Driving Safe Food Trade in the midst of a Food Crisis in Africa

A CRITICAL STEP FOR THE SUCCESS OF THE AFCFTA

July 2023
This Policy Brief is a joint product of the Food Trade Coalition for Africa (FTCA), and the Standards and Trade Development Facility (STDF). It is based on experiences and lessons of work to build food safety, animal and plant health capacity that facilitates agri-food trade in Africa.

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The Food Trade Coalition for Africa is a continental platform bringing together key stakeholders in food trade in Africa to facilitate increased intra-African food trade. This includes stakeholders from the public and private sector, Continental Bodies, the Regional Economic Communities, research institutions, donor partners. The Coalition aims to leverage the diverse experiences and knowledge of its members and Champions to build a stronger consensus on food trade policy, and increase policy coherence and predictability. The Coalition focuses on the following critical issues that have an impact on regional food trade – food and nutrition security and hunger hotspots, logistics and trade corridors, women in food trade and food safety and nutrition. The Coalition Secretariat is hosted by the Regional Food Trade and Resilience Unit, AGRA.

The Standards and Trade Development Facility (STDF) is a global partnership to facilitate safe trade, contributing to sustainable economic growth, poverty reduction and food security. The STDF promotes improved food safety, animal and plant health capacity in developing countries. This helps imports and exports to meet sanitary and phytosanitary (SPS) requirements for trade, based on international standards. The STDF brings together diverse stakeholders from across agriculture, health, trade and development. It promotes collaborative and coherent action to champion safe and inclusive trade, in support of the Sustainable Development Goals. The STDF’s founding partners are the Food and Agriculture Organization of the United Nations (FAO), World Organisation for Animal Health (WOAH), World Bank Group, World Health Organization (WHO) and World Trade Organization (WTO), including the Codex and IPPC Secretariats.

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Ensuring the right to Safe Food in Africa

Access to safe food is a basic right of individuals everywhere. The UN estimates that 25,000 people die every day as a result of hunger, 323 million people are food insecure, and 854 million people worldwide are estimated to be undernourished.\(^4\) Annually, about 600 million people fall ill after eating unsafe food and 420,000 die. One-third of these deaths occur in Africa. Food safety is critical for food and nutritional security. Unsafe food reduces the bioavailability of nutrients in food and increases malnutrition in populations already at high risk.\(^6\)

The population in Africa is growing rapidly. Twenty-six countries are expected to at least double their size between 2017 and 2050.\(^7\) This increases the demand for safe and nutritious food. Yet ensuring access to sufficient, safe food for this growing population is a huge challenge, exacerbated by climate change and increasing environmental pressures, as well as the COVID-19 pandemic and the war in Ukraine, which have driven higher food prices, higher fuel and transports costs, and higher prices of fertilizers and other inputs.

Intra-African trade is key to facilitating access to safe food in Africa. Trade also offers an important opportunity to strengthen food systems and boost inclusive economic growth, investment and poverty reduction, as recognized by the African Continental Free Trade Area (AfCFTA). To ensure that trade delivers on this potential, more investments are needed to improve food safety, animal and plant health systems, and to facilitate trade in agri-food products across the continent. Although the continent can boast of a market worth US$3.4 trillion under the AfCFTA, intra-African trade remains below 20%. In Sub-Saharan Africa, this trade is highly concentrated in selected countries in Southern, Eastern and Western Africa. (see figures below).

Regional Trade in Agricultural Products in 2020

Source: ResourceEarth.Trade, Chatham House, The Royal Institute for International Affairs, 2020

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\(^5\) Unsafe food contains microbiological, chemical, or physical hazards that can make people sick, causing acute or chronic illness that, in extreme cases, can lead to death or permanent disability.

