5 del Reg.to (UE) 2447/2015, le conclusioni raggiunte sulle condizioni economiche vengono prese in considerazione non soltanto dall'Autorità (svedese) interessata, ma anche da qualsiasi altra Autorità doganale che si occupa di autorizzazioni e richieste simili.

Pertanto, ove eventuali analoghe istanze – concernenti merci di importazione, attività di trasformazione e prodotti trasformati della stessa tipologia - siano presentate all'Autorità doganale italiana, le condizioni economiche dovranno intendersi del pari soddisfatte.

Nel caso di specie, l'autorizzazione potrà essere rilasciata anche se il prodotto trasformato che si ottiene dalla lavorazione è lo stesso (liquido per la pulizia dei vetri - CNC 3820 0000 90) ma la composizione delle materie prime utilizzate non è uguale a quella indicata nel documento unionale allegato.

La presente risoluzione sarà pubblicata sul sito web dell'Agenzia.

Il Direttore centrale  
f.to Roberta de Robertis



**EUROPEAN COMMISSION**  
DIRECTORATE-GENERAL  
TAXATION AND CUSTOMS UNION  
Customs Policy, Legislation, Tariff  
**Customs Legislation**

Brussels, 10 September 2019  
TAXUD-A2/SA/GP/sp  
Taxud.a.2 Ares(2019)8552692

**TAXUD/A2/SPE/2019/008-EN**  
[Non-confidential](#)

Working paper

## **CUSTOMS EXPERT GROUP**

*Section 'Special Procedures other than transit'*

### **Inward Processing (IP)**

IP of ethanol (CN 2207.10.00.90), into screen wash blend (CN 3820.00.00) / Examination of the economic conditions in accordance with Articles 211(6) UCC and 259 UCC-IA

This document will be examined at a forthcoming meeting of the Customs Expert Group.

**Disclaimer:**

*This document reflects solely the application for IP as submitted by an operator via the relevant MS and cannot in any circumstances be regarded as the official position of the Commission.*

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**Application for authorisation for inward processing (IP) of  
Ethanol (double click to open each document)**



6b.  
SE\_screenwash\_non



6c.  
SE\_screenwas\_Attac

2019-08-29

**1. Period of validity of the authorization**

Start: 2019-09-18  
End: 2022-09-18

**2. Goods to be processed.**

Please note that only Component 1 is sourced from outside EU, rest is purchased within EU as T2 material.

	Component 1	Component 2	Component 3	Component 4	Component 5	Component 6
Trade description:	Ethanol	Mono Ethylene Glycol	Methyl Ethyl Ketone	Denatonium Benzoate (Bitrex)	Surfactant	Deminerlized Water
CN code:	2207100090	2905310000	2914120000	29163100**	34021190**	
Tariff rate:	17,67EUR/100 Liter	5,50%	5,50%			
Estimated quantity: (KG)	30 000 000	566 667	333 333	667	100 000	2 332 667
Raw material for:	Freeze depressant(antifreeze)	Denaturing agent	Denaturing agent	Denaturing agent	Cleaning additive	Dilutant

**3. Processed product.**

Screenwash concentrate based on a mixture of Ethanol, Mono Ethylene Glycol, Methyl Ethyl Ketone, Surfactant and Denatoniumbenzoat(Bitrex). Ethanol is the dominant ingredient at >88%, remaining ingredients are denaturing agents as well as cleaning additives and water for dilution. The product is made for usage as freeze suppressant in Screenwash concentrates for the consumer market.

Trade description:	
CN code:	3820000090
Rate of yield:	100%
Tariff rate:	6,50%

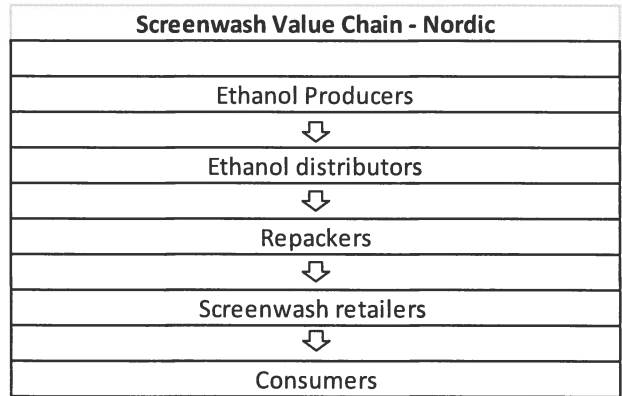
**4. Description of the processing to be performed.**

The process is performed in its entirety in one step. It is started upon receipt of the main ingredient Ethanol. All additives are pre-mixed into the storage tank before receipt of the ethanol and the process is completed once the full shipment is received and a 3rd party surveyor has inspected the process and product by analysis to make sure it complies with valid permits. Customs tariffs are then paid before product is released for sales.



**5. Economic conditions.**

The Screenwash value chain in Nordic is in general structured as described in the picture below.



