EX POST Evaluation of Project STDF/PG/298

SPS Capacity Building in Africa to Mitigate the Harmful Effects of Pesticide Residues in Cocoa and to Maintain Market Access

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Abbreviations

CDI	Côte d'Ivoire
CICC	Conseil Interprofessionnel du Cacao et du Café
CILSS	Comité permanent Inter-état de Lutte contre la Sécheresse au Sahel
CNGP	National Pesticide Management Committee
COLEACP	Europe-Africa-Caribbean-Pacific Liaison Committee
DAC	Development Assistance Committee
DGPPS	Direction Générale de la Planification, de la Programmation, du Contrôle des Projets et des Statistiques
DPVCQ	Direction de la Protection des Végétaux, du Contrôle et de la Qualité
ECOWAS	Economic Community of West African States
FIRCA	Fonds Interprofessionnel pour la Recherche et le Conseil Agricoles
GAP	Good Agricultural Practices
GWP	Good Warehousing Practices
ICCO	International Cocoa Organization
MINADER	Ministry of Agriculture and Rural Development of CDI
MRLs	Maximum Residue Levels
NPIA	National Implementing Agency
OECD	Organization of Economic Cooperation and Development
PAHs	Polycyclic Aromatic Hydrocarbons
PSB	Project Supervisory Body
PVA	Provisional Authorization for Sale
RASFF	Rapid Alert System for Food and Feed
RPEA	Regional Project Executing Agency
SPS	Sanitary and Phytosanitary Standards
STDF	Standards and Trade Development Facility
UEMOA	Union Économique et Monétaire Ouest Africaine
USAID	United States Agency for International Aid
US DA	United States Department of Agriculture
WACPA	West African Committee for Pesticides Approval
WCF	World Cocoa Foundation

Executive Summary

An ex-post evaluation was undertaken of the STDF funded project "SPS Capacity Building in Africa to Mitigate the Harmful Effects of Pesticide Residues in Cocoa and to maintain Market Access" referenced as Project STDF/PG/298, hereafter referred to as “SPS Cocoa”, which was implemented from **January 2011 to December 2013**.

The overall objective of “SPS Cocoa” was to enhance the capacity of Cocoa producing countries in Africa to meet the relevant Sanitary and Phytosanitary Standards (SPS) of cocoa consuming countries and thereby helping to maintain and improve market access for exported cocoa beans.

The STDF project (STDF/PG/298, entitled "SPS Cocoa") was implemented as part of an umbrella initiative, led by COLEACP/EDES, that aimed to strengthen the capacity of five African countries (Cameroon, Côte d’Ivoire, Ghana, Nigeria and Togo) to address SPS challenges in cocoa production and export and to enhance regional cooperation for sustainable trade. This latter initiative focused on: (1) creating awareness amongst cocoa farmers and other stakeholders along the cocoa supply chain on the relevant international standards for cocoa trade, particularly on pesticide residues and other harmful substances; (2) enhancing the capacity of cocoa farmers to apply Good Agricultural Practices (GAP) and Good Warehousing Practices (GWP) and; (3) enhancing institutional capacity in-country to monitor and enforce adherence to SPS standards in cocoa. The project had both regional and national dimensions, also aiming to strengthen regional collaboration to support institutional capacity in individual countries to apply SPS requirements in cocoa.

STDF funding represented a little more than 10% of a total funding envelope committed by other partners including the governments of the selected countries, the EU funded EDES programme and a private sector foundation: CropLife. This evaluation focused on the components 1 and 3 of the umbrella project, as they were targeted by STDF funding.

The "SPS Cocoa" project resulted in the development and dissemination of several guidance documents and communication materials targeted to farmers and cocoa producers especially in Côte d’Ivoire, Ghana, Cameroon and Nigeria. Workshops and training events were organized across the region and beyond to raise awareness of stakeholders of the cocoa sector and in particular the production sector, to SPS requirements and their application to the cocoa sector throughout 2011 and 2013.

In the judgment of the evaluator, "SPS Cocoa" was successful in creating a momentum for the improvement of management of pesticides, identified as a major SPS challenge for the cocoa sector. "SPS Cocoa" is considered to have achieved its key objectives of raising awareness and developing a better understanding among private sector stakeholders involved in cocoa production and trade, as well as regulatory authorities, in particular focused on pesticide selection, application and management.

Project partners and stakeholders interviewed throughout the course of the evaluation, unanimously agreed that this initiative was **relevant** and addressed a **crucial need** for the region: Pesticide management, as an illustration of SPS measures, has been and continues to be an area of scrutiny for the food/agri-food sector of the region, in particular for productions aimed primarily for export markets, such as the cocoa sector.

Overall, awareness raising initiatives and training programs developed through a mix of train-the-trainers and community / user targeted initiatives were deemed to be effective and to have contributed to increasing capacity for pesticide management amongst all actors of the cocoa sector. The evaluation noted significant reported uptake in Ghana, Cameroon followed by Côte d'Ivoire and Nigeria. Some momentum was also reported to be gathered in Togo but with limited documentation as to its effective progress.

The examined documentation did not indicate that tangible progress was achieved in strengthening the regulatory oversight on pesticide registration and management overall, nor was this specifically clear when examined for the cocoa sector specifically. The same can be said of areas pertaining to pesticide testing and monitoring.

The collaborative nature of the project implementation, leveraging several training initiatives by partners resulted in a demonstrated cost-effectiveness. The number of training and awareness events and the level of documented representation were conducive to generate a higher impact than what would have been expected if the resources were limited to STDF funding alone. The evaluation noted that several Project outputs outlived its period of implementation. In particular, efforts of training and awareness-raising were further expanded-upon and continued with the contribution of various partners and stakeholders (EDES and CropLife in particular).

Some organizational and financial constraints were reported to have impeded the project completion and in achieving some of the objectives. While presented as a regional initiative, the dis-jointed nature of the matching contribution of the various national partners and in particular government organizations (which pledged / committed support) seems to have led to a less coordinated initiative than was intended. The Program is better described as the sum of 5 country programs moving at various paces, based upon the availability of national support provided. It was not clear from the evidence and documentation available, to what extent the leadership of ICCO (the project implementing organization) was exercised to mitigate these impediments encountered throughout the project delivery period.

Based on the findings of this evaluation, and leveraging the success of the training approach in particular, as well as the material developed, it is recommended to consider the availability of such material in the form of e-learning modules, where relevant and where allowed through intellectual property agreements. This would enable improved accessibility and re-usability. This approach could be considered through collaborative agreements between owners / developers of the training material with academic institutions in the region and internationally which are willing to invest in offering open access e-learning mechanisms. Similarly, and given the continued relevance of the need to enhance capacity in addressing SPS requirements as they apply for the cocoa sector and beyond in the region, it is recommended that food safety capacity building initiatives planned in the region devote more efforts to aspects related to strengthening the food safety regulatory oversight overall, using pesticide management as a pilot for a regional initiative of food / agrifood regulatory convergence amongst countries of an economic block in the region such as the Economic Community of West African States (ECOWAS). For example, a coordination mechanism developed and implemented by ECOWAS could pilot the implementation of this approach, along with efforts to strengthen food laboratory testing capacity with emphasis on pesticide residue monitoring. It is recommended that ECOWAS, supported by relevant capacity building initiatives, consider developing a pilot for a food laboratory “centre of expertise”, specialized in (pesticide) residue monitoring, at the regional level to address this need. Such actions can further contribute to the harmonization of SPS measures, enhancement of food control systems and increase in market access opportunities of food and agri-food products from the targeted

region (i.e. ECOWAS countries), along with further alignment of food regulatory provisions of countries of the region with international (Codex) standards.

I- Objectives of the Evaluation

This document is an evaluation of Project "SPS Capacity Building in Africa to Mitigate the Harmful Effects of Pesticide Residues in Cocoa and to maintain Market Access" referenced as Project STDF/PG/298, hereafter referred to as “SPS Cocoa”. This project was implemented from **January 2011 to December 2013** with support from the STDF. It was selected in October 2014 by the STDF Working Group for an independent ex-post evaluation.

This evaluation aims to verify whether the project achieved the objectives set out in the project document; how it contributed to the higher-level objectives of the STDF Medium Term Strategy for 2015-2019 (e.g. measurable impact on market access, improved domestic (and where applicable) regional SPS situation, poverty reduction). The evaluation also attempted to identify key experiences, good practice and lessons learnt useful to the project beneficiary/beneficiaries and beyond. This evaluation will follow the general structure set out in the STDF Monitoring and Evaluation Framework and will address the OECD Development Assistance Committee (OECD DAC) criteria of relevance, effectiveness, efficiency, impact, sustainability and lessons learnt.

This evaluation was conducted from November 2017 to September 2018. The evaluator confirmed not being related in any way to the project implementation team, nor did he present apparent or implied conflict of interest in relation with the "SPS Cocoa" Project implementation.

II- Background and Introduction

The objective of “SPS Cocoa” was to enhance the capacity of cocoa producing countries in Africa to meet the relevant Sanitary and Phytosanitary (SPS) Standards of cocoa buying countries and thereby helping to maintain and improve market access for exported cocoa beans. The International Cocoa Organization (ICCO) Secretariat applied to the STDF for a Project Preparation Grant (PPG), which was approved in June 2009. Implementation of the PPG identified major deficiencies (based on the report produced in March 2010) in: (1) the quantification of the levels of risk from contaminants affecting the cocoa supply chain;

(2) the availability of information on pesticide science, at all levels, in producer countries; and (3) the availability of infrastructure to monitor and enforce international standards.

Given the magnitude of the needs identified during the PPG implementation, the ICCO and the five West African countries involved (Cameroon, Côte d'Ivoire, Ghana, Nigeria and Togo) decided to develop a larger Umbrella Project that encompassed a number of complementary stand-alone components, for which funding was sought from various sources including the STDF, other donors and the private sector.

The STDF project was therefore implemented as part of an umbrella initiative aimed to strengthen the capacity of five African countries (Cameroon, Côte d'Ivoire, Ghana, Nigeria and Togo) to address SPS challenges in cocoa production and export and enhance regional cooperation for sustainable trade. The STDF Working Group approved funding in July 2010 for the STDF project, submitted by the ICCO, which represented about 10% of funding for the overall umbrella initiative.

