

Africa Trade Policy Notes

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Addressing Standards Management Challenges from a Strategic Trade Perspective

Export diversification and expansion is an integral part of the Government of Tanzania's trade and competitiveness strategy. Nontraditional agricultural exports, notably in fish and horticulture products, have exhibited strong growth in the last decade. But trade in these products continues to face significant challenges arising from the stringent standards that they must comply with, especially in developed countries' markets. Managing food safety hazards is a key challenge for growing developing countries as they integrate more deeply into regional and global markets and as the flow of food and animal products across borders increases.

Recognizing the critical role of standards compliance in achieving its trade objectives, the Government has made continuing efforts to improve its standards management system. These include, among others, (i) measures to strengthen food safety controls by updating legislation and establishing the Tanzania Food and Drug Authority (TFDA); (ii) considerable investments in food safety laboratory and certification systems; (iii) collaboration with the private sector by the Tanzania Bureau of Standards (TBS) to fast-track development of highly demanded standards; and (iv) progress towards harmonizing Tanzania's standards requirements with those of its regional trade partners.

Despite positive steps, the prevailing standards system continues to face severe limitations, mainly (i) fragmentation and duplication of tasks among responsible agencies, leading to lack of coordination and weak delineation of roles and responsibilities among them; (ii) systematic reliance on fees and charges from inspection and certification activities, as funding has significantly biased the incentives towards compliance rather than facilitation;

HIGHLIGHTS

MANAGING FOOD SAFETY...

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THE STANDARDS SYSTEM IN TANZANIA...

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MOVING FORWARD ...

promoting reforms of the current standards system such that it can play a more catalytic role in enhancing trade and competitiveness and implementing measures intended to streamline the institutional framework for managing standards



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and (iii) lack of prioritization and strategic approach to managing standards to promote trade and widen markets. As a result, standards management has served more as a barrier rather than a catalyst to trade, lowering competitiveness and weakening enforcement. This policy note sets out to highlight these key challenges based on the findings of recent studies commissioned by the World Bank, building on an earlier assessment of the country's standards management capacity as part of the Diagnostic Trade Integration Study (DTIS) for Tanzania (World Bank, 2005).

Tanzania's Trade and the Relevance of SPS Standards

Tanzania currently derives around 43 percent of its export revenue from agriculture. Of its agricultural exports (excluding fishery products), about 90 percent comprises traditional products, such as coffee, tea, tobacco, cotton, groundnuts, sisal, cereals, and cashew nuts but Tanzania has more recently diversified into high-value food products, such as fish and horticultural products. By 2009, these nontraditional products accounted for a third of the total agri-food exports.

The country's exports of fish and fishery products used to be predominantly directed to OECD markets especially the European Union (EU) which, by value, account for 57 percent of the total fishery exports in 2003; by 2009, this declined to 47 percent. Within the East Africa and southern Africa regions, Tanzania's current trade in agro-food products is very small, and much of the trade that takes place on an informal basis and hence is not officially recorded, however, Tanzania's informal intra-regional food trade is likely to be more than double the level of officially recorded trade of US\$29 million in 2009.

While Tanzania's nontraditional agri-food products are some of its fastest growing exports, they are also much more vulnerable to SPS-related problems than traditional commodities. They are therefore subject to greater scrutiny for such risks associated with, for example, microbial pathogens, pesticide and veterinary drug residues, mycotoxins, heavy metals and other contaminants. Thus, Tanzania's trade in nontraditional products has made compliance with stringent food safety and agricultural health standards a precondition for accessing and remaining competitive in its export markets.

The SPS Management System and its Key challenges

The standards system in Tanzania has in place the core legislations, with attendant regulations and institutional structures, providing adequate legal basis for official oversight. However, with several agencies involved, enforcement is hampered by a number of major challenges:

Coordination Failure

Both the TBS and the TFDA set and enforce standards for agri-food products. Both deploy their own team of inspectors at ports of entry and border posts, as well as in processing plants and in market places, for conformity assessments against standards. In addition, since 2003, the Tanzania Atomic Energy Commission (TAEC) has been tasked with mandatory radiation testing of all food imports and exports regardless of the products' source. The Plant Health Services (PHS) and the Directory for Veterinary Services (DVS) inspect plant and animal products for pest, disease, and related risks. Such fragmentation and duplication of tasks lead to repeated inspections, which often entail multiple laboratory analyses for clearance against standards, which impose onerous costs to traders and jeopardizes competitiveness.