\(^6\) Jaffee et al. (2019). Why Food Safety Matters to Africa: Making the Case for Policy Action

Enabling Safe Trade in Africa

The African Continental Free Trade Area (AfCFTA) aims to drive the expansion of Africa’s agricultural growth and transformation, including trade in agri-food products. Over 75% of intra-African trade is in agricultural products (UNECE), but intra-regional trade remains low relative to other regions around the world. According to the Africa Agriculture Trade Monitor (AATM), intra-African trade in agricultural products, in 2019, accounted for 22.9% of total African exports of semi-processed agricultural products. However, the AATM analysis goes on to show that for intra-African trade in agricultural products, there was a decline in 2020.

The AfCFTA offers the potential to increase intra-African trade from 18% of total trade to 50% by 2030 and lift 30 million Africans out of extreme poverty, based on significant policy reforms and trade facilitation measures. The reduction of non-trade barriers, including procedural obstacles related to customs and other border agencies, is estimated to lead to trade gains of US$20 billion per year in Africa, compared to US$3.6 billion that could be achieved by the elimination of tariffs. Addressing non-tariff barriers related to food safety, animal and plant health, and trade is therefore critical for the success of the AfCFTA.

In Africa, part of the problem stems from limited capacity, resources and infrastructure in both the government and private sector to meet international standards and implement SPS measures in a way that protects health and facilitates trade. The gaps tend to be diverse and wide-ranging, affecting trade to regional as well as international markets, as evidenced by trade bans and rejections. Since the costs of implementing SPS measures are generally fixed, small and medium-sized enterprises tend to be the most affected.

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8 https://resourcetrade.earth/?year=2020&exporter=ssf&importer=ssf&category=1&units=value&autozoom=1
Both the disease burden and economic burden of these gaps is huge and often underestimated. For instance, a study commissioned by AGRA, on behalf of the Food Trade Coalition for Africa, found that inadequate capacity to manage just two food safety issues – aflatoxins in maize and avian flu in poultry – collectively cost Uganda, Kenya, Tanzania, Rwanda, South Africa and Zimbabwe close to US$1.2 billion between 2016 and 2021. This included costs related to aflatoxin in maize of US$235.9 million and costs related to Avian flu of US$937.4 million. With most staples and traded food products susceptible to food safety, and sanitary hazards – ranging from mycotoxins in grains and legumes, to animal diseases in livestock and livestock products – the costs are clearly huge.

While progress is being made, illustrated by growing export volumes, science continues to evolve and SPS requirements for trade are becoming increasingly stringent. At the same time, new food safety, zoonotic and other risks are emerging, so that the challenges continue to evolve and grow.

Improved implementation of SPS measures is key to protect human, animal and plant health on the continent from existing and emerging risks, and to ensure that agricultural trade flows smoothly, while keeping time and costs as low as possible for traders.

The African Union SPS Policy Framework aims to address these issues. It seeks to strengthen efficiencies in intra-African trade under the AfCFTA through the harmonization of SPS standards and border processes, sharing of information, and increased technical capacity. It encourages AU Member States to take action to strengthen their regulatory systems and prioritize SPS funding streams, working closely with diverse stakeholders from farmers to traders, distributors, retailers, regulators and consumers.

Key strategic areas prioritized in the AUC SPS Policy Framework include the following:

1. support for Member State efforts to establish harmonized science-based SPS systems, taking into account both the international standards and regional conditions;
2. increased efficiencies and reduced trading costs by working towards a harmonized continental SPS system;
3. increased technical capacity in Regional Economic Communities (RECs), Member States, and stakeholders through cooperation and sharing of resources; and
4. enhanced opportunities to expand intra-African trade of plants, animals, and food through strengthened public-private cooperation, awareness raising and resource mobilization.

Annex 7 of the Agreement establishing the AfCFTA encourages Parties to the Agreement to be guided by the WTO SPS Agreement in the preparation, adoption, and application of their SPS measures. The objective is to facilitate trade while safeguarding human, animal or plant life or health, enhance cooperation and transparency in the development and implementation of SPS measures to ensure that they do not become unjustifiable barriers to trade, and improve technical capacity to implement and monitor SPS measures while encouraging the use of international standards.

