

Background Paper
on
**Challenges of implementing regionally adopted standards at
the national level**

for consideration at the

3rd USAID Feed the Future East Africa Regional Meeting – Focus on Structured Trade

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1.0 Background

Harmonization of EAC Standards of standards for agricultural produce is one of the key goals towards realization of the EAC overall objective of achieving food security and rational agricultural production within the Community.

The EAC Food Security Action Plan underscore the necessity and urgency for the harmonization of standards in realization that lack of harmonized agricultural standards has acted as a technical barrier to intra-EAC trade.

Towards implementation of the EAC Food Security Action Plan, the EAC, through support from USAID/COMPETE finalized development of the following products.

Cereals and cereals products

1. Maize Grain (Review)
2. Dry Milled Maize Products
3. Wheat Grains Specifications
4. Wheat Flour
5. Rough Rice
6. Brown Rice
7. Milled Rice
8. Sorghum Grain Specification
9. Sorghum Flour Specification
10. Finger Millet
11. Pearl Millet
12. Millet Flour

Beans and Pulses

13. Dry Beans & Pulses
14. Dry Soy Beans
15. Dry Whole Peas
16. Dry Split Peas
17. Chick Peas
18. Cow Peas
19. Pigeon Peas
20. Lentils
21. Faba Beans
22. Green Grams

Refer Annex 1 for specification of select standards for information. The detailed standards are posted in the EAC website and can be downloaded through this link:

2.0 Challenges for implementing regionally adopted standards at national level

Implementation of regionally adopted standards faces challenges at the national level as a result of the following limitations: -

- a) Lack of knowledge among the traders on the regionally harmonized standards and skills to meet the standards

- b) Procedures for National Standards Bureaus for verification and certification that products meet the required standards. Often, the services are inaccessible to traders because of the limited outreach that is attributed to the procedures and lack of presence of standards officials at the market place for cross border trade.
- c) Lack of harmony with other agencies that are also mandated to regulate trade of agricultural produce for food safety purposes. Such Agencies include:
 - Atomic Energy Agencies in some Partner States to verify that the products have no radioactive contamination.
 - National Nutrition Authorities in some Partner States who undertake evaluations to confirm that the products meet their national nutritional plans.
 - Crop protection organizations who undertake evaluations to ensure that the products do not carry disease vectors.
 - Weights and measures agencies who undertake verifications to ensure that the products are packed in accordance with the approved weights in Partner States and which actually vary from State to State.
 - Customs Authorities who undertake verification with regard to rules of origin and customs valuations.
 - Health authorities, who verify that the foods are safe for human consumption.

3.0 Proposed measures to address the challenges

The EAC Customs Authorities have led the way in coming up with measures relating to complex customs procedures which were impossible for cross border traders to attain. This is in form of the Simplified Certificate of Origin for goods worth up to US\$500. This figure has recently been revised to US\$2,000. Traders obtain the forms at the border and by so doing the products qualify to be traded on duty free basis.

On this basis of the experience with the EAC SCO, the following has been proposed for consideration by standards institutions and other agencies that are involved in regulating trade of agricultural produce for food safety and nutritional purposes.

1. Simplification of standards procedures

In undertaking to harmonize standards for staple foods in May 2009, the EASC was concerned that there is need to ensure free movement of products meeting standards. It was expected to interface these standards with the STR in order realize the aspirations for SMEs to be able to participate in cross border trade.

Under the current arrangements under the EAC SQMT Act, 2006, goods certified by one National Standards Bureau are accepted to move freely in other Partner States.

It is proposed that Bureaus of standards combine efforts with other agencies in order for them to establish their presence in areas that are close to their borders. In particular, close cooperation between the plant health protection agencies will be vital in supporting the use of harmonized standards.

Once the cooperation is achieved, only one simplified form needs to be designed for the traders to fill at the country of origin. Leveraging on the current mutual recognition agreement in the Partner States on SQMT matters, once the form is authorized by a recognized authority, the customs control offices at the border are obliged to accept the form and initial this acceptance by stamping or other suitable means.

