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Committee on Sanitary and Phytosanitary Measures

ACTIVITIES OF THE EUROPE-AFRICA-CARIBBEAN-PACIFIC LIAISON COMMITTEE (COLEACP)

COMMUNICATION BY THE ACP GROUP OF STATES

The following communication, received on 4 March 2016, is distributed at the request of the <u>ACP</u> Secretariat.

1 CONTEXT

- 1.1. The Europe-Africa-Caribbean-Pacific Liaison Committee (COLEACP) is a private sector association entrusted by the ACP Group of States to support the private and public sectors in ACP countries in complying with EU market requirements. COLEACP is entrusted with the implementation of major cooperation programmes to protect the interests of ACP countries facing major regulation changes in Europe (Food Safety), managing to turn them into sustainable development programmes, thus reducing the potential negative effect of the change in European rules and fulfilling obligations for technical assistance contained in the SPS Agreement in the WTO. For example, the challenge of traceability could be converted into an opportunity to streamline business management and improve profitability; or else the need for managerial advice capabilities of the weakest players in the sector could become a vast training system whose main actors are locals (consultants, experts in companies, utilities, NGOs, training centers, universities, etc.). This has led to a network of nearly 1,000 local experts "trained" or "formatted" to COLEACP's tools and training methods. The local side (90% of missions) is concretely involved in improving and multiplying the tools, and is summarized in the name "fair and revolving training system".
- 1.2. Over the past 15 years, COLEACP has provided technical assistance to ACP companies to help them meet SPS requirements arising from regulations and standards. As the market requirements have changed, COLEACP has adapted its support accordingly. The areas covered by PIP2 support have expanded from its original focus on food safety regulations and standards to also address social and environmental initiatives; and targeting sustainability, food security, and poverty alleviation in a broader context.
- 1.3. The EDES programme is the response from the European Union to the introduction of regulations on feed and food. This has allowed COLEACP to extend its working methods to other sectors, with at time surprising success (e.g. Cameroonian coffee) thanks to the multiplier factors. The coffee and cocoa sectors have responded particularly well to these participative multi-stake holders' approaches but unfortunately they will remain unsatisfied since EDES's operations have been terminated. About fifteen countries, through their ministries, as well as producers' associations, and European industry representatives have expressed their interest to benefit from more COLEACP support in the coming years. It will be necessary to find ways to extend the positive experiences to the greatest number of small producers.
- 1.4. The 2015-2030 COLEACP vision significantly increases the power of positive experiences from the PIP1 & 2 programmes and EDES. In order to finalize the conversion of our defensive approach into an "offensive and positive" one, the major theme is sustainability (3 pillars). This implies to anticipate market requirements and approach sustainability criteria as a means of improving the competitiveness of SMEs and small producers based on a voluntary approach. This new

programme of "competitiveness through sustainability" allows multi-stakeholder partnerships, including civil society, to take their true dimension.

1.5. DG_DEVCO has already committed 20 million euros to this new programme for the fruit and vegetable sectors. COLEACP is still searching for financial partners for \$60 million over the 2016-2025 period in order to continue ramping-up for a more substantial social impact in relation to the challenges of migration, decent jobs, food safety, nutrition, and food security.

2 COLEACP APPROACH

2.1. The model developed by COLEACP is unique in that it provides targeted assistance to the private sector, while also ensuring that the capacity of the enabling environment to support the sector over the long-term is also strengthened. This includes the development of local services, as well as supporting to national food safety systems in ACP countries. COLEACP has also developed a comprehensive cascade training system that encompasses both the public and private sectors, and which ensures greater sustainability of programme impact over the long-term. The folliowing sections explain the COLEACP methodology in supporting: 1) producers and exporters; 2) service providers; and 3) national food safety systems. In conclusion, examples are given on how this approach can be used to benefit not only export markets, but also have an impact on local markets and food security.

Under the PIP2 and EDES programmes (2010-2015), COLEACP managed 1,600 projects similar to the ones described in Kenya and Madagascar. 14,281 men and women were directly trained by COLEACP through 1,068 training sessions across 50 countries. In total, the capacities of more than a million farmers, workers and civil servants were strengthened. More information at http://www.coleacp.org.

3 SUPPORTING PRODUCERS AND EXPORTERS

- 3.1. The challenge for COLEACP is to address a common subject (food safety, sustainability) over a very diverse range of conditions (small vs. large companies; different commodities; different countries; different players, different needs). It requires an approach that is sufficiently structured to allow a central team in Brussels to implement a programme of capacity building in several countries, while at the same time being sufficiently flexible to accommodate the considerable variation between and within them. The PIP2 programme opted for an approach that works on three distinct leverage points:
 - Identifying the barriers and opportunities;
 - Lowering the barriers and creating opportunities: improving conditions for market access by challenging and/or ameliorating the regulatory or commercial requirements; and
 - Helping suppliers to overcome the barriers and seize the opportunities: direct capacity building of ACP producers and exporters towards compliance with regulations and standards.

