STDF Standards ar Developmen

PROJECT: STDF/PG/346

BREAKING BARRIERS, FACILITATING TRADE

FINAL REPORT

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PROJECT INFORMATION

Title Breaking Barriers, Facilitating Trade
Implementing Agency Common Market for Eastern and Southern Africa (COMESA) Secretariat COMESA Centre Ben Bella Road P.O. Box 30051 Lusaka, Zambia
Partners Ministry of Agriculture and Irrigation, Sudan Ministry of Industry and Trade, Egypt Ministry of Agriculture, Animal Industry and Fisheries, Uganda Kenya Plant Health Inspectorate Service, Kenya Ministry of Agriculture, Irrigation and Water Development, Malawi Ministry of Agriculture, Zambia Ministry of Agriculture, Mechanisation, and Irrigation Development, Zimbabwe CAB International
Start Date 1st November 2014
End Date 31st October 2018
Beneficiary Egypt Sudan Uganda Kenya Malawi Zambia Zimbabwe
Budget Project value: US$ 1,156,210.80 STDF contribution: US$ 902,690.80

LIST OF ABBREVIATIONS

AEOs:	Authorized Economic Operators
AFDB:	African Development Bank
BEMs:	Border Efficiency Management Systems
CABI:	CAB International
CAC:	Codex Alimentarius Commission (Codex)
COMESA:	Common Market for Eastern and Southern Africa
DRC:	Democratic Republic of Congo
EAC:	East African Community
EAGC:	Eastern African Grain Council
ESADA:	Eastern and Southern African Dairy Association
IPPC:	International Plant Protection Convention
ISPM:	International Sanitary and Phytosanitay Measures
JBC:	Joint Border Committees
NTB:	Non-Tariff Barriers (NTB)
NTM:	Non-Tariff Measures
NWG:	National Working Group
OIE:	World Organization for Animal Heath
OSBP:	One-Stop-Border Post
PRA:	Pest Risk Analysis
SADC:	Southern African Development Community
SC:	Steering Committee
SOP:	Standard Operating Procedure
SPS:	Sanitary and Phytosanitary Measures
STDF:	Standards and Trade Development Facility
STRs:	Simplified Trade Regimes
TIDO:	Trade Information Desk
TORs:	Terms of Reference
WB:	World Bank

1. EXECUTIVE SUMMARY

The Common Market for Eastern and Southern Africa (COMESA) was formed in 1994 with an aim to provide a market through which member states could trade freely in order to promote economic development and food security. A major concern amongst the 21 COMESA member countries was the slow growth of intra-Africa trade. By the time this project was proposed in 2013 only 10% of total trade undertaken in the continent was from goods produced in African countries. Over 95% of cereals traded in Africa were from outside the continent. COMESA undertook studies to identify barriers to trade. It carried out some of these studies in partnership with other economic blocks, such as, the Southern African Development Community (SADC) and the East African Community (EAC). The three organizations proposed to have a Tripartite Free Trade Agreement. Studies on non-tariff measures (NTM) and consequently non-tariff barriers (NTB) indicated that some of the costs to trade were as a result of how Sanitary and Phytosanitary Measures (SPS) were implemented.

Subsequently, COMESA requested the Standards and Trade Development Facility (STDF) for assistance to facilitate countries to reduce these trading costs. The project was to pilot good practice in SPS-related regional cooperation. In 2014, the STDF granted COMESA, USD$ 902,691 to implement the project titled 'Breaking Barriers, Facilitating Trade'. The three-year project was implemented in seven countries: Egypt, Sudan, Uganda, Kenya, Zambia, Zimbabwe and Malawi. It focused on trade in maize, soya beans, groundnuts, milk, fish, beef and oranges along specific trading routes. In each country a project partner organization undertook day-to-day project activities. COMESA contracted CAB International (CABI) to oversee project coordination.

The projects goal was to *increase intra-COMESA trade in agri-food products for improved food security*. It would be achieved through three result areas (i) increasing understanding on costs and benefits of technical measures, (ii) improving these measures, (iii) and enhancing efficiency of their implementation. Key activities included baseline assessment studies to identify and set benchmarks of trading costs arising from the implementation of SPS measures, updating national lists of pest and conducting joint pest risk analysis (PRAs) where necessary, revising and harmonizing Standard Operating Procedures (SOPs) to be in line with agreed protocols, and raising awareness on the new measures to policy makers, traders and regulators.

Five countries identified costs associated with implementation of SPS measures and NTBs for five targeted commodities passing through four One-Stop-Border Posts (OSBPs). Information on costs was collected through baseline assessments, as well as during joint consultative meetings with stakeholders from each pair of trading countries. A consulting firm facilitated the development of new tools and guidelines to carry out the assessments. Information was gathered for fish, milk & milk products exported from Uganda into Kenya through Busia & Malaba borders; soya beans & groundnuts exported from Malawi to Zambia at Mchinji-Mwami border, maize, soya beans & soya products exported mainly from Zambia into Zimbabwe through their Chirundu border, and fish exported from Zambia to Democratic Republic of Congo (DRC), Angola, Namibia and Zimbabwe. Key factors influencing the cost of trading at the borders was attributed to inefficiency as a result of non-functional OSBPs, unnecessary inspections that are not risk-based, and traders not being well prepared due to inadequate information on SPS requirements.

Stakeholders discussed and agreed on priority interventions to address these challenges both in the short and long term. These included enabling the OSBPs to operate effectively, re-orientating border operations to be based on risk-based considerations, harmonizing measures undertaken at the borders, and raising awareness amongst traders on new measures as well as explaining their role in enhancing the efficiency of their implementation. They also agreed on which interventions needed to be addressed at national, bilateral and regional levels.

Four countries, Sudan, Zambia, Zimbabwe and Malawi updated their national lists of pests for maize, soya beans, ground nuts and citrus. The three southern Africa countries used the new lists to conduct joint pest risk analysis on maize, soybeans and groundnuts in accordance with International Sanitary and Phytosanitary Measures (ISPM) 11[1]. Their aim was to put together bilateral lists of quarantine pests and agree on harmonized risk mitigation measures. Zambia and Malawi drafted harmonized phytosanitary border inspection procedure taking into consideration ISPMs 23[2], 31[3] and 32[4]. While Zimbabwe and Zambia drafted harmonized import requirements for soya beans and maize.

Countries encountered challenges in setting up administrative structures which led to significant delays in project start up. The project was officially launched in May 2015. However, it took six to twenty-four months for countries to complete signing implementation agreements with CABI and provide national accounts where CABI would deposit project funds. Delays were later on encountered due to political considerations that resulted in countries banning trade in a selected commodity. These bans affected five countries especially on Maize, except Kenya and Uganda. In the case of Egypt and Sudan a trade impasse completely curtailed project implementation.