A sub-Committee on SPS Measures has been established by the AfCFTA Secretariat to promote cooperation between the State Parties on SPS issues under discussion in multilateral fora, including the WTO SPS Committee, as well as the international standard setting bodies (Codex, IPPC and WOAH).

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Tools to support implementation of the AU SPS Policy Framework and the AfCFTA Agreement

At the continental level, two key tools to support the roll out of the AU SPS Policy Framework and the AfCFTA Agreement already exist – the Food Safety Strategy for Africa (FSSA) 2022-2036 and the Plant Health Strategy for Africa. With strong high-level political will, access to adequate financial resources and the right incentives in place for implementation at the regional and national level, these ambitious strategies can be transformational for improved agricultural trade and food security in line with the objectives of the Malabo Declaration and Agenda 2063. They also have the power to contribute to biodiversity protection and more sustainable food systems. Moving to effective execution across the continent is more urgent than ever. Development partners and donors are supporting these efforts at a regional and national level. But much more needs to be done to leverage the necessary investments (including from national budgets), mobilize political commitment where it is not yet in place, and bring together diverse stakeholders from the public and private sector to work in coordination for stronger results and impacts.
Limited Knowledge and Skills to Meet International Standards

Many African countries continue to face challenges to implement international standards for food safety (Codex), animal health (WOAH) and plant health (IPPC). In some cases, while international standards and good practices are used for products exported to international markets, they are not used for products on the local market, which often means the poorest and most vulnerable groups suffer most. Lack of food safety data and scientific capacity means that some countries struggle to define an appropriate level of protection for their citizens.

Fragmented Regulatory Landscape at National Level

While policies and structures to promote coherence in SPS measures exist at the continental and regional level, the SPS regulatory landscape is often fragmented at the national level. Regulations related to food safety, animal and plant health tend to fall under the responsibility of different authorities and/or departments that deliver on their mandates independently, often with minimal or no linkages between them. In the worst cases, there are overlaps resulting in inefficient use of limited resources. Lack of harmonization in food safety legislation and regulations also poses a huge challenge in addressing issues with non-conformity to prescribed standards and regulations for African countries. Although, considerable work has been done through the African Organization for Standardization (ARSO) and Regional Economic Communities (RECs) towards harmonization of standards, more needs to be done at the country level.

Patchy use of Good Agriculture and Hygiene Practices

Limited use of good agriculture/aquaculture, manufacturing and hygienic practices contributes to the high prevalence of physical, chemical, and microbial hazards, and unsafe food. Value chain actors (from farmers to manufacturer, traders and even consumers) often have limited awareness about food safety, and/or lack the knowledge, skills and resources to use improved food safety practices.

Inadequate Financing and Infrastructure Deficits

Government agencies and the private sector need adequate resources and infrastructure to implement SPS measures. This includes sufficient financing for staff and training, as well as up-front investments and operational costs for infrastructure and equipment like testing laboratories, cold chain storage and packaging materials, or IT systems and equipment for surveillance of food safety contaminants, plant pests and animal diseases. Faced with more acute and pressing needs of hunger and poverty, national budget allocations for SPS management are often inadequate, reflecting limited understanding of the returns on investments and the importance of food safety, animal and plant health capacity for policy goals.

