

UK-GHANA INTERIM TRADE PARTNERSHIP AGREEMENT (TPA)

Rules of Origin

How to navigate rules of origin and unlock opportunities between UK and Ghana



WHAT IS THE UK GHANA INTERIM TRADE PARTNERSHIP AGREEMENT (TPA)

- 2nd March 2021 Ghana and the United Kingdom (UK) signed the TPA
- The agreement gives TPA qualifying Ghanaian goods 100% duty reduction when imported into the UK
- UK Goods must meet the qualifying criteria in accordance with the TPA regulations. UK Exporters should be aware that up until 2029 there is a phased introduction for duty reductions on 78% of goods

UK EXPORT TO GHANA

Category	Overview of Products	Phased Reduction	% of Tariff Lines
A	Foodstuffs, pharmaceutical products, books, basic consumer goods and some agricultural plant	2021-2029	18%
B	Raw materials, machinery and equipment for established and developing industries	2024-2029	37%
C	Processed foods, beverages, electronics, household goods, some manufactured consumer products	2024-2029	23%
D	Selected: cotton and textile goods, meat, poultry, dairy and fish products, cocoa, coffee and tobacco, sensitive agricultural and horticultural products, cement and rubber products, vehicles and automobiles, beauty and cosmetic products, pearls and precious stones, and high-value and luxury items	Indefinite exclusion	22%

GHANA EXPORT TO UK

Category	Overview of Products	Phased Production	% of Tariff Lines
-	All products included	Immediate	100%

The agreement can be accessed here: [Interim Trade Partnership Agreement](#)

UK-GHANA TPA:

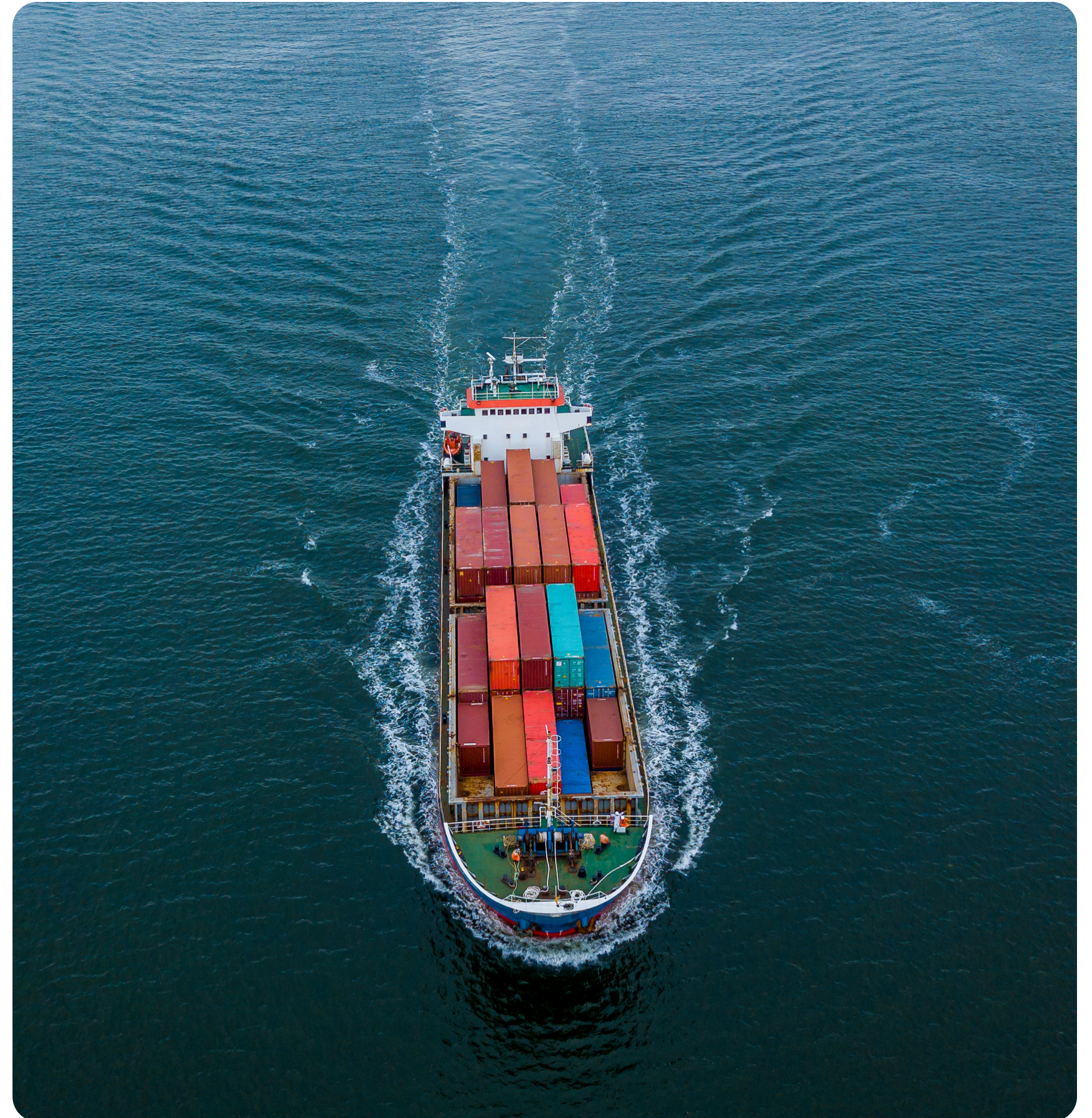
WHAT IT PROVIDES

- A bilateral agreement which allows qualifying UK origin goods to receive preferential duty reductions
- The criteria for preferential origin are set out in the TPA, which clearly provides the principles for each category of goods
- Not all goods are included in the TPA, certain products are excluded due to the sensitive nature of the goods and the Ghana economy
- Goods which fail to meet the TPA preference criteria are known as Non-preferential origin and are not eligible for duty reductions

