

# SUPPORTING POLICY DIALOGUE AND ADVOCACY EFFORTS OF THE COMESA BUSINESS COUNCIL

**Draft Position Paper on the Development of Framework for  
Implementation of Food and Beverages Product Standards in  
the COMESA region**



## CITATION

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COMESA Business Council (2021) *Supporting Policy Dialogue and Advocacy Efforts of Comesa Business Council - Draft Position Paper on the Development of Framework for Implementation of Food and Beverages Product Standards in the COMESA region.*

The COMESA Business Council (CBC) is a Business Member Organization and recognized private sector institution of the Common Market of Eastern and Southern Africa (COMESA).

CBC, COMESA Building, Ben Bella Road, P.O. Box 30051, Lusaka, Zambia  
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## ACKNOWLEDGEMENTS

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This report was developed as part of the COMESA Business Council's (CBC) Business Policy Programmes Division advocacy efforts regarding regulatory barriers affecting trade and investment, with special focus on matters relating to the agro-industry/manufacturing sector within the COMESA. The position paper on the Development of a Framework for Implementation of Food and Beverages Product Standards in the COMESA region presents an analysis on the harmonisation of food and beverage product standards in COMESA. This particular issue was selected on the basis of the challenges that agro-industry/ manufacturing sector players in the food and beverages subsector face in adhering to differentiated product standards across the region. In that respect, this paper has identified the key challenge, which is the failure by member states to domesticate regional standards.

The position covers research that was conducted in 2021, with validation done during the same year. The International Trade Centre provided financial support to the COMESA Business Council for this report.

Our special thanks go to the following institutions, organisations and CBC Workgroups for their support in the development of this paper: NESTLE East Africa; the Zambia Association of Manufacturers; the African Organization for Standardization (ARSO); members of the CBC Agroindustry Workgroup, Manufacturers Workgroup, and Industry Committee; and the Trade Policy Training Centre in Africa (TRAPCA) for provision of key research data.

This position paper was developed by Mr. Shimukunku Manchishi, Trade Policy Expert, International Trade Centre National Consultant and further reviewed and edited by COMESA Business Council's Business Policy Programs Manager, Mr. Dickson Poloji, under the overall supervision of the Chief Executive Officer, Ms. Sandra Uwera.

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## ABBREVIATIONS:

<b>CBC</b>	COMESA Business Council
<b>COMESA</b>	Common Market for Eastern and Southern Africa
<b>FTA</b>	Free Trade Area
<b>PTA</b>	Preferential Trade Area for Eastern and Southern Africa
<b>WTO</b>	World Trade Organisation
<b>GDP</b>	Gross Domestic Product
<b>LDC's</b>	Least Developed Countries
<b>LLDC's</b>	Land Locked Least Developed Countries
<b>UN</b>	United Nations
<b>ITC</b>	International Trade Centre
<b>NTB's</b>	Non-Tariff Barriers
<b>ARSO</b>	African Organisation for Standardisation
<b>REC's</b>	Regional Economic Communities
<b>MoU</b>	Memorandum of Understanding

## 1. Introduction

The Business Policy Programmes division of the COMESA Business Council (CBC), in particular, is mainly responsible for engaging the private sector in dialogue and advocacy initiatives with the objective of improving the competitive business environment in the Common Market for Eastern and Southern Africa (COMESA) region. Within the scope of COMESA, the Business Policy Programmes Division of CBC is undertaking further advocacy efforts regarding regulatory barriers affecting trade and investment, with special focus on matters relating to the agro-industry/manufacturing sector within the COMESA.

Therefore, to enhance policy advocacy for specific issues affecting the business community in the region, CBC has undertaken to develop a position paper on one issue relating to developments around the COMESA. This position paper constitutes an analysis undertaken by CBC on the harmonisation of food and beverage product standards in COMESA. This particular issue was selected on the basis of the challenges that agro-industry/ manufacturing sector players in the food and beverages subsector face in adhering to differentiated product standards across the region. In that respect, this paper has identified the key challenge, which is the failure by member states to domesticate regional standards.

The methodology used to develop this paper was a mixture of desk review and interviews with selected sector players given the time constraints which could not allow for a full scale survey. The desk review took the form of a detailed review of the COMESA treaty as well as other relevant literature.

The remainder of the paper is organised as follows; Section 2 provides a historical overview of COMESA as well as the socio-economic aspects of the region, especially trade. Section three provides an analysis of food and beverage trade in COMESA while section 4 speaks to the challenges of implementing food and beverage product standards in COMESA. Section five provides a conclusion and this is followed by section 6 which ends the position paper with a set of recommendations.