The umbrella project had 3 immediate objectives, formulated in the Project Logical Framework, as follows:

1- To create awareness amongst cocoa farmers and other stakeholders along the cocoa supply chain on the SPS requirements of the international cocoa market, including the issues of pesticide residues and other harmful substances.
2- To enhance the capacity of cocoa farmers to apply Good Agricultural Practices (GAP) and Good Warehousing Practices (GWP).
3- To enhance institutional capacity in-country to monitor and enforce adherence to SPS standards in cocoa. This would include strengthening domestic regulatory, legislative provisions on SPS standards and adapting them to international standards for better market access.

In implementing the umbrella project, activities were divided into 4 key components:

- **Component 1:** Creating awareness among cocoa farmers and other stakeholders along the cocoa supply chain about SPS requirements in cocoa.
- **Component 2:** Enhancing the capacity of relevant stakeholders to apply the rational pesticide use / component of GAP and GWP.

- **Component 3:** Enhancing institutional capacity in-country to monitor and enforce adherence to SPS requirements in cocoa.
- **Component 4:** Strengthening regional collaboration to support institutional capacity in individual countries to apply SPS requirements in cocoa.

The approved contribution for the STDF project was set at **US$593,460** out of a total costing of **US$5,322,104** for the umbrella initiative to be financed by the selected countries and other partners (EU funded EDES programme and a private sector foundation (CropLife)). The STDF funding – according to the project document – was to be dedicated to activities associated with **components 1 and 3.**

The ICCO led the implementation of the project and partnered with National Implementing Agencies (NPIA) from each participating country, which were responsible for all project activities in the country. A "Regional Project Executing Agency" (RPEA) function was created to support coordination of project implementation by individual NPIAs. This function was assumed by the Fonds Interprofessionnel pour la Recherche et le Conseil Agricole (FIRCA). A Project Steering Committee (PSC) was also set-up to enable coordination, monitoring and overall supervision of the Project. The PSC encompassed the ICCO, representatives from the NPIAs and the RPEA, as well as an international consultant. The regional structure and the multiplicity of sources of funding (in kind and in cash) and their difference in timing and availability represented an initial challenge that had to be addressed, in the way the project was to be implemented and managed.

III- Evaluation Approach and Methodology

Overall, the evaluation structure followed the strategic project evaluation framework of the STDF, which is based on the five evaluation criteria stemming from the Development Assistance Committee (DAC) of the Organization for Economic Cooperation and Development (OECD): Relevance, Effectiveness, Efficiency, Impact and Sustainability.

The evaluation was focused on areas where STDF funding was most dedicated, i.e. **components 1 and 3**. Similarly, this evaluation was set to focus on two countries: **Côte d'Ivoire (CDI) and Ghana**, major producers and exporters of cocoa and cocoa products. Attempts for on-site data collection were therefore limited to these two countries.

The evaluation approach adopted desk research and analysis of information made available as part of the project implementation planning and reporting, including the review and analysis of project documents, the review and analysis of project accomplishments and legacies (websites, brochures, publications), the review and analysis of any relevant document generated by / associated with the project, as well as interviews and consultations.

Questionnaires were developed in the form of on-line surveys and attempted to capture insights of stakeholders and partners that have contributed to the project, as well as those who may not have been aware of the initiative but could shed some light on the challenges and needs in the area of the project implementation:

Questionnaires were developed for institutional organizations and food regulators (**Annex IIa, Annex IIb**):

- Link to questionnaire destined to regulators aware of SPS Cocoa: https://www.surveymonkey.com/r/CHWQC5H
- Link to questionnaire destined to regulators / authorities who may not have heard of SPS Cocoa: https://www.surveymonkey.com/r/CPZYVBG

Another set of questionnaires was developed for representatives of the production sector with a focus on cocoa buyers, industry associations and other production actors (**Annex IIIa, Annex IIIb**):

- Link to questionnaire destined to those partners and stakeholders aware of SPS Cocoa: https://www.surveymonkey.com/r/CPRVDW6
- Link to questionnaire destined to stakeholders that were not aware of SPS Cocoa: https://www.surveymonkey.com/r/CPNYRQV

Efforts were made to share these e-questionnaires and encourage partners and stakeholders to answer them. The questionnaires were deliberately set to be answered online, in about 4-5 minutes or less, to encourage participation. They were meant to enable more quantitative data gathering in support of areas associated with the documentation of relevance and impact of SPS Cocoa.

Another source of information relied upon is the data gathered through interviews and meetings organized with key partners and stakeholders who have agreed to discuss aspects of the project implementation with the evaluator:

- 3 missions were organized to the region[1], with a focus on CDI and Ghana, and meetings were set with project partners. These missions were organized as follows:
  - 03-05 October 2018: Abidjan, CDI
  - 12-14 December 2018: Abidjan, CDI
  - 02-07 April 2018: Abidjan, CDI
  - 22-29 April 2018: Accra, Ghana and Abidjan, CDI
- Phone calls and web-enabled connections supported other interviews for data collection purposes, including follow-up discussions where relevant.

Summaries of input from key informants were shared with select interviewees for validation purposes. The list of interviewed partners and stakeholders is appended in **Annex I**.

Despite efforts to confirm meetings and appointments, some of the set meetings, as part of the evaluation plan, were not honored and did not take place. Consequently, measures were taken to find alternative sources of information to cover / corroborate the point(s) expected to be addressed by the said meetings. The overall information collected and corroboration of key points through multiple informants, as well as documented information served as a good mitigation measure to enable access to a satisfactory pool of information and resources in support of the evaluation.

Similarly, the evaluation witnessed a low level of response to the written questionnaires, despite efforts to make them easy to access, to fill and the short time required to fill them. Over 40 requests to fill the on-line questionnaires were sent to stakeholders, seeking to relay them amongst actors in the sector. Only 7 (**17% return rate**) questionnaires were filled on line. This low-level response makes conclusions drawn from the questionnaire information more limited. They could be used however as an added

[1] The STDF evaluation budget included the cost of one round-trip to Africa. The evaluator was able to combine work on this evaluation as part of his other (non-STDF) work in the region.

source of information to the other resources available (document analysis and direct interviews of key informants).

Given that the SPS Cocoa project was part of a broader initiative that continued to be carried out subsequent to the end of availability of STDF funding, it was somewhat difficult to attribute, with precision, some of the findings to areas supported specifically by STDF. However, impacts of project areas associated with Components 1 and 3 of the SPS Cocoa project clearly benefitted from STDF support, in a significant manner, during the period of implementation of the Project and an attribution of their results to STDF support would be considered as a valid approximation.

The evaluation budget enabled a partial support to travel in the region (1 mission). The travel and presence of the evaluator in the targeted country/countries leveraged other opportunities linked to the evaluator's contribution to the delivery of other food safety capacity building programs in the region. Spacing the missions over time, due to these circumstances (capacity building programs), enabled to access more participation to face-to-face interviews, particularly in CDI.

IV- Evaluation Findings

This evaluation aimed to determine the "relevance and the fulfilment of the project objectives, its developmental efficiency, effectiveness, impact and sustainability" as per the OECD DAC criteria. It also intended to ascertain the level of the Project contribution to fulfilling the direction identified in the STDF Medium Term Strategy (2015-2019), in particular the project's ability to "promote information exchange amongst SPS capacity building providers and dialogue with relevant stakeholders", as well as dissemination of good practice in SPS capacity building to support enhanced effectiveness. The contribution of the Project to achieving STDF's program goal of "increased capacity of developing countries to implement international sanitary and phytosanitary standards, guidelines and recommendations" and their "ability to gain and maintain market access" was also investigated.

The following paragraphs describe the evaluation findings.

IV-1 Evaluation of the Relevance

All interviewed (100%) informants, project partners and stakeholders unanimously agreed that this initiative was **relevant** and addressed a **crucial need** for the region: enhancing the level of awareness and the application of SPS requirements associated with the cocoa sector. Cocoa exports represent a

key economic sector for the 5 targeted countries (Côte d'Ivoire about 40% of market share or production; Ghana about 20% of market share or production and Cameroon, Nigeria and Togo representing about 10% of market share or production). Pesticide management, as an illustration of SPS measures, has been and continues to be an area of scrutiny for the food/agri-food sector of the region, in particular for production aimed primarily for export markets, such as the cocoa sector. Addressing pesticide management practices span from the need to improve agricultural practices, which can begin by producer awareness to abide by rules and requirements set to protect them and their production's access to domestic and foreign markets, up to the development of the corresponding regulatory mechanism to impose such requirements. All informants confirmed that progress made through the STDF-funded project has been tangible in addressing increased awareness of cocoa producers that **pesticide management according to Good Agricultural Practices (GAP) is essential**.

The evaluation found that the development and implementation of regulatory approaches that support a better control of pesticides (registration, enforcement, residue monitoring and management) in West Africa and in Cocoa-producing countries continues to be lacking, showcasing that the sustainability of efforts in this area was limited. However, SPS Cocoa has led to some modest enhancements of pesticide registration practices. For example, CDI through its MINADER, implemented an on-line system of pesticide registration with the purpose of making the list of approved substances continuously available, along with conditions of registration (i.e., MRLs). Unfortunately, due to limited (human and financial) resources and to organizational issues inherent to the stability situation in CDI, the maintenance of such a website was not undertaken. Pesticide registration requirements returned to a paper-based format with a document that routinely requires updating, a responsibility of the MINADER's DPVCQ (Direction de la protection des végétaux, du contrôle et de la qualité). It was also found that this paper document was not as frequently updated and did not cope with new pesticide products accessing the market on a regular basis. At the current stage, the document can only be accessed upon request, which limits transparency and limits the availability of information to those of the production sector aiming to stay current of approved substances and their MRLs. Similarly, and as will be discussed below, control measures associated with the regulatory provisions have been and continue to be areas of relevance for investment, as enforcement and monitoring efforts continue to be modest or lacking (little to no pesticide monitoring programs are currently underway). The review of data from the European Union's

Rapid Alert System for Food and Feed (RASFF)[2] using cocoa as a target commodity for the period 2008-2018 identified only 2 border rejections of products originating from West Africa, none of which were related to pesticide residues, rather to molds and insects and/or to defective packaging materials. Far more incidents were reported (53 notifications) in relation, mainly, to the possible presence of heavy metals, management of mycotoxins and Polycyclic Aromatic Hydrocarbons (PAHs). This is however not reflective of the lack of issues in relation with pesticide management in the region, rather that pesticide non-compliance is more difficult to identify in final products, and is more visible / detectable on cocoa pods (rather than beans).