Weak implementation and enforcement of SPS measures

While SPS policies and regulations may appear adequate on paper, in some countries this does not translate into effective implementation and enforcement. Inadequate financial and human resources is part of the problem. Many African countries lack the necessary personnel and skills required for conformity assessments to ensure that food sold on domestic markets, and traded regionally and internationally, meets appropriate standards.
Facilitating Safe Food Trade: Key Lessons

1. Evidence-based approaches help target SPS investments to areas where they are likely to have the greatest impacts linked to policy goals

Countries across Africa face a wide range of SPS challenges, while resources available in the public and private sector are extremely limited. This makes it essential to set clear, evidence-based priorities for investments, and to review these priorities as gaps are addressed and needs change. Evaluating SPS capacity needs using the tools developed by international-standard setting bodies is an important first step to generate this evidence.13

Given the number of competing SPS investment needs and diversity of stakeholders involved, setting priorities in a structured and transparent manner is key. Lessons from the use of the STDF’s evidence-based approach to prioritize SPS investments for market access (P-IMA) in Africa point to the value of a robust, evidence-based approach to prioritize SPS needs, even when data is limited. Use of the P-IMA framework in Ghana, Kenya, Ethiopia, Madagascar, Malawi, Zambia, Uganda and other countries underscored the benefits of engaging diverse public and private sector stakeholders, as well as academia and civil society. Taking a participatory approach and allowing everyone to have their say encouraged transparency on investment needs. It also enabled stakeholders to understand how setting priorities based on decision criteria and weights, links to expected impacts from trade growth to increased agricultural productivity. This builds ownership for follow-up and supports resource mobilization.

Aflatoxins in maize, groundnuts and other food products are problematic for public health and trade, as well as food security. For instance, in Ghana, as much as 18% of maize is lost annually due to aflatoxin contamination. The national aflatoxin policy identifies diverse needs for aflatoxin control, costed at over US$7.6 million.


Using Evidence to Set Priorities for Aflatoxin Control in Ghana14

Ghana recently developed the landmark National Policy for Aflatoxin Control in Food and Feed (‘Aflatoxin Policy’) aimed at addressing challenges related to aflatoxin contamination in feed and food (groundnuts, maize, and other raw and processed products). The Science and Technology Policy Research Institute of the Council for Scientific and Industrial Research (CSIR-STEPRI) of Ghana, collaborated with AGRA and the STDF to prioritize and rank investment areas identified in the National Policy’s implementation plan using STDF’s P-IMA framework.

With participation from stakeholders from the public and private sector, academia/research institutions, NGOs and development partners, a consultative workshop was held in July, 2022 with the aim to launch the National Policy for Aflatoxin Control in Food and Feed and validate the P-IMA report prioritizing investment options.

Key takeaways from the workshop include:

- Using P-IMA led to a dashboard to guide diverse aflatoxin investments for public health and trade across different value chains;
- The P-IMA analysis generated data and information on five (5) food safety investment options;
- The P-IMA analysis delivered hard evidence on the expected impacts of investments linked to national policy goals on agricultural productivity, trade and poverty reduction including the expected impact on vulnerable groups;
- This analysis and ranking is expected to leverage additional resources for follow-up from the national government and donors.

Strong public-private dialogue and economic data and evidence helped in identifying resources and investment required to bring the national policy on aflatoxins control in food and feed.

~ Dr Rose Omari
Lead Scientist, CSIR-STEPRI, Ghana

14 https://standardsfacility.org/PPG-786
2. Effective coordination across the public and private sector is key

Diverse government authorities, as well as the private sector and other stakeholders from consumers and trade associations, regional and continental institutions, all have a role to play in improved food safety, animal and plant health in Africa. Effective dialogue and coordination at the country level paves the way towards improved food safety coordination at the regional and continental level. SPS outcomes are better in countries where all the relevant organizations involved in SPS matters understand the value of sharing information and working across government, as well as with the private sector. For instance, national Codex Coordinating Committees provide a useful platform to facilitate dialogue, coordination and trust on food safety across different government agencies, and with consumers and the food industry. In other countries, national SPS committees or trade facilitation committees can play this role. Public–public and public-private coordination may be achieved in different ways, depending on the country context. The key is to identify the incentives that encourage collaboration, and to find a model that works for the key stakeholders involved and can be sustained (financially and institutionally) over time.

