CUBA TRADE BRIDGE

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Cuban MIPYMEs and the Non-State Sector

Structure | Market Signals | Trade Capacity | Commercial Verification

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Market intelligence | Trade representation | Commercial research

Publication Note

This final edition is part of the Cuba Trade Bridge Research Paper Series. It is designed for foreign suppliers, trade managers and business-development teams that evaluate commercial opportunities with Cuban MIPYMEs and other non-state economic actors.

The paper is informational and analytical. It does not constitute legal, banking, customs, tax, sanctions, investment or financial advice. Transaction-specific advice should be obtained from qualified professionals, banks, authorised entities and relevant authorities.

Executive Summary

Cuba's non-state sector has become an important part of the country's commercial landscape. MIPYMEs, cooperatives and self-employed economic actors increasingly appear in food, retail, repair, construction, logistics support, hospitality, light manufacturing and import-related demand.

However, foreign companies should not treat the existence of a Cuban MIPYME as automatic evidence of import capacity, payment capacity or operational reliability. A MIPYME may be a real market signal, a potential customer, a local distributor, an end user, or simply a source of demand that must be routed through authorised channels.

Core thesis

In Cuba's non-state sector, demand is often visible before capacity is verifiable.

Working rule

Registered existence does not equal import capacity, payment capacity or operational reliability.

1. What Are Cuban MIPYMEs?

MIPYMEs are micro, small and medium-sized enterprises within Cuba's economic actor framework. They may appear as private or state-linked entities and are part of the wider map of Cuban economic actors that also includes state enterprises, non-agricultural cooperatives and self-employed workers.

For a foreign supplier, the first question is not whether a MIPYME exists in the abstract. The first question is whether the specific entity is registered, active, relevant to the product, able to participate in the transaction and connected to a workable import and payment route.

Verification point	Practical question
Legal existence	Is the entity visible in official MIPYME/CNA or economic actor records?
Activity	Is it commercially active, or only legally registered?
Sector fit	Does its approved/main activity match the product category?
Counterparty role	Is it the buyer, end user, distributor, intermediary or demand originator?
Import route	Which authorised foreign-trade entity will execute the import?
Payment route	Who pays, through which bank and in which currency?

2. Non-State Sector Map

Actor type	Practical meaning	Foreign supplier question
MIPYME	Registered micro, small or medium-sized enterprise.	Is it active, solvent and relevant to this product?
CNA	Non-agricultural cooperative.	Does it have commercial demand and a verified payment route?
TPCP	Self-employed worker / cuenta propia actor.	Can it operate at the scale required by the transaction?
State company	State economic entity.	Is it buyer, importer, distributor or end user?
Authorised importer	Foreign-trade channel authorised for import operations.	Is it authorised for this product and transaction?

Key message

A MIPYME can be a market signal before it becomes a verified buyer.

3. Legal and Institutional Framework

The public framework for this subject should be read through official Cuban sources: the Gaceta Oficial for legal instruments, MEP information and lists for economic actors, MINCEX rules for relations with authorised foreign-trade entities, and BCC information for foreign-currency mechanisms affecting non-state actors.

Framework area	Why it matters
MIPYME legal regime	Defines the legal basis and status of MIPYMEs.
MEP actor records	Provides a practical first point for checking approved MIPYMEs and CNA.
MINCEX authorised trade rules	Frames how non-state actors relate to authorised foreign-trade entities.
BCC foreign-currency mechanisms	Helps interpret whether a non-state actor may access formal foreign-currency channels.
Aduana / customs framework	Determines product classification, import treatment and clearance requirements.

Regulatory caution

Public rules provide the general framework. Transaction-level procedures, service fees and operational rules should be confirmed directly with the authorised importer.

4. What MIPYMEs Can Signal

Signal	What it may mean
Active commercial page or sales channel	There may be real demand or local customers.
Product-specific inquiry	The actor may understand the product and need.
Existing local operations	There may be distribution, retail, workshop or production capacity.
Imported goods already visible	The actor may have previous import-related experience.
References to logistics or distribution	There may be local execution capacity, but it must be checked.

5. What MIPYMEs Do Not Prove

MIPYME visibility does not prove...	Why not?
Import authority	The authorised foreign-trade channel must be separately identified.
Payment capacity	Foreign-currency access, bank route and payment timing must be verified.
Operational reliability	Storage, delivery, after-sales or technical capacity must be checked.
Bank acceptability	The exporter's bank may still reject the route.
Legal/compliance clearance	Party, product, bank and route screening may still be required.
Sustainable demand	A one-time inquiry does not prove recurring purchase capacity.

Key message

Buyer interest is not the same as verified counterparty capacity.

6. MIPYME Trade with Foreign Suppliers

A Cuban MIPYME may identify a foreign supplier itself, or it may request sourcing support from an authorised foreign-trade entity. Both routes can be commercially relevant. In both cases, the foreign supplier should verify the contractual buyer, authorised importer, payment route, banking channel and delivery responsibilities before treating the transaction as executable.

