



STANDARDS *and* TRADE
DEVELOPMENT FACILITY



PROJECT: STDF/PG/606

**MAINSTREAMING SPS CAPACITY BUILDING INTO THE
COMPREHENSIVE AFRICA AGRICULTURE DEVELOPMENT
PROGRAMME (CAADP) AND OTHER NATIONAL POLICY
FRAMEWORKS**

FINAL REPORT

JUNE 2022

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PROJECT INFORMATION

Beneficiary

Uganda, Kenya, Rwanda, Malawi, Ethiopia

Project number and title

STDF/PG/606: Mainstreaming SPS Capacity Building into the Comprehensive Africa Agriculture Development Programme (CAADP) and Other National Policy Frameworks

Budget

Total donor contribution (STDF and EIF) to project: US\$428,425

Approved STDF contribution: US\$221,025

Approved EIF contribution: US\$207,400

Period of implementation

July 2018 – 15 January 2022

Implementing Agency

Common Market for Eastern and Southern Africa (COMESA)

Partners

Enhanced Integrated Framework (EIF)

European Union through the COMESA 11th EDF Trade Facilitation Programme

Alliance for a Green Revolution in Africa (AGRA)

LIST OF ABBREVIATIONS

AGRA	Alliance for a Green Revolution in Africa
CAADP	Comprehensive African Agriculture Development Programme
EIF	Enhanced Integrated Framework
EU	European Union
IAD	Industry and Agriculture Division of COMESA Secretariat
P-IMA	Prioritising SPS Investments for Market Access
SPS	Sanitary and Phytosanitary
STDF	Standards and Trade Development Facility
TBT	Technical Barriers to Trade
WTO	World Trade Organization

1 EXECUTIVE SUMMARY

COMESA has implemented an evidence-based decision-support framework known as “Prioritization of Sanitary and Phyto Sanitary (SPS) Investments for Market Access (P-IMA)”, with support from the Standards and Trade Development Facility (STDF), housed at the WTO, and the Enhanced Integrated Framework (EIF). This Initiative supported COMESA countries to identify and prioritise key SPS issues associated with the major export trade flows in five countries namely, Uganda, Malawi, Ethiopia, Kenya, and Rwanda. The aim was to mainstream SPS priorities in national agriculture investment plans and mobilize additional resources for SPS capacity development.

The COMESA P-IMA initiative has also received financial support from the EU under the COMESA 11th EDF Trade Facilitation Programme. The two programmes are building synergies specifically on SPS capacity building in risk-based approaches on food safety management in priority value chains. The prioritization results of the SPS investments under P-IMA are also progressively informing other COMESA on-going work on Trade Facilitation including, technical regulations and harmonization of regulatory limits for agriculture commodities of regional trade importance, adoption of good practices in food import control and strengthening of laboratory testing requirements, among others. In addition, the COMESA P-IMA initiative has received technical support from the Alliance for a Green Revolution in Africa (AGRA) on the application of the P-IMA Framework.

The COMESA P-IMA Initiative was successfully launched in 2018 as a three-year project (2018-2021). However, the project implementation experienced delays due to the COVID 19 Pandemic which necessitated 6 months No Cost Extension (NCE) up to 15 January 2022 and an additional three months for Project Closure to 15 April 2022.

The P-IMA findings allowed to identify more than 60 SPS investments options across diverse value chains to boost trade in the five (5) pilot countries.

The project delivered five country reports that prioritized SPS investments using P-IMA's evidence-based framework on the basis of available data and information, with the active engagement of relevant public and private sector stakeholders:

- i. [In Uganda](#), approx., **US\$74.9 million** is required to address the 33 SPS investment options identified by the P-IMA framework in order to generate **US\$1.4 billion** worth of agriculture exports annually.
- ii. [In Rwanda](#), approx., **US\$9 million** is required to implement the 14 priority SPS investments options identified by the P-IMA framework which would generate potentially **US\$255.5 million** worth of agriculture exports annually.
- iii. [In Kenya](#), approx., **US\$37.7 million** is required to implement the 16 SPS investment options prioritized using the P-IMA framework, which would potentially generate around **US\$2.3 billion** worth of agriculture exports annually.
- iv. [In Malawi](#), approx., **US\$15.1 million** is required to implement the 19 SPS investment options prioritized using the P-IMA framework, which would potentially generate around **USD85.8 million** worth of agriculture exports annually.
- v. [In Ethiopia](#), approx., **US\$30 million** is required to implement the 19 SPS investment options prioritized using the P-IMA framework, which would potentially generate around **US\$1.9 billion** worth of agriculture exports annually.

At the regional level, the prioritization results under P-IMA are also progressively informing other ongoing COMESA Trade Facilitation initiatives including technical regulations and harmonization of regulatory limits for agriculture commodities of regional trade importance, adoption of good practices in food import control and strengthening of laboratory testing requirements, among others.

