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| **COMMON MARKET FOR EASTERN**  **AND SOUTHERN AFRICA**  **DRAFT**  **COMESA Sanitary and Phytosanitary Programme (SPS)**  **Annual Report 2018/9** |

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**ACRONYMS**

AAPBP Australia-Africa Plant Biosecurity Partnership

ACTESA Alliance for Commodity Trade in Eastern and Southern Africa

AEO Authorized Economic Operator

APPSA Agricultural Productivity Program for Southern Africa

AIFSRC Australian International Food Security Research Centre

ASTF Africa Solidarity Trust Fund

BB Project COMESA Breaking Barriers project

BIOFIN Global Biodiversity Finance

CAADP Comprehensive Africa Agriculture Development Programme

CIMMYT International Maize and Wheat Improvement Center

C-MRF COMESA Mutual Recognition Framework

COMESA Common Market for Eastern and Southern Africa

COMLAB COMESA virtual network of regional laboratories

COMMAF COMSHIP Mutual Accountability Framework

COM-SHIP COMESA Seed Harmonization Implementation Plan

DFID Department for International Development of the United Kingdom

EAC East African Community

EDF European Development Fund

EU European Union

FAO Food and Agriculture Organization of the United Nations

FAW Fall Army Worm

FDA Food and Drug Administration

FMD Foot and Mouth Disease

FSMA Safety Modernization Act

FSVP Foreign Supplier Verification programs

IAEA International Atomic Energy Agency

IAS Invasive alien species

IPPC International Plant Protection Convention

MLND Maize Lethal Necrosis Disease

NaPHIS National Plant Health Inspectorate services

NFSA National Food Safety Agency

NPPO National Plant Protection Organisation

NTB Non-Tariff Barrier

OIC Indian Ocean Commission

OSBP One Stop Border Post

PCE Phytosanitary Capacity Evaluation

PCHF Hazard Analysis and Risk-based Preventive Controls

P-IMA Prioritization of SPS investments for Market Access

PRA Pest Risk Analysis

RECAMP Regional Enterprise Competitiveness & Market Access Programme

RSIE3 Réseau de Surveillance et d’Investigation des Epidémies

SADC Southern African Development Community

SOP Standard Operating Procedure

SPS Sanitary and Phytosanitary

STR Simplified Trade Regime

TBT Technical Barriers to Trade

TMEA Trademark East Africa

TRF Trade Related Facility

UNCTAD United Nations Conference on Trade and Development

UNDP United Nations Development Programme

UNIDO United Nations Industrial Development Organization

US United States of America

USAID US Agency for International Development

WTO World Trade Organisation

1. **Introduction**

The Common Market for Eastern and Southern Africa (COMESA) sanitary and phytosanitary (SPS) program works across COMESA and the tripartite region of COMESA, East African Community (EAC) and Southern African Development Community (SADC), to promote a harmonized risk based regulatory environment and strengthened biosecurity systems that enhance food and nutrition security and facilitate agricultural trade, exports and investments.

The COMESA SPS Regulations were established to ensure that the implementation of SPS measures does not unnecessarily hinder trade in food and agricultural products in the region. The regulations place emphasis on compliance with the World Trade Organisation’s Agreement on the Application of Sanitary and Phytosanitary Measures (WTO SPS Agreement), with additional obligations on member states to:

1. Create mechanisms for cooperation in the implementation of SPS measures
2. Promote regional public goods such as regional reference and satellite laboratories and the Green Pass Certification Scheme
3. Enhance the surveillance and mitigation of phytosanitary and food safety risks
4. Harmonize SPS measures, and promoting mutual recognition arrangements

If SPS measures were not implemented in a manner that is consistent with provisions of the WTO SPS Agreement, these measures becomes Non-Tariff Barriers (NTBs) to trade would be insignificant. According to the United Nations Conference on Trade and Development (UNCTAD), a significant proportion of NTBs relate to unjustified SPS measures and weak regulatory systems is estimated to contribute to approximately 70% of SPS related trade barriers.