KEY TAKE AWAY

The TPA only benefits you if your goods qualify – checking eligibility before you provide your quotation to your buyer is essential

The agreement can be accessed here: [Interim Trade Partnership Agreement](#)



WHAT ARE FREE TRADE AGREEMENTS (FTAS)

Trade agreements are negotiated between countries to expand market access, making it easier and cheaper for businesses to trade by cutting import duties and reducing unnecessary barriers.

There are three types of agreement – each working differently:

- Unilateral – One country grants duty reductions without expecting anything in return. Typically used to support developing nations in growing their trade. The UK's Developing Countries Trading Scheme (DCTS) is a great example
- Bilateral – Two countries sit down, negotiate and agree trade policy together. The Ghana-UK TPA is a good example of this in action
- Multilateral – Three or more countries reach a shared agreement on trade policy, creating a broader, unified framework for trade. Examples include World Trade Organization (WTO) agreements and the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP), which has 12 members



NOTE

Not all trade agreements are equal. The duty reductions available to your business depend on which agreement applies, the origin of your goods, and whether you can meet the rules of origin requirements set out in the specific agreement

LAYOUT OF THE TPA

UK-GHANA INTERIM TRADE PARTNERSHIP AGREEMENT

Part I Interim trade partnership agreement for sustainable development

Part II Trade policy and questions concerning trade

Chapter 1	Customs Duties
Chapter 2	Trade defence instruments
Chapter 3	Technical barriers to trade, sanitary and phytosanitary measures
Chapter 4	Other non-tariff barriers
Chapter 5	Facilitation of trade, customs cooperation and mutual administrative assistance
Chapter 6	Agriculture, fisheries and food security

Part III Dispute avoidance and settlement

Chapter 1	Objective and scope
Chapter 2	Consultation and mediation
Chapter 3	Dispute settlement procedures
Chapter 4	General provisions

Part IV General exceptions

Part V Institutional provisions

Part VI Final provisions

Annexes

Annex A	Protocol No. 1 concerning the definition of the concept of originating products and on methods of administrative cooperation
Annex B	Customs duties on products originating in the United Kingdom
Annex C	Customs duties on products originating in Ghana
Annex D	Appendices to Chapter 3 of Part II of this Agreement concerning technical barriers to trade, and sanitary and phytosanitary measure
Annex E	Protocol No. 2 on mutual administrative assistance in customs matters
Annex F	Joint Statement of the Parties relating to fundamental Elements of this Agreement
Annex G	List of fees and other charges of Ghana referred to in Article 14(2)

PART II - CHAPTER 1

This is where customs duties and the tariff liberalisation commitments sit, the legal basis for the duty reductions

PART II - CHAPTER 3

Technical barriers and sanitary measures – useful for anyone in food, agriculture or regulated products

PART II - CHAPTER 4

Trade facilitation and customs cooperation, relevant for anyone wanting to understand pre-arrival processing and customs procedures

ANNEXES

- Annex A Rules of Origin Protocol
- Annex B and C are the Tariff schedules covering duty commitments for both sides
- Annex G covers fees and other charges

KEY TAKEAWAY

For most traders, Annex A, B and C are your working documents, Rules of Origin and the tariff schedules are where the practical decisions are made