At national level,

- i. In Uganda, The P-IMA findings led to the review of their national SPS frameworks and are informing on their new SPS programming in terms of harmonisation of policies and strategies.
- ii. The private sector in Kenya has forged strategic partnerships in working closely with the government entities on issues relating to SPS measures.
- iii. The P-IMA findings in Rwanda are providing technical inputs in the drafting of the Food Safety Law and regulations for governing the food industry and agri-food exports

- iv. In Malawi, the P-IMA findings are providing technical inputs in the drafting of the national SPS strategy and the Food Safety Law and regulations for governing the food industry and agri-food exports.
- v. In Ethiopia, The P-IMA findings have led to a more enhanced collaboration with other key stakeholders such as the Food and Agriculture Organisation (FAO) and the Trademark Africa (TMA) in terms of rolling out new initiatives for addressing SPS Measures

Other achievements include:

- i. Increased awareness on SPS investments needed to facilitate trade to regional and international markets, based on successful high-level dialogues between the private sector (including women-led SMEs) and government entities/regulatory authorities on SPS issues faced by the private sector. With the project, the private sector has received clear guidance as to how they can be assisted to overcome their SPS related trade obstacles.
- ii. Through P-IMA, stakeholders especially MSMEs (women inclusive) have been assisted in understanding the global SPS/TBT regulations that are applied to international trade. Emphasis was equally made on the key requirements on regional standards, certification including private standards and the overall quality management system for the high-end/lucrative markets.
- iii. The P-IMA process has also served as a great instrument for awareness creation among senior public officers on the cost and threats of food safety to the public and the general economy in each country. It is on this basis that many member states had advocated for the upscaling of the process into other member states.
- iv. The P-IMA analysis was used as far as possible within the project timeframe to inform programming and mobilize funds for SPS capacity building. This included informing development of the COMESA EDF 11, as well as interventions to improve food safety in key value chains under an EU-funded COMESA Trade Facilitation Programme. COMESA Agriculture Ministers have identified an opportunity to use the analysis to leverage more resources to address SPS challenges, including as part of agricultural, environment and trade investment plans at national and regional level.
- v. The P-IMA process also saw the uptake of SPS interventions by strategic partner institutions such as the TradeMark Africa, Land O' Lakes and the Food and Agriculture Organization.

This project was impacted negatively by the global Covid-19 pandemic, which occurred at a time when the project was building on the initial in-person country work in Uganda and Kenya to plan P-IMA workshops and analysis in Rwanda, Malawi, and Ethiopia. While the project partners took steps to mitigate the risk of Covid-19 as far as possible, the pandemic caused delays. In-person country work, training and stakeholder workshops could not take place. The P-IMA expert and COMESA staff were unable to travel to the project countries in 2020 and 2021. Stakeholders in the five countries were seriously affected by the pandemic (including the obligation to work from home, reduced working hours, increased care responsibilities, etc.). This limited their ability to engage on the project. COMESA and the project partners took steps to mitigate the impacts of the pandemic as far as possible. The P-IMA training was moved to an online mode. Stakeholder meetings were held online. While much was achieved, the pace of implementation and results were nevertheless impacted. Delays occurred, connectivity was often difficult for some stakeholders during online meetings, activities took longer to deliver.

Although the P-IMA process was successfully implemented, more time and support will be needed to ensure that the analysis (country reports and prioritizations) are fully utilized to inform SPS decision-making by national authorities and development partners including to mainstream the

investment options into national investment frameworks and mobilize resources to implement the key investment options prioritized.

In Uganda, building on the project activities on P-IMA, a Prime Ministerial Committee is using the P-IMA evidence-based approach to inform resource allocations under an UK loan/grant, providing evidence of how the project has contributed to changes in decision-making processes and use of P-IMA's evidence-based approaches beyond the end of the project. In countries (e.g., Malawi, Ethiopia) where the in-country P-IMA work started late due to the pandemic (and was completed not long prior to the end of the project), more time will be needed to leverage these kinds of opportunities.

Based on the above, the following follow up actions are proposed:

- i. Future P-IMA Project to embed a follow-up or monitoring mechanism for implementing the outcomes of the P-IMA framework
- ii. There is also need to upscale P-IMA into other COMESA Member States to ensure that SPS trade related barriers to the COMESA intra-regional trade are reduced.
- iii. To implement SPS Capacity Building Options that were identified through the P-IMA process in the five countries under the pilot (Ethiopia, Kenya, Uganda, Malawi, and Rwanda).