The COMESA SPS strategy for the period 2016-2020, complements the COMESA Medium Term Strategic Plan for the same period, and is intended to influence and guide Member States’ actions and decisions in the SPS area to ensure that “Effective, risk-based, harmonized SPS measures are efficiently implemented to facilitate safe regional and international trade.”

The COMESA Secretariat (SPS) initiated several technical support initiatives in accordance with the COMESA SPS Strategy to implement SPS measures in a coherent and consistent manner and according to the principles and provisions of the SPS Agreement. This report focuses on the major SPS issues affecting trade and Member States’ efforts in building appropriate capacity to address such issues whilst ensuring that the SPS regulatory systems respond to regional and international trade requirements.

1. **Result Area 1: Public and private sector capacity development needs prioritised and addressed**

Sanitary and phytosanitary (SPS) systems and regulations is an essential part of any agricultural value chain investment strategy. Investments in SPS capacities are necessary to protect countries’ agricultural production against plant/ animal pests and diseases and to ensure that food is safe for trade and consumption.

COMESA in collaboration with the Standards and Trade Development Facility (STDF) and TradeMark East Africa have launched a regional initiative to help strengthen the management of Standards and Phytosanitary (SPS) Measures in the region through a programme called Prioritization of SPS investments for Market Access (P-IMA). P-IMA is a five-year pilot programme which has been launched in Uganda and will be rolled out to Ethiopia, Kenya, Malawi and Rwanda. Madagascar also used the P-IMA framework in 2017/8 to prioritize its SPS investments for market access in export-oriented value chains. The programme is an evidence-based approach to inform and improve SPS planning and decision-making in the region and to mainstream SPS investments into the Comprehensive Africa Agriculture Development Programme (CAADP) and other national policy frameworks. Its benefits include having enhanced public-private dialogue, evidence to support programme design and fundraising, high level awareness about value of investing in SPS capacity building, transparency and accountability and greater resource efficiency. It will form an integral part of the regional integration agenda which includes the need to remove SPS trade barriers through equivalence and mutual recognition of SPS regulatory frameworks.

There are obvious synergies with interest from Trademark East Africa (TMEA) to use the P-IMA framework to support implementation of TMEA's Strategy on Standards and SPS in EAC Partner States (Burundi, Kenya, Rwanda, South Sudan, Tanzania and Uganda) and to facilitate intra-EAC trade, that are being exploited by the COMESA secretariat to analyze and harmonize regulatory and operational SPS barriers between the EAC and non-EAC countries that belong to the COMESA grouping.

The United Nations Development Programme (UNDP) defines capacity as “the ability of individuals, organization’s and societies to perform functions, solve problems, and set and achieve objectives in a sustainable manner”. Capacity, however, means more than the knowledge and skills of individuals and organizations but includes the formal and informal linkages between actors. This result area focuses on SPS capacity development efforts at individual, organisational and system levels. The use of structured capacity assessments and prioritisation approaches are supported and ensures that investment in capacity development is made based on evidence.

Several tools have been developed and endorsed by the international organisations and recognised by the WTO SPS Agreement to assess SPS capacities. These tools are also used in capacity building to make the prioritisation process transparent and as objective as possible. Since 2016, Kenya and Zambia conducted plant health capacity evaluations using the International Plant Protection Convention (IPPC) Phytosanitary Capacity Evaluation (PCE) tool.

Capacity evaluation tools often highlight the need to strengthen or update national legal and regulatory frameworks. Several Member States have conducted legislative reviews including Kenya’s phytosanitary legislation review in 2017/8, Madagascar’s phytosanitary and food legislation review, Rwanda’s review on aquaculture and fisheries legislation, Eswatini’s phytosanitary legislation review and Malawi’s phytosanitary legislation review in 2018. Zambia’s phytosanitary legislation review and Malawi’s reviews on various pieces of sanitary legislation are currently underway. A COMESA funded project to review the SPS policy and legislation of Seychelles was initiated in 2018 and will continue in 2019. In addition, Seychelles conducted a biodiversity Needs Assessment, policy/expenditure review and developed a Biodiversity Investment Plan that was supported by the Global Biodiversity Finance (BIOFIN). Comoros received funding from the WTO STDF to review its food hygiene and plant pesticide legislation and developed a national SPS strategy with support from COMESA Secretariat (SPS) to facilitate key exports, including vanilla of which COMOROS is the 9th largest producer in the world.