A number of lessons were learned, recommendations made, and some good practice was identified during project implementation. It is important that projects that are implemented in multiple countries have adequate pre-project preparations. A thorough stakeholder assessment is necessary in order to accurately identify the most appropriate set of partners and led organization, build rapport and mobilize political support for the project. In similar future projects the organs responsible for trade in each country should be considered for a greater role in designing and implementing the project. Efficiency in project implementation can be significantly improved by identifying at project development the best suited institutions and/individual experts to provide support in the delivery of specific technical outputs. Great effort and loss of time was experienced from the process of hiring consultants and managing their outputs to meet expected standards.

Countries need to implement the bi-lateral interventions identified through this project in order to achieve its intended purpose. Further they need to strengthen institutions and improve infrastructures at the OSBP for efficiency at the borders to be achieved. The assessment tool developed through the project should be piloted in other COMESA countries before it is refined into a standard tool.

2. BACKGROUND

The COMESA secretariat was concerned that intra-regional trade within COMESA countries remained low despite countries having free trade agreements. A key factor was thought to be the high cost of doing business as a result of how SPS measures were administered and implemented. Costs could be high because administrative processes both at and behind borders, for different reasons, being complicated and lengthy; inspections and treatments duplicated; or when there were over-stringent requirements arising from unnecessary measures. Further, value chain actors may not have had the knowledge or capacity to meet technical requirements. This could have been due in part

[1] ISPM 11 – Pest Risk Analysis for Quarantine Pests: This standard provides details for the conduct of pest risk analysis to determine if pests are quarantine pests. It describes the integrated processes to be used for risk assessment as well as the selection of risk management options.

[2] ISPM 23 – Guidelines for Inspections: This standard describes procedures for the inspection of consignments of plants, plant products and other regulated articles at import and export. It is focused on the determination of compliance with phytosanitary requirements, based on visual examination, documentary checks, and identity and integrity checks.

[3] ISPM 31 – Methodologies for sampling consignments: This standard provides guidance to National Plant Protection Organizations (NPPOs) in selecting appropriate sampling methodologies for inspection or testing of consignments to verify compliance with phytosanitary requirements.

[4] ISPM32 - This standard provides criteria for NPPOs of importing countries on how to categorize commodities according to their pest risk when considering import requirements. This categorization should help in identifying whether further pest risk analysis is required and if phytosanitary certification is needed.

to different countries having differing requirements. The high cost of doing businesses was thought to affect trade negatively because it was reducing competitiveness or profitability.

COMESA requested funding from STDF to investigate how SPS measures were being implemented, their associated costs and how such costs could be reduced. Funding was approved at STDFs working group meeting held on 27 March 2014. COMESA implemented the 3.5-year project, *Breaking barriers, Facilitating trade,* from May 2015. The project focused on selected commodities (maize, fish, oranges, beef, milk, groundnuts, and soya beans) on selected trading routes in Egypt, Sudan, Uganda, Kenya, Zambia, Zimbabwe and Malawi. It aimed to identify and pilot tools and approaches for simplifying the application of SPS measures, upgrading and harmonising regulatory protocols and standard schemes, and developing the necessary institutional and human resources capacities to facilitate intra–COMESA trade. The project also aimed to identify good practices and innovative approaches that could be disseminated and replicated elsewhere in COMESA.

Funding was initially for a 3-year period starting on 1st November 2014 to 31st October 2017. COMESA requested a six-month no-cost-extension (NCE) in September 2017 to enable completion of the project. Implementation of project activities was significantly delayed primarily due to bureaucratic hurdles experienced in most countries when setting up its administrative structures. The NCE was granted for the period November 2017 to October 2018. CAB International (CABI) was contracted by COMESA in February 2015 to provide management and technical support.

3. PROJECT GOAL

The goal of the project was to **increase intra-COMESA trade in agri-food products for improved food security.** The project contributed to COMESA's Medium-Term Strategic Plan 2011-2015 under Priority Area 1 - Removing barriers to factor mobility, and under Priority Area 2 - Building productive capacities for global competitiveness.

The African region was progressively shifting from subsistence to market-led production systems. Small scale producers generated surpluses and cash crops for domestic, regional and global markets. Thus, effective and efficient implementation of cost effective simplified and harmonised SPS measures would enable producers to secure and maintain market access for their commodities. This in turn would contribute to improved food and income security as well as poverty alleviation.

4. PROJECT IMPLEMENTATION AND MANAGEMENT

Regional coordination

The project was managed by COMESA from its secretariat in Lusaka under the overall supervision of the Head of COMESA's SPS programme (SPS Expert). Day-to-day coordination of the project was subcontracted to CABI through a contractual agreement. Project oversight was provided by a Steering Committee (SC) who approved its terms of reference (TORs) in May 2015 during its initial meeting. The committee had two other sittings in the life of the project, 16th May 2016 and 17th May 2017. The committee was comprised of the COMESA Secretariat, a national coordinator from each country, the Eastern African Grain Council (EAGC), the Eastern and Southern African Dairy Association (ESADA), African Development Bank (AFDB), as a development partner and representatives from World Bank (WB), World Organization for Animal Heath (OIE), Codex Alimentarius Commission (Codex) CAC, International Plant Protection Convention

(IPPC) on occasion. The SC's official chair was COMESA's Assistant Secretary General (Programmes). The Committee met 3 times in 2-day meetings and reached its decisions by consensus. The meetings were held in Lusaka Zambia. CABI was responsible for organizing the meeting, preparing committee papers and taking minutes.

National Coordination

Each country was responsible for implementing their approved activities which were coordinated by its appointed national coordinator. The officer was also responsible for compiling and submitting both technical and financial reports to CABI in line with agreed accounting requirements. Bi-lateral and regional activities were coordinated with support of CABI and COMESA.

National Working Groups

Each country (except Egypt) set up a small working group comprised of SPS contact points, regulatory agencies, and representatives of traders/trading groups of the selected commodity. The working group deliberated on technical issues as presented by the national coordinator and provided advice. Members were expected to bring on board their experiences from interacting with other trade initiatives, Joint Border Committees (JBC) among others. The groups met on need-basis and not necessarily quarterly as had been envisaged. Minutes of working group minutes were appended to progress reports.

Overall coordination

COMESA and CABI liaised closely in project implementation as listed below

- *Workplans and Budgets:* CABI drafted workplans and budgets in liaison with National Country Coordinators which were presented to the SC for inputs before final approval by COMESA.
- *Financial Management:* COMESA sent CABI funds in tranches upon approval of submitted interim progress reports. CABI thereafter disbursed funds to each country as per approved workplan and budget; and in accordance with CABI/Country implementation agreements. Countries accounted for funds to CABI who compiled financial reports in line with the STDF's requirements and submitted to COMESA. In September 2017 COMESA requested for a budget reallocation and 6-month NCE which was approved by STDF. COMESA undertook a project audit in October 2018 which was the last month of project implementation.
- *Sub-contracting:* CABI proposed consultancy terms of reference for inputs and approval by COMESA. Consultants were procured, contracted and supervised by either CABI or COMESA
- *Reporting:* CABI collated six-monthly interim progress reports in line with STDF's reporting requirements which COMESA reviewed and submitted to STDF. A total of six interim reports were submitted covering the following periods
    - Inception report & First Progress Report (1st May 2015 to 31st October 2015)
    - Second Progress Report (1st November 2015 to 30th April 2016)
    - Third Progress Report (1st May 2016 to 31st October 2016)
    - Fourth Progress Report (1st November 2016 to 30th April 2017)
    - Fifth Progress Report - submitted as part of the No-Cost-Extension Request (1st May 2017 to 30th September 2017)
    - Sixth Progress Report (1st October 2017 to 31st March 2018)

- *Dissemination and publicity:* CABI oversaw the development of a communication and dissemination strategy which was approved during the project's initiation meeting held on 4th May 2015.