2 BACKGROUND

Like many other developing countries, COMESA countries face considerable demands to strengthen their sanitary and phytosanitary (SPS) capacity to boost exports of food and agricultural products, yet resources are limited. COMESA countries also as members of the World Trade Organization (WTO) are bound by international and regional trade protocols, which include commitments on protecting human health, animal, and plant health. Implementation of the WTO agreement on the Application of Sanitary and Phyto Sanitary (SPS) measures is even more important to access developed countries' high value markets. The subject of SPS is a crucial dimension of agriculture trade and Industrial policy given the fact that, there are high levels of non-compliance to SPS requirements especially amongst Small and Medium Scale Enterprises (SMEs).

SPS capacity varies across countries, occasionally translating into trade related barriers. Countries with strong SPS systems are usually reluctant to trade with countries that have weak SPS systems even when they belong to the same regional trade grouping. Within the COMESA Region for example, it is estimated that 70 percent of the reported Non-Tariff Measures are constituted of Technical Barriers to Trade (TBTs) and SPS measures. COMESA Secretariat further notes that, low SPS compliance capacity of value chain actors constrains intra-regional trade, undermines industry competitiveness and market access for food and agricultural products. National resources are often deployed without any apparent use of evidence-based approaches to ensure they are targeted to areas where they are likely to have the greatest impact. Lack of compliance to SPS requirements has led to numerous rejections from COMESA's destination markets particularly the EU and US due to presence of pests and other hazards.

Considering the limited resources to address the numerous SPS challenges and resulting need to prioritise SPS challenges to address first, COMESA Secretariat in partnership with the Standards and Trade Development Facility (STDF) and the Enhanced Integrated Framework (EIF) introduced an evidence- based approach, known as "Prioritizing SPS Investments for Market Access" (P-IMA). Overall, the initiative aimed at ensuring that COMESA Member States (specifically Ethiopia, Kenya, Malawi, Rwanda, Uganda) would effectively use an evidence-based approach (P-IMA Tool) to prioritize and address SPS investment needs and boost agriculture exports. The P-IMA initiative also built synergies with the COMESA European Union's (EU) Trade Facilitation Programme, specifically on SPS capacity building in risk-based food safety management in priority value chains. Under these two programmes, prioritization of SPS capacity building options was essential in sustaining increased market access.

3 PROJECT IMPLEMENTATION AND MANAGEMENT

The project was managed by a small and dedicated Project Management Unit, located within the SPS/TBT Unit in the COMESA Secretariat, under the responsibility of the COMESA SPS/TBT Coordinator, Dr. Mukayi Musarurwa. This Project Management Unit was responsible for oversight and management of the project on a day-to-day basis, under the strategic guidance of the Director for the COMESA Industry and Agriculture Division, Ms. Providence Mavubi.

COMESA contracted external expertise to lead the P-IMA training and provide support to national stakeholders to apply the P-IMA Framework and draft the country reports. Mr Daniel Njiwa carried out this role for a short time at the start of the project. Following his departure to a new role at AGRA, Mr Isaac Gokah was recruited in August 2019 as the P-IMA expert/consultant for the project activities. When Mr Gokah accepted a full-time role at AGRA in March, 2021, it was necessary to find another option to support project implementation. Following discussions with AGRA, an arrangement was agreed whereby Mr Gokah could continue to provide some limited technical support to the project as P-IMA Expert. At the same time, Ms Talumba Chilipaine took on increased responsibilities.

The Project Management Unit was staffed by a project Officer, Ms. Talumba Chilipaine and the Finance Officer, Mr. Nigel Kondolo. Senior staff of COMESA and AGRA also supported the project management unit to ensure that the project met its expected outputs, among the senior staff, the COMESA Director for Finance, Ms. Auleria Olunga, the COMESA SPS expert, Mr. Dingiswayo Shawa and the AGRA Head for Regional Food Trade, Mr. Daniel Njiwa. The contact details for key persons that were involved in the project implementation is attached as Annex 2 of this report.

4 ACHIEVEMENT OF PROJECT RESULTS

4.1 Project objective

The COMESA P-IMA Project aimed to boost agriculture exports in the targeted countries, through identifying the Sanitary and Phytosanitary (SPS) challenges associated with the major export trade flows. Specifically, the project ensured that five COMESA Member States used an evidence-based approach (P-IMA) to prioritize SPS investment needs within national agriculture investment plans, which has helped to promote public-private dialogue and raise high-level awareness on the importance of SPS investments. It is also helping to mobilize additional resources for SPS capacity development.

At regional level, the prioritization results under P-IMA are also progressively informing other ongoing COMESA Trade Facilitation initiatives including technical regulations and harmonization of regulatory limits for agriculture commodities of regional trade importance, adoption of good practices in food import control and strengthening of laboratory testing requirements, among others.