## 2. Overview of COMESA

Before delving into the intricacies of product standards in COMESA, it is important to highlight the historical development of COMESA as this provides context to some of the findings and recommendations of this paper. This section therefore provides an overview of the COMESA region, highlighting the political and economic aspects of the region.

### 2.1 Historical background of COMESA

COMESA<sup>1</sup> was initially established in 1981 as the Preferential Trade Area for Eastern and Southern Africa (PTA). The PTA Treaty was signed on 21 December 1981, in Lusaka, Zambia, and came into force on 30 September 1982, after ratification by more than seven signatory states<sup>2</sup>. The PTA Treaty envisaged the transformation of the Preferential Trade Area into a Common Market and, in conformity with this, the Treaty establishing COMESA was signed on 5 November 1993 in Kampala, Uganda, and was ratified a year later in Lilongwe, Malawi, on 8 December 1994<sup>3</sup>. COMESA was notified to the World Trade Organisation (WTO), under the Enabling Clause, in 1995<sup>4</sup>. COMESA achieved a Free Trade Area (FTA) in 2000 and launched its Customs Union in June 2009.

The objectives<sup>5</sup> of COMESA are articulated in the COMESA Treaty to be as follows:

- To attain sustainable growth and development of the Member states;
- To promote joint development in all fields of economic activity and the joint adoption of macroeconomic policies and programmes;
- To cooperate in the creation of an enabling environment for foreign, cross border, and domestic investment;

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<sup>1</sup> There are currently 21 member states: Burundi, Comoros, Djibouti, Democratic Republic of the Congo, Egypt, Eritrea, Ethiopia, Kenya, Libya, Madagascar, Malawi, Mauritius, Rwanda, Seychelles, Sudan, Swaziland, Uganda, Zambia and Zimbabwe. Most recently, Somalia and Tunisia have joined as COMESA members.

<sup>2</sup> Siteke G Mwale, 'An Historical Background to the Formation of COMESA' in Victor Murinde (ed) *The Free Trade Area of the Common Market for Eastern and Southern Africa* (Ashgate Publishing Ltd, Aldershot, 2001) 31, 35.

<sup>3</sup> See Treaty establishing the Common Market for Eastern and Southern Africa, 1993

<sup>4</sup> GATT Document, 'Differential and More Favourable Treatment, Reciprocity and Fuller Participation of Developing Countries, (Decision of 28 November 1979, L/4903) (Enabling Clause). For an analysis of the Enabling Clause see Panel Report, *European Communities – Conditions for the Granting of Tariff Preferences to Developing Countries*, WT/DS246/R, adopted as modified by the Appellate Body report on 20 April 2004; Appellate Body Report, *European Communities – Conditions for the Granting of Tariff Preferences to Developing Countries*, WT/DS246/AB/R, adopted 20 April 2004

<sup>5</sup>

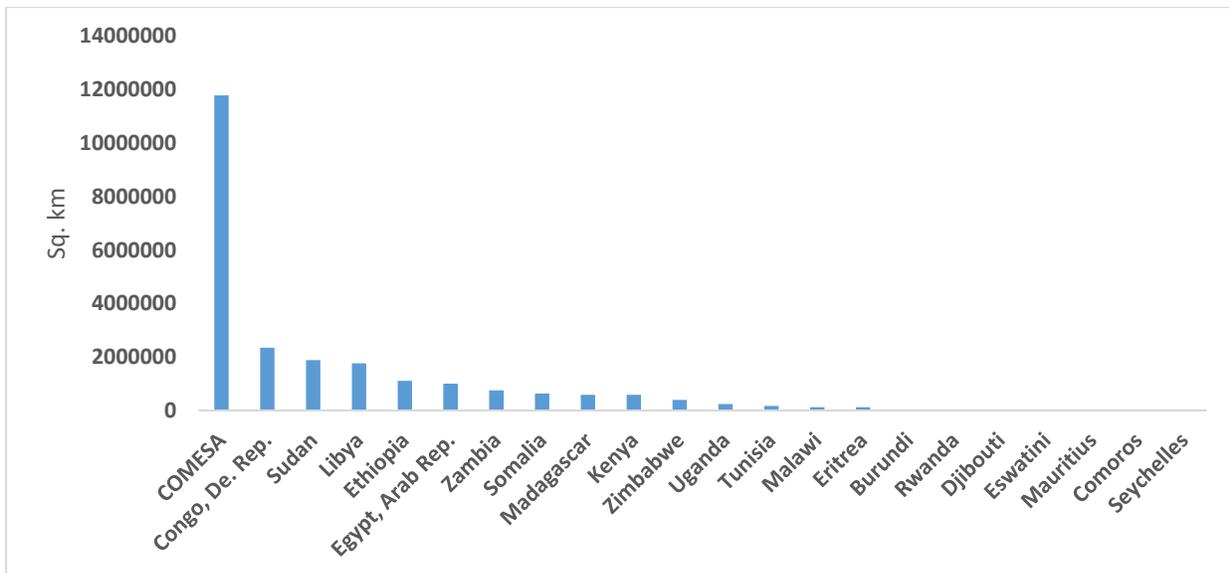
- To cooperate in the promotion of peace, security, and stability among the Member states;
- To cooperate in strengthening the relations between the Common Market and the rest of the world; and
- To contribute towards the establishment, progress, and realisation of the objectives of the African Economic Community.