Route	How it works	Exporter checkpoint
MIPYME identifies supplier	The MIPYME negotiates product, price and basic terms with the foreign supplier, then brings the opportunity to an authorised importer.	Do not assume the MIPYME will be the contractual buyer or payer.
Authorised importer sources offers	The MIPYME submits a need; the authorised importer may request offers or use existing supplier channels.	Confirm who signs, pays, imports and takes delivery.

7. Practical Import Flow

Step	Action	Main risk
1	MIPYME identifies product need.	Demand may be real but unverified.
2	Foreign supplier provides proforma and product documents.	Price may not reflect full Cuba landed cost.
3	MIPYME or supplier routes the file to authorised importer.	Importer authority and product fit must be checked.
4	Authorised importer reviews product, documents and import feasibility.	Additional certificates, controls or restrictions may appear.
5	Cost, payment, delivery and contract structure are defined.	Parties may misunderstand who pays what.
6	Payment route is verified with banks.	A buyer is not a payment route.
7	Shipment occurs only after payment route activation.	Shipping on promises creates recovery risk.
8	Customs clearance and local delivery.	Demurrage, storage or delivery delays may change cost.

Key message

A MIPYME demand can open the commercial conversation; the authorised import and payment route determines whether the transaction can actually be executed.

8. Profitability and Landed-Cost Logic

A MIPYME cannot calculate profitability from the supplier price alone. Even if the supplier offers CIF Cuba, the MIPYME still needs to understand what happens after the cargo reaches the Cuban import point.

Cost layer	Profitability question
Supplier CIF price	What does the foreign price include and exclude?
Customs duties / customs operations	Which tariff treatment applies to this product?
Inspection / certification / sanitary controls	Are extra controls required for this product category?
Port, terminal, handling and storage	Who pays local operational costs and delay costs?
Banking and payment charges	Which side pays bank costs, transfer costs or LC costs?
Authorised importer margin / service charge	What is charged, and on which cost base?
Local delivery	Is delivery to the MIPYME included?

The MIPYME should request a landed-cost estimate from the authorised importer before treating the transaction as profitable. The estimate should indicate included costs, excluded costs, expected currency, payment timing and whether the final amount can change after arrival.

Essential point

The key question is not only the percentage charged by the authorised importer, but the cost base on which any charge is applied.

9. Authorised Importer Procedures and Service Fees

Specific service fees, tariff tables and operational procedures should be requested directly from the authorised importer through official channels and confirmed in writing.

Publicly available regulations provide the general framework, but the detailed internal tariff tables, service rules and operational procedures of specific authorised importers are not always publicly available. These should be requested directly from the authorised importer through official channels and confirmed in writing before the MIPYME treats the transaction as commercially viable.

Question	Why ask it?
What service fee, margin or charge applies?	Identifies the importer's compensation.
What is the calculation base?	Clarifies whether the charge is based on CIF, customs-included cost or total landed cost.
Which costs are included?	Avoids hidden landed-cost changes.
Which costs are excluded?	Highlights demurrage, storage, inspection or local delivery exposure.
When must the MIPYME deposit funds?	Determines working-capital needs.
Can the amount change after arrival?	Protects profitability assumptions.

CTB note

The practical answer is simple: ask the authorised importer directly, officially and in writing.

10. CTB MIPYME Verification Ladder

Level	Verification question	Evidence type
1. Existence	Is the entity officially identifiable?	MEP list / registration record / official documents.
2. Activity	Is it commercially active today?	Website, social media, invoices, site visit or references.
3. Sector fit	Does the product match its activity?	Main activity, business model and sales channel.
4. Role	Is it buyer, user, distributor or intermediary?	Contract chain and written role confirmation.
5. Import route	Which authorised entity will import?	Written confirmation from authorised importer.
6. Payment route	Who pays and through which bank?	Bank route, LC/transfer/advance payment details.
7. Operations	Can it receive, store, distribute or use the product?	Warehouse, delivery, technical or retail capacity evidence.
8. Track record	Has it completed similar transactions?	References, non-confidential proof or transaction history.

Key message

No counterparty should be treated as verified until its legal status, role, payment route and operational capacity are checked.

11. Social Media and Field Signals

In Cuba, many active commercial actors may have limited formal web presence but visible activity on Facebook, Instagram, WhatsApp, LinkedIn or local directories. These signals can be useful, but they are not due diligence results.

Social / field signal	Can suggest	Does not prove
Product photos	Product interest or current sales.	Legal status or import authority.
Customer comments	Market engagement.	Solvency or payment capacity.
Warehouse/store images	Possible local operations.	Scale, ownership or reliability.
Imported-brand presence	Possible past imports.	Current ability to import or pay.
LinkedIn/Facebook company page	Identity and contacts.	Regulatory compliance or bankability.