At national level:

- i. In Uganda, The P-IMA findings led to the review of their national SPS frameworks and are informing on their new SPS programming in terms of harmonisation of policies and strategies.
- ii. In Ethiopia, The P-IMA findings have led to a more enhanced collaboration with other key stakeholders such as the Food and Agriculture Organisation (FAO) and the Trademark Africa (TMA) in terms of rolling out new initiatives for addressing SPS Measures.
- iii. The private sector in Kenya has forged strategic partnerships in working closely with the government entities on issues relating to SPS measures.
- iv. The P-IMA findings in Rwanda are providing technical inputs in the drafting of the Food Safety Law and regulations for governing the food industry and agri-food exports.

- v. In Malawi, the P-IMA findings are providing technical inputs in the drafting of the national SPS strategy and Food Safety Law and regulations for governing the food industry and agri-food exports.

The project enabled national stakeholders (public and private sector) in the five countries to discuss and prioritize SPS investment options, based on available information and data. Stakeholder workshops were organized to enable stakeholders to contribute to the process, and to validate the resulting analysis and findings. The detailed country reports and policy briefs targeted at high-level decision-makers are available on the STDF website: <https://www.standardsfacility.org/PG-606>

More than 60 SPS investments options were identified across diverse value chains to boost trade in the five pilot countries. Approximately, USD165 million is required to address these SPS investment Options to generate trade worthy of USD 6 billion agriculture exports, annually.

- vi. In **Uganda**, approx., **US\$74.9 million** is required to address the 33 SPS investment options identified by the P-IMA framework in order to generate **US\$1.4 billion** worthy of agriculture exports annually.
- vii. In **Rwanda**, approx., **US\$9 million** is required to implement the 14 priority SPS investments options identified by the P-IMA framework which would generate potentially **US\$255.5 million** worth of agriculture exports annually.
- viii. In **Kenya**, approx., **US\$37.7 million** is required to implement the 16 SPS investment options prioritized using the P-IMA framework, which would potentially generate around **US\$2.3 billion** worth of agriculture exports annually.
- ix. In **Malawi** approx., **US\$ 15.1 million** is required to implement the 19 SPS investment options prioritized using the P-IMA framework, which would potentially generate around **USD85.8 million** worth of agriculture exports annually.
- x. In **Ethiopia**, approx., **US\$30 million** is required to implement the 19 SPS investment options prioritized using the P-IMA framework, which would potentially generate around **USD1.9 billion** worth of agriculture exports annually.

The work carried out through the project – as well as the country reports – remain highly relevant. While SPS investments were prioritized based on evidence, resources to address the prioritized investments remain inadequate. While the project has ended, the COMESA Secretariat is working with Member States and other partners to build on and make use of the analysis, in an effort to secure funds for the prioritized investments.

Given the challenges caused by the COVID 19 pandemic, strengthening SPS capacity to boost trade in food and agriculture products is even more important. Within the COMESA Region for example, it is estimated that TBT/SPS measures account for as much as 70 percent of the reported Non-Tariff Barriers to trade. Weaknesses in SPS capacity therefore constrain intra-regional trade, undermine industry competitiveness, trade facilitation and market access for food and agricultural products.

The identified value chains and sectors under P—IMA remain priorities for governments in beneficiary countries as outlined in their national strategic documents and frameworks that are advocating for an export led growth.

4.1.1 Output 1: Regional expertise and skills to apply the P-IMA framework to prioritize SPS investments in five COMESA member states

COMESA conducted a four-day training on the P-IMA Framework for National Experts in each of the five COMESA countries under the Pilot. The training workshops targeted selected country facilitators both from the public and private sector. The training sessions achieved the following:

- Introduced the P-IMA framework as an alternative, evidence-based approach to inform SPS decision-making
- Identified SPS issues that posed market access challenges, identified capacity building options that can address the SPS issues

- Discussed and agreed on decision criteria and weights in order to be able to rank the capacity building options using a Multi Criteria Decision Analysis (MCDA) tool, powered by D-Sight Software.
- Provided initial training on D-sight software
- Developed a roadmap to finalize the P-IMA work for the country process

The training session was guided by the P-IMA User Guide. Based on these skills, participants were able to identify specific SPS issues and propose SPS Investments Options and agreed on decision criteria and weights in all the targeted value chains. These value chains are considered of great export potential assuming identified SPS challenges are addressed.

By the end of the project, a total of 100 persons (60 men and 40 women) in the five countries had been trained on use of the P-IMA framework, including use of the D-Sight software. Some of these persons were actively involved alongside the COMESA P-IMA expert/consultant in writing the country reports.

4.1.2 Output 2: SPS investments for market access are prioritized by public and private sector stakeholders in 5 COMESA Member States

Five country reports identifying SPS investment needs were successfully produced for each country (see above). The reports are available at: <https://www.standardsfacility.org/PG-606>

4.1.3 Output 3: Increased awareness, advocacy and knowledge management on use of P-IMA to prioritize SPS investments and integrate SPS investments into national investment frameworks in COMESA Member States, as well as in other Regional Economic Communities in Africa.