RULES OF ORIGIN

How to assess and apply them to your goods



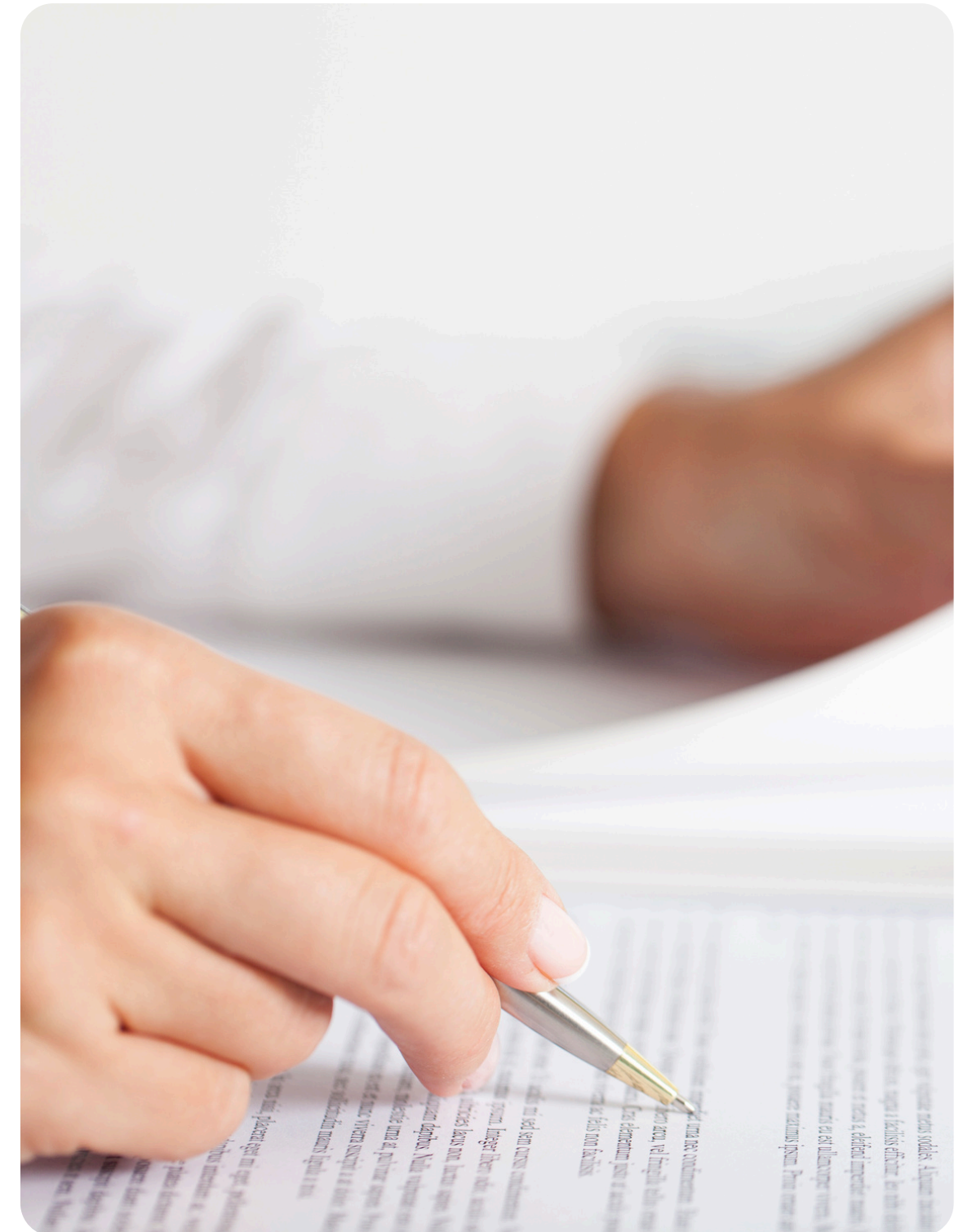
WHAT ARE RULES OF ORIGIN?

Every product traded internationally has an economic nationality – and rules of origin are how that nationality is determined.

The WTO advises: *"They are the criteria used to define where a product was made and are important for implementing other trade policy measures, including trade preferences, quotas, anti-dumping measures and countervailing duties."* (WTO, Rules of Origin Gateway)

In practice, rules of origin influence a range of decisions and outcomes, including:

Duty rates:	origin determines what a trader pays at the border
Trade remedies:	anti-dumping and safeguard measures hinge on where goods come from
Trade statistics:	accurate data on global flows depends on correct origin
Consumer protection:	health, safety and labelling rules all trace back to origin



NON-PREFERENTIAL RULES OF ORIGIN

EXPORTING TO GHANA

- Where goods do not qualify for preferential treatment, non-preferential origin rules apply, and standard customs duties become payable at the Ghanaian border.
- Ghana's tariff structure is built around five duty bands under the ECOWAS Common External Tariff. Once origin is established, the commodity code determines which band applies and the rate of duty the importer is liable to pay.
- Consider our case study – Ciprofloxacin 500mg finished tablets (HS 3004). As a finished medicament, Ghana classifies this as an essential social good, attracting 0% import duty under Band 0. So why does origin matter here at all?
- Duty is not the only reason origin counts. Even at zero percent, an incorrect or unsubstantiated origin declaration affects trade statistics, labelling compliance and the product's exposure to any future trade remedy measures. Origin must be correctly determined regardless of the duty outcome.

NOTE

Customs duty represents only one element of the charges payable on importation. Ghana applies additional levies including VAT and other charges



GHANA OPERATES FIVE TARIFF BANDS:

- 0%** Essential social goods, including medicines
- 5%** Essential commodities, raw materials, capital goods
- 10%** Intermediate goods (semi-finished goods)
- 20%** Finished goods and consumer goods
- 35%** Specific goods for economic protection