3.1 Identifying the barriers and opportunities

3.2. COLEACP retains close contact with regulatory authorities, standard-setting bodies, retailers, research organizations, and suppliers. This allows COLEACP to keep abreast of current developments, monitor trends in market requirements, and engage with decision-makers. It puts COLEACP in a better position to advocate for the interest of ACP suppliers. It also allows COLEACP to be in a position to help ACP suppliers prepare and be ready for new market requirements that are in the pipeline. A concrete example of this is the monitoring of pesticide maximum residue limits (MRLs) set by the European Union. If it seems likely that a pest control product will be withdrawn or an MRL will be reduced to the limit of detection, COLEACP begins field trials two or three years ahead of time to identify alternative products or to provide data for setting an appropriate MRL in order to ensure that producers are not disadvantaged.

3.2 Lowering the barriers - Some examples

3.3. The regulations and standards set by markets can create barriers for suppliers, but they can also create opportunities. Through engagement with key stakeholders (retailers, standard-setting

bodies, regulators, donors), COLEACP advocates on behalf of the sector to ensure that any new demands they are generating will benefit and not disadvantage ACP suppliers. This has become a critical role, as ACP suppliers themselves often have little influence or voice in the standard-setting process.

- 3.4. In the case of private standards, for example, COLEACP publicises and raises awareness of any negative impacts experienced by ACP suppliers. The content and modus operandi of standards tend to be designed for a "European" context, and they are often poorly adapted to the agronomic and socio-economic conditions of tropical production. COLEACP engages with the main standard-setting bodies to ensure they are aware of and address any problems that put ACP suppliers at a disadvantage. COLEACPP is also actively involved in initiatives to make private standards more locally appropriate and to facilitate wherever possible the direct participation of ACP stakeholders.
- 3.5. COLEACP also advocates on the issue of buyer practices both with buyers themselves (retailers) and at an EU policy level. Ensuring fair practices along the supply chain is critical in ensuring that ACP exporters can access and benefit from participation in high-end international markets.
- 3.6. COLEACP also has an R&D team to address specific technical barriers. This includes identification of emerging problems (e.g. new pests, soil degradation), and the sharing of this information with key stakeholders, such as donors and researchers, so necessary resources may be mobilised to address them. The R&D team also implements an internal research programme. A major focus is on the availability of crop protection products. Most tropical horticultural crops are "minor markets" for suppliers because total volumes and acreages are small; as a result there is a general shortage of crop protection products, something also exacerbated by changes in EU regulations. COLEACP identifies critical areas where growers lack effective and affordable methods of pest management, conducts field trials, and works with national authorities, research organizations, and crop protection product companies to obtain MRL extrapolations and import tolerances and to identify alternative products.

3.3 Helping suppliers overcome the barriers

- 3.7. <u>Food Safety</u>: To ensure that food is safe, traceable, and compliant with regulations and standards, COLEACP adopts the "field to fork" philosophy of the new EU regulatory framework. An approach has been developed to manage risk and promote good practice along the supply chain, from field to point-of-sale or shipment (production/transport/packaging/export). This means helping companies/exporters establish and maintain durable risk management systems for food safety, traceability, in-house training, and integrated pest management (IPM).
- 3.8. <u>Sustainability</u>: Global retailers are putting in place an array of initiatives in the sustainability arena. They have established codes of conduct, set up industry-wide stakeholder platforms, and adopted and complied with numerous different sustainability standards. These include social responsibility, ethical trade, and environmental protection (water, soil, waste, etc.). COLEACP is investing in sustainability, recognising its importance for ACP fruit and vegetables suppliers, as well as the potential development opportunities it presents. For many ACP countries and companies, social and environmental requirements are a new phenomenon and they lack the knowledge and skills to meet them. COLEACP support therefore now includes help to suppliers to meet specific sustainability standards. However, the ACP industry also needs assistance to address the sustainability agenda at a more fundamental level, in particular to ensure that the smaller and weaker economic players including smallholders are able to benefit from rather than being disadvantaged by these emerging trends.
- 3.9. COLEACP support to producers, exporters, and others involved in the supply of fresh fruit and vegetables, is addressed at two levels:
 - a. Ensuring that technologies and technical recommendations are available to enable supply chain operators to produce safely and sustainably; and
 - b. Ensuring they possess the knowledge (know-how) and skills necessary to apply them.

Ensuring that technologies and technical recommendations are available to enable supply chain operators to produce safely and sustainably

- 3.10. In recognition of the importance of pesticide residue limits in maintaining access to international markets, COLEACP puts considerable emphasis on the safe and effective use of pesticides. Growers need access to safe, effective and cost-effective technologies to control pests and diseases, and essential pesticides need to be available locally and registered for use. Recommendations also need to be developed for the use of these pesticides under local conditions. Finally, producers need to know what pesticides are permitted on crops for different markets, and have the necessary information to use them correctly so that they avoid exceeding permitted levels of pesticide residues.
- 3.11. The COLEACP R&D team support local registration of pesticides, and in addition conduct field trials to establish recommendations for use under local conditions. COLEACP has also worked with researchers, agronomists and IPM specialists to develop a series of 40 crop protocols and good practice guides for the main ACP horticultural crops. These good practice guides provide plans which, if followed, ensure that produce comply with regulations and MRLs for both the European Union and CODEX (for local markets). With an increasing emphasis on sustainability, COLEACP is now expanding its technical support and recommendations to also cover good practice in the management of waste, water, and soils.