Win-win partnership in Tanzania to facilitate safe trade

In Tanzania, the Ministry of Agriculture and the horticulture industry have put in place an innovative partnership to improve training, inspection and certification services. Under a Memorandum of Understanding, GreenCert Ltd (established as a subsidiary company under the Tanzania Horticulture Association) is responsible for food safety inspection and certification, as well as training farmers on HACCP and GLOBALG.A.P. It also has the mandate to support risk surveillance, and work by the Tanzania Plant Health and Pesticides Authority (TPHPA) on risk assessment and management. This is a win-win partnership for the public sector, farmers and other stakeholders in the horticulture sector. The government is better able to deliver on its official oversight functions. Smallholder farmers have increased access to improved, more affordable services, which has enabled them to improve the safety and quality of their produce, opening up new opportunities in regional and markets and beyond.

3. Regional approaches promote efficiencies and add value

Risks related to food safety, animal and plant health are interconnected across national borders. Plant pests like fruit flies or animal diseases do not stop at borders. Taking a regional approach can help to identify cost effective opportunities to pool resources and realize economies of scale, for instance through joint diagnosis, monitoring and control, or regional training and laboratories. This can further support policy coherence and strengthen linkages to other efforts to build capacity, including those led by regional economic communities (e.g., Comprehensive Africa Agriculture Development Programme), as well as other issue specific initiatives (e.g., Partnership for Aflatoxin Control in Africa).

4. Use Good Regulatory Practices to make SPS measures fit-for-purpose for faster, less costly trade

All countries have the right to put in place measures to ensure that food is safe for consumers. Yet when these measures are not well designed or implemented, they risk increasing the costs of trade, sometimes without protecting health. In Africa, traders frequently raise issues related to SPS procedural costs including limited transparency on requirements, forms and fees, overlapping documentary requirements, multiple inspections, longer than necessary waiting times, and uncertainty and unpredictability. Tackling SPS procedural costs helps to reduce trade costs for the private sector, and to ensure that public resources are used optimally. Analysing the potential of the AfCFTA, UNECA and the World Bank underscore that the greatest benefits will only come with robust trade facilitation measures, including simplified SPS measures that cut the costs and time of business.

Good Regulatory Practices (GRPs) are tools to make regulations simpler and smarter. They include diverse processes and systems – from transparency to coordination, regulatory stock-taking to forward-looking agendas and regulatory impact assessments (RIAs). Using GRPs helps regulators to develop better SPS measures based on international standards. This benefits governments and the private sector, including MSMEs, in practical ways. For instance, it ensures more effective regulatory frameworks (with less overlapping and/or contradictory measures), and reduces the costs and administrative burden of measures for the private sector, especially the smallest businesses, and leads to improved compliance. It also builds the trust of consumers and the food industry in regulatory processes, and leads to enhanced confidence of trading partners and investors.
Action to Facilitate Safe Food Trade in Africa

Moving from rhetoric to action on safe food trade facilitation that supports the policy objectives of the AfCFTA requires commitment, action and cooperation across diverse public and private sector stakeholders at national, regional and continental level. Actions should be guided by the AUC SPS policy framework and AfCFTA SPS Annex. Synergies should be proactively identified and encouraged with food systems and One Health approaches. The following actions are key:

1. **Leverage the SPS Policy Framework and AfCFTA SPS Annex to reinforce cooperation at a continental and regional level and drive transformational change.** While continental and regional institutions have already achieved important results, business as usual will not be enough for the change that is needed to facilitate safe food trade, improve food security and transform food systems. Sharing the same broad goals for the continent, the AfCFTA Secretariat, the AUC and its specialized agencies can further deepen their cooperation to drive the transformational change that is needed. The action plans in the SPS Policy Framework, the Food Safety Strategy for Africa and the Plant Health Strategy for Africa outline what needs to be done by the continental and regional institutions. Efforts need to be closely coordinated with regional institutions and initiatives like AGRA, TradeMark Africa and the Forum for Agricultural Research in Africa to leverage synergies and maximize results. Accelerating action and tracking performance will be key.