The main institutions of COMESA are the COMESA Authority, the Council of Ministers, the Secretariat, and the Court of Justice.

## 2.2 Socio-economic aspects of COMESA

The COMESA region is characterised by heterogeneity among its 21 member countries in terms of land area, economic size and performance, and dependence on trade. COMESA Member states, in terms of physical area vary, ranging from small islands like Seychelles, Comoros, and Mauritius to large countries like the Democratic Republic of Congo, Sudan and Libya as shown in figure 1.

Figure 1: COMESA Area by country

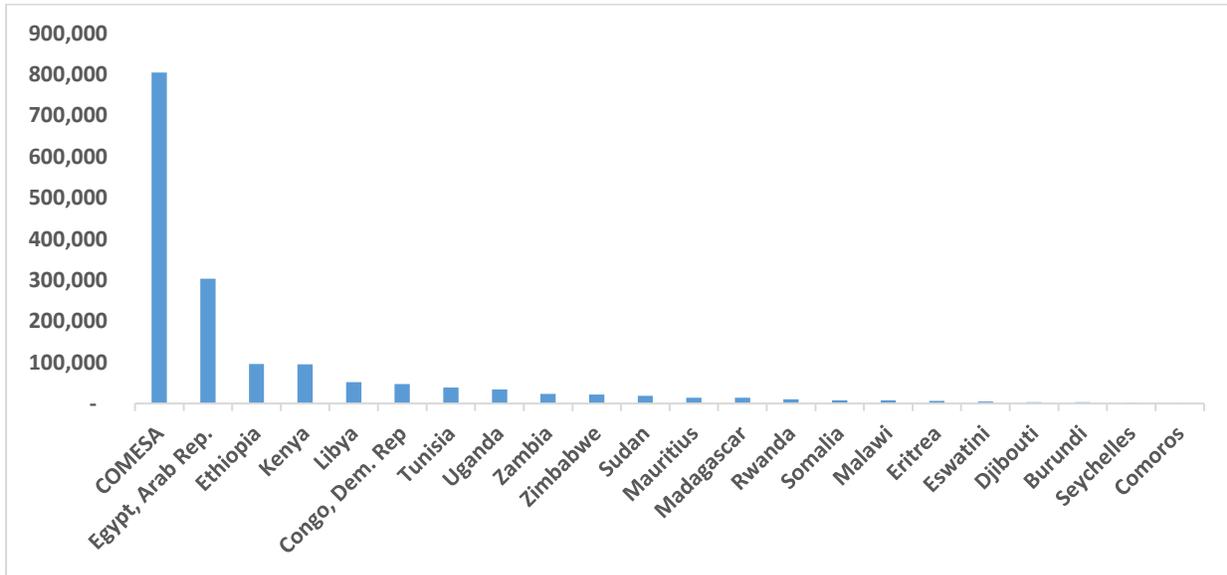


Source: Authors' construction based on data from <https://comstat.comesa.int/>

Furthermore, the economic variability across the region is evident in Figure 2 which shows the distribution of Gross Domestic Product (GDP) within the region. Egypt, Ethiopia, Kenya, Libya and Democratic Republic of Congo account for the top five country shares

of GDP within the region. In addition, regional per capita income varies widely, ranging from US\$202.4 in Burundi to US\$12, 598.8 in Seychelles in 2020<sup>6</sup>.