Project initiation milestones

Table 1: Project implementation milestones

Milestone	Date
Signing COMESA/CABI service contract	February 2015
Appointment of National Coordinators	April 2015
Project Initiation and Launch	May 2015

5. PROJECT OBJECTIVE, OUTPUTS & ACTIVITIES

5.1. Project Objective:

The Objective (Purpose) of the project was to reduce trading costs associated with SPS measures for selected commodities on selected trade routes in the COMESA region.

The three project results (outputs) and their achievement indicators are listed in table 2. A detailed logframe with an indication of achievement made towards project outputs is attached as appendix 1. As explained in the results section some of the project assumptions did not entirely hold true and contributed in some instances to delayed achievement of results - these were assumptions 1, 3 & 4 under activities as listed below.

Table 2: Project results, indicators and assumptions

<table>
<tr><th></th><th>Output</th><th>Logframe indicators</th><th>Assumptions</th></tr>
<tr><td>1</td><td>Improved efficiency of implementation of technical measures</td><td>1.1 Average times for SPS documentation and clearance</td><td rowspan="5">Output assumptions
(1) Current One Stop Border Posts (OSBP) and integrated border management programmes continue
(2) Additional new technical measures (such as due to new pests) do not add to costs
Activity assumptions
(1) Continuity of key staff in countries and COMESA secretariat
(2) Cooperation from related initiatives/agencies, particularly at borders
(3) Political situation does not hinder activities
(4) Baseline assessment produces clear results</td></tr>
<tr><td rowspan="2">2</td><td rowspan="2">Improved technical Measures</td><td>2.1 No. of technical requirements</td></tr>
<tr><td>2.2 No. of inspections</td></tr>
<tr><td rowspan="2">3</td><td rowspan="2">Increased understanding of technical measures</td><td>3.1 Proportion of consignments non-compliant</td></tr>
<tr><td>3.2 Data on contribution of technical measures to cross-border trading costs</td></tr>
</table>

5.1.1. Output 1: Improved efficiency of implementation of technical measures

This output aimed to improve the efficiency with which technical measures were applied at specific borders for selected commodities. This would be achieved by improving interactions with relevant agencies involved in the OSBPs as provided in activity 1.1. SPS related issues and operations would be considered when decisions were made on border operations. Further countries would identify opportunities for streamlining SPS and generate agreed action plans under activity 1.2. These actions would be implemented as part of activity 1.3.

Recommendations for enhancing efficiency were identified as summarized below. Some of these were implemented by countries and notable milestones made as detailed under each activity below. These formed a good basis for future work.

Activity 1.1 Integrated SPS operations with other border operations

Through workshops and meetings, all countries engaged representatives from Joint Border Management Committees (JBCs), staff from the OSBPs and other agencies in deliberations to improve implementation of SPS measure in order to reduce trading costs. By fostering rapport with these officers, the project coordinators got to better understand issues as experienced in day to day operations. For example, the National Working Group (NWG) in Zimbabwe participated in JICA funded Border Efficiency Management Systems (BEMS) Project that sought to identify procedures that affected trade negatively. Six of the seven countries (except Egypt) formed NWGs that brought together SPS, regulators and trading companies to provide advice. The teams participated in project activities such as assessment of border procedures (activity 1.2) and harmonizing SPS measures (activity 1.3) amongst others.

Activity 1.2 Assess border procedures

Countries conducted self-assessments on how border procedures were implemented. The assessments were conducted through discussions held with border officials as mentioned in (activity 1.1). A consultancy agency developed, together with country partners, a tool to assess SPC costs incurred by the trader at the borders (activity 3.1). The tool was used to gather information from traders, regulatory agencies and border officials in a systematic manner (Activity 3.2).

Challenges and their solutions were derived from these assessments. They are summarized in tables 3, 4 and 5 under section 3 below. Details of each border assessment and full lists of proposed activities are described in baseline assessment reports and validation workshop proceedings under activity3.2 below. Findings from these assessments were narrated in three synthesis reports appended to this report as: appendix 2 - Synthesis Report SPS TBT Trading Costs Kenya and Uganda; appendix 3 - Synthesis Report SPS TBT Trading Costs Zambia and Malawi; and appendix 4 – Synthesis Report SPS TBT Trading Costs Zambia and Zimbabwe. Cross-cutting activities identified in most countries are listed below:

- review and share pest lists and undertake risk assessment as may be required
- review and harmonize SOPs for exports and imports
- equip border points with necessary equipment, for example automation systems need to operationalize the OSBPs

- train border agencies on implementation of new SOPs – in particular conducting risk-based inspections
- create awareness amongst traders on SPS procedures and what is required of them
- strengthen joint border committees where these are not operational

The key deliverable from this activity was to generate action lists. All countries managed to generate some priority actions some of which were initiated or completed as reported in activity 1.3 and under output 2 below.

Activity 1.3 Implement improved border procedures

Countries (Egypt, Sudan, Zambia and Malawi) began to implement some actions identified under activities 1.1, 1.2 and 3.2 as follows:

- Sudan reported it has begun reviewing its SOPs for beef and live animals
- Sudan revised its SOP for citrus
- Egypt developed a SOP for citrus and trained inspectors on its application
- Zambia procured minor equipment for seven border offices
- Malawi procured a desktop computer and laptop which were issued to border officials
- Zambia revised 5 SOPs on imports, exports, sampling, fumigation and nurseries
- Sudan's NWG were trained on provisions of the legal framework and implementation modalities for the OSBP courtesy of Sudan Customs

5.1.2. Output 2: Improved technical measures

Under this output countries were expected to review their national pest lists for the selected commodities and share with each trading partner. They would then consider whether to conduct joint PRAs to decide whether existing measures were justified. Further they would consider instituting new risk management methods in response to identified risks. As demonstrated by this output's indicators it was intended that the revised measures or protocols would reduce technical requirements and inspections.

Activity 2.1 Conduct joint risk analysis

Based on findings from the updated lists of pests (activity 2.2), two joint risk analysis were conducted, one between Zambia and Malawi and the other between Zambia and Zimbabwe. Sudan conducted PRA training.