Before certifying the products, it will be useful for a simplified regime of tests for essential characteristics of the products to be conducted by designated laboratories or centres. It is recommended that the designated test centres be as close as possible to the areas which are accessible to traders rather than depending on facilities located in the capitals of the Partner States.

2. Prerequisite programmes

To avoid lengthy test procedures, it is recommended that agricultural field officers in the Partner States be sensitized to conduct prerequisite programmes including the following:

- (1) surveys of the soil conditions in their countries with specific emphasis on nutrient requirements and compositional profiles
- (2) levels and types of pesticides used
- (3) prevalence of pests of interest
- (4) application of fertilizers
- (5) use of or occurrence of heavy metals in the soils
- (6) incidences of radioactive contamination
- (7) incidents of chemical spillage that may affect soil and environmental conditions
- (8) other factors that might require more attention.

Records from these surveys should be exchanged regularly among Partner States in order to bring into focus any situation that might lead to rejection of products originating from certain regions or initiation of mitigation measures that would lead to making the products from those areas conform to relevant standards.

It is expected that once this level of cooperation is achieved, the number of tests to be conducted for agricultural products will be drastically minimized. This will entail a shift from quality control to a quality assurance system that could be certifiable through assessment.

Training of stakeholders with respect to the requirements in a simplified field version could help in increasing the levels of compliance from the field level. Training of stakeholders would include good agricultural practices that take into account the following factors:

- (a) Basic requirements for successfully raising food crops within the compliance framework for the specific crops.
- (b) **Traceability** — All the product is traceable to the farm where it has been grown or reared.
- (c) **Record keeping and internal self-inspection** — Farmers must keep up to date records available to demonstrate that all activities of production comply with GAP and to help trace the history of products from farm to final consumer.

- (d) **Varieties and rootstocks** — Growers should be aware of the importance of effective crop husbandry in 'mother crops' (e.g. in the production of seed potatoes), which can lead to less intervention in subsequent crops.
- (e) **Site history and site management** — A recording system must be established for each field or greenhouse to provide a permanent record of the crops and agronomic activities undertaken at those locations.
- (f) **Soil and substrate management** — Soil maps should be prepared for the farm, which can then be used to plan rotations, planting programmes and growing programmes.
- (g) **Fertilizer use — Nutrient requirement** — A cropping or soil care plan should be developed to ensure that nutrient loss is minimized. The application of fertilizers should be based on nutrient requirements of the crop and on appropriate routine analysis of nutrient levels in the soil, the crop or the nutrient solution. Fertilizer application, using either mineral or organic fertilizers, must meet the needs of the crops as well as maintaining soil fertility.
- (h) **Irrigation** — Predicting irrigation requirements — Incorrect usage of water can have a detrimental effect on product quality. To avoid excessive or insufficient water usage, methods of systematically predicting the crop requirement for water should be utilized. Where possible irrigation should be adjusted based on predicted rainfall, plant water use and evaporation. Daily rainfall records for outdoor production may be used to assist in planning irrigation requirements. Growers are recommended to obtain access to regular meteorological forecasts to aid irrigation planning.
- (i) **Basic elements of crop protection** — Protection of crops against pests, diseases and weeds must be achieved with the appropriate minimum pesticide input. Correct use of biocides, that is, fungicides, herbicides, insecticides, algicides, molluscicides, miticides and rodenticides; or antimicrobials (germicides, antibiotics, antibacterials, antivirals, antifungals, antiprotoas and antiparasites) in order to avoid exceeding appropriate residue limits and detrimental effects on biodiversity, environment and health of workers.
- (j) **Biosecurity plans** — Establishment of biosecurity plans through identification of potential pathways for the introduction and spread of disease in a zone or compartment, and the measures to be applied to mitigate the disease risks in accordance.
- (k) **Produce handling** — All permanent product packing and storage sites must have adequate pest (including rodent) control measures, particularly in areas for food handling, storage of packaging, storage of pesticides and storage of fertilizers. Workers should receive basic training in hygiene requirements for the handling of fresh produce.