PREFERENTIAL RULES OF ORIGIN

WHY THEY MATTER

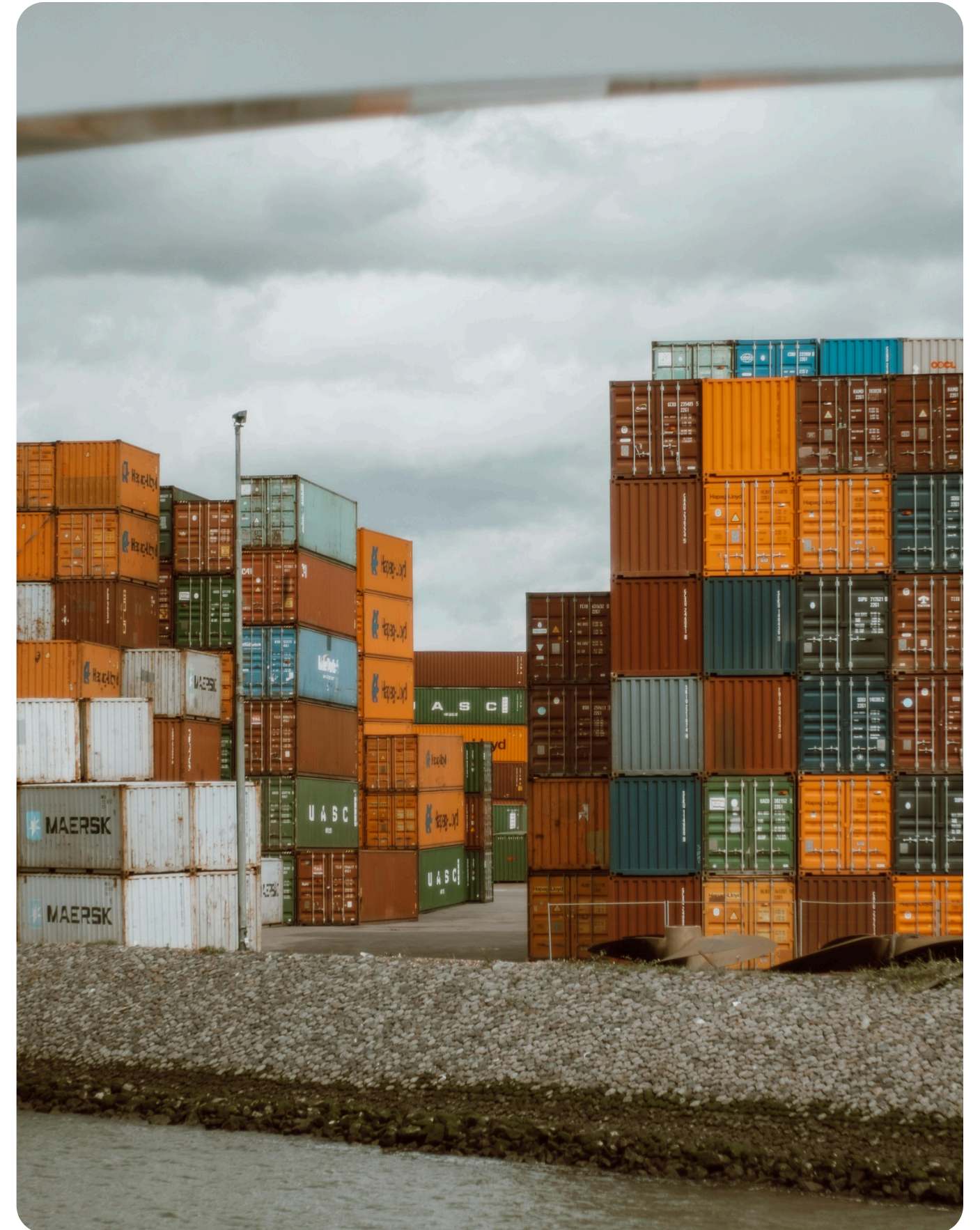
The difference between preferential and non-preferential origin is not merely procedural – it impacts on the commercial viability of a trade relationship.

Under the TPA, goods which can demonstrate qualifying origin are eligible for reduced or zero rates of customs duty. Where that proof cannot be established, the standard ECOWAS Common External Tariff rate applies in full.

For a UK exporter, the stakes are real. Machinery shipped to Ghana sits at 5% under the ECOWAS CET as a capital good. Under TPA preference, that liability can be eliminated entirely, but only if origin can be demonstrated. Multiplied across a commercial shipment, that saving is significant.

KEY TAKE AWAY

Getting origin right is therefore not just a compliance requirement, it is a direct commercial advantage



PREFERENTIAL RULES OF ORIGIN

QUALIFYING FOR PREFERENCE

Preference is not automatic. To benefit from the TPA duty rates, goods must be formally classified as "originating" under the terms of the Agreement.

Simply being manufactured in the UK is not sufficient on its own. The product must satisfy the relevant Product Specific Rule for its commodity code – and that origin must be supported by the correct proof of origin documentation.

For our case study product – Ciprofloxacin 500mg tablets – the import duty rate in Ghana is already zero as an essential medicine under Band 0 of the ECOWAS CET.

However, preferential origin remains relevant - it provides formal protection under the TPA framework, guards against future tariff changes, and feeds directly into the labelling and documentation requirements is covered in the accompanying guide "UK-Ghana Interim Trade Partnership Agreement (TPA) - Standards and Regulatory Requirements.

KEY TAKE AWAY

Qualifying for preference starts with understanding the rules - the following slides show you exactly how to meet them.



PROCESSING AND TRANSFORMATION

Ensure your business is doing enough during
manufacture to meet origin rules



WHOLLY OBTAINED

Some products do not need to undergo any manufacturing process to confer origin. Where a product has been harvested, extracted or otherwise derived entirely from one country, it is considered wholly obtained, and automatically qualifies as originating under the TPA.

This rule is most applied to:

- **Agricultural and food products grown or harvested in the country of export**
- **Mineral products extracted from the soil, seabed or ocean floor**
- **Live animals born and raised in the country of origin**
- **Products derived entirely from the above**
- **Where goods are wholly obtained, no further processing test is required. The goods are originating by nature of where they came from.**

NOTE

Goods which incorporate any material not originating in the country of production cannot be considered wholly obtained – even where the non-originating content is minimal. A separate processing test then applies.

