



**COMMON MARKET
FOR EASTERN AND SOUTHERN AFRICA**

SPS Strategy

2016-2020

Contents

Foreword.....	2
Acronyms and Abbreviations.....	3
Executive Summary	4
1. Introduction.....	6
2. Context for the new Strategy.....	7
2.1 2011-2015 SPS strategy	7
2.2 COMESA SPS Regulations	9
2.3 Lessons	10
2.4 COMESA Medium Term Strategic Plan	11
2.5 SADC, EAC and the Tripartite Free Trade Area.....	11
2.6 African Union	12
2.7 World Trade Organisation	13
2.8 Diagnostic trade integration studies	14
3. Strategy 2016-2020	15
3.1 Objectives.....	15
3.2 Results and Indicative Activities	16
3.2.1 Result 1: Public and private sector capacity development needs prioritised and addressed	16
3.2.2 Result 2: Regional leadership, coordination and collaboration on SPS issues...	18
3.2.3 Result 3: Reduced trading costs associated with SPS measures	20
3.2.4 Result 4: Priority SPS risks managed	21
4. Implementation	24
4.1 Roles and responsibilities	24
4.2 Finance.....	25
4.3 Monitoring and Evaluation.....	25
References	26
Annex A. Logical Framework for the SPS Strategy	27

Foreword

COMESA Member States know that agricultural trade within Africa and beyond is critical to their economic development. This is recognised in the COMESA Treaty, as well as at the continental level in the Comprehensive Africa Agriculture Development Programme. The African Union's 2014 Malabo Declaration on accelerated agricultural growth and transformation reiterated the need to expand Africa's agricultural trade, and made a commitment to "harness markets and trade opportunities locally, regionally and internationally". Intra-regional trade is particularly important in achieving food security and improving livelihoods, a basis for the new Tripartite Free Trade Area between COMESA, EAC and SADC.

Sanitary and phytosanitary (SPS) measures are required to ensure agricultural trade does not increase risks to food safety, animal health and plant health. But SPS measures must be designed and implemented with the aim of facilitating safe trade, as laid out in COMESA's SPS regulations as well as in the WTO's SPS Agreement.

COMESA's new SPS Strategy 2016-2020 aims to contribute to our goal of economic development. It complements the new Medium Term Strategic Plan, and I thus commend it to our Member States, partners and supporters. The COMESA Secretariat, particularly the SPS Unit, will play its role in leading and coordinating SPS activities in the region. But it is in the Member States where action must be taken, by farmers, traders, regulators and many others, and I trust this strategy will provide direction for us all.

Sindiso Ndema Ngwenya

Secretary-General

Common Market for Eastern and Southern Africa (COMESA)

Acronyms and Abbreviations

AAPBP	Australia-Africa Plant Biosecurity Partnership
ASARECA	Association for Strengthening Agricultural Research in Eastern and Central Africa
AU	African Union
AUC	African Union Commission
CAADP	Comprehensive Africa Agriculture Development Programme
CABI	CAB International
CFTA	Continental Free Trade Area
COMESA	Common Market for Eastern and Southern Africa
COP	Conference of the Parties
COPE	Centre of Phytosanitary Excellence
EAC	East African Community
FAMIS	Food and Agriculture Market Information System
FAO	Food and Agricultural Organisation of the United Nations
FMD	Foot and Mouth Disease
IAPSC	InterAfrican Phytosanitary Council
IBAR	InterAfrican Bureau for Animal Resources
IITA	International Institute of Tropical Agriculture
IPPC	International Plant Protection Convention
ISPM	International Standard for Phytosanitary Measures
KEPHIS	Kenya Plant Health Inspectorate Service
MTSP	Medium Term Strategic Plan
NEPAD	New Partnership for Africa's Development
NPPO	National Plant Protection Organisation
NTB	Non-tariff barrier
OIE	World Organisation for Animal Health
PACA	Partnership for Aflatoxin Control in Africa
PCE	Phytosanitary Capacity Evaluation
P-IMA	Prioritizing SPS Investments for Market Access
PVS	Performance of Veterinary Services
REC	Regional economic community
SADC	Southern African Development Community
SPS	Sanitary and Phytosanitary
STDF	Standards and Trade Development Facility
TFA	Trade Facilitation Agreement
TFTA	Tripartite Free Trade Agreement
UNDP	United Nations Development Programme
VETGOV	Reinforcing Veterinary Governance in Africa
WTO	World Trade Organisation

Executive Summary

1. This document presents COMESA's Sanitary and Phytosanitary strategy for the period 2016-2020, complementing COMESA's Medium Term Strategic Plan for the same period.
2. The strategy draws from successes and experiences of implementing the 2011-2015 SPS strategy. It supports the implementation of COMESA's SPS regulations as well as the Tripartite Free Trade Area's SPS Annex, both of which are anchored in the WTO SPS Agreement.
3. The overall objective or goal of the strategy is "A fully integrated, internationally competitive regional economic community which promotes shared prosperity and improved livelihoods for all its people". This reflects COMESA's 2016-2020 vision and the CAADP Vision 2025 for Agriculture.
4. The specific objective or purpose of the strategy is "Effective, risk-based, harmonised SPS measures efficiently implemented to facilitate safe regional and international trade." This recognises that both regional and international agricultural trade is important for COMESA Member States, and aligns the strategy to the WTO SPS Agreement.
5. The strategy has four results:
 - i. Public and private sector capacity development needs prioritised and addressed
 - ii. Regional leadership, coordination and collaboration on SPS issues
 - iii. Reduced trading costs associated with SPS measures
 - iv. Priority SPS risks managed
6. Under Result 1 activities will include assessing and prioritising capacity development needs using established tools and methods. Capacity development is needed in the areas of human resources (managerial and technical), legal and regulatory frameworks, infrastructure and equipment. COMESA recognises that many actors must work together for SPS measures to be implemented effectively.
7. Under Result 2 the secretariat will lead advocacy for SPS issues at national, regional and international levels. Regional collaboration through SPS Regional Reference Laboratories will be facilitated, and links to other regional and global SPS initiatives will be fostered. Mechanisms to improve information exchange within the region will be strengthened.
8. Under Result 3 activities will be aimed at improving the efficiency of implementing SPS measures so their cost to traders is reduced. This will include promoting harmonised approaches and mutual recognition, fostering public-private partnerships and building users' awareness of SPS service provision. The activities will contribute to implementing the WTO Trade Facilitation Agreement in the SPS context.
9. Under Result 4 specific SPS risks will be identified and managed through early warning and contingency planning, surveillance, reporting and communication of SPS risks, and the promotion of harmonised risk-based approaches.

10. Implementation of the strategy will be led and coordinated by the SPS Unit at the COMESA Secretariat. Most activities will take place in and be conducted by public and private sector actors in the Member States. Regional and international partners' contributions are anticipated in resourcing and implementing the activities.
11. The strategy was developed through COMESA's SPS Subcommittee. The Subcommittee will provide oversight for its implementation, and monitor and evaluate progress towards achievement of the objectives and results.