- **Zambia and Malawi** conducted a PRA on maize, soya beans and groundnuts. It was conducted in a workshop attended by both countries held on 2nd to 6th October 2017 in Lilongwe Malawi. The purpose of the risk analysis was to harmonise phytosanitary measures in order to enhance safer and faster movement of these commodities in cross border trade. The specific objectives were to develop a bilateral list of quarantine pests as well as harmonised risk mitigation measures. The PRA approach included comparing updated national lists of pests, followed by identifying possible phytosanitary risks and then proposing new phytosanitary import conditions as guided by International Standard for Phytosanitary Measures (ISPM) 11. Malawi was tasked to draft revised phytosanitary import requirements for the two commodities which could be implemented bilaterally. They agreed to come up with specific import requirements for pests causing Maize Lethal Necrotic

Disease which was not reported in either country but in the region. Phytosanitary inspections were found to be necessary for detecting pests and determining compliance to import or export phytosanitary requirements. Therefore, in October 2018 the countries drafted their harmonized phytosanitary border inspection procedure taking into consideration the requirements of ISPMs 23, 31 and 32 and other relevant international treaties. The procedures would be implemented at the Mchinji/Mwami OSBP.

- **Zambia and Zimbabwe** in October 2018 conducted a joint PRA workshop where they developed their harmonized phytosanitary regulations for soybeans and Maize. The PRA was based on updated national lists of pests for both commodities. Harmonised import requirements that alone or in combination would reduce the risk to an acceptable level were drafted for both commodities during a bilateral PRA workshop held in Victoria Falls town, Zimbabwe. The requirements were chosen based on their effectiveness as well as considerations such as cost-effectiveness, feasibility, minimal impact and equivalence.

- **Sudan** in October 2018 conducted a PRA training for its inspectors

- **Uganda** identified the need to undertake a risk profile for *vibrio cholera* in fish, produce a product-hazard combination list for milk and fish, develop a sampling plan and train border inspectors on risk-based sampling. A Hazard assessment for *V. cholera* along the fish value chain was undertaken for Uganda and SPS related recommendations made for fish handling in order to reduce risks to human health

Outputs expected from this activity were risk analysis workshop or training reports. The reports were delivered and contained management options agreed by the countries. Technical capacity to conduct PRAs needs to be further developed in these countries given inadequate capacity was a key challenge in implementing this activity.

2.2 Update lists of pests

Trading countries considered where they needed to update and share their lists of pests for commodities the project was addressing. Possible pests of concern were noted, and Joint Risk Analysis carried out as listed under activity 2.1. The expected outputs from this activity were updated lists of pests with a decision on whether risk analysis was necessary between trading partners.

Sudan, Zambia, Malawi and Zimbabwe revised their national lists of pests for the specified commodities as follows:

- Sudan - citrus
- Zambia, Malawi and Zimbabwe - maize grain, soya beans, groundnuts

The updated lists were used to conduct PRAs in accordance with ISPM 11. The lists are appended in the PRA reports. Risk analysis was based on distribution and status of pests or diseases in the exporting and importing countries.

5.1.3. Output 3: Increased understanding of the costs and benefits of technical measures

This output was intended to increase awareness and understanding of how technical measures were (i) applied at specific borders for the selected commodities, (ii) how trade was affected by cost of implementation, and (iii) how these measures could be either reduced and/or applied more effectively and efficiency in order to reduce costs to the trader (activity 3.1 & 3.2). New measures would be developed and implemented under output 2. Subsequent effects on trade would be monitored at the end of the project through an evaluation assessment conducted under activity 3.3. The evaluation was also meant to generate information that would be used for writing dissemination materials including videos and 'how to trade booklets', (activities 3.4, 3.5). These materials would be shared with traders, regulators and policy makers. Traders would understand their expected role in applying the measures and regulators would improve how they monitor application of these measures. Policy makers would be better placed to allocate required resources and continuously advice on improving implementation strategies.

For reasons expounded in the results section, activities 3.1 and 3.2 were achieved while activities 3.3-3.6 were not.

Activity 3.1 Develop assessment methodology

A methodology to collect baseline information on costs incurred due to implementation of SPS technical measure was developed with assistance from DevelopmentShift consulting company. The tool was designed to disaggregate costs and time spent for different measures. This methodology was comprised of sets of tools and implementation guidelines. The SC approved the initial tools that were presented at the 2nd SC meeting. During the meeting, National Coordinators were trained on how to use the tools.

The tool was designed to gather information and costs on:

- process flow from when the trader arrives at the border to when they leave
- SPS inspections and certification (time, fees)
- storage and parking fees
- border point document control
- SPS laboratory testing and physical inspections
- costs of adhering to SPS prior to trading (national level inspections)
- other informal payments

Data gathering was conducted through interviewing traders, regulators and clearing agents.

Activity 3.2 Conduct baseline assessment

The baseline assessment studies were conducted in five countries (Kenya/Uganda, Zambia/Malawi, Zambia/Zimbabwe) at four One Stop Border Posts: Busia and Malaba borders for Kenya and Uganda; Mchinji-Mwami border between Zambia and Malawi; and Chirundu border for Zambia and Zimbabwe. Data on five commodities (maize, groundnuts, soya beans, milk and fish) were collected and used to generate findings. Kenya and Uganda conducted their study in 2016 and 2017 with the assistance of DevelopmentShift consultants. National coordinators in the three southern African countries led the work in their countries in late 2017 taking consideration of lessons learned by Kenya and Uganda. Each pair of trading countries conducted stakeholder validation workshops between May and October 2018 to consolidate findings from the assessments and come up with a concrete list of agreed actions.

The studies were implemented through a set of steps:

- Engaging, training enumerators and pretesting the tool
- Surveys to collect information from traders, border officials, national trade & regulatory agencies

- Data analysis and report writing
- Report validation workshops– to present findings and come up with an action plan jointly developed by a wide range of stakeholders
- Presentation and review of finding by SC meeting (Kenya and Uganda only)
- Production of synthesis reports (regional activity commissioned by COMESA)

Uganda and Kenya conducted a baseline assessment study on SPS related trading costs for fish, milk and milk products at their Malaba and Busia OSBPs. Survey data was collected over a four-month period between August to November 2016 whereby all consignments crossing the border (71 milk and 40 fish) were sampled. The data was analysed and an initial report submitted after a six-month (December 2016 to April 2017) period. DevelopmentShift consultant and the national coordinators presented study findings to the SC on 17th May 2017. The SC member advised that the report be shared with national and local stakeholders for validation and in order to draw up an action plan agreed by the two countries. During the SC meeting, lessons learned on using the assessment tools were shared by Kenya and Uganda and suggestions made by the SC on how to improve the study method. This would benefit of other countries that were yet to implement the tool.

A stakeholder validation workshop, facilitated by two consultants (Mr. Charles Mannara, Mr. George Opiyo), was conducted on 6th to 7th March 2018 at the Kenya/Uganda Busia Border. During the meeting stakeholders reviewed the study findings and shared their insights on both SPS and TBT issues as experienced during day to day operations at both Malaba and Busia borders. They identified and prioritized interventions that could be addressed during the remaining seven months of project implementation. Longer term interventions for consideration by the two countries were also identified. The baseline report was validated and accepted with a few factual corrections. Following this validation meeting, the baseline assessment report was further revised by a trade and SPS expert (Dr. Chagema Kedera) to incorporate stakeholder inputs, see appendix 5: Assessment Report SPS TBT Trading Costs Kenya & Uganda

Though the study found most costs were affordable to traders, a number of issues that hinder efficiency of border operations were identified and solutions recommended as listed in table 3 below.