Institutional and technical capacity to implement regulations, to do SPS technical work and to manage organisations such as competent authorities is linked to SPS constraints. SPS human resources and technical capacities provides the basis of risk-based import conditions and successful bilateral negotiations for trade. Member States such as Zambia, Seychelles, Madagascar and Uganda are addressing their SPS human resource needs through various organized technical training programmes based on a baseline assessment of their SPS constraints. The Eswatini National Plant Health Inspectorate Services (NaPHIS) was capacitated and a new strategy developed for its operations which includes the development of Standard operating procedures (SOPs) to improve diagnostic services at ports of entry. Rwanda conducted several SPS training activities on risk assessment and risk management, responsible use of veterinary products by framers, implementation of the National Residue Monitoring Plans that was developed May 2018, and the sensitization of stakeholders on official controls. Malawi invested in capacity building of phytosanitary inspection services at eight (8) borders.

Egypt launched its National Food Safety Agency (NFSA) to protect consumers’ health through ensuring that food produced, processed, distributed, marketed, and consumed in Egypt meets the highest standards of food safety and hygiene. The key activities of NFSA include institutional development, legislation, laboratory, outreach and inspection services.

The need for additional or improved SPS infrastructure, facilities and equipment is another area that the capacity assessment tools address. COMESA regional reference laboratories have been provided with some equipment, and whilst seeking support for further enhancement of SPS infrastructure in other Member States, regional collaboration will also be promoted to make maximum use of existing facilities. The aflatoxin analysis laboratory at Chitedze Agricultural Research Station in Malawi was refurbished and equipment procured. Not all SPS infrastructure needs to be in the public sector, and where possible, COMESA will encourage private sector investment.

**Box 1: A Phytosanitary Capacity Evaluation for Zambia**

Zambia conducted a base-line phytosanitary capacity evaluation in 2016. Information was gathered on phytosanitary capacity needs and challenges facing the Agri-food exports from Zambia taking into consideration previous work that had been undertaken to identify capacity-building options and the definition of priorities for related investments. The evaluation identified specific Infrastructure capacity needs for accommodation, office space and laboratory equipment as well as additional official vehicles to ensure that the required phytosanitary services can be provided by the National Plant Protection Organisation (NPPO) of Zambia. Ongoing in-house training of Plant Health inspectors in laboratory diagnosis, data capturing management, general inspections and sampling techniques have been conducted since 2016. The NPPO of Zambia identified Pest Risk Analysis (PRA), Pest Diagnostics, GIS, data management and phytosanitary communication as areas for further training of phytosanitary staff.

The NPPO of Zambia has two operational Plant Health diagnostic laboratories to analyze phytosanitary samples. These laboratories can conduct basic diagnostic tests in mycology, bacteriology, virology, entomology and nematology but have not been accredited. Advanced diagnostic tests cannot be done due to a lack of appropriate equipment and reagents. Diagnostic services are currently not available at Zambian border points but the NPPO is able to utilize other diagnostic laboratories under the department for analysis (Entomology, virology and Pathology) due to the limited capacity of its two laboratories.

The Australian International Food Security Research Centre (AIFSRC) in collaboration with CABI-Africa and COMESA initiated a capacity development programme that used Australian expertise to strengthen skills and capacity of professionals within African plant biosecurity agencies and institutions in order to address critical plant pest and disease issues. The initiative’s focus was to improve the competence of plant health authorities and the effectiveness of phytosanitary management services in COMESA, whilst leveraging private sector/industry partnerships. The network meetings were a key component of the Australia-Africa Plant Biosecurity Partnership (AAPBP) and brought together African Biosecurity Fellows and industry members from Burundi, Ethiopia, Kenya, Malawi, Mozambique, Rwanda, Tanzania, Uganda, Zambia and Zimbabwe with Australian biosecurity colleagues to share information, provide ongoing mentoring, and boost training and outreach. African members of the network include 15 Senior Biosecurity Fellows who have undertaken plant protection training in Australia and Africa and are passing on their skills and knowledge to 30 Associate Fellow colleagues.