To a large extent, the problem is driven by legislative ambiguity, with each agency having its own piece of legislation governing its standards-related responsibilities. Tanzania adopted a new Standards Act in 2009 that sought to better define the responsibilities of the TBS, and enhance the role of the private sector in standards setting. The new Act, however, does not address the question of overlapping responsibilities between the TBS and the TFDA.

The Ministry of Industry and Trade has taken initiatives to improve the coordination problem, but the implementation and effectiveness of such measures have been dismal given the lack of resources. The Ministry established a National Sanitary and Phytosanitary (SPS) Committee in late 2009, which is chaired by the TBS¹. The Committee was to meet quarterly to discuss the work of member organizations and agree on areas of operational responsibility. Despite these ambitions, the SPS Committee has so far met only three times within 18 months and has not yet defined a specific work program. When asked, Committee members could not point to any tangible action to resolve the issue of institutional overlap or to specific agreements reached to improve coordination.

Legalistic approach to Standards, with High Inspection, Certification, and Registration Costs

Stemming in part from budgetary constraints, regulatory agencies have been enhancing their efforts to raise revenues from their inspection and certification activities. There is an element of some agencies using their respective mandates to maximize revenues, rather than facilitating trade. Thus, standards enforcement tends to focus on inspections for which fees can be levied. At border posts, for instance, traders have to pay TSh 30,000 for a quality inspection certificate by the TBS, Tsh 50,000 for a radiation certificate by TAEC, and TSh 30,000 for a TFDA health / sanitary certificate. These are in addition to fees paid to both the TBS and the TFDA for product registration, as well as for annual inspections of food manufacturing premises and processing facilities. All these substantially increase the transaction costs incurred by traders and, along with time spent to complete export procedures, can impact product competitiveness since the costs of all these “services” are passed on to the consumers.

Another notable example relates to the testing and registration of agro-chemicals by the TPRI, which is responsible for approving pesticides for use in Tanzania. The domestic market for pesticides is small and dominated by products used in cotton, coffee, and tea production. The TPRI charges relatively high fees to register a new agro-chemical, and also requires three years of field testing (Table 1). It does not recognize the testing done and registration of chemicals in neighboring countries, including Kenya. Hence, there is a broad range of newer, more effective, and safer chemicals which do not get registered in Tanzania because they are prevented from being legally imported. This presents a major problem for producers of horticultural products (compared to Kenya with much better access to modern chemicals), creating a competitive disadvantage that the emergent Tanzanian horticulture export sector can ill afford.

¹ Members include representatives from the TFDA and the Ministry of Health, the Tanzania Pesticide Research Institute (TPRI), the Animal and Plant Health Departments within the Ministry of Agriculture, Food and Cooperatives, the Tanzania Chamber of Commerce and Industry (TCCI), and the Tanzania Horticulture Association (TAHA).

Table 1: Comparison of Typical Fees for Pesticide Registration in Tanzania and Kenya (US\$ per product)

	Tanzania	Kenya
Application	50	0
Field Trial (typical)	4500	1500
Registration (full)	600	435
Total	5150	1935

Source: TAHA, 2007

Weak and Ineffective Enforcement Capacity

Overall, the standards system is operating with weak capacity, both in terms of an inadequate number of professional/technical personnel and poor basic infrastructure. This undermines effective enforcement and compliance, thus compromising the role of standards organizations. Although most standards departments provide regular training to staff to keep abreast of technical issues, their ability to address the problem of inadequate staffing and standards infrastructure is constrained and depends on the priority the Government places on the role of standards. More critically, due to the problem of overlapping functions, it is difficult to estimate optimal capacity from the available information. Once this problem is addressed, and coordination improved, a capacity needs assessment can be undertaken as part of the strategic planning of standards management. We now briefly discuss issues relating to key elements of the standards system:

Food Safety: Given the scope of their operations, the number and level of professional capacity of staff tasked with standards enforcement responsibilities are generally limited. These local government officials conduct inspections at many relatively minor ports or border posts, as well as local food markets, hotels and restaurants, and food manufacturing premises, while TFDA officers are posted in the major ports of entry. Such work can be highly technical and demands specific knowledge of food manufacturing procedures. However, most local government officers have little specialization or limited training in food safety inspection.

Because of staff constraints and limited physical infrastructure, many facilities go uninspected by TFDA. The TBS, on the other hand, is similarly short-staffed as the TFDA. Thus, at a number of border posts, for instance, exporters and importers cannot be assured that a TBS inspector will be available, even during normal business hours. It is also likely that even if present, staff lacks basic testing instruments and materials.