Table 3: Key actions agreed between Kenya and Uganda

Issues	Recommendations
Unharmonized cross-border operations causing duplication of effort and delays to the trader	Activities such as inspection, sampling and testing could be handled by one agency, or jointly by both countries as envisaged in the One Stop Border Point implementation (OSBP) Develop harmonized SOPs on inspections and certification and train OSBP operators on how to implement these
Many traders not conversant with the export/import requirements, mainly due to inadequate information provision hence not adequately prepared for processing at the border	To enhance information access among traders and other stakeholders, information on SPS/TBT certification requirements and fees plus the anchoring legislations should be provided on an easily accessible platform to traders, especially the small-scale ones. In addition to receiving funding from public sources, Trade Information Desks (TIDOs) can be sustained through charging a fee,

causing uncertainty and delays	more so if they can demonstrate their value addition to the stakeholders. Develop service charters for export trade on both commodities (fish and milk). Awareness materials on SPS certification requirements and costs for the two commodities. These will include (i) coming up with a graphic representation (flow diagram) in form of posters and brochures showing the steps in SPS & trade requirements and the official rates for each step; (ii) followed by training of border officials including TIDOs, Authorized Economic Operators (AEOs) and leaders of traders/exporters associations from both sides of the border. SPS guidelines for Simplified Trade Regimes (STRs) – working closely with the ministry of trade in the two countries first of all to understand how the STRs are functioning at the moment; then produce these documents for reference by TIDOs and traders.
Manual certification related delays	Certification processes need to be automated which requires investment in ICT infrastructure and training of traders, agents and other stakeholders on the use of available electronic platforms. Where several regulatory authorities are involved in issuance of SPS/TBT certificates, licenses and permits, they should be electronically linked with appropriate alert systems to facilitate online document approval. In Uganda, train traders and regulators on e-certification particularly for fish.
Unnecessary procedures such as random sampling with no documented justification	Inspectors need to be trained on and produce risk-based sampling and testing protocols for implementation. Traders should be sensitized on sampling protocol in order to enhance transparency in the process and enable traders prepare for samples rather than interfering with the quantity being exported. Conduct joint Microbiological/food safety Risk Assessments (RA) on milk and fish building on the capacity & risk profiling conducted through FAO. Hold stakeholder validation workshop to build consensus on risk management options based on RA findings. Review SOPs based on agreed risk management options.
Centralized certification services	In Uganda, push for the decentralization of certification services for milk which are done centrally in Entebbe
Inadequate cross-border meetings to identify and deliberate on issues	Joint Border Committees (JBC) should meet regularly and should focus on streamlining border operations by

affecting trade	operationalizing the One Stop Border Posts (OSBPs). Joint sampling and testing (using one sample and one designated laboratory) to be discussed as a possible solution. The lead agency to escalate this issue as an operational bottleneck through official channels. COMESA should use the recommendations from the JBC meeting to push relevant governments and ministries and state corporations to make exceptions for joint sampling and testing as a way of streamlining border operations As part of their immediate actions after training, the JBC should organize regular meetings to address trade flow challenges for commodities including milk and milk products. The deliberations should be escalated to relevant ministries and government departments including the EAC for action, and the meetings should serve as training opportunities for new officers on relevant procedures developed by say the EAC on trade facilitation. The JBC should include standard review in their meeting agendas with a view to reviewing standards and measures that hinder trade and do not add value.

Zambia and Malawi conducted a baseline assessment on soya beans and groundnuts at Mchinji-Mwami OSBPs from 19th June to 31st August 2017. The study was conducted under the guidance of Zambia's national coordinator who had been fully trained in 2017, under COMESA's Tripartite Capacity Building Programme, on how to use the tools. During this 3-month survey period, only four consignments of groundnuts were recorded and none for soybean. The data was inadequate to generate credible findings. This was attributed to late harvest of the crop from the field and national government restriction on export of food security crops. As a follow-up to this exercise, a border stakeholder meeting was conducted 25th-28th June 2018 to gather information on SPS related costs based on traders, inspectors and regulators experiences. During this meeting the challenges at the borders were identified and solutions proposed as listed in table 4.

Table 4: Key actions agreed between Zambia and Malawi

Issue	Recommendations
Inadequate awareness on SPS information	Have SPS information online and on posters at the border posts
Lack of risk-based approaches	Development of harmonised risk-based SPS border inspection procedures
Inadequate automated system for issuance of SPS documents	Invest in IT infrastructure
Scattered regulatory authorities	Establishment of one-stop-shop for issuance of SPS documents or development of online issuance of SPS documents.
Absence of verification systems	Establishment of SPS measures verification system, e.g. laboratory testing results or SPS documents
Inadequate SPS inspection and sampling facilities	Construct or provide relevant facilities such as laboratories, sampling equipment etc

Zambia and Zimbabwe: National teams from the two countries carried out a baseline assessment study at Chirundu OSBP on maize, soya beans and soya products in August 2017. Zambia's national coordinator trained enumerators comprised of officials from both countries. The training was held on 9thand 10th August followed by a 10 days of data collection session. The enumerators were selected from clearing agents' association and regulatory agencies as agreed by both countries. A stakeholder validation meeting was held on 18th to 22nd June 2018 to present and validate study findings as well as develop an action plan with stakeholders. Table 5 is a summary of findings.

Table 5: Key actions agreed between Zambia and Zimbabwe

Issue	Recommendations
Delays in time taken and transport costs in moving from one regulatory office to the other seeking regulatory documents	Institute an online application system for issuance of SPS documents; have import/export documents at one site and enhance awareness on trade web-based portal
Unharmonized sanitary and phytosanitary requirements	Domesticate both international and regional treaties and harmonize SOPs
Inadequate awareness of SPS regulations among small scale traders	Raise awareness among traders on SPS regulatory requirements
Interruptions in Asycuda system connectivity which results to slower manual clearance	Recommendation to trade and customs committee on this issue to follow up with power supply providers in order to minimise time lost when using manual clearance system if Asycuda system is down.
Congestion on transit cargo	Recommendation to customs and trade for Chirundu OSBP to operate 24 hrs

COMESA commissioned a consultant to write three **synthesis reports**, see Appendices 2, 3 and 4. The reports were derived from content in the baseline assessments, validation meetings and other project activities. They describe how four OSBPs operate (Malaba, Busia, Chirundu and Mchinji-Mwami), issues that negatively affected cross border trade, and opportunities for improvement with concrete recommendations towards reducing trading costs.