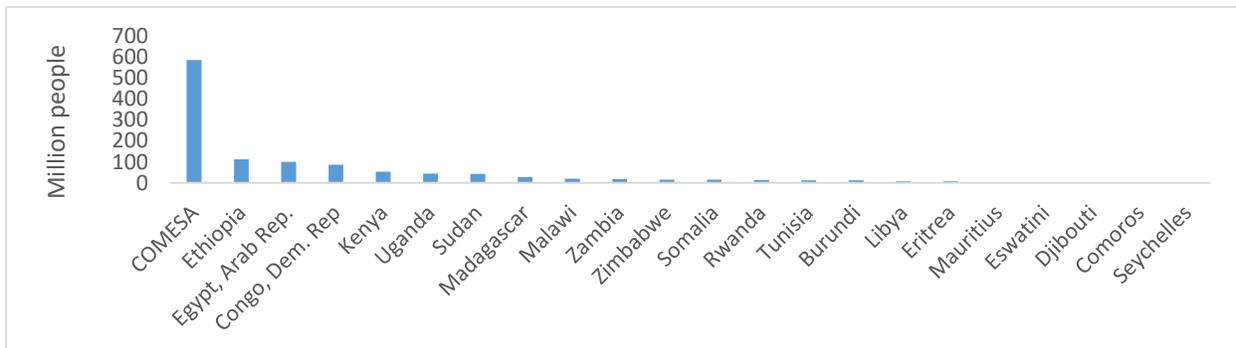
Figure 2: COMESA GDP at Current Prices (2019)



Source: Authors' construction using data from <https://comstat.comesa.int/>

The countries within the COMESA region also vary in terms of population size as evidenced by figure 3 which shows the population distribution across the region with a total population of 586 million people as at 2019. Ethiopia, Egypt, Democratic Republic of Congo, Kenya and Uganda account for the top five most populous countries within the region.

Figure 3: COMESA Population (2019)



Source: Authors' construction using data from <https://comstat.comesa.int/>

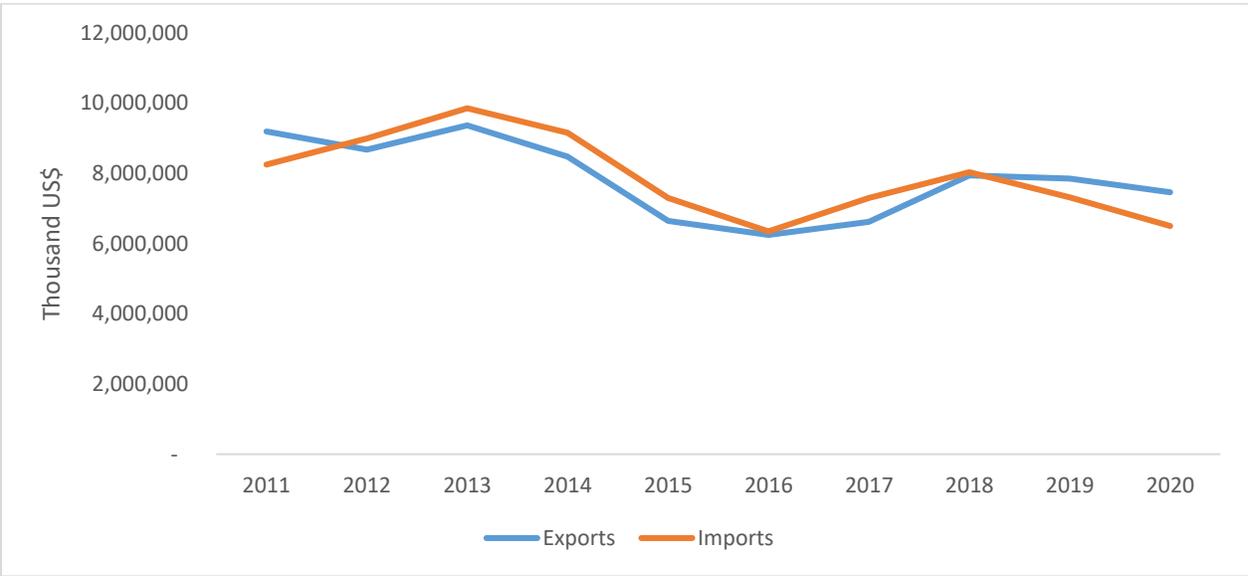
<sup>6</sup> See <https://databank.worldbank.org/source/world-development-indicators#>

Out of its 21 member states, 12 are officially classified as Least Developed Countries (LDCs) by the United Nations (UN)<sup>7</sup>, of which 6 are land-locked developing countries (LLDCs). These factors have hindered economic growth and constrained the region’s trade performance. Although there is significant diversity in performance across countries, overall, Sub-Saharan Africa’s (which includes COMESA countries) long-term growth has been slow relative to other developing countries, experiencing less than half of the average growth and about half of average investment efficiency levels obtained in other developing regions.