TPA Goods considered wholly obtained in a country:

- (a) Live animals born and raised there
- (b) Mineral products extracted from its soil or from its seabed or ocean floor
- (c) Vegetable products harvested there
- (d) Products from live animals raised there
- (e) Products obtained by hunting or fishing conducted there; products of aquaculture, including mariculture, where the animals are raised there from eggs, spawning, larvae or fry
- (f) Products of sea fishing and other products taken from the sea outside the territorial waters of the UK or Ghana by vessels flying the flag of the UK or Ghana
- (g) Products made aboard their factory ships exclusively from products referred to in (f)
- (h) Used articles fit only for the recovery of raw materials
- (i) Waste and scrap resulting from manufacturing operations conducted there
- (j) Products extracted from marine soil or subsoil outside their territorial waters, provided that they have sole rights to work that soil or subsoil
- (k) Goods produced exclusively from the products specified in points (a) to (j)

SUFFICIENT PROCESSING

Goods containing non-originating materials, need to go through a level of processing that meaningfully transforms what they are, not just where they ended up.

This is tested against Product Specific Rules (PSRs) set out in Annex A of the TPA. Every HS commodity code has its own PSR, which will require one or more of the following:

- Change of Tariff Heading (CTH) – non-originating materials must fall under a different four-digit HS heading to the finished product
- Maximum Non-Originating Materials (MaxNOM) – the value of non-originating materials cannot exceed a set percentage of the finished product's ex-works price
- Specified Operations – defined manufacturing steps must take place in the country of origin

Passing the PSR test is the foundation, but not the whole picture. The processing must represent a genuine transformation. Operations that are minor or cosmetic will not confer origin even if the PSR is technically met on paper.

Operations that will NOT confer origin include:

- **Preservation for transport or storage**
- **Basic handling (dusting, sifting, sorting, washing, cutting)**
- **Removing surface coatings**
- **Bleaching or polishing and husking of cereals, rice**
- **Straightforward assembly or disassembly**
- **Peeling or shelling of fruit and vegetables**
- **Slaughter of animals**
- **Simple mixing**
- **Repackaging or simple placing into containers**
- **Ironing or pressing of textiles, applying marks or labels**
- **Basic sharpening or grinding**
- **or any combination of the above**

NOTE

Performing several of these operations together does not make them sufficient. If everything carried out on your goods in the UK amounts only to operations on this list, origin cannot be conferred.

KEY TAKEAWAY

Your PSR tells you what test to apply – but evidence of genuine manufacturing is what makes the origin claim stand up.

CUMULATION:

WHAT IS IT AND WHY IT MATTERS

The TPA includes cumulation provisions – rules that allow certain materials or processing from other countries to count towards your origin calculation.

What is cumulation? Cumulation allows a manufacturer to include materials or processing from certain other countries when calculating whether their product meets the applicable Product

Specific Rule (PSR). Rather than looking only at what happened in the UK, cumulation widens the scope.

Bilateral Cumulation. The most straightforward type. Materials or processing from Ghana can be treated as UK originating when calculating whether a UK manufactured product meets its PSR – and vice versa. So, if a UK manufacturer incorporates Ghanaian raw materials into their finished product, those Ghanaian materials count as originating content for the purposes of the origin calculation.

KEY TAKE AWAY

If your product uses Ghanaian materials, you do not lose your UK origin claim. Those materials are treated as UK originating – they work in your favour.



CHANGE OF TARIFF HEADING (CTH)

The CTH rule compares the classification of inputs against the classification of the finished product. Every non-originating material must fall under a different four-digit HS heading to the finished goods.

Where expressed as a **Change of Tariff Sub-Heading (CTSH)**, the comparison is made at **six digits** – a narrower and more demanding test.

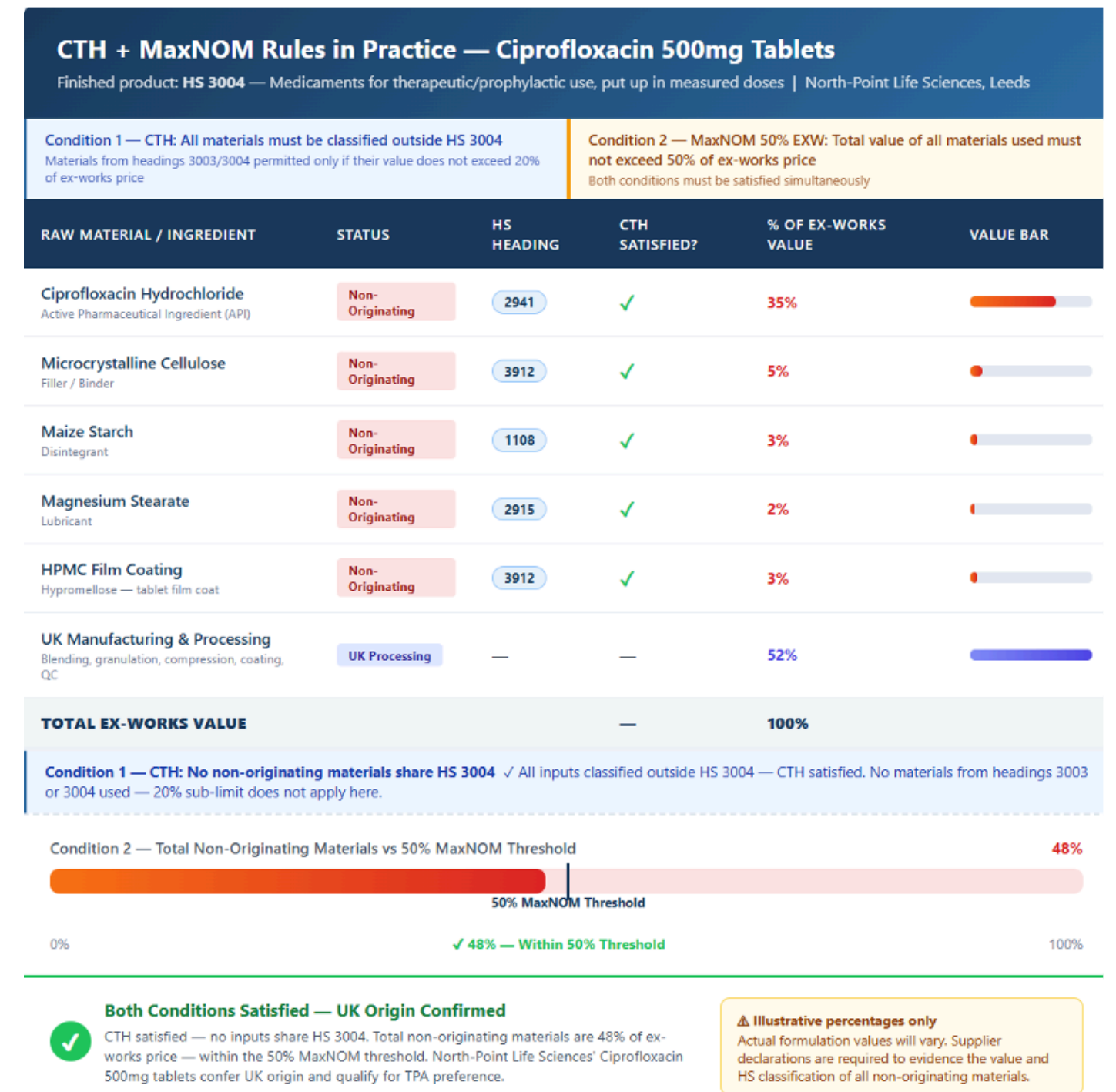
A general tolerance allows non-originating materials sharing the same HS heading to be used, provided their value does not exceed **15% of ex-works price**. This does not apply to HS Chapters 50 to 63.