Addressing SPS measures in relation with the cocoa production would benefit from a more holistic set of measures that address not only pesticide management but other food safety hazards, such as those identified in border rejection from cocoa producing countries. Continuing such an investment in the future, with a regional dimension, would benefit the sector more broadly and enhance its market access opportunities.

IV-2 Evaluation of the Effectiveness

The project workplan identified a set of activities in relation to components 1 and 3. These activities included: holding regional workshops, national events to support SPS awareness, training initiatives and the development of manuals, information and messages in support of improved pesticide management and enhanced awareness of SPS requirements.

All workshops (100%) mentioned in the project document and planned were held. Evidence was available to demonstrate the achievement and delivery of various products (awareness documents, guidance(s), self-assessment tools, reports).

The following paragraphs will attempt to assess the extent to which the project objectives were achieved through these activities, as well as factors that influenced success or caused impediments.

- **Enhanced awareness of cocoa farmers of SPS requirements, in particular for pesticide management and use in conjunction with cocoa production:**

[2] Review of all data from RASFF system from Jan1, 2008 to 24 May 2018 -

Beyond the meetings and workshops organized at the local/national level (country level in the 5 targeted countries) and planned throughout the implementation period of "SPS Cocoa", four (4) workshops were held at the regional level and were dedicated to the safe use of pesticides in cocoa production. These workshops served to launch the SPS Cocoa Project (launch workshop in January 2011, in Ghana), to disseminate results (dissemination workshop held on 10-13 Dec 2013 in Abidjan CDI), and to discuss specific issues of pesticide management, awareness development and training approaches (regional workshop in Cameroon 7-10 June 2011; Kenya workshop 28 Nov-2Dec 2011). All these workshops were well documented: results available on the SPS Cocoa website, presentations shared, agendas and reports were made available. These workshops focused not only on requirements associated with pesticide use, but also on stimulating discussions on regulatory management and residue monitoring of these substances.

Although by nature, and in reviewing the available documentation associated with these events, such workshops typically enhance awareness of SPS requirements for pesticide use in conjunction with cocoa production, there was no access to documented evaluations from the audience as to a measured change in knowledge and awareness. The level of attendance reported (over 200 participants for regional events), as well as the diversity of stakeholders, showcase the level of interest and confirms their contribution in raising awareness of SPS requirements associated with pesticide management. Similarly, a number of national awareness and sensitization workshops were planned and implemented in each of the 5 countries from 2011 to 2013, these were coupled with training initiatives. The evaluator identified **28 events reported at the national level**, covering the period January 2011 – December 2013. In several instances, it was difficult to distinguish awareness-raising events from strict training initiatives, therefore this quantitative estimation encompasses both types of events. In most countries, more than **5 (five) awareness workshops or training initiatives** were held and were reported to have gathered a variety of domestic stakeholders, including the national ministries of agriculture, trade, law enforcement agencies (e.g., customs, police and local officials), as well as representatives of the production sector (farmers, handlers, federations of cocoa production). There was documented evidence that these events were well attended and publicized, including through local and national media outlets. In some instances, the events coincided with a larger initiative such as the cocoa campaign year (Togo) and enabled the

dissemination of information concerning SPS requirements, including sharing lists of permitted and banned pesticides. There was no access to evaluation reports stemming from these events, rather, their description and their agenda were indicative of their relevance and their contribution to supporting enhanced awareness of pesticide management rules, along with overall associated SPS requirements.

The website supporting the umbrella initiative, including the STDF-driven program, initially set-up by ICCO via the link www.icco.org/sps was relocated to: https://www.icco.org/sites/sps/ (**Annex IV**) – this link is accessible from the main ICCO webpage. Information available on these pages supports continued availability of what was developed through the project and its update. Similarly, a number of flyers, posters, and messages pertaining to pesticide use: choice of products, prevention of fraud and use of illicit substances have been produced and are contributory to education and awareness raising approaches for good practices, including good warehouse handling.

A key publication, a "Manual of Use of Pesticides in Cocoa", was updated with support of the implementation of SPS Cocoa. The fact that the manual has been recently updated and continues to be current and available online supports the overall effectiveness of awareness measures destined to farmers and pesticide users in conjunction with cocoa production. This document is made available in both English and French to meet the language requirements of the region.

Similar key documentation was made available at the national level, which contributes to awareness raising and information dissemination. The "Cameroon Cocoa Pesticide Handbook" / "Annuaire des pesticides Cacao au Cameroun" is another example of documents developed during the same period by SPS Cocoa partners, as a result of information dissemination and awareness raising efforts in both English and French.

- **Enhanced uptake of Good Agricultural (GAP)/ Good Warehousing Practices (GWP):**

The development of training material and implementation of training events are a well-documented feature of the outputs of SPS Cocoa.

Workshops and training events were organized across the region and beyond, with support from STDF funding to the SPS Cocoa initiative, to raise awareness to SPS requirements and their application to the cocoa sector throughout 2011 and 2013, as reported. Based on dates of workshops

reported in the documents reviewed, this effort seemed to have been spread during the implementation period of the project from 2011 to 2013 and geographically across the region targeted (5 workshops or training events in each country). The reviewed documents indicated that the trainings managed to reach farmers and extension workers in Nigeria and Ghana. Sensitization and training initiatives seemed to have a broad outreach in Ghana where the implementing organizations (Cocoa Board and Quality Control Company Ltd) had reported campaigns involving operators, professional organizations and extended to the use of mass-media with 5 radio programs dedicated to food safety, safe use of agrochemicals and SPS standards.

Cameroon trainings were reported to have reached pesticide retailers through CropLife Cameroon and CropLife Africa, and focused, amongst other aspects, on counterfeit prevention measures for pesticide selection.

A collaborative approach was developed with the project partners to plan and implement such training, including the use of material and leveraging events organized by partners such as EDES / COLEACP and CropLife West Africa. Historically, the EDES / COLEACP program gained significant experience in developing training modules and initiatives in relation with GAP in the area of fruit and vegetables, but has now extended to various other sectors including Cocoa. EDES / COLEACP training material and events are documented to cover agricultural and handling practices from plantation to beyond harvest, i.e. including transport and warehousing. Several informants, interviewed by the evaluator, who have participated in COLEACP training initiatives praised the content and the mode of delivering these training programs. Reliance on “train the trainers” programs as well as the strong interaction with local partners were identified as key contributors in achieving such a success. STDF funding to the SPS Cocoa project enabled primarily to support the organization of “Training of Trainers” (ToT) sessions on “GAP, post-harvest treatment, transport and traceability through the supply chain”, based on the 21 training modules that have been finalized by EDES with cocoa experts from Cameroon, CDI and Ghana. A ToT was reported to have been held in CDI, from 15-20 July 2013, with participants from Togo, Cameroon and CDI.

In the context of the collaborative approach with SPS Cocoa, the evaluator recorded input from the field indicating that the EDES / COLEACP training initiatives, delivered with support from the SPS Cocoa Project, achieved important uptake in Cameroon, with the training of several regional

trainers, and efforts to stimulate the entire ecosystem of cocoa production to adopt best practices on GAP and post-harvest management of Cocoa. The development of the program "New Generation" (https://www.youtube.com/watch?v=0JJFTeh-ct0) promoted by the Conseil Interprofessionnel du Cacao et du Café (CICC) achieved a major milestone in attracting the younger generation to Cocoa culture and to adopting best agricultural practices, including pesticide management. A high uptake of training material and best practices was also reported in Ghana. In both cases, the key factors of success included: a high commitment from national governments, the mobilization of players and stakeholders, cost-sharing opportunities with producers' federations and the establishment of a monitoring system involving the various contributors, such as exporters, producers, etc. Another factor of success for the uptake of training and awareness raising messages, reported to the evaluator, pertains to instilling the realization amongst farmers of the importance of best practices in pesticide handling, in terms of impacts on their own and their family's health, i.e. in helping prevent health issues associated with misuse / misapplication of pesticides. In parallel, some of the aspects that seemed to impede training effectiveness were linked to a misalignment between organizations and sometimes the adoption of divergent approaches in the context of ascertaining each organization's mandate. These situations considered as part of what is commonly known as "turf protection" were witnessed in Côte d'Ivoire and negatively impacted some aspects of activity planning and implementation. Similarly, undertaking training initiatives as part of "ad hoc" initiatives and without prior strategy and relevant planning is not conducive to a high potential of sustainability.

Another key collaborative effort in training development and implementation, that was reported to the evaluator, consisted of the collaborative process with CropLife West Africa. This organization has been active in supporting enhanced stewardship in relation with the use of pesticides, by providing cocoa farmers with the pesticides needed in a preventive manner to avoid their reliance on illicit substances and/or to prevent fraud. Farmers were provided with one box of pesticide/2.5 ha surface/year, enabling up to 2 applications of pesticides (generally up to 6 applications of fungicides and 2-4 applications of insecticides are needed).

One of the main challenges being faced by the sector, and reported to the evaluator, is related to pesticide counterfeiting and the wide availability of illicit products on the markets regionally. This is

further confounded with the low level of literacy amongst farmers who trust what is being sold to them at a lower price/cost. The need for training of re-sellers/retailers and enhanced collaboration with farmer associations was identified as key requirements to mitigating these risks. Similarly, several efforts were made to enhance training of customs officials to promote better controls over illicit substances. Dedicated training sessions were therefore organized, throughout the implementation of the SPS Cocoa initiative, targeting this audience (resellers and customs officials) in collaboration with CropLife. These sessions were reported to have been held primarily in CDI, but were open to other participants from the region. Awareness campaigns were undertaken, supported and relayed through CropLife, including through traditional media outlets (e.g. radio messages). Such actions continued beyond the STDF initiative, in particular, through actions supported by the World Cocoa Foundation (WCF) and the EDES / COALECP project (2013-2017), which is another indication of the sustainability of the project and its interventions.

As part of its collaboration within SPS Cocoa, CropLife has also invested in actions pertaining to training young workers to be sprayers of pesticides and to apply best "Pesticide Application Practices". CropLife officials indicated that resources continue to be lacking to sustain such training efforts over time. After the end of the project, some of the training initiatives initiated and funded under SPS Cocoa were not maintained by national stakeholders. Nonetheless, some self-funded initiatives continued to emerge and be implemented through the impulse of partners such as CropLife and EDES / COLEACP.