“Ethanol Producers”.

In the current market concerning raw material for Screenwash Concentrates the “Ethanol Producers” are

1. Producers of fermented ethanol based mainly in the Americas
2. Producers of synthetic ethanol and/or oxo-alcohols based in South Africa.

“Ethanol Distributors”

These are mainly chemical distributors who are in the general commodity market adding value through pooling purchases and large scale infrastructure – and thereby link the Ethanol Producers to the Repackers.

“Repackers”.

These companies are generally small or midsize enterprises, adding value by filling and packing Screenwash under private labels and making their profit by sourcing raw materials effectively or/and with efficient production facilities. The margins in this industry are well below other comparable industries and when considering the capital intensity of the business, they are hard pressed to turn a profit.

“Screenwash retailers”.

These are the major retail chains who typically compete on prices, and as such, they are very price sensitive. The price is what drives their decisions on a commodity such as Screenwash.

“ Position”

In our position as “Ethanol distributor” for Screenwash concentrate our typical customers are Repackers. Since the Screenwash retailers can source the goods from Norwegian Repackers - who are not subject to EU customs tariffs on the raw material, the price level needed to compete on the distribution market is set by the price offered

from Norwegian Repackers. This immediately disqualifies any ethanol of EU origin due to price. As depicted below, calculations based on average prices of EU material according to *Attachment 1*.

Screenwash Concentrate cost calculation Imported Synthetic Ethanol			
	Usage / 1 kg	Cost / 1 kg (EUR)	Cost Usage / 1 KG
Ethanol	0,9	0,58	0,522
Mono Ethylen Glycol	0,017	0,6	0,010
Methyl Ethyl Ketone	0,01	1	0,010
Bitrex	0,00002	253	0,005
Surfactant	0,003	1,9	0,006
Water	0,06998	0,05	0,003
Sum total cost of goods used	1		0,556
Processing			0,010
Customs 6,5%			0,036
Screenwash Concentrate (EUR / kg)			0,603
Screenwash Concentrate cost calculation EU origin Synthetic Ethanol			
	Usage / 1 kg	Cost / 1 kg (EUR)	Cost Usage / 1 KG
Ethanol	0,9	0,86	0,774
Mono Ethylen Glycol	0,017	0,6	0,010
Methyl Ethyl Ketone	0,01	1	0,010
Bitrex	0,00002	253	0,005
Surfactant	0,003	1,9	0,006
Water	0,06998	0,05	0,003
Sum total cost of goods used	1		0,808
Processing			0,010
Screenwash Concentrate (EUR / kg)			0,818
Screenwash Concentrate cost calculation EU origin Fermented Ethanol			
	Usage / 1 kg	Cost / 1 kg (EUR)	Cost Usage / 1 KG
Ethanol	0,9	0,787	0,708
Mono Ethylen Glycol	0,017	0,6	0,010
Methyl Ethyl Ketone	0,01	1	0,010
Bitrex	0,00002	253	0,005
Surfactant	0,003	1,9	0,006
Water	0,06998	0,05	0,003
Sum total cost of goods used	1		0,743
Processing			0,010
Screenwash Concentrate (EUR / kg)			0,753

In order to match the low price levels offered by imported materials that are already exempt from ethanol tariffs our intention is to source Synthetic Ethanol from Russia. The Ethanol arrives into EU by railcars as opposed to deep sea imports from the Americas. There is no free trade agreement in place with Russia and thus we would have to pay ethanol tariffs on the imports that render the processed product more expensive than domestic options, fermented or synthetic.

Furthermore, the raw material supply for Screenwash concentrate in Nordic is dominated by products already being imported, either from outside neighboring countries like Norway or under Inward Processing as mixtures of synthetic ethanol and other oxo-alcohols under CN 3814\*.

In our opinion this effectively disqualifies any argument of protecting domestic ethanol production since the consumption is already being served by imported raw materials and as long as this is the case we will argue that denying this permit for inward processing of Russian Synthetic Ethanol into Screenwash Concentrate limits our ability to compete on equal terms.

## Conclusions

- If permission for inward processing of imported synthetic ethanol is rejected the result will not serve to increase or strengthen the position of European producers of synthetic Ethanol since the Nordic market is already served by imported synthetic ethanol under CN 3814\* and imported ethanol via Norway. As long as both of these options remain open there is no position for domestic producers of either Fermented or Synthetic ethanol in the Screenwash market.
- If inward processing of synthetic ethanol is not an option in the Nordic region, contracts currently being served by Swedish and Danish repackers will be served by Norwegian repackers due to the significantly higher raw material cost of EU produced ethanol, causing jobs to move from Sweden and Denmark to Norway. Norway as a non member can import the raw materials exempt from EU tariffs, process them and ship them into the Nordic market at a great advantage under current conditions.
- Product contains surfactants which limits the processed product to the intended use.
- The commercial advantage of the product after processing is offset by outgoing freight and thus will not have any impact on regions outside Nordic.