Some products require both CTH and MaxNOM simultaneously. For Ciprofloxacin 500mg (HS 3004):

1. All inputs must fall outside HS 3004; and
2. Total non-originating materials must not exceed **50% ex-works price**

KEY TAKE AWAY

Supplier declarations confirming the HS classification of all non-originating materials are essential evidence. Keep them on file.



MAXNOM – MAXIMUM NON-ORIGINATING MATERIALS

The MaxNOM rule sets a ceiling on how much of the finished product's value can come from non-originating materials. Exceed that ceiling and the product does not confer origin. The percentage is calculated against the **ex-works (EXW) price**

Ex-works price is your total production cost, raw materials, components, labour, overheads and profit, before freight, insurance or internal taxes are added

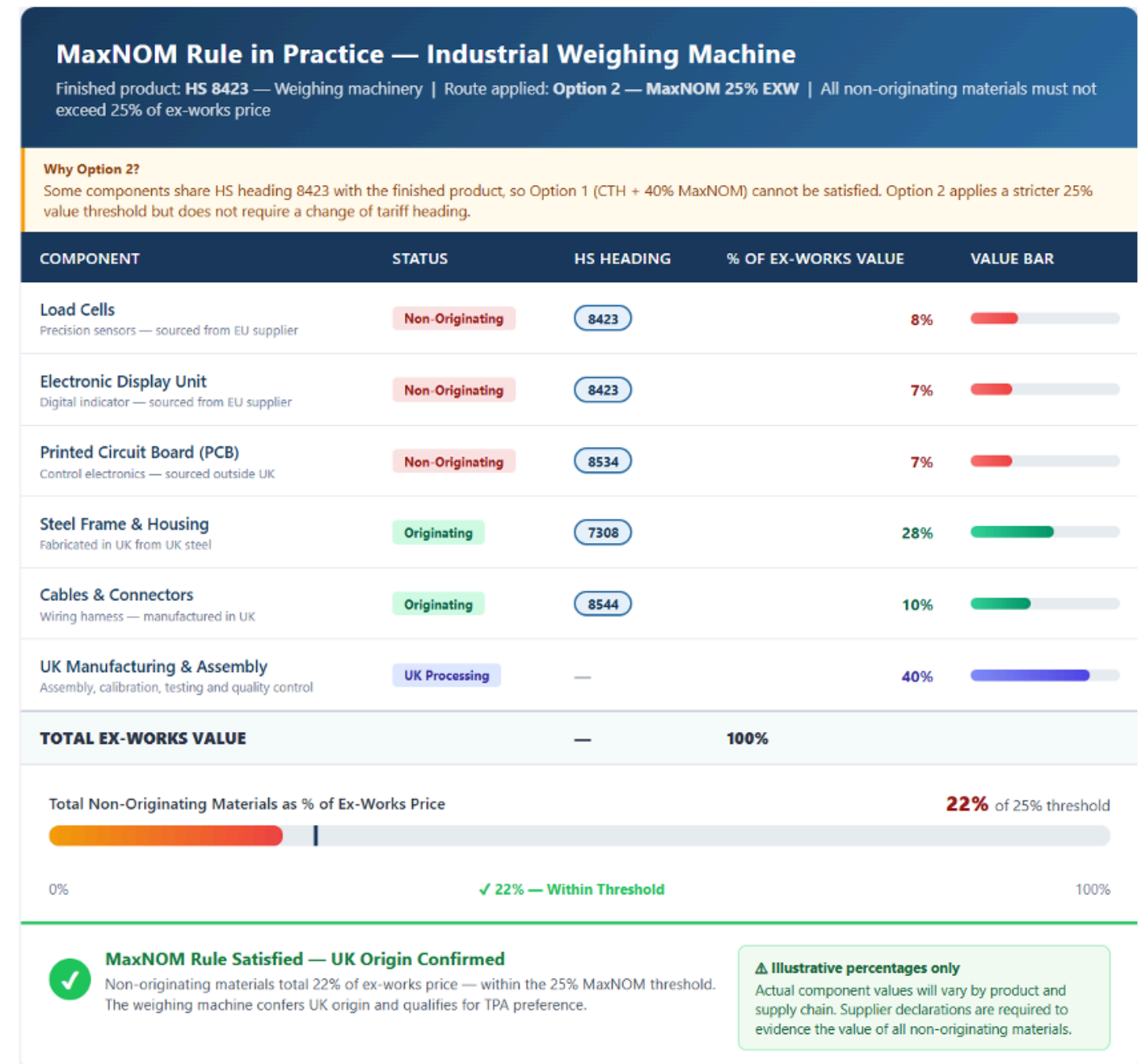
Example: Industrial Weighing Machine (HS 8423): The PSR gives two routes:

Option 1 – CTH plus MaxNOM 40% EXW: All materials must be classified outside HS 8423 and total non-originating materials must not exceed 40% of ex-works price.

Option 2 – MaxNOM 25% EXW: Where some components share HS 8423, CTH cannot be satisfied. A stricter 25% value threshold applies instead.

KEY TAKE AWAY

Assess both options and use whichever you can evidence most clearly. Supplier declarations must be kept for a minimum of four years – ideally six given GRA's audit window.



SPECIFIED OPERATIONS

For certain products, passing a CTH or MaxNOM test is not enough. The PSR instead requires that specific manufacturing steps are carried out in the country of origin. It is not enough to use the right materials – the right processes must also happen there.

This is most common in the textiles and clothing sector, where certain stages of manufacture – weaving, knitting, or assembling from fabric cut to shape – must take place in the country of origin.

Example: T-shirts of UK origin (HS 6109) exported to Ghana: For a knitted T-shirt to qualify as UK originating, the garment must have been produced by sewing together or assembling two or more pieces of knitted or crocheted fabric that were either cut to shape or knitted directly to shape in UK. Sourcing fabric and finishing or labelling in UK alone would not be enough.

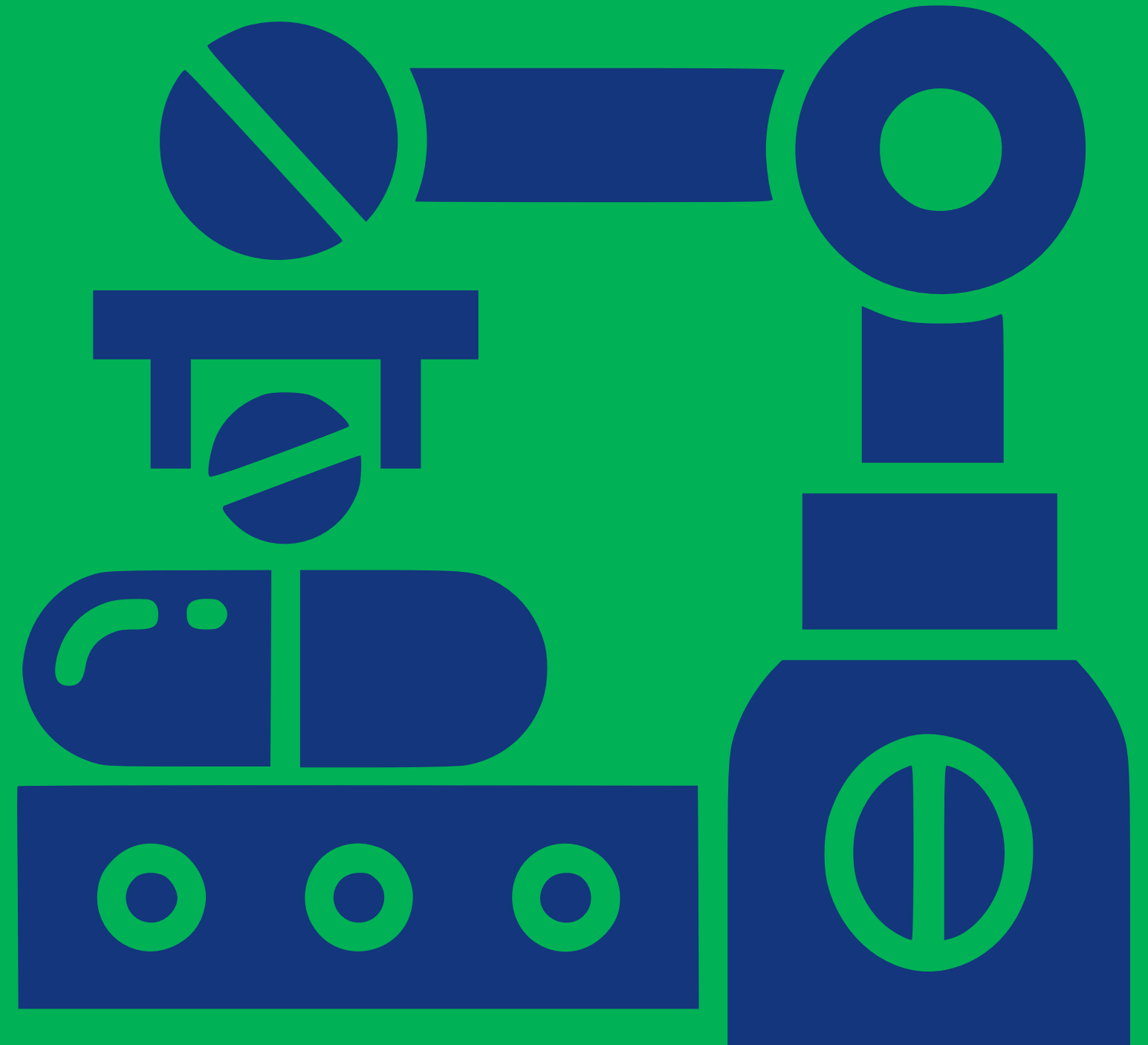
Chapter 61	Articles of apparel and clothing accessories, knitted or crocheted:		
	— Obtained by sewing together or otherwise assembling two or more pieces of knitted or crocheted fabric which have been either cut to form or obtained directly to form	Manufacture from fabric	
	— Other	Manufacture from yarn (1)	