2. **Governments in Africa need to invest much more in SPS capacity development, and to invest more wisely.** Increased awareness about why SPS capacity matters for food trade, food security and economic growth is essential. The SPS capacity evaluation tools developed by FAO/WHO, IPPC and WOAH should be used to take stock of food safety, animal and plant health capacity gaps, and guide the development of capacity development actions plans based on baselines. Use of evidence-based approaches like P-IMA help to prioritize SPS investments linked to policy goals, encourages a more transparent and robust decision-making process, and can help to leverage resources for follow-up. Public-private partnerships and innovative funding models should be explored to leverage the knowledge, capacity and/or resources of the private sector and regional development banks in a way that adds value and improves delivery, for instance to address laboratory infrastructure deficits.

3. **The diversity of stakeholders with an interest in improved SPS capacity in Africa calls for collaborative, multi-disciplinary and regional approaches.** Opportunities should be seized to promote dialogue and build stronger synergies across government authorities involved in agriculture, health, trade and development, and with the private sector and civil society. Better connecting to, and leveraging food systems and One Health approaches, is essential to achieve joint objectives, promote food security, and improved results across the continent. More efforts are needed to strengthen collaboration across SPS agencies within and across countries, to build the foundations for effective regional and continental collaboration on safe trade facilitation from the ground up.

4. **National governments need to listen to and cooperate with the private sector, and consider the special needs of micro, small and medium-sized enterprises (MSMEs).** This requires more support to build the capacity of value chain actors on good agriculture, hygiene and manufacturing practices, and to ensure an enabling environment for agri-food trade. Governments should ensure that their SPS measures facilitate safe food trade, without increasing the costs and time of doing business. Use of good regulatory practices is recommended to improve the design and implementation of SPS measures so that they are fit-for-purpose.

5. **Take advantage of innovation and data-driven, digital approaches to inform and improve service delivery, and improve decision-making and food safety, animal and plant health capacity.** For instance, there are opportunities to use mobile apps or hand-held devices for improved surveillance of plant pests and animal disease, and to roll out new technologies for rapid testing of food safety challenges such as aflatoxins. Data-driven, digital approaches offer potential to inform and improve food safety decision-making. Artificial intelligence can be used to transform existing data on food safety risks into intelligence that can help governments to make quicker, better-informed decisions that protect consumers and improve public health. The experiences of e-Phyto certification in reducing the costs and time of trade in plant and plant products highlights potential to expand the use of e-certification in other SPS areas.
Drive the implementation of Mutual Recognition Frameworks and Agreements. In the face of several SPS challenges such as the proliferation of non-tariff measures, cumbersome procedures faced by traders in obtaining SPS documents, quality certificates and other documents, differences in quality and conformity assessments, non-harmonised SPS measures, regulations, and Standard Operating Procedures (SOPs), non-mutual recognition of technical regulations and conformity assessment simply poses additional constraints to intra-regional trade in agricultural commodities.

The aspirations in both multilateral and regional trade agreements encourage countries to enter into mutual recognition agreements so as to remove the need for multiple inspections and testing in the exporting and importing countries. COMESA in partnership with AGRA and FCDO is currently piloting the development of Mutual Recognition Framework (MRF) in six COMESA Member States i.e., Kenya, Malawi, Rwanda, Uganda, Zambia, and Zimbabwe covering six commodities (maize; soybean; sorghum; groundnuts; beans; rice). The initiative targets the elimination of redundant testing and/or certification through recognition of mutual conformity assessment procedures and equivalence of food control systems, underpinned by mutually agreed standard operating procedures (SOPs) for traders and inspectors. This needs upscaling to more products and other countries.

Leveraging food systems and One Health approaches are essential to promote food security and improved results across the continent.
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