1. Introduction

The Common Market for Eastern and Southern Africa (COMESA) was established in 1994. Among its objectives is “to attain sustainable growth and development of the Member States by promoting a more balanced and harmonious development of its production and marketing structures”. Regional integration was advanced in 2000 with the establishment of a Free Trade Area, and the aim is to establish a full economic community by 2025. Agriculture is key to the economies of most COMESA countries, and the treaty has many provisions and articles addressing the sector. A Technical Committee on Agriculture is established by Article 15 of the treaty, that reports to the Ministers of Agriculture.

Article 132 of the treaty concerns co-operation in the export of agricultural commodities, and member states agree to “harmonise their policies and regulations relating to sanitary and phytosanitary (SPS) measures without impeding the export of crops, plants, seeds, livestock, livestock products, fish and fish-products”. In 2007 the 23rd Council of Ministers established the SPS Subcommittee under the Technical Committee on Agriculture, for effective coordination of SPS matters at regional level, and the 29th Council of Ministers requested the Secretariat to set up and make functional an SPS unit at the Secretariat. Subsequently the Council of Ministers directed the Secretariat to enhance programmes aimed at mutual recognition of standards and SPS measures, as well as to expedite the harmonization process as stipulated in the COMESA SPS regulations.

SPS activities in the period 2011-2015 have been guided by a logical framework, linked to COMESA’s Medium Term Strategic Plan (MTSP) operating over the same period. The current document advances COMESA’s SPS work by presenting a strategy for the period 2016-2020, coinciding with the new MTSP.

Section 2 reviews the context of the new strategy. First the 2011-15 strategy is briefly reviewed, to identify lessons and success stories that can be built on in the new strategy. The regional and international trade and policy environment is then summarised, within and to which the strategy must be implemented and anchored. Section 3 presents the strategy itself, with some aspects of implementation addressed in Section 4.

The main elements of the strategy were developed at a regional workshop for SPS experts from Member States held in Kigali in June 2015. The draft was subsequently reviewed and approved by the SPS sub-committee.

2. Context for the new Strategy

2.1 2011-2015 SPS strategy

The specific objective of the 2011-15 logical framework was “Enhanced SPS capacity of the public and private sector to gain and maintain regional and international market access for food and agricultural products”. The emphasis was thus on capacity development. The logical framework had four results; the main activities and achievements under each are summarised.

(i) Regional leadership, coordination and collaboration on SPS issues

COMESA has taken the lead in regional SPS issues in a number of ways. SPS was identified as a priority area under the Tripartite Free Trade Agreement negotiations, and COMESA led on developing the Annex on SPS measures. The secretariat has also represented the sub-region at continental and international levels, including on the steering committee of the InterAfrican Phytosanitary Council, in the Working Group of the Standards and Trade Development Facility (STDF), and in CAADP and AU/NEPAD meetings. One area anticipated where there has been less activity is in coordinating and supporting member states in attending and presenting common positions in international SPS organisations, such as the WTO SPS Committee and the three international standard setting organisations.

Another aspect of leadership and coordination where the secretariat has been successful is in developing partnerships with a range of organisations within the region and beyond, in the public and private sector. This is a key role for a regional organisation, which benefits both the Member States and the partners. This included brokering a range of partnerships through which phytosanitary aspects of market access in South Africa were identified and negotiated for strawberries from Ethiopia, pre-packed chillies from Kenya, litchi from Madagascar, and stone fruit from Zimbabwe.

Amongst Member States the secretariat has provided an important role in coordination and facilitating collaboration in a number of areas including responding to major SPS risks such as aflatoxin and fruit flies. The three regional reference laboratories in animal health (Zambia), plant health (Kenya) and food safety (Mauritius) have been further equipped, though work is required to ensure widespread use of these laboratories by the Member States.

A further area in which COMESA has provided leadership is in the application of the principles of the new WTO Trade Facilitation Agreement to the SPS context. Research has been conducted in several countries, and an initiative has been developed and funding secured from the Standards and Trade Development Facility to implement the project in 7 countries.

(ii) Private sector driven common certification schemes/protocols and standards in use

Under this result prioritisation of interventions was anticipated using the approach described in the CAADP Pillar 2 document. However, during the period of the strategy COMESA played a major role in the testing and deployment of a tool developed by STDF that takes multiple criteria into account for prioritising different SPS interventions. The tool focuses on

market access so in principle should be private sector driven. It has been used in several countries including Ethiopia, Malawi, Mozambique, Rwanda, Seychelles, Uganda, Zambia. The strength of the approach is shown by the fact that several of the identified priorities have subsequently been pursued, including through external funding.

This result also envisaged the implementation of common certification, inspection and mutual recognition schemes. One of the priorities identified by the prioritisation tool was aflatoxin controls, where reliable testing capacity is limited, despite being essential. With support from the secretariat, a number of countries have been involved in setting up a proficiency testing scheme for aflatoxin testing, which provides the basis for regionally harmonised procedures for sampling and laboratory analysis, and mutual recognition of test certificates. The procedures have been established for maize, and laboratories in several countries have been evaluated. This will be continued under the new strategy.

COMESA has collaborated with ASARECA to develop harmonised seed regulations with the aim of promoting seed trade in the region. An important element of the regulations relates to phytosanitary issues, so falls within the SPS ambit. Implementation of the regulations must now be pursued.

(iii) Monitoring, surveillance, diagnostic and emergency response systems established for priority SPS risks

As noted in the previous paragraph, aflatoxin is a priority SPS risk in the region, and capacity to diagnose and test for it is the basis for managing the risk. One way to manage aflatoxins is through the use of a biological control agent, and COMESA has been supporting this work within the Partnership for Aflatoxin Control in Africa (PACA) and in collaboration with the International Institute of Tropical Agriculture (IITA) and others.

Fruit fly is another priority risk that affects both production and market access for most COMESA Member States. COMESA has therefore been seeking ways to address the problem, including through establishing surveillance systems. Towards the end of 2015 COMESA co-convened a regional consultation on the basis of which a regional strategy for fruit fly management is being developed.

During the period of the strategy Tropical Race 4 of Panama Disease in bananas was discovered in Mozambique. COMESA has partnered with regional and international organisations to address the threat this disease poses to many COMESA and other countries in Africa. Coordinating a rapid emergency response to new SPS problems remains a challenge, but COMESA is an appropriate institution for this role, and this is therefore carried forward in the new strategy.

One factor affecting SPS risks, and in some cases increasing them, is climate change. Accurate predictions of how the climate will change in different regions are difficult to make, and much more so the exact effect on SPS hazards. However, Member States need to be aware that climate change will certainly change SPS risks, and take account of this in their decision making. In support of this a number of analyses on climate change and SPS risks were undertaken and presented at the 17th session of the Conference of the Parties (COP17) to the United Nations Framework Convention on Climate Change (UNFCCC) in South Africa, as well as to the COMESA SPS sub-committee.

(iv) Improved decision making using accurate and up-to-date SPS information

Information exchange is an important role for a regional organisation. It is something that Member States frequently demand, and the 2011-2015 strategy included setting up a COMESA SPS portal. A web-based Food and Agricultural Marketing Information System (FAMIS) was created with IITA, which included a pillar on SPS. However, the system has not been maintained or used.