**2.2.1 Trade in COMESA**

Trade in the COMESA region is highly reflective of the wider picture of trade within the African continent where trade is largely in primary commodities, specifically mineral and agricultural products. Notably, both total imports and exports in the COMESA region have been unstable over the last 10 years as indicated in Figure 4. Between 2011 and 2013, total imports and exports were on an upward trajectory before dipping between 2013 and 2016. A steady rise in total imports and exports was then experienced before another dip in 2020 probably attributable to COVID-19.

*Figure 4: Intra-COMESA total Imports and Exports (2011 -2020)*



Source: Authors’ construction based on ITC Trademap data

<sup>7</sup> [https://www.un.org/development/desa/dpad/wp-content/uploads/sites/45/publication/ldc\\_list.pdf](https://www.un.org/development/desa/dpad/wp-content/uploads/sites/45/publication/ldc_list.pdf)

When we examine the specific export products within the COMESA region as shown in Table 1, the indication is that the bulk of imports within the region are primary products such as precious stones which accounted for 9% of total exports in 2020. Other top imports include salt (6%), mineral fuels (5%), sugars and sugar confectionery (5%) and fertilizers (4%) among others.

*Table 1: Intra-COMESA top import products*

Import Product	Share of total Imports
Natural or cultured pearls, precious or semi-precious stones, precious metals, metals clad ...	9%
Salt; sulphur; earths and stone; plastering materials, lime and cement	6%
Mineral fuels, mineral oils and products of their distillation; bituminous substances; mineral ...	5%
Sugars and sugar confectionery	5%
Fertilisers	4%
Coffee, tea, maté and spices	4%
Iron and steel	4%
Copper and articles thereof	4%
Plastics and articles thereof	4%
Tobacco and manufactured tobacco substitutes	3%

*Source: Authors' construction based on ITC Trademap data*

The picture for exports is quite similar to that of imports and this is expected given that the exports are imported within the region. The top import products include ores, slag and ash which accounted for 10% of total exports in 2020. Other export products include salt (6%), inorganic chemicals (6%), sugars and sugar confectionery (5%) and copper and articles thereof (4%) among others as shown in Table 2.

*Table 2: Top Intra-COMESA top export products (2020)*

Export product	Share of total exports
Ores, slag and ash	10%
Salt; sulphur; earths and stone; plastering materials, lime and cement	6%
Inorganic chemicals; organic or inorganic compounds of precious metals, of rare-earth metals, ...	6%
Sugars and sugar confectionery	5%
Copper and articles thereof	4%
Coffee, tea, maté and spices	4%
Animal or vegetable fats and oils and their cleavage products; prepared edible fats; animal ...	4%
Iron and steel	4%
Plastics and articles thereof	3%
Mineral fuels, mineral oils and products of their distillation; bituminous substances; mineral ...	3%

*Source: Authors' construction based on ITC Trademap data*

Our analysis of the top exporting countries in COMESA as shown in Table 3 reveals that Kenya, Egypt, Zambia, Democratic Republic of Congo and Uganda are the regions' chief exporters accounting for 21%, 19%, 17%, 17% and 11% respectively of COMESA's total intra-regional exports.

*Table 3: Top exporting countries in the COMESA region (2020)*

Country	Share of total Exports
Kenya	21%
Egypt	19%
Zambia	17%
Congo, Democratic Republic of the	17%
Uganda	11%
Zimbabwe	3%
Eswatini	3%
Mauritius	3%
Malawi	2%
Ethiopia	2%
Djibouti	1%
Madagascar	1%
Burundi	1%
Libya, State of	0%
Rwanda	0%
Sudan (before 2012)	0%

Seychelles	0%
Comoros	0%
Eritrea	0%

*Source: Authors' construction based on ITC Trademap data*

The picture is slightly different when we look at exports with Uganda being the top importer and accounting for 20% of total imports. Other top importing countries include Kenya (15%), Libya (9%), Egypt (8%) and the Democratic Republic of Congo (8%) respectively as shown in Table 4.