Laboratory Capacity: Most of the regulatory agencies run their own laboratories, for example, both the TBS and the TFDA have food laboratories for microbiological testing of food products. The TFDA's laboratory has equipment that can only test for microbial pathogen contamination in food. Because of its limited laboratory capacity, it outsources food sample testing to the Government Chemist Laboratory Agency (GCLA), thereby adding to the list of agencies traders have to deal with.

None of the existing laboratories, however, have adequate capability to test products for pesticide residues, aflatoxins, and heavy metals, three contaminants for which Tanzania's agri-food products are subject to strict inspection in its export markets. Both the TBS and the TPRI have laboratories for pesticides testing, but lack adequate equipment to test pesticide limits. Thus, exporters of horticultural products, for example, have to commission the services of laboratories in Europe for costly residual pesticides testing and certification.

One major constraint faced by Tanzania's standards agencies is their lack of an accredited laboratory and/or an internationally recognized certification system. Thus, product certificates issued by the TBS and the TFDA are generally not accepted as sufficient in export markets because their laboratories are not ISO/IEC 17025-certified. Recently, however, a DANIDA-supported business sector development program sought to obtain international accreditation for 17 local testing facilities run by the TBS and other local standards institutions, including TPRI. According to the program managers, progress in this area was very slow to the point where only five of the targeted facilities managed to obtain international accreditation by the end of the project.

Plant Health: The PHS has around 150 inspectors posted at 28 out of 56 total entry points, including the international airports at Dar es Salaam and Kilimanjaro, major sea and lake ports, and selected border posts. Not one entry point is equipped with an illuminated table for pest inspection. There is little or no direct means of communication with headquarters, and only six entry points are equipped with a computer. At the majority of field stations, staff does not have reference materials for pest identification or any kind of sampling kits. Moreover, there are no pest identification manuals and very little money at the field level for transport to carry out essential work. At least until 2005, some 20 percent of PHS staff did not meet the basic minimum educational requirement of having a diploma in an agricultural field.²

Weak communication between plant health services and various stakeholders, coupled with a lack of appropriate reporting procedures, has resulted in a system with no regularized pest surveillance system and little capacity to prevent the spread of animal and plant diseases. As a result of these weaknesses, Tanzania has been prone to outbreaks of plant pests and diseases. With very limited capacity to monitor and report incidence of plant pests and diseases, and to control them, horticulture exporters reported loss of crops. Moreover, unable to answer requests from the South African Government for pest risk analysis or certification of disease-free zones in Tanzania, a potentially large investment in banana and avocado production was abandoned.

Animal Health: The Directorate of Veterinary Services (DVS) is responsible for matters related to animal health matters. It has inspectors at some 22 ports of entry to inspect live animals and animal products. Most staff have little specialist training and limited facilities to communicate with headquarters. Disease surveillance activities are intermittent, and communication and coordination between local and centrally based officers has been ineffective.³ Moreover, the capacity of the DVS to ensure early detection and rapid response to outbreaks is also limited. Basic control measures such as restriction of animal movements, quarantine, closing of poultry markets in affected areas, and border controls have not been fully implemented. The impact of outbreaks is felt through loss of poultry production.

Limited Progress in Implementing the EAC Regional Agreements

Although good progress has generally been made at the diplomatic level with the harmonization of East African standards and in reaching agreement on the mutual recognition of other EAC country quality marks, little has been achieved on the ground. Much more work still needs to be done to build awareness of these agreements among customs inspectors and other frontline officials representing standards and other

² Jaffee, et. al. 2005.

³ Jaffee, et. al. 2005.

trade support agencies. Traders report that goods are frequently delayed at the border and may be sent for additional testing even when the consignment has an EAC quality mark and all other documentation is in place.

In 2001, members of the EAC signed the East Africa Protocol on Standardization, Quality Assurance, Metrology and Testing (EA-SQMT). Under this agreement, each member country committed themselves to applying uniform rules and procedures for formulating national standards; adopting and implementing the EAC standards as national standards; harmonizing procedures, sampling, and testing of products for conformity with the agreed quality standards; adopting common rules and procedures for the use of certification marks and providing mutual recognition of other EAC countries' national certification marks; and establishing an East African accreditation body to promote the recognition of certification and test laboratories within and outside the region, among others.