The project helped to raise awareness on how evidence-based approaches can be used to improve SPS (and other) decision-making processes. P-IMA workshops enabled dialogue and discussions among government authorities, the private sector, civil society, and other stakeholders on SPS investment needs. In some cases, these discussions helped to clarify understanding about the roles and responsibilities for SPS capacity needs, address real SPS challenges facing trade, etc.

These discussions were reported in the local media in the five countries, for instance: :
<https://www.businessdailyafrica.com/news/Why-differing-standards-threaten-Africa-s-free-trade-push/539546-5198022-15m1qpnz/index.html>
<https://www.newtimes.co.rw/news/push-invest-agri-food-standards-attract-regional-attention>

Project partners took part in webinars organized by the STDF, EIF, TMEA, AGRA and others helping to further disseminate the findings, experiences and lessons learned from the project to a broader audience. For instance, staff of the COMESA Secretariat shared the project results, experiences and lessons at high-level meetings of COMESA and other regional bodies. This included the 5th COMESA Ministers of Agriculture and natural resource environment meetings that took place in August 2020.

In addition to the five P-IMA country reports (see above), country policy briefs were developed to summarize the key findings and results for high-level policy and decision-makers. These policy briefs were disseminated via the STDF website and through the COMESA statutory meetings of the Ministers of Agriculture on use of P-IMA tool, lessons drawn from the P-IMA process in the five countries were successfully captured through policy briefs and SPS Investments profiling reports and financing gap analysis reports.

The outputs have been used in different ways to contribute to higher-level results:

- In the case of Malawi, the government has endorsed the P-IMA outcome report to inform the formulation of the national SPS strategy
- In Uganda, following the self-imposed ban that the country instituted due to repeated export rejections and interceptions, the P-IMA outcome report is being used to address key issues on Maximum Residue Limits challenges in its agri-food exports.
- In Ethiopia, the prioritised SPS investments are informing the next key investments options for all the four prioritised sectors (Coffee, Sesame, Honey and Livestock)
- In Rwanda, the P-IMA outcomes are at the centre of discussions for the review of its national export strategy. Also, through its national SPS committee, there is a strong advocacy to integrate SPS issues into its national frameworks and strategies.

In summary, the use of the P-IMA framework show that the immediate outputs produced, including the prioritization itself as well as the information sheets, are relevant in the following ways:

- Providing compelling evidence to support SPS project development.
- Enabling more coherent funding requests to be compiled. The prioritization provides a concrete basis for requests for funding from bilateral and multilateral donors.
- Guiding the development of an action plan for the enhancement of SPS capacity, based on potential investments
- Improving SPS planning and decision-making processes and informing discussions among relevant stakeholders

Through the roundtable discussions, stakeholders including development partners have expressed commitment to their support in addressing the P-IMA outcomes.

5 CROSS-CUTTING ISSUES

5.1 Gender

- Through P-IMA, stakeholders especially over 100 MSMEs (including MSMEs owned by women) have been assisted in understanding global SPS/TBT regulations. Emphasis was equally made on regional standards requirements, private sector certification and the overall quality management system for high-end/lucrative markets.
- The P-IMA process has also increased the awareness on SPS investments and has entailed successful high-level dialogues between the private sector (women-led SMEs) and government entities/regulatory authorities on SPS issues as they relate to the business sector. Through P-IMA, the private sector has received clear guidance as to how they can be assisted to overcome their SPS related trade obstacles. For example, technologies like mobile slaughter units that help to overcome animal disease contamination was made known to meat exporters and received a quick uptake in some countries like Rwanda.

5.2 Environmental aspects

The P-IMA project formulation took into consideration the likely environmental impacts of SPS Investments. The P-IMA Framework also often considers environmental issues as a decision criterion within the P-IMA analysis.

Through the P-IMA analysis, issues of environmental sustainability emerged in line with Biosecurity and Biosafety. For example, P-IMA Uganda identified an SPS Investment Option on "*Technical capacity building in biosecurity, biosafety and technology for beef, poultry and bee products.*" This was based on the fact that access to lucrative markets continues to be a major challenge for majority of smallholder livestock farmers partly due to lack of disease status assurance in terms of biosecurity and biosafety measures. Therefore, ensuring and maintaining biosafety and biosecurity along the value chain is key in increasing confidence of exporters/importers of Ugandan livestock and livestock products.

This proposed SPS Investment Option on Biosecurity and Biosafety aims to build the technical capacity of regulators to ensure that livestock products are produced, handled and processed under safe environment, so as to enhance compliance and access better markets.