Overall, SPS Cocoa contributed to the development of key documents that support sustainable guidance to farmers and producers along the supply chain, in applying SPS measures as they pertain to Cocoa production and in particular in relation with pesticide management. The development of the "Manual of Use of Pesticides in Cocoa", and the "Self-Assessment tool" are a good illustration of broad guidance on the application of SPS measures to this sector. SPS Cocoa supported the development, update and/or dissemination of the application of these tools. For example, the "Self Assessment Tool" focuses to help identify shortcomings of business operators in cocoa production (along the supply chain) including shortcomings in GAP and post-harvest management. The tool was applied in Ghana and efforts were underway to ensure its adaptation for CDI and Cameroon. At least 21 training modules on GAP and GWP were reported to have been

developed by EDES / COLEACP and the evaluator identified 9 **technical** training initiatives that were reported to have been held during the period of the SPS Cocoa project implementation. These trainings covered not only handling of pesticides but overall good agricultural practices and the prevention of use of illicit substances (including through training of law enforcement agents to help combat and reduce/eliminate the availability of fraudulent material). In Ghana, the implementation of SPS Cocoa attempted to ensure that the information conveyed and material shared would cascade down to front line workers wherever possible. The STDF *Project report* indicated that training and information dissemination included practical examples showcasing the demise of business operators that did not comply with SPS requirements, i.e. they did not adhere to their clients' needs. The report also indicated that these training efforts, supported through SPS Cocoa, reached "8925 farmers, 753 inspectors and 325 transporters".

- **Increased in-country and regional oversight on pesticide management: Setting and enforcing SPS requirements**

  The SPS Cocoa Project report identified efforts to support legislative and regulatory reforms with the aim to strengthen controls over pesticides, including pesticide registration, and compliance with several health and safety provisions associated with their use. Some of these measures were implemented in Ghana and CDI with progress accomplished in the areas of pesticide registration, setting of MRLs, as well as compliance and enforcement associated with the market for illicit substances.

  The evaluator's review of the current regulatory oversight for pesticides in the West African region, and in particular for the targeted SPS Cocoa countries (Cameroon, CDI, Togo, Ghana and Nigeria), has identified several regional efforts to develop a harmonized approach for pesticide management and registration. Several committees and organizations share the responsibility in developing these frameworks, including ECOWAS (Economic Community of West African States) and the Economic Community of Central African States.

  The CILSS (Comité permanent Inter-état de Lutte contre la Sécheresse au Sahel) and UEMOA (Union Economique Monétaire Ouest Africaine) are reported to be working towards harmonization of national pesticides legislation/regulations with support from the initiative: Marketing Input

Regionally (MIR) (joint ECOWAS-UEMOA project) which is implemented by the International Fertilizer Development Initiative (IFDC), CropLife Africa/Middle East and the Sahelian Pesticides Committee. The regional pesticides registration process is reported to be 3-pronged: (1) Pre-registration stage; (2) Registration stage; and, (3) Post-registration stage. **Regulation C/REG.3/08/2008** was enacted at the 60th session of the ECOWAS Council of Ministers on harmonizing rules governing pesticides registration in the ECOWAS sub-region. The Regulation established the WACPA (West African Committee for Pesticides Approval) which implements the common regulations for the ECOWAS through each Member's CNGP (National Pesticide Management Committee). The CNGPs are responsible for pre and post-approval. There are 5 lists of pesticides: (1) Approved pesticides or provisional authorization for sale (PVA); (2) Severely regulated pesticides; (3) Pesticides under toxico-vigilance; (4) Prohibited pesticides; and, (5) Registered pesticides maintained in each member state. The administration of the regulation is similar to CILSS's Common Regulation, i.e. it has a single registration office (common registration), pre-approval (experimentation) and post-approval (market, use, monitoring, analysis, disposal) within the responsibility of each State. Application of the Regulation is not without its challenges, typically associated to non-functioning CNGPs in some States. Presently, 10 ECOWAS members have reported functional CNGPs: Benin, Burkina Faso, Cape Verde, Cote d'Ivoire, Gambia, Guinea Bissau, Mali, Niger, Senegal and Togo.

Annex V reviews current regulatory requirements for pesticide management collected by the evaluator.

Key informants, interviewed during the course of this evaluation, acknowledged the challenges associated with achieving this specific objective aiming for legislative and regulatory reform of pesticide registration and development and enacting consistent MRLs in the region. Some of the progress achieved in enhancing the regulatory oversight and / or developing clear procedures for pesticide registration and regulation has not been sustained (e.g. decline in CDI's pesticide registration approach and the maintenance of the positive list). The adoption of a regional approach for enhancing regulatory provisions to control pesticides appears to be most suitable, as it would permit the leveraging of resources and would help achieve an integrated market for food and agrifood products. It appears however that several of the suggested approaches have not been

further supported by a clear implementation path. As an example, members of competent authorities in CDI, interviewed about their processes, admitted current limitations and shortcomings in pesticide registration and management. However, these authorities (and their membership) revealed a high level of awareness with respect to current trends related to tighter regulatory requirements on pesticides implemented by importing jurisdictions such as the European Union.

Similarly, laboratory analysis of pesticides to support compliance and enforcement does not seem to have achieved significant progress and appears to be lacking investment in infrastructure and in capacity development (training on analytical procedures). Some limited information was available as to the intent to acquire analytical equipment and training of laboratory staff in Ghana, Côte d'Ivoire and Nigeria.

The evaluation determined that one of the main challenges faced by the cocoa sector continues to be pesticide counterfeiting and the availability of illicit products on the market despite efforts deployed to curb fraud initiatives. A key evaluation informant reported several efforts to enhance training of customs officers with the objective to support added controls over illicit substances. According to ECOWAS texts, products should be cleared at non-terrestrial points of entry, i.e. at ports and airports. Controls over illicit pesticides was reported to work reasonably well at ports, e.g. at Abidjan's port, where there is little chance for a non-compliant product to access the market. Land points of access have however been reported to continue to represent a challenge and may continue to be hotbeds for illicit trade. This is despite measures taken by competent authorities, such as enhanced training of customs officers or the application of easier/simpler approaches to identify approved substances (colour-coded products used in Ghana: yellow for fungicides, green for herbicides).

The weaker regulatory oversight over pesticides in the targeted countries is symptomatic of another broader issue: "weak food control systems" and will need to be an area of focus in and by itself as part of regional capacity building efforts. Figure 1 attempts to offer a summary of a qualitative indication of the extent to which the immediate objectives of SPS Cocoa have been attained, along with the identification of relevant indicators to support such assertions.

Immediate Objectives & Associated Results	Appreciation of the Level of Achievement through Evaluation
(1) Enhanced awareness of cocoa farmers of SPS requirements, in particular for pesticides management / use in conjunction with cocoa production	**ACHIEVED** - 4 regional workshops > 200 participants - National workshop highly attended / well publicized - Ongoing / updated website and information - Pesticides in Cocoa Manual
(2) Enhanced uptake of Good Agricultural / Good Warehousing Practices	**ACHIEVED** - Training Material and Guidance Developed Deemed Highly reliable - Collaborative: EDES / COLEACP – CropLife - High appreciation of relevance and uptake supported
(3) Increased in-country and regional oversight on pesticide management – Setting and Enforcing SPS requirements	**LIMITED ACHIEVEMENT** - Progress unsustained - Regional coordination incomplete - Opportunities of enhanced pesticide control through ECOWAS - Limited laboratory capacity - Continued challenge with pesticide counterfeiting

Figure 1: Linking Logical Framework to Evaluation Framework for Effectiveness Assessment – Assessing the Ability to Achieve the Stated Objectives through the Implementation of Planned Activities

IV-3- Evaluation of the Efficiency

SPS Cocoa was implemented over the period of January 2011 to December 2013. It was officially launched as a two-year project at a regional workshop held from 7-10 June 2011, i.e., 6 months after the official start date of January 2011. STDF granted a 1-year budget neutral extension leading to a completion date of 31 December 2013. STDF committed $539,460 to the relevant components, out of an overall budget of $5,322,104 for the umbrella initiative, to be secured through commitments from the selected 5 countries and other partners (EU funded EDES Program) and CropLife. Upon the termination of the project, not all activities and initiatives were completed and less that 50% of the STDF grant was spent ($249,265 out of $593,460). The late availability of the committed matching funds, agreed to by several partners of the umbrella initiative, resulted in the delays of implementation and the subsequent underspending.

SPS Cocoa was initially developed with high expectations based on commitments from other partners and the extensive set of expected deliverables at the regional and national levels. As such, it was meant to have a high level of coordination with partners in planning, availability of funding and implementation. The project management and coordination structure relied on a complex set-up involving regional coordination and oversight structures, as well as national structures. The evaluator noted that the project focal points in the different countries were distinct from those retained for one of the key collaborating initiatives (EDES / COLEACP). Judging from the limited level of responsiveness and availability of identified project focal points and representatives of coordination entities tasked with the project implementation during the course of this evaluation, it is likely that the project coordination structure and mobilization of various country and regional focal points represented a major challenge during the project implementation period. The evaluator also noted a number of non-synchronic events that must have impeded implementation efforts for components 1 and 3. Mainly, the limited control over timing of fund availability from partner governments which committed to this initiative, as well as the dissimilar timing of implementation of relevant initiatives by partner organizations, e.g. EDES / COLEACP would have impacted efficiency of project delivery. While presented as a regional initiative, the dis-jointed nature of the matching contribution of the various national governments (who pledged / committed support) seems to have led to a less coordinated initiative that appears to be the sum of 5 country programs moving at various paces based upon the national support provided. It was not clear from the evidence and documentation available to what extent the leadership of ICCO (the project holder) was exercised to mitigate such impediments in project delivery.

However, the collaborative nature of the project implementation, leveraging several training initiatives by partners resulted in a demonstrated cost-effectiveness. Added efficiency could have been sought through joint planning of the initiatives to be undertaken with partners that have a presence on the ground in the areas targeted (such as the EDES program and Croplife), at a much earlier stage. This would have limited the impacts of the lack of synchronicity witnessed throughout the Project implementation.