Sustainable and resilient food businesses need market access to local, regional and global markets through compliance with internationally recognized food safety standards as well as market-driven safety and quality schemes. COMESA conceived a Regional Enterprise Competitiveness & Market Access Programme (RECAMP) which is a food safety capacity building initiative, leveraging the experience and expertise of UNIDO to create a pathway towards food safety certification whilst building the capacities of selected local institutions to provide accredited training services and sustain food safety advisory services in the region. This intervention is funded under the European Development Fund (11th EDF).

The United States (US) Food Safety Modernization Act (FSMA) of 2011, provided the basis for the new Food and Drug Administration (FDA) rule on Foreign Supplier Verification programs (FSVP) for importers that came into effect May 30, 2017. This new rule requires that importers perform certain risk-based activities to verify that food imported into the US has been produced in a manner that meets applicable safety standards. This implies that US importers will only source food and raw materials from COMESA exporters who meet the US FDA requirements, stipulated in the Hazard Analysis and Risk-Based Preventive Controls for Human Food (PCHF) rule. The rule requires food facilities in COMESA to have a food safety plan in place that includes an analysis of hazards and risk-based preventive controls to minimize or prevent the identified hazards. The COMESA Secretariat (SPS) in collaboration with the US Agency for International Development (USAID), supports food export facilities in the region to develop and implement compliant food safety plans. National laboratories are supported to align with FSMA requirements.

1. **Result Area 2: Regional leadership, coordination and collaboration on SPS issues**

A range of actors and structures in the public and private sectors constitute a SPS system. COMESA promotes and supports the use of approaches that foster constructive and cooperative links between the different parts of SPS systems nationally and regionally.

COMESA supports the SPS Sub-Committee to convene annually. The Technical Working Group on Plant Health developed a reporting template to assist Member States to capture and share their SPS experiences and lessons on best practices.

Malawi, Mozambique and Zambia participated in the Agricultural Productivity Program for Southern Africa (APPSA) Project and agreed during the implementation of the subproject “Investigating the Occurrence of Maize Lethal Necrosis Disease (MLND) in Malawi, Mozambique and Zambia”, to develop a Memorandum of Understanding (MOU) to conduct an assessment of the MLND diagnostic capacity and laboratory equipment in the three Member States. The purpose of the project was to establish the pest status of MLND in these three countries through disease and pest vector surveillance. The MoU has not yet been signed and the assessment of the laboratories is still pending. The International Maize and Wheat Improvement Center (CIMMYT), the Africa Solidarity Trust Fund (ASTF) and the AAPBP assisted in the training NPPO of staff involved in the MLND survey and in awareness creation among the agricultural staff and farmers. MCMV diagnostic kits, ELISA test Kits and IKA tube mill were donated for use by the NPPO’s. The surveillance of MLND causing viruses has resulted in the continued export of maize seed and grain in the region. The evidence of absence of the disease has resulted in continued market access especially for the seed maize.

The NPPO of Zambia is in the process of implementing paperless certification for the issuance of permits and other licences it issues. The Trade Related Facility (TRF) project supported by SADC and the EU funded the activity to implement the development, installation and deployment of this system. However, due to the limited budget of the project and in seeking regional partnerships the NPPO partnered with KEPHIS which is currently implementing a similar system to provide some guidance and technical support owing to the years of implementation and lessons learnt. An MOU has being drafted and is yet to be signed by the two NPPOs.

1. **Result Area 3: Reduced trading costs associated with SPS measures**

SPS measures inevitably result in direct or indirect costs to those involved in trading a commodity. Procedures to ensure compliance are occasionally unnecessary or lengthy, causing delays in clearing goods. Small scale traders have limited access to SPS import requirements usually due to poor communication channels between public and private sectors. This result seeks to reduce these costs without reducing countries’ effectiveness or efficiency of managing SPS risks.