- **Sustainability:** Despite the fact that this was a relatively small-budget project covering five countries, the outcomes of the project drew interest from other stakeholders such as the EU under the COMESA Trade Facilitation Programme, the Alliance for a Green Revolution in Africa (AGRA), the Land O' Lakes and the TradeMark Africa (TMA). All these institutions are making use of the P-IMA findings to provide technical advice and support to the governments on SPS measures and market access. In addition, within the COMESA Secretariat, the EU under the 11th EDF and through the Regional Enterprise Competitiveness and Access to Markets Programme (RECAMP) made use of the P-IMA outcomes to design a continental market access and competitive programme.
- Through the Financing Gap Analysis, the P-IMA Process reviewed SPS related investment frameworks in the five COMESA countries against the top priorities emerging from the P-IMA analysis to quantify/ Identify financing gaps and strengthen the process of mainstreaming the P-IMA outcomes into national investment frameworks. In turn, the financing gaps analysis is assisting in engaging various stakeholders such as senior government officials (Finance, Economic planning, Agriculture, Trade, Environment/Climate Change), key development partners/donors, policy think tanks and the private sector on how to integrate SPS priorities into national policy and investment frameworks.
- At institutional level, the P-IMA process has built the expertise on market access and the overall SPS programming for both COMESA Secretariat and the five (5) pilot countries. The use of the D-Sight software in the prioritisation of the results has also strengthened the COMESA expertise in the similar analyses. At national level, as part of the COMESA P-IMA Project, a minimum of five (5) persons were trained per country as P-IMA national experts to assist in the subsequent revision/application of the Framework whenever new data or investment options would arise.
- Through the round table discussions, stakeholders including development partners have expressed commitment to their support both financial and technical in addressing the P-IMA outcomes from the five pilot countries. For example, Land O' Lakes is also supporting countries on their SPS programmes building on P-IMA. TMA pledged its support to Malawi and Ethiopia to address some of the SPS investment gaps identified through the P-IMA process.

In summary, the project has successfully piloted a new approach to inform SPS decision-making in selected COMESA countries. Some of these countries are considering using the P-IMA framework to inform decision-making in other areas such as the Technical Barriers to Trade (TBTs).

6 FINANCIAL OVERVIEW

This project was co-financed by the STDF and the EIF, with a total donor contribution of US\$482,425. Given the co-financing arrangements, there were two separate grant agreements:

- COMESA Secretariat signed a Grant agreement with the World Trade Organization (WTO) on 4 July 2018 for an STDF contribution of US\$221,025
- COMESA Secretariat signed a grant agreement with the United Nations Office for Projects Services (UNOPS) – EIF Trust Fund Manager – on 4 July for an EIF contribution of US\$207,400.

COMESA's own contribution to the project in terms of cash and in-kind contribution amounted to US\$74,400 (see below). This was through provision of office space, internet connectivity, time input by the COMESA SPS Expert, the TBT expert and the Director for Budget and Finance.

The actual implementation of the project started in 2018 and the first disbursement was received on 13 July 2018 and 20 July 2018 from UNOPS and WTO respectively.

Given the impact of the Covid-19, there was a need to review the budget in the original project document. Changes in the delivery of some activities (move from on-site to online mode) reduced expenditures for travel and in-country workshops, however required more staff resources and time for project management. By the end of the project, COMESA had spent all the resources allocated to the project by the EIF and the STDF. The Project also benefitted from the EU 11th EDF funding under the COMESA Trade Facilitation Programme amounting to Euro 250,000.

Project expected expenditure amounted to US\$428,425 and actual expenditure amounted to US\$428,425. Attached is excel detailed report.

COMESA Own Contribution Computation for the reporting period (1 July 2018 - 31 December 2021)		
		Spent-Contribution from
		COMESA
		US\$
		72,400.00
71200	COMESA Own contribution	
	Project Coordination	72,400.00
	Secretary General (10% time)	7,240.00
	ASG-Programmes (10% time)	7,240.00
	ASG-Admin & Finance (10% time)	7,240.00
	Director of finance (15% time)	10,860.00
	Director Agriculture and Industry (15% time)	10,860.00
	Senior SPS Coordinator (5% time)	3,620.00
	SPS Expert (5% time)	3,620.00
	Finance Officer (5% time)	3,620.00
	Admin for Agriculture and Industry Division (20% time)	14,480.00
	Admin/Conferences/Procurement (5% time)	3,620.00
	Project Office , furniture, IT equipment, communication,connectivity	1,600.00
	COMESA own contribution under Project Coordination	74,000.00

7 LESSONS LEARNED

The following lessons have been drawn from the application of the P-IMA process in the five pilot countries:

- Even though these COMESA Member States have preferential access to most markets for their products, various SPS compliance issues continue to undermine their market access.
- The P-IMA process so far has been a great Public-Private Dialogue instrument for the discussion of market access-related SPS issues/measures and sharing of information and experiences across all the five countries.
- The P-IMA process has also served as a great instrument for awareness creation among senior public officers on the cost and threats of food safety to the public and the general economy in each country. It is on this basis that many member states had advocated for the upscaling of the process into other member states.