Another information system to support decision making has been very successful. The Tripartite Non-Tariff Barriers (NTB) Reporting, Monitoring and Eliminating Mechanism provides the opportunity for all stakeholders, but especially private sector, to report incidents of what they consider to be unjustified non-tariff impediments to trade within the tripartite countries (see <http://www.tradebarriers.org>). While NTBs include a wide range of problems, a proportion of them fall under SPS. The system includes updates on problems that have been resolved, and it is likely that the transparency provided by the system encourages stakeholders to address the identified issues.

The 2011-15 strategy also anticipated Member States establishing national information and communication systems. Progress in this area has been variable, and is largely the responsibility of the countries themselves. However, one reason the FAMIS system was not successful is that if national information systems are not working effectively, Member States are not in a position to contribute to a regional system.

2.2 COMESA SPS Regulations

In December 2009 the COMESA Council of Ministers adopted “Regulations on the Application of Sanitary and Phytosanitary Measures”. The regulations were developed in line with the COMESA agreement which includes undertakings by Member States to “...abolish all non-tariff barriers to trade among themselves” (Article 4, paragraph 1 (a)), and to “simplify and harmonise their trade documents and procedures” (Article 4, paragraph 1 (e)), in addition to Article 132 on SPS measures mentioned in Section 1 above.

The COMESA Council of Ministers has urged the Secretariat to support Member States to domesticate the regulations, and has directed the secretariat to enhance programmes aimed at mutual recognition of standards and SPS measures, and to expedite the harmonisation process. This directive must therefore be taken into account in the new strategy, along with the provisions of the regulations themselves.

Under the COMESA treaty regulations are mandatory and binding. However, an STDF-commissioned study of Regional Sanitary and Phytosanitary Frameworks and Strategies in Africa (Magalhães, 2010) suggested that some aspects of COMESA’s SPS regulations might be in contradiction with obligations under the WTO SPS Agreement. For example, Article 6(1) states that “Member States shall comply with Articles 3 to 8 of the WTO SPS agreement, except as otherwise provided for in these Regulations”, suggesting that under some circumstances Member States might not comply with the SPS Agreement. The regulations also provide for the establishment of a certification scheme known as the Green Pass. A study by the FAO legal department indicates that the Green Pass scheme could be

at odds with contracting parties' obligations under the IPPC, even though the objective of the scheme is to facilitate safe trade in line with the WTO SPS Agreement.

While supporting implementation of the COMESA SPS regulations, the new SPS strategy assumes that Member States will continue aiming to comply with their obligations under the international agreements to which they are signatories.

2.3 Lessons

Member States and the Secretariat have accumulated extensive experience of developing and deploying SPS capacity during the period of the 2011-2015 strategy. There are a many success stories, as well as areas where challenges have been encountered, and a selection of each are briefly highlighted.

Success stories

- Egypt's importation of camels from Ethiopia with FMD successfully reduced the quarantine period by the use of the Djibouti Modern Quarantine Station and phased vaccinations
- Uganda and Rwanda have successfully controlled FMD in imported cattle through the use of farms as quarantine stations, for laboratory screening, identification and traceability, issuance of intervention certificates and border controls.
- The Centre of Phytosanitary Excellence in Kenya has successfully supported Uganda to build capacity and so eliminate non-compliance of cut flowers to EU due to interceptions of *Spodoptera*. Another aspect of the success was the strengthening of public-private cooperation in Uganda.
- Kenya's electronic single window has reduced the processing time of the veterinary services' import and export certificate processing from around 5 days to 1½ days. Implementation of the system has also had some challenges.
- The arrival of panama disease tropical race 4 in Mozambique was detected through an effective collaboration between public and private sector partners in Mozambique and South Africa. The early detection has so far enabled the spread to be limited.

Challenges and lessons

- Seychelles, which is free from FMD, does not import meat from the region because they do not trust suppliers who may supply FMD infected products. However, a lesson could be learned from Madagascar, which declined to import meat from South Africa due to FMD concerns. OIE helped set up 3 disease-free regions and trade resumed.
- Advocacy in support of increased resources for plant health is challenging. Plant health experts feel that animal health is more successful in attracting resources, perhaps because they can focus on relatively few well known diseases.
- Building skills and competencies across the whole value chain is important, including capacity building of the private sector players on SPS measures and standards.
- Accreditation of quarantine facilities and laboratories at and behind borders can facilitate movement of animals.
- Addressing country-specific problems is an effective way of developing SPS capacity
- Good preparation for regional SPS meetings increases the value of such meetings

- Not all SPS issues are resolved through dispute settlement mechanisms; bilateral discussions and negotiations can often be successful

2.4 COMESA Medium Term Strategic Plan

COMESA's Medium Term Strategic Plan (MTSP) 2011-2015 identified a number of actions, outputs and outcomes to which SPS measures are linked, specifically under Priority Area 1 (Removing barriers to factor mobility), and Priority Area 2 (Building productive capacities for global competitiveness). The draft new MTSP uses a balanced scorecard approach to identify a strategy map with 11 objectives. SPS issues are addressed under Objective 1, Strengthen Market Integration. This objective foresees a number of SPS-related initiatives, particularly "Supporting the harmonization of sanitary and phytosanitary measures to improve inspection and certification systems and subsequent implementation by Member States and private sector". Other potential initiatives concern reducing technical barriers to trade and adopting risk based approaches. Thus the MTSP recognises the role of SPS measures, and the need to seek ways to reduce their trade restrictiveness while maintaining an appropriate level of protection.

2.5 SADC, EAC and the Tripartite Free Trade Area

Most members of COMESA are also members of the East African Community (EAC) or the Southern Africa Development Community (SADC). SADC has a Trade Protocol in which Article 16 commits Member States to base their Sanitary and Phytosanitary (SPS) measures on international standards, guidelines and recommendations, in order to harmonise SPS measures. An SPS Annex to the Trade Protocol was approved in 2008 promoting implementation of the WTO SPS Agreement, and providing for regional collaboration, consultation and communication, all within the overall aim of fostering regional integration. Recently strategies for the three SPS areas (plant health, animal health and food safety) have been drafted, identifying priority areas for the short, medium and longer term.

EAC adopted an SPS Protocol in 2013, which aims to harmonise SPS measures and promote intra-regional trade. Harmonised standards are envisaged for: (i) plants and plant products, (ii) mammals, birds and bees, (iii) fish and fish products, and (iv) food safety. The protocol also establishes an EAC SPS Committee along with National SPS Committees. In 2015 draft SPS measures were discussed and finalised, which will be the key reference documents in the development of an EAC SPS Bill and Regulations.

In June 2015, COMESA, EAC and SADC launched the Tripartite Free Trade Area (TFTA). During the several years of negotiations, SPS issues were addressed by a working group within the market integration pillar, coordinated by COMESA. This resulted in an SPS Annex under Article 26 of the Agreement. In common with the RECs' SPS agreements, the Tripartite SPS Annex emphasises implementation of the WTO SPS Agreement, including the principles of harmonisation, equivalence, transparency, risk assessment and the appropriate level of protection. The Annex also makes provisions regarding technical assistance and institutional arrangements.