*Table 4: COMESA's top importing countries*

Importing Country	Imported value
Uganda	20%
Kenya	15%
Libya, State of	9%
Egypt	8%
Congo, Democratic Republic of the	8%
Zambia	6%
Zimbabwe	5%
Ethiopia	5%
Rwanda	5%
Madagascar	4%
Malawi	3%
Djibouti	3%
Burundi	3%
Mauritius	2%
Eritrea	1%
Sudan (before 2012)	1%
Seychelles	1%
Eswatini	0%
Comoros	0%

*Source: Authors' construction based on ITC Trademap data*

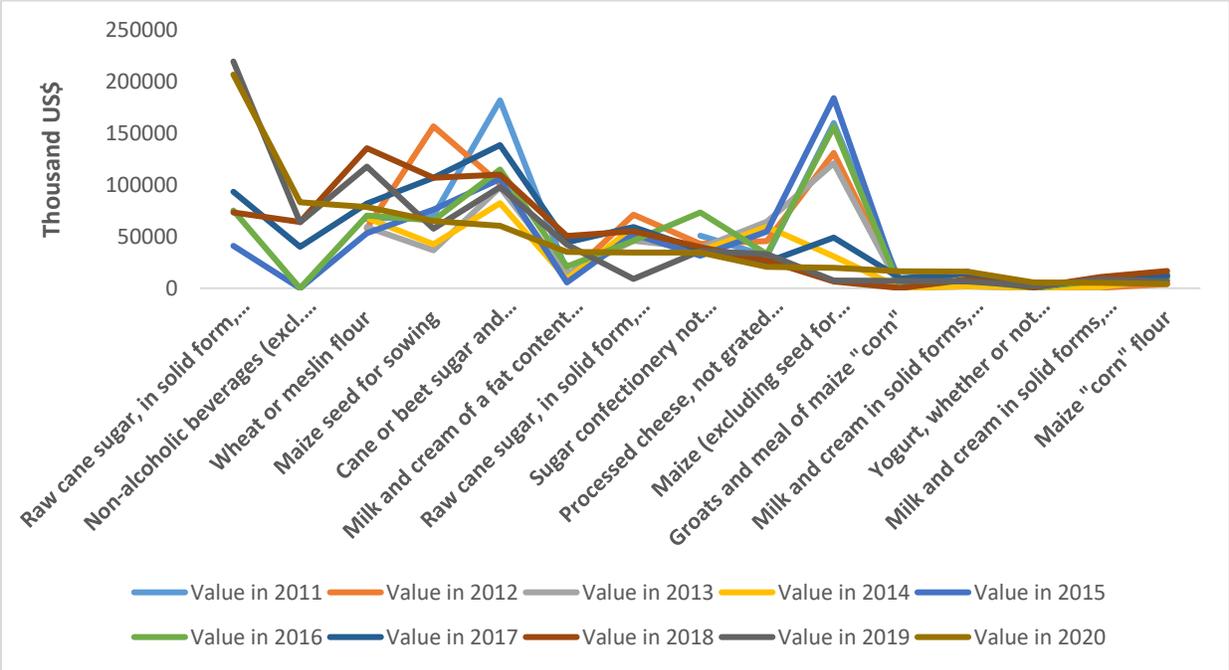
### 2.2.2 COMESA trade in selected Agro processed products

Arising from the overall emphasis of the assignment on issues relating to the Agro-industry/manufacturing sectors, the food and beverages subsector forms the basis of analysis in this paper with a focus on selected products such as sugar and sugar confectionery, beverages, dairy products, maize and flour. These products were arrived

at on the back of trade statistics from ITC’s Trade map showing that they are the most traded food and beverage products within COMESA.

Figure 5 shows the trend in the exports of these selected food and beverage products within the COMESA region between 2011 and 2020. The trend indicates instability in the exports and from the perspective of the private sector, this is reflective of some challenges in access to markets owing to non-tariff barriers through prohibitive product standards. This forms the basis of the next sections where we discuss in detail, the existing product standards framework in COMESA and also highlight some of the challenges that are being faced by the private sector with respect to lack of harmonisation of product standards for food and beverages.

Figure 5: Intra COMESA trade in selected food and beverage products (2011 - 2020)



Source: Authors’ construction based on ITC Trademap data

### 3. Food and Beverage standards in COMESA

The volume and complexity of technical regulations and the variation in certification, testing and inspection practices and standards used by different African countries are highlighted as some of the non-tariff barriers (NTB's) to intra-Africa trade. These regulations make the process of obtaining the documentation needed for exporting products in other African countries long and costly.