One of COMESA’s goals is to provide a market in which member states trade freely with each other, thereby fostering economic development and enhancing food security within the region. The COMESA Breaking Barriers (BB) project supported analysis of costs associated with SPS measures on specific trade flows between the following countries: (i) Kenya/Uganda, (ii) Kenya/Tanzania (iii) Zambia/Malawi, (iv) Egypt/Sudan, (v) Zambia/Zimbabwe. Country teams constituted by customs authorities, SPS and Technical Barriers to Trade (TBT) authorities, as well as private sector entities, were facilitated by COMESA to conduct border assessments at selected border crossings, assess direct and hidden SPS costs, and establish mechanisms to improve the efficiency of SPS measures in overall border management.

**Box 2: Reducing SPS trading costs at Busia border**

A study was conducted to identify costs associated with SPS measures for fish and milk traded across the Uganda/Kenya Busia border as part of the COMESA Breaking Barriers project. It assessed whether existing border controls/ conformity assessment procedures are risk based and the least trade restrictive, as required by the WTO SPS agreement. The study found that indirect costs such as administrative arrangements, unpredictable SPS/TBT measures and multiple documentary checks by SPS/TBT regulatory agencies contributed significantly in terms of time delays. Ugandan government interventions addressing these costs include, online electronic certification to reduce the administrative burden, training on risk-based sampling and border inspection procedures, and harmonization of border verification procedures with Kenyan counterparts.

COMESA promotes a number of innovative trade and transport facilitation instruments, including; (i) the Green Pass Certification Scheme (a common certification scheme to facilitate trade in agricultural products within the common market), the Simplified Trade Regime (STR) for Small Scale Traders, the One Stop Border Posts (OSBP) and the Authorized Economic Operator (AEO). The BB project examined some of the regional trade facilitation instruments to determine their effectiveness in enhancing the efficiency of SPS border controls/regulatory measures and facilitating trade through reduction of SPS trade transaction costs. Rwanda introduced an online system for inspection certification and issuance of permit in June 2018. OSBPs has been operationalized in four frequently used borders and six animal quarantine posts have been re-instated since 2017 to reduce trade costs.

**Box 3: Chirundu One Stop Border Post**

Chirundu is an extremely busy border post between Zimbabwe and Zambia. It has now been converted to a one-stop border post (OSBP) where SPS controls have been integrated with other border operations to reduce trading costs at the border. The Asycuda World live Customs portal is operational at Chirundu. In addition, the Zambian electronic single window system which is meant to have all government agencies interfaced under a single window is yet to be finalized and deployed. This will enhance trade facilitation once implemented. The National Plant Protection Organisation (NPPO) of Zambia is currently piloting the system and a good number of challenges including accessing the system and commencing the development of the complimentary electronic certification systems are still being faced. Electronic certification is underway. SPS agencies are linked and regularly updated through the Nation Trade Facilitation Committee, the National Codex Committee and the SPS committee. The NPPO of Zambia also involves other agencies through various awareness activities.

Promoting harmonised approaches and mutual recognition is an important activity to support further reduction of SPS costs without lowing the country’s level of protection. The COMESA Mutual Recognition Framework for conformity assessment (C-MRF supported Member States to participate in the regional proficiency testing scheme for aflatoxin testing, particularly Member States that trade largely in maize and maize products. Thirteen (13) laboratories in Kenya, Malawi, Rwanda, Uganda, Zambia and Zimbabwe were supported to participate in a series of proficiency testing rounds, root cause analysis to identify causes of deviations, training and technical support to address capacity gaps leading to equivalence of analytical results and mutual recognition of certificates of analysis. The C-MRF will be sustained through the COMESA virtual network of regional laboratories (COMLAB) established to facilitate the sharing of information, expertise and knowledge. One technical meeting was held to agree on the functions and specific terms of reference for the COMLAB coordinating mechanism. Additional interventions to make the COMLAB model more functional are planned under the 11th EDF.

**Box 4: Proficiency testing benefits in Rwanda**

Participating in the regional Proficiency Testing Scheme for aflatoxin analysis provided a quality assurance tool for the Rwanda laboratory. Benefits from the COMESA risk-based sampling protocol includes higher standards of performance in aflatoxin testing, as well as the production of accurate and reliable results that can be respected and trusted within and beyond borders, thus helping the country to become competitive in trade. Certificates from the partner laboratories are now accepted without repeat tests.