Nearly a decade on, it is apparent that much remains to be done to implement these and other key components of the EA-SQMT Agreement. Tanzania continues to require separate registration and/or testing of food products by the TBS and TFDA. Not only must food imports and exports comply with TBS standards and be registered with the TFDA, they also must be tested for traces of radiation, with or without prior risk assessment and regardless of international test results on the product's source. Limited progress with mutual recognition of EAC quality marks is another important issue. Despite a high-level diplomatic agreement to recognize each other's quality seals, the Uganda National Bureau of Standards (UNBS), Kenya Bureau of Standards (KEBS), and the TBS have each expressed various concerns over one another's core competencies to the extent that additional product tests and quality certificates are often required for intra-regional trade. A regional database of products that have been certified under each country's national quality mark scheme has been created, but has proved insufficient to ensure free passage of goods.

Border officials throughout the EAC still have unlimited discretion to carry out spot checks or otherwise detain goods pending additional quality inspections. There have been numerous complaints from the private sector of these procedures being used as a non-tariff barrier especially for perishable produce that is vulnerable to any delay.⁴ According to the TFDA, EAC quality seals are not sufficient for trade and all imported products must be tested and registered by the Agency. Although complaints can be registered with the EAC Secretariat, there is little or no incentive for national institutions to give up their mandate or any source of revenue in order to serve a regional integration agenda.

Dismal Voice of the Private Sector Organizations

To realize the role of standards in enhancing trade and competitiveness, the role of private sector players in standards management is critical. In Tanzania, although much has been done to involve the private sector in formulation of standards and representation in the Boards of standards organization, their impact is much less dramatic for two reasons.

First, compared to countries such as Uganda, these private sector organizations are few and operationally limited. Each focused on issues of immediate concerns/interest of its members, while little if any effort is done to unite their efforts into collective bargain (e.g. lobbying government) or in facing external challenges

⁴ World Bank, 2008; Jensen and Keyser, 2010.

posed by changing standards and regulations. Secondly, they lack supportive policy environment. Until recently, when the new Standards act (2009) was formulated, there was no clear legal framework for participation of the private sector in standards management.

In Uganda, in contrast, the private sector plays key a role in the management of trade-related quality, food safety, agricultural health, and other standards. In addition, there are various private service institutions which assist these supply chain players to improve their methods and products; or which provide conformity checks on management systems and products via inspection, testing, or certification.

Strategic Options and Priorities for Enhancing the Role of Standards

Tanzania's experience illustrates the need for a more strategic approach to building capacity. Given the binding resource constraint, such an approach requires a well thought out process of determining priorities and of sequencing investments. Clearly, it is important to first establish a solid foundation of broad awareness and recognition of the importance of food safety / quality standards, as well as a widespread application of basic 'good practices.' With this foundation, it then becomes easier to effectively manage food safety-related hazards at the farm and enterprise levels. There are some risks, however, which are difficult to manage at these decentralized levels (e.g., pest and disease outbreaks), which require a broader system of surveillance, quarantine, and emergency management. For this, an effective regulatory framework and institutional structure should be put in place.

In examining the evolution of Tanzania's standards management system against this framework, it becomes apparent that the predominant focus has been on regulations. Given the level of development of the country's export sector, this raises several important issues. One is that mandatory standards address the needs mainly of export-oriented producers, but are likely to impose too high a cost on small producers and / or infant industries, thus serving more as a barrier to entry into the export sector. Rather than making costly investments for compliance, small players may opt to supply informally or exit the market or the supply chain altogether. Moreover, mandatory standards may not necessarily be compatible with conditions in the local or regional environment. For example, local food handling habits (e.g., boiling milk before drinking to avoid health risk) may be considered safer and cheaper than adopting "foreign" standards that take for granted availability of power and water quality for food processing and storage (Box 1).

Considering these issues, the overriding challenge therefore involves prioritization, strategic choices, and sequencing of standards adoption such that trade facilitation, export competitiveness and market access are secured, while sustaining pressure for enhancing standards across all sectors in the domestic market.

First, Tanzania can opt for a dual (tier system) approach by enforcing differential application of standards such that it continues to apply mandatory standards to its export and import sectors, while allowing suppliers to its local/regional markets more time to take measures targeted at standards compliance in the medium to long term.

Second, it can leverage voluntary standards once its export sector demonstrates sufficient capacity to apply good hygiene, risk management, and quality control practices in its production and processing methods, e.g., effective use of HACCP⁵-based systems.

⁵ Hazard analysis and critical control points.