- While export rejections are obvious through available data, the greatest impact may be in “unrealised exports” or “prevented trade.” Most exporters involved in the P-IMA process indicated that they do not have the capability to comply with these SPS requirements and therefore are not able to export. Thus, the biggest challenge for these countries, particularly the small ones like Malawi and Rwanda, is not the actual interceptions or rejections due to non-compliance to SPS requirements, but rather, the inability to export due to non-compliance to these requirements.
- It is also clear from the trade flow analysis so far that there is a high untapped export potential in the affected value chains. That is given domestic supply capacity, there is a huge gap between what most of these countries export and what the demand is for their products in the international market.

8 RECOMMENDATIONS AND FOLLOW-UP ACTIONS

Although the P-IMA process has been successfully implemented, there exist gaps in ensuring the outputs are fully implemented including mainstreaming of the investment options into national investment frameworks and/or mobilizing resources to implement the options. For example, at the Continental SPS Committee Meeting that took place in October 2020, the African Union Commission expressed interest to use the P-IMA framework at the continental level to support the implementation of the Malabo Business Plan based on the P-IMA outcomes.

Furthermore, the 7th Joint Ministerial Committee Meeting on Agriculture, Environment and Natural Resources held on 8 August 2021 decided that Member States “*Institutionalize evidence-based approaches such as P-IMA to facilitate dialogue and consensus in order to prioritize and inform appropriate investments in SPS capacity in value chains that are of comparative advantage to Member States*”. Member states were equally urged to build-in M&E systems in their national P-IMA frameworks to ensure continuous updating and sustainability of the programme. The decision was made considering the added value that the tool provided to Member States in prioritising SPS Investments.

Based on the above, the following follow up actions are proposed:

- i. Future P-IMA Project to embed a follow-up or monitoring mechanism for implementing the outcomes of the P-IMA framework.
- ii. There is also need to upscaling of P-IMA into other COMESA Member States to ensure that SPS trade related barriers to the COMESA intra-regional trade are reduced.
- iii. To implement SPS Capacity Building Options that were identified through the P-IMA process in the five countries under the pilot (Ethiopia, Kenya, Uganda, Malawi, and Rwanda).

9 ANNEXES

Annex 1: Logical Framework

Objectives	Performance Indicators	Means of Verification	Assumptions / Risks
Goal: Increased trade in agri-food products from COMESA Member States	Trade volumes (mt or \$) of respective target crops/commodities increased by 2% by 2020	Trade statistics	
Purpose: COMESA member states are effectively using an evidence-based approach (P-IMA) to prioritize SPS investment needs, mainstream SPS investments within national/regional agricultural and trade investment plans, and mobilize additional resources for SPS capacity development	<ul style="list-style-type: none"> SPS priorities / investments are integrated into national and regional agricultural and trade development plans for 5 MS 5 project proposals / concept notes for key SPS investments developed Investments (government, private sector, donor) (\$) for SPS capacity development Increased by 2% by 2021 	National / regional agriculture and trade development plans Business plans of key private sector actors	Decision-makers are sensitized to the potential benefits of P-IMA and agree to integrate the priorities identified into national planning and resource allocation processes
Results 1 5 persons trained as P-IMA experts / facilitators in the selected COMESA Member States by 2021	<ul style="list-style-type: none"> 5 P-IMA facilitators have knowledge and skills to lead and facilitate use of the P-IMA framework in each of the selected COMESA member states User friendly P-IMA materials developed 	<ul style="list-style-type: none"> P-IMA Training Reports for Uganda, Kenya, Rwanda, Malawi and Ethiopia High level inception Meeting Reports for Uganda, Kenya, Rwanda, Malawi and Ethiopia 	<ul style="list-style-type: none"> Adaption of COMESA Member states on the use of the P-IMA Framework Retention of the trained P-IMA Facilitators and sector champions at national level
Result 2 Five COMESA Member States to benefit from this project selected by 2021	<ul style="list-style-type: none"> Number of Member States benefiting from the application of the P-IMA Framework in the COMESA Region by 2022 	<ul style="list-style-type: none"> National Stakeholder Workshop reports for Uganda, Kenya, Rwanda, Malawi and Ethiopia Validation Workshop Reports for Uganda, Kenya, Rwanda, Malawi and Ethiopia 	<ul style="list-style-type: none"> Funding availability for continuity Support from the Member States in the institutionalization of P-IMA
Result 3 Increased awareness and knowledge management on use and benefits of P-IMA in five COMESA Member States (Uganda, Kenya, Rwanda, Malawi and Ethiopia) by 2021	Knowledge management in Market access and SPS in 5 COMESA member states enhanced by 2022		<ul style="list-style-type: none"> Support by the Member States in the implementation of the P-IMA outcomes