Under the tripartite, a list of ten crops that are commonly traded in the COMESA-EAC-SADC region was prioritized for harmonization of phytosanitary measures, namely maize/maize seed, wheat, rice, groundnuts, sorghum, beans, cotton, soybeans, sunflower and seed potato. Ten (10) tripartite countries, namely; Uganda, Kenya, Rwanda, Burundi, Zambia, Malawi, Mozambique, Tanzania, Zimbabwe and Malawi undertook to harmonize quarantine pest lists and mitigation strategies. COMESA organized two pest risk workshops in 2017 and 2019 to facilitate the establishment of a Technical Working Group on Plant Health, the development of a regional approach to Pest Risk Analysis (PRA) and the subsequent pest listing and harmonization of mitigation measures for the ten crops that were prioritized. To date, the countries have developed a common approach to pest risk analysis, harmonized quarantine pest lists for maize grain and seed and harmonized mitigation strategies, including for the Fall Armyworm (FAW) control.

The COMESA Seed Harmonization Implementation Plan (COM-SHIP) was developed through the Alliance for Commodity Trade in Eastern and Southern Africa (ACTESA); the COMESA, through Specialized Agency, to support implementation of the COMESA harmonized seed trade regulations, with the ultimate goal of addressing seed and food insecurity in the region. It has been officially launched in eighteen (18) COMESA Member States, namely Burundi, Comoros, Djibouti, DR Congo, Egypt, Eritrea, Ethiopia, Kenya, Madagascar, Malawi, Mauritius, Rwanda, Seychelles, Sudan, Swaziland, Uganda Zambia, Zimbabwe. Seven COMESA Member States (Burundi, Malawi, Rwanda, Kenya, Uganda, Zambia and Zimbabwe) have completely aligned their national seed laws to the COMESA Seed System. Nine COMESA Member States are implementing COMSHIP through the support of USAID and UK Department for International Development (DFID). COMESA through its specialized agency, the Alliance for Commodity Trade in Eastern and Southern Africa (ACTESA) has now developed the COMSHIP Mutual Accountability Framework (COMMAF). The COMMAF framework outlines the principles, mechanisms, tools and specific activities to facilitate mutual accountability in COMSHIP and aims to assist in the evaluation, review, debate, dialogue and negotiation performance within public-private partnership arrangements of COMSHIP.

Food safety standards, regulations and regulatory limits applied for trade vary across the COMESA region and occasionally translates into trade barriers that contribute to high trading costs and/or trade disputes. Recent cases include; (i) the disruption of the Zambia/Kenya milk trade due to microbiological criteria applied to the East Africa raw milk standard, and (ii) high cost of trading due to unpredictable sampling and conformity assessment checks for fish traded across Busia border (Kenya/ Uganda) and Luangwa border (Zambia, Malawi, Zimbabwe and Mozambique).

The Food and Agriculture Organization of the United Nations (FAO)/COMESA) capacity building programme was conceived to support the food safety harmonization process. Training was provided on microbiological and chemical risk assessment and a road map towards the harmonization of mycotoxin regulations was discussed with EAC and SADC Member States. Key achievements under this programme include an improved understanding of how to apply risk-based approaches in developing, implementing and enforcing food safety regulations, and improved understanding of how to apply the FAO/WHO risk assessment methodology.

**Box 5: Zimbabwe: Harmonization of food safety regulations to facilitate trade**

COMESA training on risk profiling for chemical (mycotoxins) and microbiological hazards enabled Zimbabwe to develop risk profiles and risk management options for peanut butter and fish traded with Zambia. These risk profiles were presented to stakeholders in the public and private sectors for consensus on the appropriate risk management options. Based on the outcomes of these national consultations, Zimbabwe then developed a road map for bilateral engagement with Zambia to harmonize risk management options for fish and peanut butter and thus reduce the frequent trade disruptions between the two countries

Risk profiling is a function that should be integrated in national food control systems. The COMESA Secretariat (SPS) supports Member States to institutionalize the risk assessment function by leveraging expertise developed through the programme and to develop risk profiles for prioritized commodities. Member States are facilitated to harmonize risk management options, including those on regulatory limits, develop bilateral engagements and to reach consensus on the proposed risk management options. This new knowledge on risk profiling could then be applied to resolve trade disputes such as the Zambia/Kenya milk trade dispute or the frequent Zambia/Zimbabwe trade disruptions that are caused by the absence of harmonized regulatory limits and conformity assessment procedures. Kenya and Uganda applied new risk profiling knowledge to improve border SOPs for fish trade and to build a case for reviewing of sampling protocols (based on the findings of border assessments under the Breaking Barriers project).