A key output from activity 3.2 was the study reports which were delivered albeit after a longer than expected period. It was also expected that benchmark values for indicators listed in the project logframe would be derived. Similar studies would be conducted at the end of the project or post project to generate information on changes made to these indicators as a result of project implementation. As can be derived from how long it took to get the studies completed, a number of challenges were encountered in implementing this activity. The tool was new, and it took a number of revisions to suit local situations. The consultants and national teams struggled with generating tangible findings that pointed to high costs of SPS measures. Being a new tool, it was not clear whether it was robust enough to capture costs or whether in fact the SPS trading costs were insignificant to the trader compared to other production costs. Other challenges included numerous road blocks behind the border and inadequate coordination between ministries responsible for agriculture and trade in Malawi and Zimbabwe.

Fish Scoping Study: An assessment on conformity procedures was conducted at the Mwami/Mchinji border and Luangwa (Zambia/Zimbabwe; Mozambique/Zimbabwe) for fish trade transiting from Zambia to DRC, Angola, Namibia and Zimbabwe. The study, commissioned to Mr. Kevin Kabunda of Zambia, relied mainly on information gathered through interviews because data was not readily available. The study found that testing and inspection carried out at the border were inadequate and could not be relied upon to give accurate insights on compliance; there was low level of awareness on SPS requirements amongst the officials and traders. At the time of the study traders were not paying for field inspection reports and neither fish import permits at the border hence the associated costs were not established. However, traders found costs associated with acquiring a certificate of origin, USD 1,475 per 30 Metric tonnes, to be prohibitive. It was estimated that the total cost of SPS procedures at the border was less than 4% the value of a consignment. Despite not getting all the data sought, the report indicated that the estimated figures could be used, in the future, as a well-informed baseline.

The study recommended that both infrastructure and human capacity along the fish value chain be strengthened. Sampling for inspection needed to be guided by food safety risks associated with bacterial contamination and use of unauthorised preservatives. Information on fees that traders should pay for SPS related services needs to be displayed and communicated to traders to enhance transparency.

Activity 3.3 Conduct evaluation assessment

Studies were meant to be conducted, using the baseline assessment tools, at the selected borders to evaluate changes that occurred due to project intervention. This activity was not conducted because measures to reduce trading costs had not been implemented by the time the project came to an end.

Activity 3.4 Publish 'how-to-trade' booklets

A reference booklet for each commodity detailing exporting requirements was meant to be produced with clear explanation of SPS aspects. A consultant was to develop templates, coordinate write shops and publish. E-format of the booklets would have been made available on SPS pages of COMESA website, and hard copies distributed to stakeholders and dissemination organizations. However, the activity was not conducted because content for such booklets was still being developed at the time of project closure.

Activity 3.5 Create Video stories

This activity intended to produce videos to demonstrate how trade in commodities of focus had benefitted from project interventions. The video content would be derived from findings of the evaluation assessment (activity 3.3) so as to have factual information. They would be shown to policy makers & senior stakeholders at short seminars (activity 3.6). The activity did not take place for reasons mentioned under activity 3.3.

3.6 Dissemination activities

A communication and dissemination strategy was developed for use during the project period – copy appended to 1st Progress Report. A number of dissemination activities were envisaged at the end of the project including distribution of leaflets on procedures instituted through the project (Activity 1.3) and national policy seminars to show and promote project achievements (activity 3.6). These activities were not conducted for reasons mentioned under activities 3.3 to 3.5.

6. FINANCIAL OVERVIEW

The overall project value was USD 1,156,210.80 of which USD 902,690.80 was STDF's contribution. The rest was in-kind contribution from the seven countries and COMESA. Each country was allocated a total of USD 39,088.55 from STDF funds, amounting to USD 273,619.85. Of this amount CABI disbursed a total of USD 164,529. Countries were able to spend and account for USD 148,527 as listed in table 6 below.

Table 6: Funds allocated to countries

No.	Country	Amount Advanced($)	Amount Spent and accounted for ($)	Amount Unspent to be refunded ($)
1	Zambia	42,444.00	42,444.00	0
2	Zimbabwe	25,910.00	25,910.00	0
3	Malawi	31,935.00	31,935.00	0
4	Kenya	21,410.00	5,407.56	16,002.44
5	Uganda	21,410.00	21,410.00	0
6	Sudan	21,420.00	21,420.00	0
7	Egypt	-	-	-
	Total	**164,529.00**	**148,527**	**16,002.44**

7. OVERALL PROJECT RESULTS AND LESSONS LEARNED

The project had three expected results and five key indicators to gauge achievement as listed in table 2 above and detailed in the attached logframe, appendix 1.

Benchmarks for these indicators were established, with varying comprehensiveness, through the baseline assessment studies (activity 3.2). It was intended that similar assessments would be conducted at the end of the project to generate information from which to gauge its success (activity 3.3). However, due to challenges with project implementation, it was not possible to conduct these assessments by the time the project closed. Therefore, results presented in this section highlight mainly outputs as opposed to describing changes described in the indicators.

SPS cost assessment tool & SPS trading cost benchmarks

An SPS cost assessment tool was developed. The tool was piloted at four borders on five commodities as detailed in section 5.1.3 above. Through the pilots, key bottle necks to trade that increased cost of trading were identified, key amongst them: (i) one stop border posts were not yet working as designed due to infrastructural issues; (ii) information is not shared adequately with traders on what is expected of them and hence they are not well prepared which wastes time at the border; (iii) implementation of un-justifiable inspections that are not risk based; (iv) countries do not yet recognize each-others marks of quality hence leading to duplication of efforts when inspections have to be repeated.

Through these exercises benchmarks on trading costs were established to some extent for Kenya and Uganda. In all cases, study findings did not indicate that there were substantial costs associated with the implementation of SPS measures as was anticipated. One reason was because measures that should be undertaken, such as scientific testing of samples from consignments was not being undertaken – instead organoleptic based testing was commonly applied. Another reason could have been because most SPS costs were incurred during production which was outside the scope of the studies. Furthermore, costs incurred behind the border, such as, cost of acquiring various SPS documents provided by different offices was not assessed in the southern Africa studies.

Implementing the tool was a useful way of raising awareness on SPS and trade related issues, setting benchmarks and understanding how trade happens in real time at the borders. Further, five countries managed to prioritize interventions that should be undertaken in order to increase efficiency and effectiveness of border operations. These are described in detail in tables 3, 4 & 5 above. Key amongst them were to: (i) operationalize the OSBPs; (ii) harmonize procedures; (iii) recognize each other's marks of quality to avoid duplication; (iv) raise awareness amongst traders on the measures so as to increase transparency and avoid time wasting; (v) remove procedures that are not supported by risk-based decision making including over sampling; and (vi) build the capacity of inspectors and regulatory agencies on employing risk-based interventions. If implemented these interventions have the potential to reduce trading costs in the future. The assessment tool can be used to test changes in costs of trading. It should therefore be further tested, improved and scaled up to other regions.