The number of training and awareness events and the level of documented representation were conducive to generate a higher impact than what would be expected if the level of resources were limited to STDF funding alone, enabling to develop and disseminate a significant number of guidance

and awareness-raising material and to touch a higher number of partners and stakeholders of the cocoa supply chain. There is evidence that the cooperative quality of the project, in addition to the effectiveness and proven competencies of selected collaborating initiatives (CropLife, EDES Program) have contributed significantly to cost-effectiveness of delivery. In parallel, there was no documented evidence that the SPS Cocoa management structure followed a strategic approach of partner mobilization and development / application of mitigation measures throughout the course of implementation. Similarly, there is no evidence from reported information or collected data from this evaluation that effective planning of events and clear evaluation frameworks were set from key initiatives or events (e.g. to qualify uptake, return on investment, etc.). In the opinion of the evaluator, there are areas of the program delivery that were extremely cost-effective (e.g. training development and delivery) thanks to leveraging partnerships with initiatives in the region. Other areas of the program, associated mainly with component 3, where a high degree of leadership and partner mobilization was needed, received limited progress / outputs from SPS Cocoa. The project coordination and governance structure, along with the selection and operation of focal points did not seem to be highly effective in supporting the project implementation.

IV-4 Evaluation of the Impact

As stated in the DAC criteria, the impact evaluation aims to study the (positive or negative) changes produced by the interventions directly or indirectly, intended or unintended. The impact assessment endeavors to ascertain how the interventions associated with the project SPS Cocoa made a difference to beneficiaries and their environment. In this instance, and given that the STDF investment was more directly focused to address components 1 and 3 of the overall Umbrella project, the impact assessment is attempting to qualify whether measures taken as a result of the STDF funding has contributed to the reduction of SPS challenges by means of the adoption of pesticide management approaches, clearly in-line with international practices, as well as any long-term impacts.

From the documented reports and the interviews conducted during field visits, there was a clear identification that this Project has created a momentum for action to improve the level of readiness of the sector to address SPS challenges, for pesticides and other food safety hazards. Initiatives pertaining to enhancing awareness continued to progress beyond the implementation timelines of the initiative.

Training and awareness raising sessions on pesticide management and handling were recorded well beyond 2013. Some initiatives, in particular those undertaken through the EDES / COLEACP Program were / are being implemented with a strong involvement of the community and with the added objective to support renewal of the workforce in the Cocoa sector. The uptake of this initiative in Cameroon (under the name of "New Generation") is supportive of attracting the younger generation to this field and to the transmission of experience between generations, with an overall impact on poverty reduction, by way of creating opportunities in a thriving economic sector.

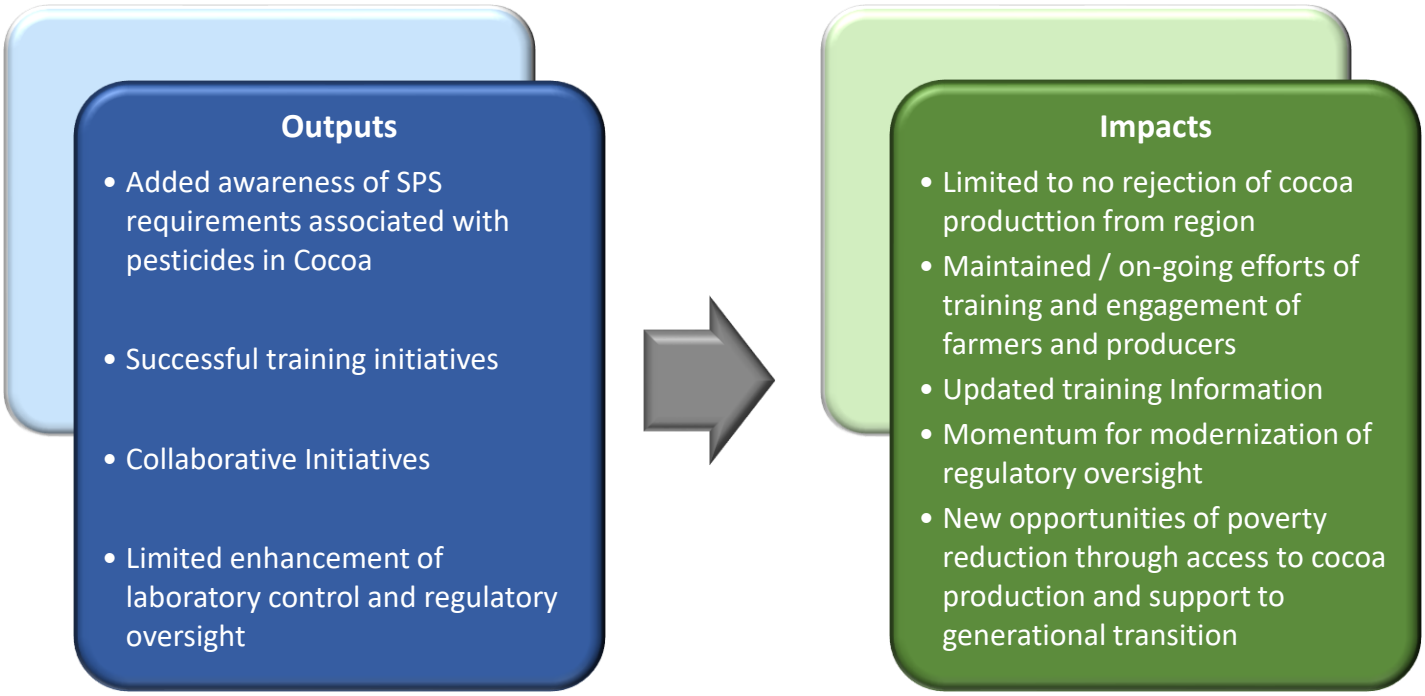
An attempt was made through this evaluation to determine the impact on added compliance with SPS requirements of export markets of the cocoa sector from the targeted countries overall, subsequent to the project implementation. The limited data in relation with compliance practices with pesticide residue MRLs and the limited number of reported rejection incidents (through EU RASFF for example) did not allow such determination. The lack of response from buyers of Cocoa beans from the region by large actors of the cocoa supply chain did not allow a quantitative estimation of the level of improvement of sector compliance using historical data.

Despite the limited outputs witnessed from component 3 and some of the set-backs identified in pesticide registration practices in CDI and other parts of the region, the evaluation has identified that the momentum created by SPS Cocoa in reviewing and triggering modernization efforts for pesticide registration and management is well underway. Information collected as recently as July / August 2018, indicated interest from ECOWAS food regulators to consider pesticide management as one of the areas to be targeted by initiatives of harmonization efforts amongst member countries, in the upcoming period. This area is being identified as a possible pilot for a larger initiative of food (safety) regulatory harmonization, in-line with Codex requirements and leading to enhancement of intra-regional alignment in SPS measures as a stimulus to intra-regional trade. Similarly, and although the evaluation noted that the food laboratory capacity for pesticide residue determination has not progressed significantly as a result of SPS Cocoa, there is an added momentum for countries in the region to upgrade their ability in pesticide monitoring in cocoa and other commodities. Some on-going capacity building initiatives, supported by development programs (e.g., USAID / USDA funded initiatives) continue to invest in this area with a possible upcoming training of laboratory personnel from the region on multi-residue methods for pesticides and mycotoxins applicable to the cocoa sector. Most of the interviewed experts

from government laboratories in West Africa, are female experts, showcasing the potential for further enhancement of female expertise and leadership in these scientific disciplines.

Despite implementation challenges in relation with coordination and governance, the multi-partner / multi-stakeholder nature of the project enabled the maintenance of an on-going momentum for collaborative efforts and engagement between the stakeholder community within the region and beyond that outlived the project implementation period. This momentum is visible within countries where most of the uptake of awareness and training efforts was witnessed, i.e. Cameroon and Ghana, and is picking up in neighboring countries e.g., CDI.

The final project report indicated a high level of attendance from various partners and stakeholders at both regional and national events. The reported media coverage associated with these events also contributed to **increased impact with a high level of outreach**. The evaluator noted that outreach was particularly effective in the context of training, where efforts were made to reach farmers and small business holders. Also, the training approach combined a train-the-trainer initiative along with a trickling effect to the community of users thus confirming the effectiveness of the outreach efforts in this area with the aim to maximize impact.



IV-5 Evaluation of the Sustainability

The evaluation noted that several Project outputs outlived their period of implementation. In particular, efforts of training and awareness-raising were further expanded-upon and continued with the contribution of various partners and stakeholders (EDES and CropLife in particular). The "Guidelines for Pesticide Use in Cocoa", considered as a major scientific and practical output of this program was more recently updated and are still available on the ICCO website under the dedicated area to SPS measures and guidance. ICCO also continued to maintain a series of webpages (https://www.icco.org/sites/sps/, **Annex IV**) in relation with SPS Cocoa and its major achievements.

There was no documentation that any of the laboratory-related initiatives or regulatory action to enhance pesticide management and oversight benefitted from any sustainability agenda. It was however identified that SPS Cocoa created a momentum for more action in these areas, through other initiatives being considered at the national and regional levels. The continued commitment of CropLife West Africa to enhanced awareness of farmers and other actors in the cocoa supply chain and the continued investment of the COLEACP EDES driven initiatives, through other sources of funding, towards more targeted training and guidance dissemination related to pesticide management and SPS measures, as

well as the continued investment made by ICCO to maintain and update some of the guidance generated through the SPS Cocoa project, are illustrations of the momentum created to sustain investments made through the STDF funded initiatives (partially or totally).

The evaluation noted the upcoming availability of results from a survey to be conducted by Croplife before the end of 2018 (results not available upon the completion of the evaluation report), on the extent of illicit use of pesticides to help prioritize action in addressing fraudulent activities and better control of products available on the market. The strong involvement of the (Cocoa) production sector (and associated services) in the delivery of project outputs and the clear relevance of the required enhancements are added guarantees for the sustainability of investments in supporting better SPS practices in the cocoa sector.

V- Cross-cutting Impacts

Enhanced awareness and uptake of SPS measures as they pertain to pesticide management in the cocoa sector in West Africa, are likely to result in a number of indirect impacts with positive societal, environmental and health impacts on the populations targeted or impacted by these initiatives.

The adoption of best agricultural practices across the sector, along with dissemination of these practices amongst a younger generation of farmers (as illustrated by the "New Generation" Program in Cameroon) was shown to be conducive to positioning the sector as a centre of interest for income generation (due to its compliance and its market access opportunities). Awareness raising messages about good pesticide handling and application have relied upon the demonstration that such practices are conducive to better health protection and prevention of diseases related to undue occupational exposure to pesticides during their application by farmers. Improved selection, application and monitoring of pesticides in a high-volume production sector such as the Cocoa sector supports not only enhanced economic opportunities and public health, but also increased environmental stewardship with a lower amount of pesticide (as low as is needed) made available in the ecosystem. These efforts could be further sustained with an improved regulatory oversight equipped with the relevant surveillance, monitoring initiatives as well as enforcement powers.