KEY TAKE AWAY

If your product is subject to a specified operations requirement, you need to be clear on exactly which manufacturing steps must take place in the UK before making any origin claim. Where any part of the required process is carried out outside the UK, your origin assessment must reflect that.

CASE STUDY – PHARMCEUTICAL EXPORT TO GHANA

Putting the rules into practice



NORTH-POINT LIFE SCIENCE:

THE PRODUCT AND THE QUESTION

North-Point Life Sciences is a Leeds-based manufacturer of generic medicines exporting Ciprofloxacin 500mg tablets to a Ghanaian healthcare distributor. The product falls under Ghana's Band 0 at **0% import duty** – but origin must still be correctly established and documented.

STEP 1

Commodity Code: HS 3004 –
medicaments in measured doses for
retail sale.

STEP 2

Product Specific Rule The PSR for HS
3004 requires both tests to be satisfied
simultaneously:

CTH: every non-originating input must
fall under a different four-digit HS
heading to HS 3004; **AND**

MaxNOM 50% EXW: non-originating
materials must not exceed 50% of ex-
works price

Material	HS Classification	Outside HS 3004?
Ciprofloxacin Hydrochloride (API)	HS 2941	✓
Microcrystalline cellulose (excipient)	HS 3912	✓
Magnesium stearate (lubricant)	HS 2915	✓
Hydroxypropyl methylcellulose (film coat)	HS 3912	✓
Titanium dioxide (film coat)	HS 2823	✓

NORTH-POINT LIFE SCIENCE:

THE PRODUCT AND THE QUESTION

STEP 4

Applying the MaxNOM Test North-Point Life Sciences calculated the total value of all non-originating inputs as a percentage of the ex-works price – the factory gate price before freight or insurance is added.

Component	Non-originating value
Ciprofloxacin HCl (API) — sourced outside UK	£18,500
Non-UK excipients and film coat	£4,200
Total non-originating value	£22,700
Ex-works price of finished batch	£68,000
Non-originating % of EXW	33.40%
33.4% is well below the 50% MaxNOM ceiling.	

The MaxNOM test is satisfied.

Both the CTH and MaxNOM tests are met. The PSR for HS 3004 is satisfied in full.

STEP 5

– **Sufficient** Processing Blending, granulation, tablet compression, film coating and QC testing go well beyond the TPA's list of insufficient operations. Transformation has taken place in the UK - **The goods confer UK origin.**

STEP 4

Keeping the Evidence All supporting records, including supplier declarations, must be kept for a minimum of four years, ideally six to cover GRA's full audit window.

STEP 4

Origin qualification is the foundation. Get it right and the preferential rate is secured.

WHERE TO GET HELP



- Rules of origin guidance – <https://www.gov.uk/guidance/check-your-goods-meet-the-rules-of-origin>
- UK-Ghana TPA – full agreement and Annexes [UK-Ghana Interim TPA](#)
- UK Trade Tariff – commodity codes and PSR lookup www.gov.uk/trade-tariff
- Approved Exporter Status – apply to HMRC [Apply for Approved Exporter Status](#)
- Supplier declarations guidance – HMRC www.gov.uk/guidance/get-proof-of-origin-for-your-goods



- Ghana Revenue Authority (GRA) – customs and ICUMS www.gra.gov.gh
- GRA Trade and Tariff Unit – dedicated GRA team handling all TPA and trade agreement queries from traders and customs officials. For origin-related questions, this is your first port of call within GRA.
- ICUMS – check Ghana duty rates and the UK-Ghana TPA tariff liberalisation schedule. The TPA-specific document ("Tariff Liberalization_UK.xlsx") is available [ICUMS Data](#)
- Ghana Export Promotion Authority (GEPA) [Ghana Revenue Authority \(GRA\) – customs and ICUMS](#) www.gra.gov.gh
- [ICUMS Live Data – check Ghana duty rates](#) external.unipassghana.com
- [Ghana Standards Authority \(GSA\) – EasyPASS programme](#) www.gsa.gov.gh
- [Ghana Food and Drugs Authority \(FDA Ghana\)](#) www.fdaghana.gov.gh
- [Ghana National Chamber of Commerce \(EUR.1 in Ghana\)](#) www.ghanachamber.org
- [Ghana Shippers Authority](#) www.shippers.org.gh
- Ghana Standards Authority (GSA) www.gsa.gov.gh



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GR^{OW} TRADE
TO^{GETHER}

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