The practical aspects of adhering to standards are indeed a hindrance as products must comply with mandatory standards in the destination market that are different from those adopted by the country of export and this raises the processing cost by producers, as they have to allocate additional financial resources to ensure compliance of their products to the technical regulations of the importing country. As a result, trading these goods informally is therefore a solution that allows traders to avoid these costs so that their products can be sold for a lesser price in the destination market. Within COMESA, initiatives have been undertaken to facilitate the harmonisation of standards across the region.

According to the Treaty establishing COMESA, specifically Article 113<sup>8</sup>, Member States undertake to:

- apply uniform rules and procedures for the formulation of their national standards;
- adopt African regional standards and where these are unavailable, adopt suitable international standards for products traded in the Common Market;
- coordinate their views with regard to the selection, recognition, adaptation and application of regional and international standards in so far as the needs of the Common Market are concerned, and constantly endeavor to improve the standardization of goods and services within the Common Market; and
- apply the principle of reference to standards in their national regulations, so as to facilitate the harmonization of their technical regulations.

In addition, COMESA recognises the African Regional Organization for Standardization (ARSO) as a leading co-operating partner in the implementation of appropriate provisions of the COMESA Treaty on Standardisation. This is on the basis of a working relationship

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<sup>8</sup> See <https://www.comesa.int/wp-content/uploads/2020/07/Comesa-Treaty.pdf>

between Regional Economic Communities (RECs) across the continent and ARSO through a Memorandum of Understanding (MoU) aimed at increasing African share in global trade to match its current tangible resource base.

Under Article 3 paragraph 2 of the ARSO-RECs, MoUs, the parties agree that the RECs shall grant recognition to ARSO as the competent body to spearhead and coordinate harmonisation of national and/or RECs standards within the continent as African Standards; and that REC shall cooperate and offer assistance to ARSO in order to realise harmonisation of national and/or RECs standards. ARSO and RECs partnerships aim to deliver comprehensive range of African standards and guides for the implementation and recognition of good conformity assessment practices, suitable for all forms of first, second or third party involvement and evaluation, widely used by all interested parties, as well as developing a keymark as the preferred mark of conformity to African Standards, leading to strengthening the concept of Mutual Recognition for the implementation of the principle “one standard, one test, one certificate<sup>9</sup>.”

Based on the above, COMESA has an arrangement with ARSO to develop regional products standards for COMESA Member States. For the food and beverage sector, ARSO has developed a number of standards and we highlight some of these in table 5 which shows selected standards for juices and mineral water, milk and yoghurt products, corn and flour, and sugar and sugar confectionery.

*Table 5: COMESA harmonised standards for selected food and beverages*

<b>Juices and mineral water</b>
<b>CHS 018:2004</b> <i>Standard for natural mineral waters</i>
<b>CHS 040: 2005</b> <i>Standard for concentrated orange juice preserved exclusively by physical means</i>
<b>CHS 066:2005</b> <i>Standard for lemon juice preserved exclusively by physical means</i>
<b>CHS 067:2005</b> <i>Standard for pineapple juice preserved exclusively by physical means</i>
<b>CHS 069:2005</b> <i>Standard for orange juice preserved exclusively by physical means</i>

<sup>9</sup> [https://www.arso-oran.org/?page\\_id=12](https://www.arso-oran.org/?page_id=12)

<b>CHS 077:2004</b> <i>Standard for blackcurrant juice preserved exclusively by physical means</i>
<b>Milk and yoghurt products</b>
<b>CHS 003:2004</b> <i>Standard for sweetened condensed milks</i>
<b>CHS 073 :2005</b> <i>Standard for yoghurt and sweetened yoghurt</i>
<b>CHS 075:2004</b> <i>Standard for sweetened condensed milk</i>
<b>CHS 084:2005</b> <i>Standard for milk-fat products</i>
<b>Corn and flour</b>
<b>CHS 014:2004</b> <i>Standard for wheat flour</i>
<b>CHS 063:2005</b> <i>Standard for whole maize corn meal</i>
<b>CHS 064:2005</b> <i>Standard for sorghum flour</i>
<b>Sugar confectionery and margarine</b>
<b>CHS 006:2004</b> <i>Standard for sugars</i>
<b>CHS 017:2004</b> <i>Standard for margarine</i>
<b>CHS 038: 2005</b> <i>Standard for cocoa butter confectionery</i>

Source: Authors' construction based on information received from ARSO<sup>10</sup>

However, implementation of these product standards developed with assistance of ARSO can be a challenge if member states are not willing to domesticate them at national level to facilitate implementation. The product standards developed by ARSO are not binding unless they are either domesticated at national level or a regional framework is established to facilitate implementation.