There are good examples of public-private partnerships that reduce the costs of implementing SPS measures in the COMESA region, but they need to be extended to other value chains. Creating awareness of the mutual benefit to be gained is crucial to establish effective and efficient public-private partnerships.

**Box 6: Zambia: Leveraging private sector for SPS capacity building**

Working in partnership with the grower (khal Amazi), the Zambian NPPO conducted regular monitoring, surveillance and implementation of Integrated Pest Management strategies (IPMs) on the farm to maintain pest free production sites (PFPS) as guided by ISPM 10, and thus guarantee the export of table grapes to the RSA. The NPPO maintained good collaboration with the grower/exporter ( Khal Amazi) during the production period and sustained exports into the RSA. This partnership ensured there were no non-compliance notifications received from the NPPO of South Africa for the entire duration that Khal Amazi exported the grapes. The NPPO applied the same model with the growers of Blueberries, Avocadoes and bananas fruits that have now gained market access to South Africa and China.

The NPPO of Zambia found that by enhancing awareness of SPS measures enabled them to strengthen public-private partnerships for implementing surveillance (MLND, Cyst nematode, Fall Armyworm), awareness and training activities. The NPPO focused their SPS awareness activities on workshops for stakeholders, participating in agriculture shows, expo’s and field days, producing radio programs both in English and local languages and distributing printed awareness materials (brochures, leaflets and posters) to stakeholders. These awareness initiatives have been supported by Government, APPSA, ASTF and the Trade Investment Hub (Trade Hub), a USAID funded project to assist Zambia in trade facilitation, SPS and TBT issues as well as policies on regional trade. The NPPO has been transparent in the implementation of its SPS measures and in communicating of pest information to stakeholders, trading partners and the IPPC, as required. Involvement of stakeholders in Emergency response plan development for MLND and Fusarium wilt and other pest control strategies e.g. *Tuta absoluta* has enhanced the country’s preparedness for these quarantine diseases.

In Rwanda risk awareness to poultry farmers on FIPRONIL intoxication of eggs was used as a preventive measure. FIPRONIL based detergent were suspended in Rwanda and farmers were trained for responsible use of detergents.

Seychelles implements a biosecurity system that integrates a SPS, TBT and Trade Facilitation related work. A National Trade Facilitation Committee was established to bring together the various stakeholders from the public and private sectors with interests in trade facilitation and to provide a mechanism for identifying priorities and implementing integrated SPS measures for trade and enhanced biosecurity.

1. **Result Area 4: Priority SPS risks managed**

Different countries have different priority SPS risks to manage and COMESA supports Member States through various initiatives to build capacity and adopt risk-based approaches. A draft regional PRA Guideline was developed by the Technical Working Group on Plant Health and submitted for adoption by the SPS Sub-Committee in April 2019. The Guideline provides a regional approach to pest and pathway-initiated PRAs.

Foot and Mouth Disease (FMD), Maize Lethal Necrosis Disease (MLND), oriental fruit fly and aflatoxin are examples of SPS risks that are common in the COMESA region. Member States focus their efforts under the 2016-2020 COMESA SPS Strategy to address these prioritized risks through the development of early warning systems, the implementation of contingency/emergency response plans and improved diagnostic services, surveillance, pest reporting and communication of SPS risks.

Uganda made significant investments in FMD vaccinations along the Uganda/Tanzania border, quarantine infrastructure and revamping of the livestock extension system. Egypt has a strong animal vaccination program and capacity to prevent transboundary diseases with three main reference laboratories for FMD conducting diagnostics, training, research and production. Egypt is close to eradication of FMD but the possibility of importation of new strains remains a challenge to increase imports from the COMESA region. Malawi established national plans to mitigate transboundary animal diseases, early warning systems and emergency response plans for key quarantine pest, including the FAW and MLND.