Key message

Social media visibility is a commercial signal, not a due-diligence result.

12. Questions to Ask a Cuban MIPYME

- What is your official registered name?
- Are you listed as a MIPYME, CNA or another economic actor?
- What is your main approved economic activity?
- Are you the final buyer, distributor, user or intermediary?
- Which authorised importer would be used for this transaction?
- Who will be the contractual buyer?
- Who will make the payment?
- Which bank will be used?
- Can the transaction be structured through advance payment, LC or another bankable route?
- Do you have experience with similar imports?
- Do you have storage, distribution or technical capacity for this product?
- Can you provide non-confidential evidence of recent commercial activity?

13. Questions to Ask the Authorised Importer

- Are you authorised to import this product category?
- Will you act as contractual buyer, importer of record, service provider or another role?
- Which documents do you require from the foreign supplier?
- What is the expected landed-cost estimate for the MIPYME?
- Which service fee, margin or operational charge applies?
- What is the calculation base for any percentage charge?
- Which costs are included and excluded?
- Who pays bank charges, port charges, storage or demurrage?
- What currency and payment timing are required from the MIPYME?
- Can all tariff tables, service rules and procedures be confirmed in writing?

14. Red Flags

Red flag	Why it matters
MIPYME refuses to provide official name	Registration cannot be checked.
Only social media profile is available	Visibility is not legal or financial verification.
Authorised importer is unclear	Import execution route is missing.
Payment party is unclear	Contract, invoice and bank route may not align.
Importer fee cannot be provided in writing	Profitability assumptions may be unreliable.
Product does not fit MIPYME activity	Demand or operational capacity may be weak.
Buyer says “we will solve it” but gives no documents	Operational transparency is low.
Open account requested with no track record	Exporter assumes payment risk.

15. Counterparty Verification Checklist

Before treating a Cuban MIPYME opportunity as executable, the foreign supplier should check the following points.

Area	Minimum check
Entity identity	Official name, actor type, province/municipality and registration evidence.
Role in transaction	Buyer, end user, distributor, intermediary or demand originator.
Authorised import channel	Name and written role of the authorised importer.
Contract chain	Who signs the contract, who receives the invoice and who imports?
Payment route	Who pays, which bank, which currency and which instrument?
Landed cost	Written estimate from authorised importer before profitability decision.
Importer charges	Service fee/margin, calculation base and excluded costs in writing.
Compliance	Party, bank, product and route screening.
Operations	Storage, distribution, delivery and after-sales requirements.
Evidence	Official documents, non-confidential track record or field confirmation.

Final working rule

A MIPYME may create demand. The authorised importer and payment route determine execution.

16. Source Register

The following official and institutional sources form the source register for this final edition.
The source register should be rechecked before transaction-specific use.

Source	Relevance	URL
Gaceta Oficial - Formas de gestión no estatal	Gateway for MIPYME, non-state actor and related regulatory instruments.	gacetaoficial.gob.cu/es/formas-de-gestion-no-estatal
Gaceta Oficial No. 78/2024	Publication gateway for Decree-Law 88/2024 and related actor framework instruments.	gacetaoficial.gob.cu/es/gaceta-oficial-no-78-ordinaria-de-2024
MEP - Actores Económicos	Official page linking to MIPYME/CNA lists and economic actor materials.	mep.gob.cu/es/actores-economicos-empresa-estatal-socialista-mipyme-cna-tpcp
MEP - Listado de MIPYMES y CNA	Official listing point for approved MIPYMES and CNA.	mep.gob.cu/es/documento/listado-de-mipymes-y-cna-aprobadas-en-el-pais
Gaceta Oficial No. 95/2024 - Resolución 166/2024	Rules for commercial relations between authorised foreign-trade entities and non-state management forms in MLC operations.	gacetaoficial.gob.cu/es/gaceta-oficial-no-95-ordinaria-de-2024
Banco Central de Cuba - Divisas actores no estatales	Official information on foreign-currency purchase channels for CNA and non-state MIPYMEs.	bc.gob.cu/divisas-actores-no-estatales
Aduana General de la República - Importación	Customs gateway for import procedures and tariff references.	aduana.gob.cu/pagina-basica/importacion

17. Disclaimer

This document is provided for informational and research purposes only. It does not constitute legal, banking, sanctions, customs, tax, investment or financial advice. The information should not be relied upon as a substitute for professional advice from qualified legal counsel, banks, compliance specialists, customs experts, authorised import entities or relevant authorities.

Cuba-related transactions may be affected by changing legal, regulatory, banking, currency, logistics and operational conditions. Foreign suppliers and Cuban MIPYMEs should verify transaction-specific facts before making commercial commitments, shipping goods, extending credit or treating an opportunity as profitable.

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