Annex 1

Specific Requirements for select East Africa Staple Foods Standards

	Maximum Levels (%)							
	Moisture Content	Extraneous Matter/trash	Defective	Insect Damaged	Discolored	Germinated	Foreign Matter	Aflatoxin
Maize Grade 1	13	0.1	4	1	0.5		0.5	10
Maize Grade 2	13	0.1	5	3	1		1	10
Maize Grade 3	13	0.1	7	5	1.5		1.5	10
Dry Beans Grade 1	13	0.1	2	1	1		0.5	10
Dry Beans Grade 2	13	0.1	3.5	2	1		0.75	10
Dry Beans Grade 3	13	0.1	5.5	3	1		1	10
Chickpeas Grade 1	13	0.1	4	2	2		1	10
Chickpeas Grade 2	13	0.1	6	4	2		3	10
Chickpeas Grade 3	13	0.1	8	6	2		3	10
Pigeon Peas Grade 1	13	0.1	3	2	1		0.5	10
Pigeon Peas Grade 2	13	0.1	5	3	1		1	10
Pigeon Peas Grade 3	13	0.1	8	6	3		2	10
Cowpeas Grade 1	13	0.1	2	2	1		0.2	10
Cowpeas Grade 2	13	0.1	4	3	1		0.6	10
Cowpeas Grade 3	13	0.1	5	6	3		1	10
Dry Whole Peas Grade 1	13	0.1	3	0.3	1		0.2	10
Dry Whole Peas Grade 2	13	0.1	5	0.8	1		0.5	10
Dry Whole Peas Grade 3	13	0.1	8.5	1.5	1		0.7	10
Lentils Grade 1	13	0.1	2	0.3	1		0.2	10
Lentils Grade 2	13	0.1	3.5	0.5	2		0.5	10
Lentils Grade 3	13	0.1	5	0.6	3		1	10
Green Grams Grade 1	12	0.1	2	1		90		10


Annex 1

Specific Requirements for select East Africa Staple Foods Standards

	Maximum Levels (%)							
	Moisture Content	Extraneous Matter/trash	Defective	Insect Damaged	Discolored	Germinated	Foreign Matter	Aflatoxin
<i>Green Grams Grade 2</i>	12	0.1	4	2		N/A		10
<i>Green Grams Grade 3</i>	12	0.1	6	3		N/A		10
Sorghum Grade 1	13	5	5				2	10
Sorghum Grade 2	13	15	8				3	10
Sorghum Grade 3	13	15	10				4	10
Millet Grade 1	12			0.2				10
Millet Grade 2	13			0.3				10
Millet Grade 3	14			0.5				10
Wheat Grade 1	13		3				0.4	10
Wheat Grade 2	13		5				0.7	10
Wheat Grade 3	13		10				1.3	10
Wheat Grade 4	13		15				2.4	10
Rice Grade 1	13	0.1						10
Rice Grade 2	13	0.1						10
Rice Grade 3	13	0.1						10
Note:								
Grade 4 Wheat to be used for only partner states' domestic use.								

Annex 2

Model certificate of conformity with standards for farm produce

1. Trader:	Certificate of conformity with the Community marketing standards applicable to farm produce No. (This certificate is exclusively for the use of inspection bodies)		
2. Packer identified on packaging (if other than trader)	3. Inspection body		
	4. Place of inspection/country of origin ⁽¹⁾	5. Region or country of destination	
6. Identifier of means of transport	7. <input type="checkbox"/> Internal <input type="checkbox"/> Import <input type="checkbox"/> Export		
8. Packages (number and type)	9. Type of product (variety if the standards specifies)	10. Quality Class	11. Total net weight in kg
12. The consignment referred to above conforms, at the time of issue, with the Community standards in force, vide: <u>CD/K/453:2010, Cowpeas — Specification and grading</u> <hr style="width: 50%; margin-left: 0;"/> Customs office foreseen Place and date of issue Valid until (date): Signatory (name in block letters): <div style="display: flex; justify-content: space-around; width: 100%;"> Signature Seal of competent authority </div>			
13. Observations:			
(1) Where the goods are being re-exported, indicate the origin in box 9.			