**Box 7: Rwanda: Managing Rift Valley Fever**

A Rift Valley Fever (RVF) outbreak from January to May 2018 in Rwanda posed a serious risk to cattle in the eastern, southern and northern provinces of the country. Surveillance and quarantine measures were immediately put in place to control the outbreak. Public awareness programmes were key to ensure the vaccination and symptomatic treatment of the affected livestock.

The NPPO of Zambia developed emergency response plans for MNLD in maize and Fusarium wilt (Panama disease) in bananas. The probability of these diseases occurring is high due to their transboundary nature and the presence of the diseases in some neighboring countries (Tanzania, the Democratic Republic of Congo and Mozambique) and the availability of some of the transmitting vectors for the MLND. The development of the response plans was done in consultation with stakeholders and the initiative was supported by the AAPBP.

The NPPO of Zambia developed early warning systems that include targeted surveillance in order to provide early warning of new pest outbreaks for the effective management of plant health risks identified. The Zambian Fall Army Worm Monitoring and Early Warning System has been developed to allow data input via a smartphone Application that was developed by the Food and Agriculture Organisation (FAO) of the United Nations. This system also effectively and timely informs trading partners when outbreaks occur to allow them to take precautionary measures. These pest reporting directives were included in a Surveillance Statutory Instrument to guide stakeholders to direct pest reporting to NPPO. In addition, CABI Plantwise Plant Clinics, which collect information on pests from farmers, also serve as an early warning system complementing the NPPO’s work.

**Box 8: Zambian exporters reaping the benefits of improved SPS risk management**

Horticultural exports are one of the fastest growing industries in Zambia and an important component of its export base. Zambia flower exporters have experienced reduced interceptions of pests of quarantine importance on cut flowers for export to the EU. Market access was achieved for the export of blueberries, bananas and avocados. The corrective actions that brought about these positive developments included improved and more effective on-farm inspections by farmers and surveillance by the NPPO, increased awareness of phytosanitary requirements to the grower, more effective sampling and the use of enhanced surveillance protocols. Technical support was provided by CABI/COMESA and funding was made available by the WTO STDF.

Targeted surveillance was done in several Member States. Zambia undertook detection surveys for emerging pests’ risks including MLND on maize seed, Fusarium wilt on bananas and cyst nematode on potato. The enhanced usage of pest data capturing systems (electronic) during survey activities has resulted in the generation of pest distribution maps for the country. The presence of new pests (e.g. Fall Army Worm) is immediately communicated to the IPPC and trading partners as is required by the IPPC. In Zimbabwe, COMESA Secretariat (SPS) supported fruit fly surveillance that improved field inspections and verification of consignment compliance that subsequently supported horticulture exports. The NPPO of Eswatini established a coordinated response for the FAW that include surveillance, collection of pest prevalence data, development of pest risk maps. An impact assessment for the FAW are underway.

In Seychelles, several surveillance projects are underway including the ‘’Réseau de Surveillance et d’Investigation des Epidémies’’ (RSIE3) which is supported by the Indian Ocean Commission (OIC), an FAO project for Improved technical capacity for surveillance, detection, identification and management of pest, diseases and invasive alien species (IAS) and trade facilitation and a project for Enhancing Capacity for Detection, Surveillance and Suppression of Exotic and Established Fruit Fly Species through Integration of Sterile Insect Technique with Other Suppression Methods was funded by the International Atomic Energy Agency (IAEA).

1. **Way forward**

Most Member States encounter considerable challenges participating in WTO SPS policy processes due to limited financial and human resources, which impedes effective participation in the agenda of the WTO SPS committee. Regional cooperation, coordination and pooling of resources could assist to mobilize resources for effective participation in SPS international diplomacy, and engagement with WTO trade partners on specific SPS issues of trade concern. Within COMESA, individual member states have demonstrated excellence in mobilizing public and private resources to address the existing challenges. The Secretariat will continue to support SPS initiatives in accordance with the COMESA SPS Strategy in a coherent and consistent manner to facilitate learning and sharing of best practices and experiences.