In 2011 the African Union summit endorsed the recommendation of the AU Ministers of Trade to fast-track the establishment of a Continental Free Trade Area (CFTA). It is expected that the TFTA will form the basis for this, and SPS issues can be expected to feature prominently, as they do in the TFTA agreement,

2.6 African Union

2.6.1 CAADP and Malabo

The Comprehensive Africa Agriculture Development Programme (CAADP) has 4 pillars, the second of which is “Improving rural infrastructure and trade-related capacities for market access”. SPS capacity is included within trade-related capacities for improved market access, and it is noted that meeting standards required for trade “remains a major challenge for all African countries”. In support of intra-regional trade, it is stated that regional standards for various sectors will be required, with the importance of harmonisation emphasised, in the first instance with international standards as advocated in the SPS agreement. The “CAADP Process” involves countries making “Compacts” with partners in agricultural development, after which investment plans are produced. Country compacts generally emphasise regional trade, though the inclusion of SPS issues in investment plans has been uneven.

2014 was the AU’s “African Year of Agriculture and Food Security”, and at the AU Summit in Malabo, Equatorial Guinea, Heads of State signed the “Malabo Declaration on Transforming Africa’s Agriculture for Shared Prosperity and Improved Livelihoods through Harnessing Opportunities for Inclusive Growth and Sustainable Development”. The declaration included a recommitment to the principles and values of the CAADP process, and amongst others, to boost intra-African trade (Box 1). It is clear from this commitment and target that an SPS strategy can contribute directly to the Malabo vision.

Box 1. Commitment to boosting Intra-African Trade in Agricultural commodities and services

We commit to harness markets & trade opportunities, locally, regionally and internationally, and resolve:

- a) to triple intra-African trade in agricultural commodities and services
- b) to create and enhance policies and institutional conditions and support systems:
 - to simplify and formalize the current trade practices;
 - to fast-track the establishment of Continental Free Trade Area (CFTA)
 - to promote and strengthen platforms for multi-actors interactions;
 - to strengthen and streamline the coordination mechanism that will facilitate the promotion of African common positions on agriculture-related international trade negotiations and agreements.

Following the Malabo summit the CAADP Results Framework 2015-25 was finalized, with three levels of results. Level 1 or impact-level results are those to which the agriculture sector will contribute, such as economic growth. Level 2 results include: Increased agricultural production and productivity; increased intra-African trade; better functioning of national and regional markets; expanded local agro-industry and value chain development inclusive of women and youth; and increased resilience of livelihoods and improved management of agricultural risks. Trade and market oriented agriculture is thus central to the framework. Finally, level 3 results describe the policy, institutional, and capacity outcomes required to trigger the changes at level 2. Again the COMESA SPS strategy can fit directly into this impact pathway.

2.6.2 Technical agencies

The African Union has a number of specialised technical agencies, two of which deal with SPS issues, the InterAfrican Bureau of Animal Resources (AU-IBAR) and the InterAfrican Phytosanitary Council (AU-IAPSC). These organisations deal with animal health and plant health respectively, although their mandates also cover aspects of food safety which at international level are dealt with by the Codex Alimentarius Commission.

The AU-IBAR Strategic Plan (2014-2017) has 4 thematic areas:

- Animal health, disease prevention and control systems
- Animal resource production systems and ecosystem management
- Access to inputs, services and markets for animals and animal products
- Animal resources information and knowledge management

Reflecting the broad mandate of the organisation, and wider scope of the new strategy, SPS issues now fall mainly under the first area. The strategy identifies RECs and their Member States as its key clients.

The AU-IAPSC Strategic Plan (2014-2023) also addresses four areas:

- *Phytosanitary accordance*: to facilitate market access but also to prevent the incursion of exotic plant pests into the continent
- *Plant pest risk reduction*: early detection, response and management of plant pest risks, including sharing of information
- *Human capacity development*: ensuring an adequate supply of trained plant protection personnel at all levels
- *Awareness creation*: to ensure plant protection issues are on national, regional and continental agendas

The plan recognises the importance of RECs and other partners in achieving impact.

There is currently no single AU agency addressing food safety issues. Some aspects fall within the mandates of IAPSC and IBAR, but there is ongoing discussion about the possibility of establishing an African food safety authority.

2.6.3 AUC

The 7th CAADP Partnership Platform in Yaounde (2011) noted the importance of advancing SPS matters within CAADP, and underscored the need to address SPS challenges in a holistic and integrated manner across the entire value chain, and across the various partners involved. The meeting “urged the AUC and the NEPAD Agency to oversee the establishment of a Continental SPS Working Group to mainstream SPS matters in the CAADP framework and establishment of an Africa-led Partnership for Aflatoxin Control”. A working group has been formed, with COMESA as one of the members.

2.7 World Trade Organisation

The COMESA SPS regulations reference the WTO Agreement on the Application of SPS measures (Box 2) which established the WTO SPS Committee. COMESA has observer

status on the WTO SPS Committee, where updates can be given on SPS challenges and activities in the COMESA region.

In November 2014 the WTO concluded a Trade Facilitation Agreement (TFA) that will enter into force once two thirds of Member Countries have ratified it domestically. The agreement states that *“nothing in this Agreement shall be construed as diminishing the rights and obligations of Members under the Agreement on Technical Barriers to Trade and the Agreement on the Application of Sanitary and Phytosanitary Measures”*.

However, it is clear that some of the obligations it contains will apply to the application of SPS measures. For example, Article 1 requires publication (in some cases on the internet) of a range

of information on fees, forms and procedures. While this is in line with the transparency provisions of the SPS Agreement, it extends and provides more detail on the obligations that SPS agencies (amongst others) will be required to meet.

Box 2 Definition of an SPS Measure (WTO SPS Agreement)

Any measure applied:

(a) to protect animal or plant life or health within the territory of the Member from risks arising from the entry, establishment or spread of pests, diseases, disease-carrying organisms or disease-causing organisms;

(b) to protect human or animal life or health within the territory of the Member from risks arising from additives, contaminants, toxins or disease-causing organisms in foods, beverages or feedstuffs;

(c) to protect human life or health within the territory of the Member from risks arising from diseases carried by animals, plants or products thereof, or from the entry, establishment or spread of pests;

(d) to prevent or limit other damage within the territory of the Member from the entry, establishment or spread of pests.

SPS measures include all relevant laws, decrees, regulations, requirements and procedures including, *inter alia*, end-product criteria; processes and production methods; testing, inspection, certification and approval procedures; quarantine treatments, including relevant requirements associated with the transport of animals or plants, or with the materials necessary for their survival during transport; provisions on relevant statistical methods, sampling procedures and methods of risk assessment; and packaging and labelling requirements directly related to food safety.