VI- Recommendations

1. The overwhelming evidence available continues to indicate that investing in enhanced SPS measures in the cocoa sector is **relevant and beneficial** to not only the sector itself but also to its actors and to the overall economies of exporting countries in West Africa. Beyond the tangible progress noted in the awareness of SPS requirements and adoption of improved practices, **a holistic approach is recommended to address the sector's needs in improving management of mycotoxins, Polycyclic Aromatic Hydrocarbons (PAHs) and heavy metals across the Cocoa supply chain.** The latter food safety hazards have been identified as the focus of priority SPS measures to be considered for the cocoa production sector, on top of pesticide management. **Proponents of capacity building project should consider seeking further investments in this area, through STDF and / or other funding mechanisms to help sustain what has been achieved and further leverage what is currently being implemented in the region.**

2. This evaluation has further confirmed that regulatory systems associated with pesticide management, in all their facets (set-up, integration in robust food control systems, operations and monitoring) remain deficient to inexistent in the region. While it may be attractive to consider that deficiencies can / should be addressed through a more comprehensive investment in upgrading overall food control systems in the region, including pesticide management, this goal may constitute a longer-term aspiration requiring a strong donor and beneficiary mobilization and investment.

   It is rather recommended that ECOWAS regulators consider the area of pesticide management as a pilot for a regional initiative to enhance food / agrifood regulatory convergence and coordination / harmonization amongst countries of the regional economic community. This area is targeted enough to enable a focused planning and implementation of common pesticide regulatory provisions and their enforcement. This would include leveraging resources towards a unique pesticide registration mechanism and maintaining a positive list of acceptable pesticides and relevant MRLs applicable to the region's needs / scenarios of exposure and in line with Codex standards. It would also encompass efforts of enforcement and compliance promotion spanning from concerted efforts aiming to limit the availability of fraudulent substances, action against

organized networks beyond national borders, common labelling and classification systems, up to and including residue monitoring planning and implementation in cocoa products and other relevant sectors.

A regional approach is also recommended to sustain a critical mass of risk assessors that can be involved in pesticide evaluation (i.e. adaptation of Codex standards) and incident management.

Similarly, it is recommended that a stronger investment be made in laboratory analysis capacity, both in equipment and in human resources, to support multi-pesticide residue determination. This investment would support the establishment of relevant regulatory compliance and enforcement programs at the regional level. The development of a food laboratory **center of expertise** at the regional level can also support efforts aiming to enhance and harmonize food control measures /systems in ECOWAS.

3. It **is recommended that several tools and material** developed with support from SPS Cocoa project (e.g. Self-assessment tools, pesticide manuals, etc..) **be turned into on-line training material**, available through free of charge accessible training platforms. E-learning opportunities can further supplement face-to-face initiatives and would contribute to the sustainability of investments made in awareness raising and training development.

VII- Lessons Learnt

1. Success of training and awareness raising initiatives depends on more than the availability of relevant and quality training material. It has to be anchored in a local approach, and to support (and be supported by) an entire ecosystem to adopt best practices. The example of uptake of awareness raising initiatives and training in Cameroon, implemented through SPS Cocoa in collaboration with the EDES / COLEACP Program was supported by an anchor in the community, collaboration with a major national organization (CICC) and an added objective to attract the younger generation to cocoa culture and to adopting best agricultural practices, including pesticide management. The key factors of success included commitment from national governments, the clear mobilization of local and national players and cost-sharing opportunities with a producers' federation. Another factor to the success was the fact that the messages shared were set to be relevant to the local community e.g., malpractice in use and application of pesticide can translate in

immediate health effects on users and the community that can be preventable for farmers and their families. Applying the principles stemming from this approach can support the effectiveness of other awareness raising initiatives with similar objectives.

2. The SPS Cocoa project was set to be a multi-stakeholder, multi-partner project with ambitious deliverables and reliance on commitments and contribution of various governments, regional, national and local organizations. Despite the availability of official letters of commitments, timing of availability of in-kind funding, start of implementation of related initiatives was highly dependent on multiple entities. This was further complicated by a complex project coordination and implementation model which relied upon different organizations, notably: (i) ICCO with overall responsibility for implementation of SPS Cocoa; (ii) National Implementing Agencies (NPIA) from each participating country responsible for all project activities in the country; and (iii) a Regional Project Executing Agency, the Fonds Interprofessionel pour la Recherche et le Conseil Agricoles (FIRCA), responsible for supporting coordination of project implementation by individual NPIAs. The clarification of roles and responsibilities between ICCO and FIRCA as well as dealing with multiple focal points in the participating countries, which were different from those identified under a partnering initiative (EDES / COLEACP), created additional challenges for project coordination and management. There would have been a benefit to ensure closer coordination and use of similar structures of delivery (e.g. same focal points) between EDES and SPS Cocoa. Similarly, and in view of the multi-component nature of an initiative **where STDF is funding approximately 10% of the overall cost**, more care about ascertaining the availability of the rest of the funding needs to be exercised prior to commencing implementation.

   Finally, while the deliverables of SPS Cocoa included in components 1 and 3 are linked, they are very broad and with multiple sub-components and deliverables at the regional level. Each of these components could have been a stand-alone initiative and would have been complex enough to be delivered at the regional level. This would have helped clarify objectives and enabled to select adapted coordination mechanisms for each of these components, with added efficiency. Developing an initiative targeting the production sector and another targeting enhanced regulatory oversight with competent authorities and regional organization would have simplified the project management structure and clarified the stakeholders and partners of each initiative. Both

initiatives would have still needed to draw on a public – private partnership, but would have had more focussed objectives and relevant representation amongst the stakeholder community.

VIII- Conclusion

In the judgment of the evaluator, SPS cocoa was successful in creating a momentum for the improvement of management of pesticides, identified as a major SPS challenge for the cocoa sector. SPS Cocoa is considered to have achieved its key objectives of raising awareness and developing a better understanding among actors of the production sector and regulators of SPS requirements for cocoa production, in particular as they relate to pesticide selection, application and management. The project was considered relevant and addressed a current and continued need for the region: improvement of pesticide management, as a key SPS measure that may impede export market access. The project objective to enhance the regulatory oversight on pesticide registration and management supported by the relevant pesticide testing and monitoring program was only partially achieved and more work is required in this area.

The collaborative nature of the project implementation, leveraging several training initiatives by partners, was expected to result in cost-effectiveness and to lead to a higher impact than what would have been expected if the resources were limited to STDF funding alone, although in practice some of the issues faced reduced the potential to achieve these opportunities. The evaluation noted that several project outputs outlived its period of implementation. In particular, efforts of training and awareness-raising were further expanded-upon and continued with the contribution of various partners and stakeholders (EDES and CropLife in particular).

A rather complex governance and organization structure at the regional and national levels, encompassing representation from government bodies as well as the industry sector, combined with the lack of synchronicity in planning and implementation of partnering initiatives impacted the level of efficiency of the project management. Mobilization of all the required actors to support the achievement of component 3 of SPS Cocoa in particular ("Enhancing institutional capacity in-country to monitor and enforce adherence to SPS requirements in cocoa") seemed more difficult to attain.

As a result of this evaluation, some key recommendations emerged and are reiterated below. It is suggested:

- to consider a more holistic approach in addressing priority SPS measures that need to be addressed for the Cocoa sector, such as the need to improve the management of mycotoxins, Polycyclic Aromatic Hydrocarbons (PAHs) and heavy metals as priority food safety hazards across the Cocoa supply chain, along with the improved management of pesticides.
- to consider aspects related to strengthening the food safety regulatory oversight in the region of West Africa, as a key enabler to achieving adherence to SPS measures, with the possible adoption of a pilot approach using pesticide management as a target for a regional initiative of food / agrifood regulatory convergence amongst countries of an economic block in the region such as the Economic Community of West African States (ECOWAS). This initiative could be further supported by the development of a laboratory "centre of expertise", specialized in (pesticide) residue monitoring, at the regional level.
- to consider the availability of the developed training and awareness-raising material through SPS Cocoa and partnering initiatives, in the form of accessible e-learning modules, where possible and relevant.

Recommendations and lessons learnt from SPS Cocoa and its achievements open further perspectives towards improved adoption of SPS measures in the West African region as a means to limit impediments for food and agrifood products to access foreign markets and to strengthen the resilience of the food and agri-food sector as a pillar of economic and human development in the region.

Annex I

List of Interviewees

The evaluation of SPS Cocoa was supported by interviews / discussions held with the following representatives of partners and stakeholders.

Name of interviewee	Function / Partner - Stakeholder
Mr. Laurent Pipitone	Project Manager, formerly ICCO
Mr. Yunusa Abubaker	Project coordinator, ICCO
Dr. Lucien Kouame	MINADER
Mr. Yao Bama	Representative of CropLife, West Africa
Dr. Hilary Barry	Institutional Development and Partnerships Strategy Advisor, COLEACP, Belgium
Ms. Mouna Kipré Zunon	Conseil du Café et du Cacao, CDI
Dr. Ardjouma Dembele	Professeur, Directeur, LANADA (Laboratoire National D'Appui au Développement Agricole), CDI
Dr. Soumaila Bredoumy	Direction Générale de la Protection de la Sécurité Alimentaire
Mr. Ouohi François	Sous-Directeur Qualité et Éthique, DPVCQ – MINADER
Mr. Meledje Enock Grah	Direction Générale de la Planification, de la Programmation, du Contrôle des Projets et des Statistiques (DGPPS), CDI
Mme Coulibaly née Karamoko Mamissi	DPVCQ – MINADER, CDI
Mr. Silue Gneneyeri	DPVCQ – MINADER, CDI
Mme Aké Assi Yolande Amoin épouse Datté	Chef, LANADA, MINADER, CDI
Mr. Bah Boni	Head of Service Phystosanitary Approvals (MINADER), CDI

Annex IIa

This questionnaire has been administered on-line through a web-enabled survey software – Survey Monkey – and has been amended to address relevant items resulting from the preliminary analysis of data collected through the desk studies.