Box 1: Development of Standards for Dairy Products in the EAC Region

Dairy in the EAC countries of Tanzania, Kenya, Uganda, Rwanda, and Burundi is a small scale activity of a very large informal sector. Milk output is mainly directed to domestic markets, and only 10 to 20 percent go through formal market chains. Less than one percent is exported formally. Consumer demand is highly skewed towards low price raw milk that is generally boiled before consumption. Due to tropical temperatures and the lack of cooling infrastructure, raw milk is not formally traded, although there may be considerable informal trade along the regions borders. Products traded formally are primarily in the form of milk powder, UHT milk, cheese, and yoghurt. The potential for intra-regional trade in these products is still very limited. More than standards compliance, the ‘infancy’ of the dairy sector, its market orientation, and limited production are the main factors that impact its overall competitiveness.

The decade prior to 2008 saw a substantial growth in the dairy trade, with the total value of exports exceeding US\$ 55 million. This was followed by efforts to raise and harmonize EAC dairy standards with international standards, a process driven mainly by the donor community and technical specialists from the EAC countries’ standards bureaux. With only limited input from the private sector (mainly from large industry), the new standards were set at levels which nearly the entire regional dairy industry found unrealistic, and which would be too costly for them to comply with. Yet, the commonly held view among industry participants was that domestic and regional trade would likely continue unaffected by the new standards. This means that authorities would likely certify compliance regardless of whether or not standards were met, thereby undermining public trust in the regulatory system. If strictly enforced, however, most EAC dairy products are most likely to be denied market entry in export markets, and would render ongoing informal milk trade illegal. Thus, any attempt at enforcement would meet strong resistance from the industry.

The need is for the newly harmonized EAC dairy standards to be reviewed such that they are upheld and enforced only if there is genuine demand for them on grounds of public health and market competitiveness is established. Conversely, if the industry-wide demand is for another set of standards, these can be developed with technical assistance from the donors, in consultation with the FAO and the WHO. The implementation and conformity assessment procedures should be in accordance with the realities of the EAC region.

Source: Jensen and Keyser, 2010.

Third, since not all markets have the most exacting standards, exporters in Tanzania can target those in countries whose standards they can more readily meet. Thus, traders often find it easier exporting to countries such as China and India and to Middle Eastern markets, where standards requirements are not so demanding (or as rigidly enforced as in high-end EU markets). Note however, that industrialized countries with more exacting standards are also higher value markets, whereas the less challenging developing country markets are where product competition is fierce not only on grounds of quality and / or safety, but also on price.

Finally, Tanzania could promote the use of (and leverage) private standards by providing direct support to the private sector in upgrading its efforts, or fostering public-private collaboration to promote the adoption of improved production and postharvest practices at the farm or firm level. The country has done this with its fishery sector (Box 2), yet the lessons from this experience have not spilled over to other existing or potential export sectors, or to supply chains. To encourage an increased role for the private sector, it is important to strengthen the private sector’s voice in the standards management system.

Box 2: Strengthening Standards Management: Tanzania's Response to the EU's Restrictions on its Fish

From the mid- to late-1990s, the export of fish and fishery products from Tanzania has been dominated by Nile perch, mainly in the form of frozen fillets destined for markets in the EU. Toward the end of the decade, however, fish and fishery exports from Tanzania (as well as those of Kenya and Uganda) were subject to restrictions by the EU due to concerns over the lack of adequate food safety controls. Following the detection of *salmonella* and cholera in a number of consignments by Nile perch importers in Spain and Italy in 1996 and 1997, the Spanish and Italian Governments banned fish exports from the Lake Victoria region. At the end of 1997, the European Commission introduced a requirement for border testing of all frozen fish from the region. This requirement was lifted in mid-1998 and replaced by a directive for the Competent Authority in each country to certify that all persons handling fish and fishery products had undergone medical checks. Later the EC undertook inspections of pesticide residue controls of fish in Tanzania.

The government and the private sector were quick to respond to these challenges. In 2000, the Fisheries Department harmonized its regulatory controls with those of the EU. To facilitate effective implementation and enforcement, a Manual of Standard Operating Procedures for Fish Inspectors was prepared in 2001 and the number of fish inspectors was increased from six to 21. These investments encompassed HACCP, Good Manufacturing Process (GMP), and auditing principles, and were made possible with material and technical support from various donors.