Updated pest lists, PRAs and new protocols

Four countries (Sudan, Zambia, Zimbabwe and Malawi) updated and shared their national lists of pests on citrus, soya beans, maize and groundnuts. It was noted that updating the pest lists should be a continuous activity in order to have in place an effective early warning system. Malawi & Zambia and Zimbabwe & Zambia conducted joint PRAs. Based on the results of these PRAs, these countries drafted harmonised import requirements for cross border trade in grains of these commodities. The PRAs revealed the need to develop different phytosanitary requirements for seeds due to difference in phytosanitary risks.

Zambia and Malawi drafted their harmonised phytosanitary border inspection procedures in line with ISPM 23, 31 and 32. The process of developing these procedures provided an opportunity to raise awareness on the use of appropriate ISPMs amongst plant health inspectors. Their understanding is integral in capacity building necessary for safe trade facilitation. The exercise also provided an opportunity to enhance collaboration with other border agencies involved in commodity clearance. Appropriate risk-based inspection of consignments is important to provide confidence that consignments meet the acceptable level of protection determined for quarantine pests and regulated non-quarantine pests.

Challenges and lessons learned

This project encountered considerable technical, political and administrative challenges in its implementation which to the extent possible were addressed and lessons were learned as detailed in project interim reports and summarized below:

Challenges

(i) Delayed signing of implementation agreements between CABI and countries after the project was officially launched in May 2015. Kenya was first to sign its agreement in November 2015, while Malawi's was signed in August 2016, taking 1 year and three months. Egypt did not eventually sign its contract despite many follow-ups. These delays were mainly attributed to bureaucracy and in other cases, e.g. For Egypt there were disputes on which ministry should have been engaged. Staff in some countries (Malawi and Zimbabwe) thought the project should have been coordinated from the sections where the SPS competent authorities sit; while others were supportive that coordination was best implemented those responsible for trade facilitation.

(ii) Delayed disbursement of funds from CABI to countries mainly as a result of delayed singing of contracts but also failure by countries to send an account to CABI where money would be deposited. In the case of Sudan, CABI sent funds through the Sudanese Embassy in Nairobi in June 2017 which was received by the implementing ministry six months later in February 2018. Despite many follow-ups, Egypt did not provide an account and hence did not receive project funding.

(iii) Delayed access by national coordinators to funds sent by CABI. For example, the national coordinator for Zimbabwe managed to access funds in the last quarter of 2016; those for Uganda and Malawi accessed funds in 2017, while Sudan's coordinator got the funds sent to their ministry in August 2018 two months to project closure.

(iv) Except for Kenya and Uganda, project implementation in the other countries was delayed at some point when one country banned trade in a selected commodity. This for example, led to the southern African countries introducing new commodities as late as May 2017; while in the case of Egypt and Sudan, the project stalled when Sudan banned trade in agricultural produce from Egypt in 2016. One assumption in the project was that there would be supportive political environment which did not hold true as demonstrated in these instances.

(v) Flow of funds from COMESA to CABI was delayed towards the end of the project and some activities had to be cancelled; this was partly caused by countries failing to submit accounting documents.

(vi) Delays in project coordination were experienced where staff assigned to the project were either too busy, withdrawn by their institutions to other duties or left for study with no replacements (one of the project assumptions was that this would not happen).

(vii) Developing and piloting the baseline assessment tool took over one year which further delayed the project given it was expected that the tool would identify SPS costs and then solutions be found and implemented to address these costs. Besides challenges with its implementation, it took a lot of effort to concretize findings into substantial costs (a key project assumption was that the tool would produce clear results which did not happen as fast as was required to give the project time to implement interventions).

(viii) As a result of these delays, the project did not manage to undertake activities to mitigate identified issues meaning that content which was needed for publishing 'how to trade booklets' and making other dissemination materials was not generated – and hence activities 3.3 – 3.6 were not implemented.

(ix) Evaluating the project impacts was not feasible (activity 3.3) as identified activities were not carried out hence no changes could be attributed to the project. The end of project evaluation was meant to generate information on the project's indicators (as in the logframe); further holding terminal national seminars (activity 3.6) did not happen because time had run out by the time the project had some recommendations from the baseline assessments that could be shared.

Lessons learned

(i) It takes countries considerable time to sign agreements on projects. Unless a country is fully involved in the project's development stage, then a period for bringing them on board, building a sense of ownership and contracting needs to be factored into the project's activity plan. In this project the first country to sign took six months after the project had been officially launched, and in another 15 months.

(ii) It took a lot of effort and follow-up to get partnering countries to liaise on agreed project activities and submit both technical and financial reports. For a multi-country project, it is necessary for the implementing agency to meet with the national coordinators in their countries at least twice a year to follow-up on progress and build rapport; and equally invest in an adequate coordination budget and resources.

(iii) Besides getting the right ministry to work with, individuals selected to act as national coordinators play an important role in getting the project to succeed or not. Criteria for selection is necessary and should be agreed with the countries. In some cases, project activities stalled because the officers were over-engaged with other activities or left for studies with no replacement.

(iv) Having funds going through two intermediary institutions before funds from the donor funds get to the beneficiary increases bureaucracy. The fewer the administrative stages in the project's funding mechanisms the better chance for efficiency.

(v) Time lost in identifying consultants and managing them could be reduced if institutions and/or individuals to provide technical support are identified and agreed during project development.

Good practices

(i) COMESA and CABI worked closely with a regional Steering Committee up to May 2017. The committee met three times and advised on both technical and administrative issues. For example, the Committee advised that detailed milestones be set for each country towards meeting agreed activities. It was expected that having achievable targets set against shorter timeframes would motivate staff to achieve results. Unfortunately, the SC meetings were not conducted to the end of the project because of big lapses in project implementation caused by challenges mentioned above.

(ii) Having working groups in each country was also helpful to the national coordinator in a similar way as having a Steering Committee. However, the composition of institutions to be represented and requirement that a consistent member of staff is deployed is important, otherwise there is inefficiency and delays caused as a result of to getting new persons on board. Two countries changed their coordinators.

(iii) The regional and especially the bi-lateral approach to this project was beneficial to individual countries and their coordinators because it gave them a chance to share ideas, learn from what other countries are doing and build their networks.

8. RECOMMENDATIONS

8.1. Specific recommendations to the project

(i) Good progress was made in developing an assessment tool to gauge SPS related trading costs. In piloting the tool, countries came up with priority actions to be undertaken, in the short and long term, in order to reduce these costs. Countries therefore need to implement these activities so as to achieve the project's goal.

(ii) The tool was adapted and used to assess SPS and TBT by the AfDB funded Tripartite Capacity Building Programme (TCBP). The programme was implemented by COMESA in 2017 on behalf of COMESA, EAC and SADC. It should be tried out further, improved and used by countries to gauge achievement in the effort to reduce trading costs.

(iii) Countries need to endorse and implement the new protocols they drafted – for example Zambia and Malawi's harmonized phytosanitary border inspection procedures; and Zambia and Zimbabwe's harmonized phytosanitary regulations for soybeans and maize.

8.2. Broader recommendations

(i) Having a PPG that enables stakeholders to come together prior to a fully-fledged project saves time in getting countries on board during actual project implementation, this is a good approach and consideration for more interactions by countries during this phase is recommended.