QUESTIONNAIRE FOR FOOD SAFETY AND / OR PESTICIDE REGISTRATION COMPETENT AUTHORITIES

intended for respondents with knowledge of the "SPS Cocoa" project

Estimated Time to Complete: 4 minutes

Introduction / Background

This short questionnaire is undertaken as part of the evaluation of the project entitled "SPS Capacity Building in Africa to Mitigate the Harmful Effects of Pesticide Residues in Cocoa and to Maintain Market Access", referred to hereafter as "SPS Cocoa", and supported by the Standards and Trade Development Facility (STDF).

SPS Cocoa was implemented between January 2011 and December 2013 in 5 African countries known to be major producers of cocoa.

SPS Cocoa aimed to enhance awareness and capacity related to best practices of pesticide use including enhanced oversight by competent authorities at the national and regional levels.

This questionnaire aims to collect data in support of the project evaluation, according to an evaluation framework assessing the relevance, effectiveness, efficiency, outreach, impact and sustainability factors. It also aims at identifying lessons learned for future capacity development investments under the STDF.

Answers provided will not be attributed and will be collated anonymously.

OK

* 1 Please identify your role in the project SPS Cocoa.

* 2 Please qualify how did you consider the Project "SPS Cocoa" to be needed and relevant in addressing challenges the cocoa sector is facing both in domestic production and to access international markets?

- ◯ Very highly needed
- ◯ Highly needed
- ◯ Moderately needed
- ◯ Not so much needed
- ◯ Not needed at all/not relevant

* 3 How can you describe the main impacts of SPS Cocoa on your work and on the changes of the management of pesticides in your country? Please check all that apply.

- ☐ Did not lead to change at all
- ☐ Identified/clarified important aspects of the way regulatory oversight for pesticides should be exercised
- ☐ Identified/clarified the list of pesticides that can be adopted for use to treat cocoa across the supply chain
- ☐ Identified/clarified the list of banned substances that should be avoided in cocoa treatment
- ☐ Identified / clarified best practices to be relayed to framers and other stakeholders to ensure pesticide use does not lead to negative repercussions (market impediments, health concerns for users / consumers)
- ☐ Gave us direction on how to reform pesticide management in the country organization
- ☐ Provided guidance on effective pesticide monitoring in cocoa products
- ☐ Enhanced our capacity in surveillance and monitoring of pesticides in cocoa products

Other (please specify)

* 4 Please qualify the impact that the project SPS Cocoa had had in improving your dialogue, interaction and collaboration on matters pertaining to pesticide management in cocoa products?

	Very high impact	High impact	Medium Impact	Low Impact	No impact/no change
With other partners and / or stakeholders ?	○	○	○	○	○
With other government departments / organizations?	○	○	○	○	○
With law enforcement agencies / authorities?	○	○	○	○	○
With pesticide suppliers?	○	○	○	○	○
With pesticide manufacturers?	○	○	○	○	○
With pesticide scientists domestically and internationally?	○	○	○	○	○
With Farmers/cocoa producers?	○	○	○	○	○
With Cocoa buyers/users?	○	○	○	○	○

* 5 In your view, how was the impact of the Project in:

	Very high impact	High impact	Medium impact	Low impact	No impact/no change
Improving pesticide registration in your jurisdiction / country?	◯	◯	◯	◯	◯
Improving the predictability and transparency of pesticide registration in your jurisdiction / country?	◯	◯	◯	◯	◯
Developing and/or enhancing the active surveillance / monitoring of pesticide residues applicable to cocoa products in your country / jurisdiction?	◯	◯	◯	◯	◯
Developing / enhancing the capacity of laboratory analysis of pesticides in cocoa products (either within your organization or through contracts with private laboratories, collaboration with Academia, etc.)?	◯	◯	◯	◯	◯
Developing / improving dissemination of information about pesticide requirements / pesticide use for Cocoa producers?	◯	◯	◯	◯	◯

* 6 In your view, and subsequent to the implementation of the Project SPS Cocoa, how do you qualify the need for further investments in the same area (improving SPS measures associated with Cocoa production in your region / jurisdiction)?

- ◯ Very highly needed
- ◯ Highly needed
- ◯ Medium need for further investment
- ◯ Low need for further investment
- ◯ No need for further investment

Please explain / indicate the areas where you consider further investments and interventions to be needed.

DONE

Annex IIb

QUESTIONNAIRE FOR FOOD SAFETY AND / OR PESTICIDE REGISTRATION COMPETENT AUTHORITIES

intended for respondents without any knowledge of the "SPS Cocoa" project

Estimated Time to Complete: 1 minute

Introduction / Background

This short questionnaire is undertaken as part of the evaluation of the project entitled "SPS Capacity Building in Africa to Mitigate the Harmful Effects of Pesticide Residues in Cocoa and to Maintain Market Access", referred to hereafter as "SPS Cocoa", and supported by the Standards and Trade Development Facility (STDF).

SPS Cocoa was implemented between January 2011 and December 2013 in 5 African countries known to be major producers of cocoa.

SPS Cocoa aimed to enhance awareness and capacity related to best practices of pesticide use including enhanced oversight by competent authorities at the national and regional levels.

This questionnaire aims to collect data in support of the project evaluation, according to an evaluation framework assessing the relevance, effectiveness, efficiency, outreach, impact and sustainability factors. It also aims at identifying lessons learned for future capacity development investments under the STDF.

Answers provided will not be attributed and will be collated anonymously.

OK

* 1 Are pesticides used in cocoa products subject to registration?

- ◯ Yes
- ◯ No

* 2 Do you have / rely upon a positive list of pesticides that may be used in cocoa production?

- ◯ Yes
- ◯ No

* 3 Do you / your organization have active surveillance / monitoring programs for pesticide residues applicable to cocoa products?

- ◯ Yes
- ◯ No

* 4 Do you have a capacity of laboratory analysis of pesticides in cocoa products (either within your organization or through contracts with private laboratories, collaboration with Academia, etc.)?

- ◯ Yes
- ◯ No

* 5 How do you qualify the knowledge and competencies of your organization in the following areas?

	Very high	High	Medium	Low	Not existing
Assessment and Registration of acceptable pesticides used in cocoa production?	○	○	○	○	○
Conducting surveillance and monitoring of pesticides in cocoa?	○	○	○	○	○
Enforcing pesticide management requirements in cocoa production?	○	○	○	○	○

* 6 The Organization:

Brief Description of the Competent Authority and its Oversight:

Identification of the organization (Not compulsory):

Position of the Respondent (Not compulsory):

DONE

Annex IIIa

QUESTIONNAIRE FOR COCOA BUYERS (INCLUDES LARGE BUYERS, INDUSTRY ASSOCIATIONS, FOOD INDUSTRY) DOMESTICALLY AND GLOBALLY

intended for respondents with knowledge of the "SPS Cocoa" project

Estimated Time to Complete: 1 minute

Introduction / Background

This short questionnaire is undertaken as part of the evaluation of the project entitled "SPS Capacity Building in Africa to Mitigate the Harmful Effects of Pesticide Residues in Cocoa and to Maintain Market Access", referred to hereafter as "SPS Cocoa", and supported by the Standards and Trade Development Facility (STDF).

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Answers provided will not be attributed and will be collated anonymously.

OK

* 1 Please qualify how did you consider the Project "SPS Cocoa" to be needed and relevant in addressing challenges the cocoa sector is facing both in domestic production and to access international markets?

- ◯ Very highly needed
- ◯ Highly needed
- ◯ Not so much needed
- ◯ Not needed at all/not relevant

* 2 How can you describe the main impacts of SPS Cocoa on your supply chain for cocoa and cocoa products? Please check all that apply.

- ☐ More compliant with domestic and / or international requirements
- ☐ At the same level of compliance with domestic and / or international requirements
- ☐ Less compliant with domestic and / or international requirements

* 3 Do you have more confidence in your supply of cocoa / cocoa products as a result of SPS Cocoa?

- ◯ Yes
- ◯ No

* 4 As a result of the implementation of SPS Cocoa, did you witness less violation of your cocoa products / supply with pesticide requirements of international markets?

- ◯ Yes
- ◯ No

* 5 Where (in which country) did you identify noticeable improvement in pesticide management and / or compliance with international standards? Please check all that apply.

- ☐ Côte D'Ivoire
- ☐ Ghana
- ☐ Togo
- ☐ Nigeria
- ☐ Cameroon
- ☐ None

* 6 Are you confident in the way the pesticide supply chain is being managed in the targeted Cocoa producing countries?

- ◯ Yes
- ◯ No

* 7 In your opinion, was there an improvement in fighting fraud associated with the supply of pesticides in the targeted Cocoa-producing countries?

- ◯ Yes
- ◯ No

* 8 Was there an improvement in fighting fraud associated with the supply of pesticides in the targeted Cocoa-producing countries?

- ◯ Yes
- ◯ No

* 9 In your view, and subsequent to the implementation of the Project SPS Cocoa, how do you qualify the need for further investments in the same area (improving SPS measures associated with Cocoa production in your region / jurisdiction)?

- ◯ Very highly needed
- ◯ Highly needed
- ◯ Medium need for further investment Low need for further investment
- ◯ No need for further investment

DONE

Annex IIIb

QUESTIONNAIRE FOR COCOA BUYERS (INCLUDES LARGE BUYERS, INDUSTRY ASSOCIATIONS, FOOD INDUSTRY) DOMESTICALLY AND GLOBALLY

intended for respondents without any knowledge of the "SPS Cocoa" project

Estimated Time to Complete: 3 minutes

Introduction / Background

This short questionnaire is undertaken as part of the evaluation of the project entitled "SPS Capacity Building in Africa to Mitigate the Harmful Effects of Pesticide Residues in Cocoa and to Maintain Market Access", referred to hereafter as "SPS Cocoa", and supported by the Standards and Trade Development Facility (STDF).

SPS Cocoa was implemented between January 2011 and December 2013 in 5 African countries known to be major producers of cocoa.

SPS Cocoa aimed to enhance awareness and capacity related to best practices of pesticide use including enhanced oversight by competent authorities at the national and regional levels.

This questionnaire aims to collect data in support of the project evaluation, according to an evaluation framework assessing the relevance, effectiveness, efficiency, outreach, impact and sustainability factors. It also aims at identifying lessons learned for future capacity development investments under the STDF.

Answers provided will not be attributed and will be collated anonymously.

OK

* 1 What are your continued food safety concerns associated with cocoa production which may have impacts on market access? Please check all that apply.