Within the industrial processing sector itself, major investments were made in both the structure of fish processing facilities and operating procedures. These included upgrading the general fabric of processing facilities, segregation of processing operations, installation of flake ice, water treatment, and effluent treatment plants, construction of changing rooms and toilet facilities, purchase of new tables and utensils among other improvements. Private laboratories were upgraded, staff were trained, and quality control personnel employed in order to implement HACCP. The non-recurring cost of these improvements for ten fish processing plants is estimated to have been around US\$ 25 million. Although this may seem a considerable amount of money, in aggregate it represents only 7 percent of the value of Nile perch exports for the period 1999 to 2003. At current value, the total investment is equal to 11 percent of annual export revenue or about 25 percent of annual exports to OECD countries. Tanzania was able to restore its market access to the EU and has since opened up substantial markets for fish and fishery products in the developing world as well.

Proposed Policy Actions to Enhance Standards Management

Using already developed capacity and resources as a springboard from which to proceed, the approach moving forward should have three objectives: (i) to promote reforms of the current standards system such that it can play a more catalytic role in enhancing trade and competitiveness (ii) to enhance implementation of measures intended to streamline or rationalize the institutional framework for managing standards; (iii) to address specific constraints that continue to limit the effectiveness of standards compliance; and (iv) to rationalize the internal incentive structure so as to minimize likely distortions associated with charging fees for services, which exacerbates the problem of overlapping institutional arrangement. With these objectives in mind, the analysis in this note suggests the following policy recommendations:

Strengthen the authority of the National Coordinating Committee to resolve the problem of poor coordination and overlapping responsibilities once and for all. The current fragmented system is not efficient and imposes extra costs on both the public and private sectors that neither can afford. Since the establishment of the National Coordinating Committee within MIT has achieved few, if any, results to resolve the issue of fragmented and overlapping responsibilities, serious efforts to strengthen this committee will require a great deal of political will and strong, decisive leadership at a high level of government. The need is to resolve this issue as top priority. This committee should establish a clear division of functions, and reallocate roles and responsibilities, including for specialized areas for diagnostic testing, surveillance, and monitoring.

Review how standards institutions are funded based upon how available public resources should be reallocated for more effective use. The limited funding available to multiple standards agencies is closely related to the problem of overlapping responsibilities among them. It can well be that better coordination alone could mean that more capacity can be sustained, even within the confines of existing budgetary resources. Streamlining the coordination mechanism, as proposed above, will also address the issue of overdependence on user fees to secure the financial viability of each agency. While such cost recovery measures are important to sustain the standards system and ensure private sector buy-in of standards services, they should not be the motivating factor that drives the provision of these services and intensifies regulatory control.

Identify priority product sectors in which there is long-term potential for export competitiveness. Efforts should then be made by the government to foster collaborative efforts with the private sector to promote the coordination and integration of supply chains of these products, drawing from the experience of the fishery sector. In doing so, areas in which the private sector can take a lead role in developing capacity either on a collective basis or through individual private enterprises should be determined. The objective is to enable supply chain leaders / industries to identify trade challenges as well as opportunities, and adopt suitable strategies and necessary investments, with effective public sector support.

Engage in policy dialogue aimed at promoting the strategic trade facilitation role of standards and awareness-building campaign to foster broad recognition of the relevance and importance of food safety and agricultural health to Tanzania's trade. Firstly, the dialogue should target policymakers and government administrators, the agro-food industry, and other interest groups (of exporters, producers, consumers, etc.) at the national level. At the more decentralized level, awareness building programs should start with small and medium scale producers in selected priority sectors with export potential, e.g., cut flowers, fruits and vegetables, etc. Secondly, the government should support a continuing program of training, retraining, and skills upgrading in basic codes of hygienic practices in these sectors, such as HACCP, good agricultural practices (GAP), and good manufacturing practices (GMP). And finally, the Government should consider feasible options for leveraging standards to promote competitiveness, and harnessing private sector's collaboration and compliance.

Intensify collaborative efforts with EAC and Tripartite partners to enhance standards management capacities at the regional level by identifying areas where acceptable levels of protection will be mutually recognized. This entails foregoing the prevailing process of import product inspection and required certification that serve more to impede rather than facilitate regional trade. As a corollary to this, the government should promote the establishment of a strong regional dispute resolution system.

Invest in improved systems for animal and plant health management. This requires enhancing capacity in pest risk analysis; pest and disease identification, surveillance and monitoring; establishment of certified disease-free areas, as well as risk alert, information, and management systems; and continuing training and skills upgrading of responsible officers charged with plant and animal health management functions.

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