2.8 Diagnostic trade integration studies

Under the Enhanced Integrated Framework for trade related assistance to least developed countries, 10-15 years ago many COMESA countries conducted diagnostic trade integration studies (DTIS). Burundi, Malawi, Uganda and Zambia have conducted updates in the last few years, and SPS issues are frequently identified as areas for intervention. Awareness, capacity in the private and public sectors, SPS constraints to exports, and private sector testing and verification are priority areas identified. Part of the awareness required is that implementation of SPS measures and standards is in order to facilitate trade. Uganda's updated DTIS points out that harmonisation can have both positive and negative effects, and suggests that mutual recognition is preferable to harmonisation in the long run, but requires a level of trust and cooperation between countries' competent authorities. This is an approach COMESA has been pursuing, and will continue to do so under the new SPS strategy.

3. Strategy 2016-2020

The following sections describe the strategy, which is summarised in a logical framework (see Annex A).

3.1 Objectives

The overall objective of the strategy is the high level goal to which the strategy will contribute.

Overall Objective: A fully integrated, internationally competitive regional economic community which promotes shared prosperity and improved livelihoods for all its people.

This goal reflects COMESA's draft MTSP 2016-2020 vision of "a fully integrated, internationally competitive regional economic community with high standards of living for all its people, ready to merge into the African Economic Community". It also incorporates the CAADP Vision 2025 for Agriculture in Africa of "Shared prosperity and improved livelihoods". Thus the new SPS strategy is anchored in the broader strategic context of both COMESA and AU.

The CAADP results framework lists 12 Level 1 indicators (agriculture's contribution to economic growth), which together provide a full picture. Those under the result areas for Wealth creation (eg per capita GDP) and Food and nutrition security (eg prevalence of undernourishment) are most relevant here.

The specific objective or purpose is what the strategy aims to deliver.

Specific Objective: Effective, risk-based, harmonised SPS measures efficiently implemented to facilitate safe regional and international trade.

In line with the WTO's SPS Agreement, the strategy thus focuses on the implementation of SPS measures (Box 2 above), with the following elements:

Effective, risk-based measures. For SPS measures to be effective, they should be based on risk, and provide an appropriate level of protection. If they do not do so, then they are unjustified, and represent an unnecessary trade restriction.

Harmonised measures. Harmonized approaches – such as through the use of common standards – help reduce the costs of implementing SPS measures. These may be international standards, such as those produced by the IPPC, OIE and Codex Alimentarius Commission (as referenced in the WTO SPS Agreement), or regional standards.

Efficient implementation to facilitate trade. The way in which measures are implemented affects their cost, and can in itself restrict trade. The specific objective thus reflects the SPS and TFA, which aim to minimise the restrictiveness of justifiable measures, while allowing countries to achieve the level of protection they deem appropriate.

Regional and international trade. Increasing regional trade is critical to economic development of the region, while international agricultural exports already provide much income. SPS measures apply to both.

Again suitable indicators are available in the CAADP results framework, this time at Level 2 where a further 12 indicators are identified. Suitable ones here are under the result area for increased intra-African and regional trade and better functioning national and regional markets (Value of intra-African trade). For this strategy agricultural products are emphasised, in international as well as intra-African trade.

3.2 Results and Indicative Activities

The purpose will be delivered through activities contributing to the achievement of four results.

Results:

1. Public and private sector capacity development needs prioritised and addressed
2. Regional leadership, coordination and collaboration on SPS issues
3. Reduced trading costs associated with SPS measures
4. Priority SPS risks managed

The following sections describe each result. For each of the results, a number of indicative activities are also described. They are “indicative” because it is recognised that situations change, opportunities arise, and COMESA cannot dictate to Member States the activities they undertake. Thus different member states may prioritise different activities according to their own needs and resource availability. It is also noted that a particular initiative might fall under more than one of the activity areas described below.

3.2.1 Result 1: Public and private sector capacity development needs prioritised and addressed

Capacity development is often taken to mean training of individuals. However, UNDP defines capacity as “the ability of individuals, organisations and societies to perform functions, solve problems, and set and achieve objectives in a sustainable manner” (UNDP, 2010). This, and similar definitions indicate that capacity is more than the knowledge and skills of individuals and organizations. It is a property of a system comprising a range of different actors and the formal and informal linkages between them. The indicative activities thus take this into account, and include capacity development efforts at individual, organisational and system levels. As there are many capacity development needs, it is also necessary to use structured capacity assessment and prioritisation approaches so that investment in capacity development is made on the basis of evidence.

Indicators for Result 1 include the following:

- Changes to capacity, as shown by repeat application of capacity assessment tools
- Number of prioritised capacity needs addressed, at either regional level or by Member States

Activity 1.1: Capacity assessment. An important first step in addressing capacity development is to assess the current situation. There are several tools available for doing this, developed and endorsed by the international organisations recognised by the WTO SPS Agreement (Table 1). A number of COMESA countries have already used these tools, but repeat use is a way of monitoring progress and assessing changing needs. The use of these tools will be encouraged and promoted.

Table 1 SPS Capacity Evaluation Tools (adapted from STDF, 2011).

Tool	Focus	Description
Quick guide and guidelines to assess capacity building needs in national food control systems	Food safety	The quick guide describes a five-step process to obtain a rapid overview of what is needed to strengthen a national food control system. It complements the more detailed guideline on assessing capacity building needs in each of five components of a food control system. A participatory approach is advocated, although an external facilitator can assist. A new version of the guidelines is currently in development and is expected to be available for use in 2016.
Evaluation of the performance of veterinary services (PVS)	Animal health	This OIE tool allows assessment of a veterinary service's capacity in 4 areas: (a) human, physical and financial resources; (b) technical authority and capability; (c) interaction with stakeholders; (d) ability to access markets. OIE trains and certifies experts to carry out the evaluations. The evaluation can be followed by a gap analysis by a certified expert.
Phytosanitary capacity evaluation (PCE)	Plant health	The PCE assesses the capacity of a National Plant Protection Organisation (NPPO) to implement International Standards for Phytosanitary Measures (ISPMs) and meet their obligations under the IPPC. The tool itself is now on a restricted access web-site, so is not publicly available.

Activity 1.2: Inclusive prioritisation processes. SPS capacity needs assessments and gap analyses can generate a large number of possible interventions which might be expected to have positive impacts. But resources are limited, so prioritisation is required. COMESA will continue to promote the use of tools which make the prioritisation process transparent and as objective as possible, particularly the "Prioritizing SPS Investments for Market Access" (P-IMA) tool (Box 3). The development and deployment of this tool has been supported by STDF, and COMESA has facilitated its application in several Member States. As with needs assessments, application of the tool can and will be repeated as situations change. STDF is producing a user manual to support the tool's wider use.

Box 3. Steps in the P-IMA Tool

1. Compilation of information dossier
2. Definition of choice set
3. Definition of decision criteria and weights
4. Compilation of information cards
5. Construction of spider diagrams
6. Derivation of quantitative priorities
7. Validation

From Henson & Masakure (2011).

Activity 1.3: Legal and regulatory frameworks. Capacity assessment tools often highlight the need to strengthen or update the national legal and regulatory framework. This may include new or revised legislation, for example establishing and mandating appropriate competent SPS authorities aligned with international agreements. Several countries have made such revisions in recent years, but this is an ongoing process, and COMESA will support those member states where the frameworks still need revising and updating. Aligning frameworks to obligations and responsibilities under regional and international agreements will foster harmonisation of frameworks amongst COMESA member states, while preserving their sovereignty.