- [ ] Pesticide management
- [ ] PAH levels
- [ ] Mycotoxin levels
- [ ] Other (please specify)

* 2 What are the regulatory and institutional concerns that are still relevant / impacting the cocoa production supply chain? Please check all that apply.

- [ ] Limited / absence of regulatory oversight on pesticides
- [ ] Enforcement of pesticide registration
- [ ] Limited oversight on agricultural practices, including requirements for pesticide application
- [ ] Other (please specify)

* 3 Indicate the various impediments / shortcomings you still encounter in the cocoa supply chain from the West-African region? Open answer.

* 4 The Organization:

Area of Business of the Company / Organization:

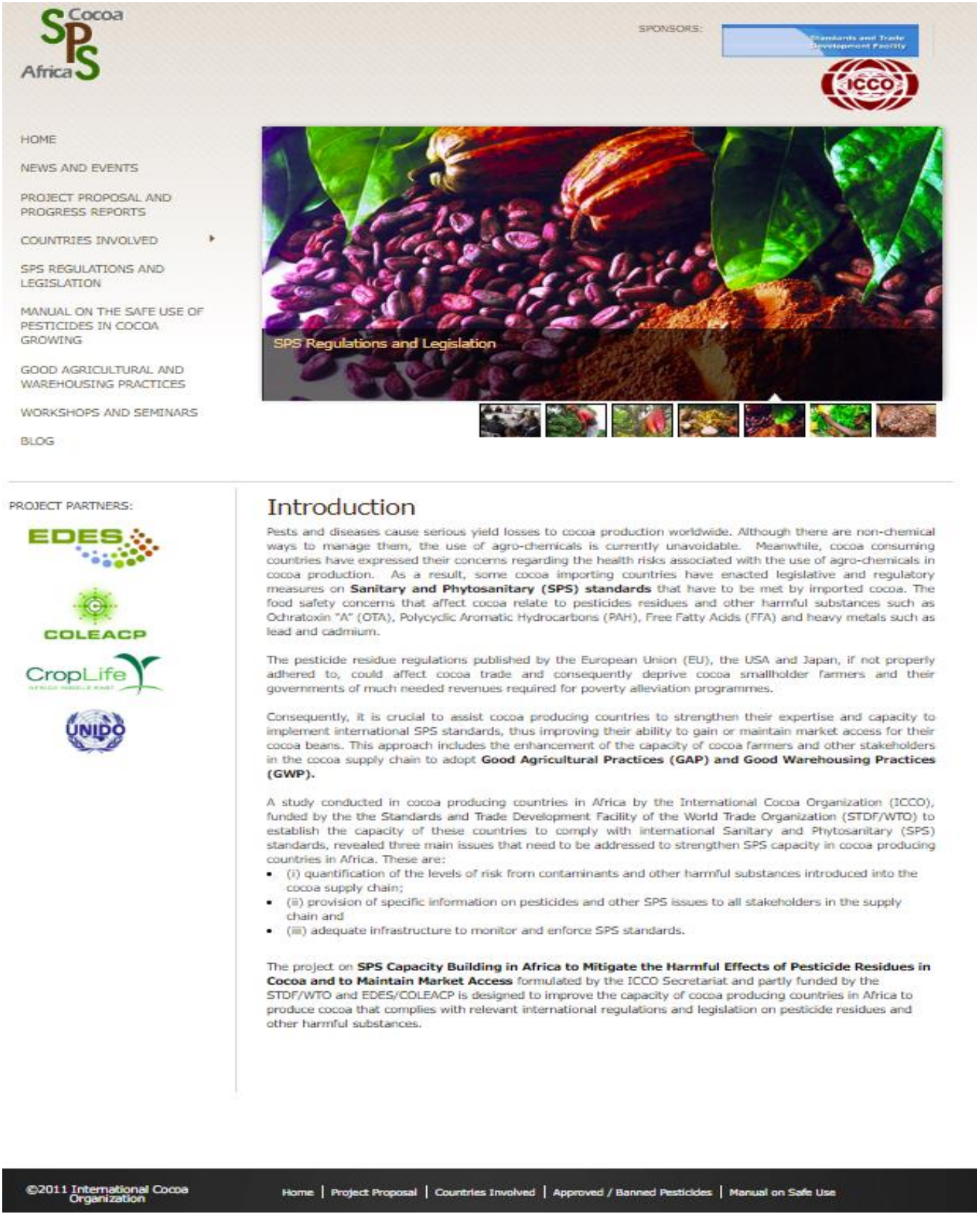
Identification of the organization (Not compulsory):

Position of the Respondent (Not compulsory):

DONE

Annex IV

https://www.icco.org/sites/sps/z



Annex V

Pesticide Regulation / Legislation

Cameroon, Côte d'Ivoire, Ghana, Nigeria, Togo

ECOWAS

Economic Community of West African States

Membership:

Benin, Burkina Faso, Cape Verde, **Côte d'Ivoire**, The Gambia, **Ghana**, Guinea, Guinea Bissau, Liberia, Mali, Niger, **Nigeria**, Senegal, Sierra leone, **Togo.**

Summary

At the regional level ECOWAS, CILSS (Comité permanent inter-État de lutte contre la sécheresse au Sahel), and UEMOA (Union Economique Monétaire Ouest Africaine) are working towards harmonization of national pesticides legislation/regulations with support from MIR (joint ECOWAS-UEMOA project) which is implemented by the IFDC, CropLife Africa/Middle East and the Sahelian Pesticides Committee. The regional pesticides registration process is 3-pronged: (1) Pre-registration stage; (2) Registration stage; and, (3) Post-registration stage. **Regulation C/REG.3/08/2008** was enacted at the 60th session of the ECOWAS Council of Ministers on harmonizing rules governing pesticides registration in the ECOWAS sub-region. The Regulation established the WACPA (West African Committee for Pesticides Approval) who implements the common regulations for the ECOWAS through each Member's CNGP (National Pesticide Management Committee). The CNGPs are responsible for pre and post-approval. There are 5 lists of pesticides:

- Approved pesticides or provisional authorization for sale (PVA);
- Severely regulated pesticides ;
- Pesticides under toxico-vigilance ;
- Prohibited pesticides;

- Registered pesticides maintained in each member state.

The Regulation is similar to CILSS's Common Regulation, i.e. it has a single registration office (common registration), pre-approval (experimentation) and post-approval (market, use, monitoring, analysis, disposal) are within the responsibility of each State. See CILSS/CSP further below.

Application of the Regulation is not without its challenges, typically associated to non-functioning CNGPs in some States. Presently 10 ECOWAS members have functional CNGPs: Benin, Burkina Faso, Cape Verde, Cote d'Ivoire, Gambia, Guinea Bissau, Mali, Niger, Senegal and Togo.

CEMAC/CPAC

Communauté économique et monétaire de l'Afrique centrale/Comité Inter-Etat des pesticides d'Afrique centrale

Membership:

Cameroon, Central African Republic, Chad, Equatorial Guinea, Gabon, Republic of the Congo

Summary:

CPAC is a specialized scientific body of CEMAC and is composed of a permanent secretariat, technical commissions and members (3 experts/representatives members of each State + experts/observers representing the CEMAC commission, the CPI/AU, FAO and WHO). Also, each member state is to establish a CNGP that implement CPAC decisions and conducts pre and post-registration activities in their State. The Rules of Procedures, adopted by the Council of Ministers of the Economic Union of Central Africa of CEMAC, N° 11/07-UEAC-144-CM-15 govern CPAC operations. CPAC activities include:

- Programme I: Common Pesticide Registration
- Programme II: Improving Agricultural Production
- Pogramme III: International Regulations and Conventions on Agricultural Inputs
- Programme IV: Monitoring Chemical Agriculture Inputs in Central Africa
- Programme V: Alternatives to the Use of Hazardous Pesticides
- Programme VI: Collaboration

Main constraints include challenges with the implementation of the common registrations procedures and the identification of organizations to conduct trials and second assessments.

CILSS/CSP:

Comité permanent inter-État de lutte contre la sécheresse au Sahel / Comité Sahélien des pesticides

Membership:

Burkina Faso, Cape Verde, Gambia, Guinea-Bissau, Mali, Mauritania, Niger, Senegal, Chad

*Note that in 2011 the following 4 nations joined the CILSS: Benin, Guinea (Conakry), **Côte d'Ivoire, Togo**

Summary:

The Common Regulation for the Registration of Pesticides was adopted by the Council of Ministers of the CILSS in 1992 at their 27th ordinary session (Resolution No. 7/27/CM/92). This resolution was operationalized in 1994 through the creation and operationalization of the CSP. With the support of FAO, the resolution was revised in 1999 (Resolution 8/34/CM/99) by the 34th session of the CILSS Ministerial Committee.

The Common Regulation provides for the creation of a body, the CSP, as the pesticide registration authority. The CSP is the committee responsible for the registration of pesticides on behalf of CILSS member states and holds the registry of approved/authorized pesticides in the original 9 States (Burkina Faso, Cape Verde, Gambia, Guinea-Bissau, Mali, Mauritania, Niger, Senegal, Chad). In 2011, 4 members joined (Benin, Guinea Conakry, **Côte d'Ivoire, Togo**) but have not yet ratified the Common Regulation of the CILSS due to the coming into force of the ECOWAS Regulation C/Reg.3/05/2008 of which they are signatories. The scope of the Common Regulation includes the authorization, release to market, use and control of active ingredients, including formulated products of pesticides classification, labelling, and packaging of pesticide formulations in member states. Management of pesticides is joint effort between both regional and national levels. However, the activities or pre-registration (experimentation) and post-registration (marketing, import/export, use, monitoring, information and destruction of obsolete products) are carried out by national research and extension structures. The role of the regional level is to assess the registration applications for approval. At minimum once a year, the CSP publishes a list of registered pesticides. The publication includes a global list of pesticides including all categories of crop protection products; lists of: insecticides, acaricides, herbicides, fungicides, nematicides, bactericides, rodenticides (*Note that lists also contain biopesticides).

Main challenges facing the Common Regulation include:

- Virtually no control of pesticides circulating in member states
- Low promotion of organic products
- Virtually total absence of enforcement

- Non-functionality of CNGPs in certain countries
- Low risk assessments of pesticide use towards human health and the environment
- Multiple working languages (French, English, Arabic, Portuguese)
- Insufficient technical expertise in certain areas

CSP will be replaced by a new institution encompassing all the countries of West Africa in the (near) future.