(ii) Cross border projects should consider working through the established joint border committees to avoid duplication and piecemeal information.

(iii) Trade projects would best if anchored in trade or related ministries – as opposed to agriculture ministries or departments that do not necessarily have the strong stakeholder linkages and sometimes mandate required to mobilize traders & border officials.

(iv) Having a three-step funds disbursement (STDF to COMESA to CABI to countries) was not very efficient and should be avoided especially in multiple country projects. However, the most significant delay was getting countries to receive the funds.

(v) It is arguable that non-SPS issues had more impact on trade (e.g. the politically driven bans). This could have been a coincidence that during the project implementation most of the countries were affected by bans. It may be good to incorporate, in trade promoting projects, an output that targets to get the support of political institutions at the onset of a project.

(vi) The cost of implementing SPS measures at the borders did not emerge as being 'the key factor' (in most countries) in slowing or making trade expensive for traders for the reasons explained above. A key assumption of the project was that SPS costs were a key hindrance to trade but as indicated in the baseline reports infrastructural issues were key and hence may be better to consider the two types of issues alongside each other.

(vii) The assessment tool developed through the project and its use should be improved with time and shared with other regions.

(viii) Farmer Unions, Chambers of Commerce and cross border associations should be actively involved in running trade-related projects.

(ix) Having a value chain approach in investigating SPS related cost should be considered in order to get more comprehensive and comparative results

9. APPENDICES

Appendix I Project Logical framework

	Project description	Measurable indicators / targets	Sources of verification	Assumptions
Goal	Increased intra-COMESA trade in agri-food products for improved food security	Trade flows Food security indices	COMStat Ministries of Trade National statistics offices	• Increased trade has wide benefits in society • Good governance and economic policy
Immediate objective (purpose)	Reduced trading costs associated with SPS measures for selected commodities on selected trade routes in COMESA	Costs per unit of commodity traded, by border crossing and size of trader	Project survey (under Result 3)	• Other NTMs do not increase • Agricultural production continues to expand, and is not constrained by other factors (e.g. climate)
Expected results (outputs)	1. Improved efficiency of implementation of technical measures 2. Improvement of technical measures 3. Increased understanding of technical measures	1.1 Average times for SPS documentation and clearance 2.1 No. of technical requirements 2.2 No. of inspections 3.1 Proportion of consignments non-compliant 3.2 Data on contribution of technical measures to cross-border trading costs	1.1 One-stop border post data 1.2 Project data 2.1 Competent authorities 2.2 Project data 3.1 Competent authorities 3.2 Project survey, reports, dissemination materials	• Current OSBP and integrated border management programmes continue • Additional new technical measures (such as due to new pests) do not add to costs
Activities	1.1 Integrate technical and other	See Work plan for	See Section 15	• Continuity of key staff in countries

	border operations 1.2 Assess border procedures 1.3 Implement improved border procedures 2.1 Conduct joint risk analyses 2.2 Update lists of pests 3.1 Develop assessment methodology 3.2 Conduct baseline assessment 3.3 Conduct evaluation assessment 3.4 Publish "How-to-trade" booklets 3.5 Create video stories 3.6 Dissemination activities	target dates for each activity. See Budget for details of costs/inputs for each activity.	(Reporting) for sources of information on progress and delivery	and COMESA secretariat • Cooperation from related initiatives/agencies, particularly at borders • Political situation does not hinder activities • Baseline assessment produces clear results

Assessment of project progress – October 2018

Output / Activity	Indicator / Target:	Actual performance: (% complete)	Comments (results and challenges faced)
Output 1: Improved efficiency of implementation of technical measures	Indicator 1: Average times for SPS documentation and clearance		The indicators for all the project outputs were not assessed because the project did not implement any of the identified actions to reduce trading costs. Reasons are provided under the outputs and challenge section above
Activity 1: Integrate technical and other border operations	**Target 1:** Technical agencies attend OSBP, JBC meetings	40%	Details of achievements are highlighted under activity 1.1 above. All countries except Egypt and Sudan generated comprehensive actions derived partly from engagement with OSBP and JBC officials
Activity 2: Assess border procedures	**Target 1:** Review current procedures and operations **Target 2:** Cross border meetings **Target 3:** Prepare action plans	50%	Key actions that countries (except Sudan and Egypt) needed to address either alone or bi-laterally were identified and sets of priority actions agreed upon as listed under activity 2 and 3.
Activity 3: Implement improved border procedures	**Target 1:** Develop/revise SOPs **Target 2:** Implement revised SOPs **Target 3:** Disseminate leaflets on border procedures	40%	All countries identified some procedures that need to be either harmonized or put in place. Some SOPs were as listed under activity 3 above were revised. However, the project ended prior to their implementation Zambia, Malawi and Zimbabwe also harmonized their phytosanitary inspection and regulation protocols

Output 2: Improvement of technical measures	Indicator 1: No. of technical requirements Indicator 2: No. of inspections		
Activity 1: Conduct joint risk analyses	**Target 1:** Sub-regional risk analysis workshops	50%	Three countries Malawi, Zambia and Zimbabwe conducted joint Pest Risk Assessments for soya beans, maize and groundnuts – from which they drafted new regulation and inspection protocols
Activity 2: Update lists of pests	**Target 1:** Document review **Target 2:** Field surveys	50%	Sudan, Zambia, Malawi and Zimbabwe updated their national lists of pests for oranges, maize, soya beans and groundnuts; the three southern African countries based their PRAs on these new lists; while Sudan conducted a PRA training
Output 3: Increased understanding of technical measures	Indicator 1: Proportion of consignments non-compliant Indicator 2: Data on contribution of technical measures to cross-border trading costs		
Activity 1: Develop assessment methodology	**Target 1:** Draft methodology **Target 2:** Write-up implementation guidelines	100% 100%	Methodology, templates and guidelines for data collection were endorsed by the SC in May 2016; and used to assess costs at borders in five countries
Activity 2: Conduct baseline assessment	**Target 1:** Border operations assessment **Target 2:** Analysis and write-up	70%	Baseline assessment studies were conducted by Kenya, Uganda, Zambia, Malawi and Zimbabwe as detailed under activity 3 above. From the studies priority actions that are needed to reduce trading costs; and benchmarks for SPS costs were generated. Only Sudan and Egypt did not conduct the assessments due to a trade impasse that started in 2016
Activity 3: Conduct evaluation assessment	**Target 1:** Border operations assessment	0%	Was not undertaken by the time the project ended due to reasons explained in the activity and challenges

	Target 2: Analysis and write-up		sections
Activity 4: Publish "How-to-trade" booklets	**Target 1:** Regional write-shop **Target 2:** Publication	0%	As above
Activity 5: Create video stories	**Target 1:** Pre-production, filming **Target 2:** Post production, distribution	0%	As above
Activity 6: Dissemination activities	**Target 1:** Border procedures leaflet **Target 2:** Project leaflet **Target 3:** National policy seminars	0%	As above