Activity 1.4: SPS infrastructure, facilities, equipment. Many countries need additional infrastructure and equipment in order to undertake relatively basic measures, such as testing for organisms or contaminants of SPS concern, and this is one of the areas that the capacity assessment tools address. COMESA's regional reference laboratories have already been provided with some equipment, so as well as seeking to support enhancement of SPS infrastructure in other countries, regional collaboration will also be promoted to make maximum use of existing facilities (see Activity 2.2). Not all SPS infrastructure needs to be in the public sector, and where possible COMESA will encourage private sector investment.

Activity 1.5: Human resource development (technical, managerial). In the COMESA region there is already a reasonable level of technical expertise, though there is need for continuous human resource development. This is required in both the private and public sector, and at all levels from technicians to senior technical and managerial staff. COMESA also recognises that capacity development is required in the area of running and managing organisations such as competent authorities.

Activity 1.6: "System" capacity development. As noted above, an important part of capacity development is in enabling the different parts of a "system" to function effectively together. An SPS system comprises a range of actors in the public and private sectors, and structures such as national SPS committees, crop-specific task forces and other mechanisms are designed to take account of this. COMESA will promote and support the use of approaches that foster constructive and cooperative links between the different parts of SPS systems nationally and regionally.

3.2.2 Result 2: Regional leadership, coordination and collaboration on SPS issues

Regional organisations are premised on members being better able to achieve their goals through working together. For this to occur, leadership and coordination are required, a role that sits well with the Secretariat. Under this result a number of activities are identified that seek to deliver this regional benefit.

Indicators for Result 2 include the following:

- Number of Member States collaborating in COMESA-led SPS initiatives
- Decisions by the Committee for Agriculture on SPS issues
- Documented influence of COMESA on regional and international SPS activities and initiatives

Activity 2.1: Advocacy. Advocacy will be undertaken in and amongst Member States, as well as externally. COMESA will promote the importance of biosecurity and SPS issues, with the aim of increasing resource allocation by government to SPS activities. Such advocacy needs to be based on economic evidence of the cost-effectiveness of SPS investments. COMESA will also advocate for "Regulatory good practice" amongst SPS regulatory bodies and competent authorities, promoting delivery of public policy goals efficiently and cost-effectively. The Secretariat communications team will support advocacy through dissemination of information including success stories, using a variety of media.

Activity 2.2: Strengthen regional centres of excellence and accredited reference laboratories and the systems for using them. The COMESA SPS regulations introduced regional reference laboratories (Article 16). With limited infrastructure and human resource in the region, this is a logical approach which Member States endorsed, nominating the reference laboratories as follows:

- Plant Health: KEPHIS, Kenya
- Animal Health: CVRI, Zambia
- Food Safety: FTL, Mauritius

During the last few years these laboratories have been provided with equipment, but under the new strategy, systems for using the laboratories will be set up. A key issue is the financing of the centres; if expertise at a national facility is deployed for regional work (such as undertaking identifications for another member state), then a mechanism is needed to reimburse the laboratory, as the country hosting the reference laboratory cannot be expected to cover all the costs.

The SPS regulations also envisage regional satellite laboratories (Article 17), which Council may designate with particular functions. These would be part of the network of laboratories that provide a regional resource. COMESA will support the capacity development necessary for laboratories to achieve accreditation.

Activity 2.3: SPS in the Continental Free Trade Area. COMESA has played a leading role in promoting the inclusion of SPS as a priority within the Tripartite Free Trade Agreement. As implementation progresses, COMESA will continue with this role, including playing a similar role at a continental level. As various RECs already have their own SPS agreements and protocols, a process of harmonisation will need to be pursued.

Activity 2.4: SPS information exchange and knowledge management systems (web-based portal, rapid alerts etc). Information exchange is an important role for a regional organisation. Although a previous initiative to establish a web-based SPS portal was not sustained, Member States expect the Secretariat to facilitate information exchange. A renewed effort will be made to establish an information portal, taking into account the lessons from the earlier attempt, as well as avoiding duplicating the information that is available through other regional and international portals. This will require a careful specification of needs and priorities, though at minimum should include information on COMESA's SPS activities.

Activity 2.5: Coordination with other regional and global initiatives. COMESA Member States are members of and are served by many other regional and international organisations and initiatives. COMESA does not attempt to duplicate those roles, but at the same time there is an opportunity to improve linkages and coordination between the various initiatives that all concern COMESA Member States. A number of these are mentioned under Section 4.

3.2.3 Result 3: Reduced trading costs associated with SPS measures

While SPS measures should not constitute an unjustifiable restriction to trade, they inevitably result in direct or indirect costs to those involved in trading a commodity. For example, obtaining a phytosanitary certificate has a direct cost (it has to be paid for), and an indirect cost (it takes time). These costs all contribute to the market price of the product, so affect competitiveness.

This result therefore seeks to reduce these costs, and so contribute to facilitating trade. It is important to note that reduction of costs associated with SPS measures must not reduce their effectiveness or efficiency in terms of managing risk. Countries have a sovereign right to set their own appropriate level of protection, and reducing the cost of SPS measures is not concerned with changing that level. Instead this result aims to maintain the level of protection but at lower cost. The result is thus in keeping with implementation of the new Trade Facilitation Agreement as well as the SPS Agreement.

Indicators for Result 3 include the following:

- Cost per unit of commodity traded, disaggregated by commodity, border, and size of trader
- Competent authorities' compliance with transparency and other obligations

Activity 3.1: Link and coordinate SPS with other agencies within the country and at borders. Within the COMESA region several one-stop border posts have been, or are in the process of being, established. While these have primarily been established for improving customs operations, they offer opportunities for integrating SPS measures with other border operations, and thus reducing costs. Various fora are in place in COMESA countries, such as Joint Border Management Committees, One-stop Border Post Management Committees, as well as Trade Information Desks for supporting small scale cross border traders operating under the simplified trade regime. Similar opportunities may exist behind the borders. COMESA will promote the inclusion of SPS organisations and issues in these fora and structures, with the aim of improving efficiency and reducing costs.

Activity 3.2: Promote harmonised approaches & mutual recognition. The international standard setting organisations create standards that facilitate harmonisation, and COMESA will continue to promote harmonisation through developing the capacity of countries to implement those standards. However, there can be practical difficulties caused by Member States lacking confidence in the capacity of their trading partners within the region. This can lead to duplication of effort, such as testing by both exporting and importing country. Using specific examples such as aflatoxin testing, COMESA will promote mutual recognition of Member States' capacity.

Activity 3.3: Create/strengthen effective and efficient public-private partnerships. Within COMESA there are already good examples of public-private partnerships that reduce the costs of implementing SPS measures, but there is need to extend these to other value chains. Such partnerships will be promoted where there is a clear focus around which to build a partnership, such as addressing an SPS issue that is constraining trade. This approach has been found to be effective, but requires awareness of the benefits of partnership which is not always present. Only where there is willingness to enter into partnership can the necessary mutual trust be developed.