<p>Activities:</p> <p>1.1 Identify P-IMA facilitators and Sector Champions at national level</p> <p>1.2 Training of P-IMA Facilitators on the P-IMA framework</p> <p>1.3 Training of P-IMA Facilitators on the D-Sight Software</p> <p>2.1 Identify five countries to benefit from the P-IMA initiative by 2018</p> <p>2.2 Identify Priority value chains in each of the selected countries</p> <p>2.3 Compile an information dossier</p> <p>2.4 Conduct at least one national stakeholder workshop in each identified Member State by 2021</p> <p>2.5 Conduct Validation Workshops for the P-IMA outcome Reports</p> <p>3.1 Develop Policy Briefs and other knowledge management materials</p>		<ul style="list-style-type: none"> • P-IMA Outcome Reports for Uganda, Kenya, Rwanda, Malawi and Ethiopia • Trade Flow Synthesis Reports for Uganda, Kenya, Rwanda and Malawi • Policy Briefs for Uganda, Kenya and Rwanda • Profiling Reports for Uganda, Kenya and Rwanda • Summarized Reports for P-IMA Uganda, Kenya and Rwanda • Documentary Script on the use and benefits of P-IMA in the COMESA countries 	
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Annex 2: Contact details (e-mail and telephone) of key persons involved in project implementation and management¹

Names		E-mail addresses	Phone contacts
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¹ List of contacts for the project beneficiaries in included in the P-IMA outcome reports.

Annex 3: List of Documents produced during the Project

Report Category	Report Title
1.High Level Inception Meeting Reports	High level Inception Meeting Report for P-IMA Uganda
	High level Inception Meeting Report for P-IMA Kenya
	High level Inception Meeting Report for P-IMA Rwanda
	High level Inception Meeting Report for P-IMA Malawi
	High level Inception Meeting Report for P-IMA Ethiopia
2. Training Reports on the P-IMA Framework	P-IMA Uganda Training Workshop Report
	P-IMA Kenya Training Workshop Report
	P-IMA Rwanda Training Workshop Report
	P-IMA Malawi Training Workshop Report
	P-IMA Ethiopia Training Workshop Report
3. Training Report on the D-Sight Software	Training Report on the D-Sight Software for Uganda, Kenya and Malawi ²
4.Trade Flow Synthesis Reports	Trade Flow Synthesis Report for P-IMA Uganda
	Trade Flow Synthesis Report for P-IMA Kenya
	Trade Flow Synthesis Report for P-IMA Rwanda
	Trade Flow Synthesis Report for P-IMA Malawi
5.National Stakeholder Workshops Reports	National Stakeholder Workshops Reports for P-IMA Uganda
	National Stakeholder Workshops Reports for P-IMA Kenya
	National Stakeholder Workshops Reports for P-IMA Rwanda
	National Stakeholder Workshops Reports for P-IMA Malawi
	National Stakeholder Workshops Reports for P-IMA Ethiopia
6. Validation Workshops Reports	P-IMA Uganda Validation Workshop Report
	P-IMA Kenya Validation Workshop Report
	P-IMA Rwanda Validation Workshop Report
	P-IMA Malawi Validation Workshop Report
	P-IMA Ethiopia Validation Workshop Report
7. P-IMA Outcome Reports	P-IMA Uganda Outcome Report
	P-IMA Kenya Outcome Report
	P-IMA Rwanda Outcome Report
	P-IMA Malawi Outcome Report
	P-IMA Ethiopia Outcome Report
8. Summarized P-IMA outcome Reports	Summarised P-IMA outcome Report for Uganda
	Summarised P-IMA outcome Report for Kenya
	Summarised P-IMA outcome Report for Rwanda
9. Profiling and Financing Gap Reports	Profiling of Uganda's SPS Priority Investment Options and Financing Gaps
	Profiling of Kenya's SPS Priority Investment Options and Financing Gaps
	Profiling of Rwanda's SPS Priority Investment Options and Financing Gaps
10. Policy Briefs	Policy Brief for P-IMA Uganda
	Policy Brief for P-IMA Kenya
	Policy Brief for P-IMA Rwanda
11.Script for video documentary case study for P-IMA Rwanda	Prioritizing Sanitary and Phytosanitary (SPS) Investments for Market Access (P-IMA): a case of Rwanda

² The Training included Rwanda; however, Rwanda could not participate due to logistical challenges related to COVID. Ethiopia was not part of this training as the project was yet to be rolled out in the country at the time of the training, March 2020