Although some progress has been achieved within the COMESA region in harmonizing such standards (especially product quality standards) given the work with ARSO, significant gaps still persist with respect to the lack of domestication of these standards by member states. The industrialization and trade potential of the COMESA region cannot be realized without an implementation framework.

In the next section, we highlight some of the challenges faced by the private sector within the region with respect to product standards for selected food and beverage products.

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<sup>10</sup> These standards are not publicly listed and available. They were accessed through a request to ARSO

This was on the basis of some interviews conducted with some importers and exporters of these products to understand some of the challenges that they face relating to product standards.

#### **4. Product standards and food and beverage trade in COMESA**

While product standards have been harmonised regionally, few are adopted nationally, thus limiting their effectiveness. From the experiences of the firms in the food and beverages sector, this has a negative effect on trade in the COMESA region as firms face barriers in accessing markets.

The interviews conducted with some firms revealed that the standards currently being implemented in the region are based on Codex standards, which are often not appropriate to some national circumstances. This is despite regional standards that are created and harmonised by ARSO being in existence. The undesired effect of this scenario is that firms are hindered from accessing market access through these differences in food and beverage standards that are implemented by member states. It is also apparent that some countries experience difficulty in adapting Codex standards and harmonizing them with regional standards to meet national needs due to lack of technical expertise.

In addition to the failure by most countries to domesticate regional food and beverage standards, the interviews revealed that most food inspection services in COMESA are underfunded, while the food inspectors are poorly trained, poorly paid, and tasked with additional functions over their core functions. This often leads to costly delays in processing inspections. There is also a perception that food inspection staff in some of the countries in the region suffer generally from a low professional status, which is not commensurate with their responsibilities, and a lack of logistical support to carry out the inspections and the cumulative tasks often requested from them.

The interviews also revealed a concern from the private sector that while COMESA has published several harmonised standards, mainly on agricultural and food products, most COMESA harmonised standards relate to specifications and compositional requirements of various products, with a few harmonised standards covering testing, sampling methods, and labelling. As such, these standards, being vertical (prescribing specific

composition requirements for products) and sectoral (confining themselves to particular types of products, such as milk or maize), are limited in their harmonisation impact.

Other challenges mentioned included the outdated nature of food legislation in most countries, inadequate, fragmented, and scattered statutes and codes which create an inevitable confusion among food control enforcement agents, producers, and distributors. It was also mentioned that except in a few countries, the bodies mandated to formulate and enforce standards, standards authorities or bureaus, are not well established and are not actively engaged in the development of national standards.

Furthermore, it was indicated that the COMESA region lacks infrastructure for structured and regular acquisition and dissemination of relevant information to the public on food safety standards. There are few ongoing educational programmes for government food control officials, food industry officials, and consumers. The trainings that do exist are sporadic, unfocused, and not based on actual and/or possible food safety problems.

From the foregoing analysis of the key issues that arose from interviews with selected stakeholders in the COMESA food and beverages value chain, the most prominent challenge relates to the lack of domestication of regional standards by Member states which restricts market access by exporters of food and beverage products. In most cases, the countries within the region implement Codex standards despite the existence of harmonised regional standards.

## **5. Conclusion**

This position paper has analysed the challenges of food standards in COMESA arising from the harmonisation of product standards by ARSO. Having undertaken analysis of trade in the region, the study focused on the food and beverages sector following interviews with some sector players in the region. The interviews revealed that the key challenge being faced related to the failure by countries to domesticate regional standards.

As part of the solution to this challenge, there is scope for an additional level of regional cooperation to facilitate implementation of these ARSO product standards. It means that member states should consider developing a framework to facilitate implementation of product standards within the COMESA region. The absence of the framework is cited as one of the major challenges in implementation of regional standards in COMESA region. The development of an implementation framework to enable members states adopt respective standards for them to be considered as national standards which are harmonised within the region should be considered as a priority.

## **6. Recommendations**

In view of the analysis undertaken in this paper, we make the following recommendations for consideration by the policy organs within COMESA:

- (i) Development of a framework to facilitate implementation of product standards within the COMESA region;
- (ii) Enhanced provision of technical support to standards bodies across COMESA member countries;
- (iii) Increased supportive funding mechanisms for national standards bodies in the region; and
- (iv) Enhancing the scope of harmonised standards to cover testing, sampling methods, and labelling.

CBC Report supported by the International Trade Centre