Activity 3.4: Increase users' awareness of SPS service provision. Related to the previous activity area, there is a need to build awareness of users of the services provided by competent authorities. Often they are seen as policing rather than facilitating trade, and changing such perceptions can take time. One way to do this is in a specific context, where the users can gain their own experience of how the services ultimately benefit them. Nevertheless, COMESA also recognises that objectives of public and private sector organisations do not always coincide.

Activity 3.5: Implement Trade Facilitation Agreement provisions in an SPS context. As noted above, the TFA has implications for the implementation of SPS measures, with a number of obligations regarding transparency and communication of information that go beyond those of the SPS agreement. Under this strategy COMESA will support countries in understanding and implementing the provisions of the TFA as they apply to SPS measures.

3.2.4 Result 4: Priority SPS risks managed

Different countries have different priority risks to manage, although a number of problems are common to many COMESA countries in that they are already constraining trade and/or threatening animal, plant and/or human health.

Priority risks may be problematic for different reasons:

- Problems already present which are hindering trade within the region or exports beyond the region. Foot and mouth disease, oriental fruit fly and aflatoxin are examples.
- Problems already present which are affecting production. Strictly speaking these are not SPS risks, but they affect trade indirectly as they reduce the volume and quality of tradeable production. Often such problems may also constitute an SPS risk.
- Problems not yet present in a country but which are expected to cause trade and/or production problems if they are introduced. Many of these are already present in one or more countries of the region, but are a risk to other unaffected countries. An example is the Tropical Race 4 of Panama disease which has been found in one country in Southern Africa, but so far not in any COMESA countries.
- Potential problems not yet present in the COMESA region, but which appear to present a risk. Identification and management of these risks is not well developed in COMESA or most other African countries.
- Problems created as a result of trading partners changing their regulations (such as maximum residue or contaminant levels permitted).

Under the 2016-2020 strategy COMESA will seek to address all of the above categories of SPS problems, as described below, with the aim of reducing losses to production, trade and health.

Indicators for Result 4 include the following:

- Number of initiatives targeting prioritized SPS risks
- Number and value of trades (commodities/routes) facilitated by managing SPS risks

Activity 4.1: Develop and implement early warning systems. Early warning systems involve various activities, several of which fall within the other activities under this result. For

example, good surveillance can provide early warning of a new outbreak, allowing a contingency or emergency response plan to come into effect. However, early warning systems are identified as an activity area that Member States aspire to, in recognition of the fact that early warning allows more effective management of risks. Early warning could also be part of information sharing system, in which a Member State could inform its neighbours when it experiences an outbreak. Risks from outside the region could also be identified, and Member States advised on appropriate precautions, something that currently rarely occurs.

Activity 4.2: Develop and implement contingency/emergency response plans including traceability systems. Few countries in COMESA have contingency plans for responding to SPS emergencies, such as the incursion of a new plant pest or animal disease, or an outbreak of a food-borne pathogen. Often it is difficult to secure resources for contingency planning for potential problems, when resources for existing problems are already scarce. However, COMESA will encourage the development of contingency and emergency response plans particularly where the risks are high, due to a high probability of the problem occurring and/or major losses if it does. Appropriate cases would be for hazards already within the region in some but not all countries (such as maize lethal necrosis disease). Contingency plans also need to be made to respond to as yet unforeseen SPS problems, and COMESA will investigate the possibility of a regional response mechanism. Traceability systems within agri-food chains will be promoted as they provide information that can assist with an effective emergency response.

Activity 4.3: Diagnostic services. Diagnostic services are critical to many SPS risk identification and management activities, and countries worldwide look to regional collaboration to meet their needs. Such an approach is appropriate for COMESA, so collaboration between Member States will be promoted to utilise the diagnostic capacity that already exists. In particular the regional reference laboratories will be further developed to provide regional diagnostic capacity (see Activity 2.2). Efforts will also be made to further develop the capacity of diagnostic experts in the region.

Activity 4.4: Surveillance, reporting, communication of SPS risks. Surveillance can be done at a general level, involving various stakeholders and even the general public; this generally happens on an *ad hoc* basis in COMESA countries. Specific surveillance surveys are also necessary by appropriate experts to confirm and expand on general surveillance information. Data from surveillance serves a variety of purposes from supporting exports through to monitoring for identified risks such as a notifiable animal disease. Surveillance needs to be supported by data management systems, and the results are of little value unless communicated. This includes communication amongst stakeholders within a country, with neighbouring countries and COMESA Member States, as well as internationally in fulfilment of obligations. Transparency and communication are key elements in both the COMESA regulations as well as international agreements, including in relation to information collected through surveillance. COMESA will therefore promote the establishment of effective surveillance and data management systems, as well as the communication of the results.

Activity 4.5: Promote harmonised and regional risk-based approaches. Harmonisation reduces costs of trade and is a benefit of adherence to international SPS agreements under which agreed standards are developed. Regional standards can also be developed to foster harmonisation, especially where there are no international standards, and COMESA will

support the development and implementation of appropriate regional SPS standards. Such standards are based on risk, an assessment of which should underpin SPS measures. However, it is noted that mutual recognition and equivalence are alternatives to harmonisation in reducing the costs of SPS measures in trade, and COMESA will also continue to promote these approaches.

4. Implementation

4.1 Roles and responsibilities

Implementing strategies of regional organisations that have a Secretariat and Member States requires a flexible approach with shared responsibilities. On the one hand a regional organisation is comprised of its Member States, so they must own and take responsibility for implementation. On the other hand, Member States sometimes see the implementation of a regional strategy as the responsibility of the Secretariat. And the Member States and the Secretariat work with a range of partners on SPS activities. For this SPS strategy specific roles and responsibilities are not prescribed, but some of the broad roles are summarised below.

4.1.1 Member States

COMESA's 19 Member States have a central role in implementing the strategy. All in-country activities are implemented by organisations (public and private) within the Member States. They may or may not be funded through the Secretariat, and they may or may not be in collaboration with other Member States. But all SPS activities have the potential to contribute to the implementation of the strategy.

It is noted that Member States may implement SPS-related activities that do not fall within this strategy. That is their right, and it is not the aim of this strategy to confine Member States to the activities described. However, it is anticipated that the strategy will provide a framework within which Member States' SPS activities can be located, and that they will share information and experiences for the benefit of other Member States. As described below, the Secretariat has a role to play in such situations.

4.1.2 COMESA Secretariat

Within the COMESA Secretariat there is an SPS unit, which has overall responsibility for promoting the implementation of this strategy. The COMESA secretariat also convenes the SPS Sub-Committee once a year. The Sub-Committee was involved in developing this strategy, and proposed that it exercises a role in monitoring implementation of the strategy. However, its role in that respect is not formalised, so during implementation of the current strategy the role of the sub-committee will be re-visited. This might require more consistent and effective representation from the Member States.

4.1.3 Partners

In implementing the activities, COMESA and its Member States will work with many partners in both public and private sectors. In-country activities will involve partnership with private sector producers, traders, exporters and importers of agrifood and other products for which SPS measures may be required. However, the Secretariat will also seek to maintain and strengthen linkages with regional private sector bodies such as the COMESA Business Council, and commodity groups such as the Eastern Africa Grain Council (EAGC), the East and Southern Africa Dairy Association (ESADA), the Africa Seed Trade Association (ASTA) and others.

Partnership is also necessary with regional and international technical agencies, such as AU-IBAR, AU-IAPSC, ASARECA, international agricultural research centres (IARCs), and global organisations including the three standard setting organisations. For particular project activities, technical agencies will be engaged to support implementation. COMESA has enjoyed good collaboration with the Standards and Trade Development Facility, and this partnership will be continued.

Where appropriate COMESA will also partner with Member States of EAC and SADC that are not part of COMESA, as well as with their secretariats. For example, South Africa is an important trading partner for several countries, and COMESA has successfully brokered SPS negotiations between South Africa and COMESA countries.

Where possible COMESA will seek involvement in regional or international initiatives that contribute to the delivery of this strategy. Some current examples include:

- Partnership for Aflatoxin Control in Africa (PACA), led by the African Union Commission
- Reinforcing Veterinary Governance in Africa (VETGOV), implemented by AU-IBAR, FAO and OIE
- Australia-Africa Plant Biosecurity Partnership (AAPBP), led by the Plant Biosecurity Cooperative Research Centre and CAB International
- Strengthening controls on food safety, plant and animal pests and diseases to boost agricultural productivity and trade in Southern Africa, led by FAO

4.2 Finance

Financing for a regional strategy such as this comes from a number of sources, in line with the various organisations having a role in its implementation. Member States will undertake activities with their own as well as externally sourced funds. Member States will also commit substantial in-kind finance when implementing regional activities, in terms of personnel costs and the use of facilities.

The COMESA Secretariat is supported by Member States, but SPS and other activities are also supported by development partners. Thus implementation of this strategy is contingent in part on external funding for the COMESA secretariat and for Member States. The Secretariat and SPS Unit will use this strategy to support resource mobilisation.

4.3 Monitoring and Evaluation

Monitoring and evaluation requires a framework based on a set of indicators. Work is required to determine baseline values for the indicators, and to set and monitor progress towards milestone and target values for the indicators.

However, in a strategy such as this, such a detailed framework may not be appropriate. As indicated above the resources available for the strategy are not certain, and progress towards the targets depends to some extent on what the Member States decide to do themselves. It is intended that this strategy influences and guides their actions and decisions in the SPS area, but COMESA cannot require individual Member States to undertake specific activities.

Thus in the previous section appropriate indicators were identified, but not targets. However, this strategy still needs monitoring and evaluation of progress and achievements, particularly by those responsible for implementing it. It is envisaged this will be done at several levels. The high level indicators for the General and Specific Objectives were drawn from existing strategies and programmes, so should be monitored by COMESA and other regional and international organisations aside from this strategy.

At the results level, monitoring and evaluation will be conducted in several ways. COMESA's SPS Sub-committee meets annually to monitor, review and evaluate SPS work and priorities. Currently this is not done formally against the strategy, but strengthening the role of the SPS Sub-committee has been identified above as an aspect of implementation. One way to do this would be to have a standardised template for countries to report against to the COMESA secretariat, which could be used to provide an annual "state of the COMESA SPS system".

If possible, COMESA will also conduct a more formal mid-term review of the implementation of the strategy, to highlight progress and achievements, as well as identify any changes or shifts of emphasis required, and any hindrances to progress that need addressing.

COMESA will also ensure that individual initiatives have their own monitoring and evaluation frameworks, and these too will provide information for M&E of this strategy.

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Annex A. Logical Framework for the SPS Strategy

	Intervention Logic	Objectively verifiable indicators of achievement	Sources and means of verification	Assumptions
Overall objectives	A fully integrated, internationally competitive regional economic community which promotes shared prosperity and improved livelihoods for all its people.	<ol style="list-style-type: none"> 1. Per capita GDP 2. Prevalence of malnourishment 	<ul style="list-style-type: none"> • WDI, national sources • FAO 	<ul style="list-style-type: none"> • Countries remain committed to regional integration • Sound national economic development policies are pursued
Specific objective	Effective, risk-based, harmonised SPS measures efficiently implemented to facilitate safe, regional and international trade	<ol style="list-style-type: none"> 1. Value of intra-African and international trade in agricultural products (for specific commodities and routes) 	<ul style="list-style-type: none"> • UNCTAD, FAOStat, COMStat 	<ul style="list-style-type: none"> • Countries implement CAADP investment plans • Agricultural production is regionally and globally competitive
Expected results	<ol style="list-style-type: none"> 1. Public and private sector capacity development needs prioritised and addressed 2. Regional leadership, coordination and collaboration on SPS issues 3. Reduced trading costs associated with SPS measures 4. Priority SPS risks managed 	<ol style="list-style-type: none"> 1.1 Changes to capacity, as shown by repeat application of capacity assessment tools 1.2 Number of prioritised capacity needs addressed, at either regional level or by Member States 2.1 Number of Member States collaborating in COMESA-led SPS initiatives 2.2 Decisions by the Committee for Agriculture on SPS issues 2.3 Documented influence of COMESA on regional and international SPS activities and initiatives 3.1 Cost per unit of commodity traded, by commodity, border, and size of trader 3.2 Competent authorities' compliance with transparency and other obligations 4.1 Number of initiatives targeting prioritized SPS risks 4.2 Number and value of trades (commodities/routes) facilitated by managing SPS risks 	<ul style="list-style-type: none"> • Member state reports • COMESA reports • Committee for Agriculture minutes • Reports/minutes of regional and international SPS initiatives • National studies • WTO, IPPC, OIE, CAC • COMESA reports • FAOStat, COMStat 	<ul style="list-style-type: none"> • Public and private sector players are willing to cooperate • Private sector continues to invest in agriculture • Member States support COMESA Secretariat and implement decisions • Regional and International organisations retain COMESA as a member/observer • Other border costs do not inhibit trade • Competent authorities not affected by any organizational and institutional changes • Cost effective risk management methods are available or can be developed

Activities	<ul style="list-style-type: none"> 1.1 Baseline capacity assessment 1.2 Inclusive prioritisation processes 1.3 Strengthen Legal and regulatory frameworks 1.4 Develop SPS infrastructure, facilities, equipment 1.5 Human resource development (technical, managerial) 2.1 Advocacy 2.2 Strengthen regional centres of excellence and accredited reference laboratories 2.3 Promote SPS in the Continental Free Trade Area 2.4 SPS information exchange and knowledge management 2.5 Coordination with other regional and global initiatives 3.1 Link and coordinate SPS and other agencies 3.2 Promote harmonised approaches & mutual recognition 3.3 Create/strengthen effective and efficient public-private partnerships 3.4 Increase users' awareness of SPS service provision 3.5 SPS aspects of the Trade Facilitation Agreement 4.1 Early warning systems 4.2 Contingency/emergency response plans and traceability systems 4.3 Diagnostic services 4.4 Surveillance, reporting, communication of SPS risks 4.5 Promote harmonised and regional risk-based approaches
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