Ensuring they possess the knowledge (know-how) and skills necessary to apply them

- 3.12. COLEACP receives requests for capacity building from producers, producer groups, and companies, to help establish management systems that ensure safe and sustainable production. Support is delivered through training, accompanied by coaching from local experts to help put the training into practice. This support is delivered over a timescale that fits in with the company's capacity to invest and implement, and follows a stepwise approach:
 - STEP 1: Following an application for support from a company, a COLEACP consultant conducts a needs assessment and identifies weak points (from field to point of shipment).
 A project action plan and budget is then developed with company staff;
 - STEP 2: Company staff establishes and implements food safety, training, IMP, and traceability systems, as well as sustainable practices, with training, backup, and support from COLEACP experts. The company takes the lead in implementing the action plan, which promotes ownership and ensures that the systems are "internalised"; and
 - STEP 3: Validation of the systems: COLEACP provides consultants for blank audits to assess implementation and compliance with regulations. Many companies then opt for certification against a private standard.
- 3.13. To deliver this support to companies, COLEACP has developed a comprehensive training system. This includes standardised training modules (complete with training tools and publications) targeting different players in the supply chain from company managing directors to food safety managers, farm managers, packhouse workers, field workers, drivers, outgrower managers, and smallholders. They cover topics such as safe use of pesticides, hygiene, IPM, traceability, HACCP, and sustainable production. The same modules and standardised training courses are used in all countries and by all COLEACP trainers to ensure consistency.
- 3.14. Traceability tools have also been developed. Traceability is a linchpin and essential for companies to establish and maintain safe and sustainable systems. The COLEACP traceability tools can be customised according to company resources and circumstances, and vary from simple, paper-based systems to comprehensive software and barcoding.
- 3.15. To avoid the risk of exporters shifting production away from smallholder outgrowers to company farms, COLEACP puts considerable emphasis on building capacity within companies to train and support smallholder outgrowers. By developing and implementing training for their smallholders, it is easier (and affordable) for companies to continue sourcing from them, and for the latter to maintain their foothold in the supply chain. Similar support is given to extension workers in projects and NGOs working with smallholder groups.

4 DEVELOPING LOCAL SERVICES

- 4.1. COLEACP aims to deliver training and technical assistance in ACP countries using local expertise. However, at the outset COLEACP found that in many countries it was necessary to fly in costly European consultants; local, affordable, up-to-date expertise in specialised areas such as food safety was simply not available. This put ACP suppliers at a disadvantage, but also endangered the sustainability of COLEACP programme impact. In the same way that support to companies is designed to be "internalised", for sustainability it is also important to ensure that export industries have access to high-quality and affordable local services that will support them over the long-term.
- 4.2. In each beneficiary country, COLEACP consults with national stakeholders to identify the needs for capacity building of key players and to develop the wide range of services (public and private) that are needed. These include:
 - Local experts (including private consultants) to train and advise on food safety, pesticide use, IPM, HACCP, Good Agricultural Practices, Fair Trade, organic production, social responsibility, ethical trade, environmental protection, among others;
 - Local/regional certification bodies;
 - Universities, agricultural colleges and training centres;
 - Pesticide registration systems compatible with EU requirements; and
 - Accredited laboratories for pesticide residue analysis.
- 4.3. In the same way that support is provided to companies, service providers can request capacity building from COLEACP. This is available to both public and private sector service providers, and to individuals as well as companies and organizations. The range of support provided is very wide, and every application is considered on a case-by-case basis; support is customised according to the needs of the recipient.
- 4.4. Capacity building is provided through a mixture of COLEACP technical and "train the trainer" courses; international training courses; study tours, and short-term resident experts such as pesticide chemists, IMP specialists, and regulatory affairs specialists. On-the-job training is also widely used, whereby local service providers shadow experienced consultants and trainers during field missions. Much of the training leads to recognised qualifications such as HACCP, BASIS, ISO 9000:2000, and Lead Auditor.
- 4.5. Once COLEACP has trained local service providers, it then uses them under contract to deliver COLEACP support. This approach has been cited as a model of good practice for capacity building. It ensures that the capacity building is embedded and sustainable, as well as establishing working relationships between companies and local service providers.
- 4.6. In addition to support for local service providers, COLEACP puts considerable emphasis on capacity building of professional associations (e.g. producer or exporter associations) and public-private stakeholder platforms. Having strong associations and stakeholder platforms is increasingly essential to meet new challenges (regulations, standards, taxes, pest outbreaks, etc.). Many of these challenges need a multi-stakeholder response, and strong forums for dialogue and advocacy. COLEACP supports industry associations in many countries, and in several has facilitated the creation of national stakeholder platforms involving, for example, exporter associations, grower representatives, service providers, and Ministries of Health, Agriculture, and Trade. When functioning well, they provide a forum for dialogue that allows stakeholders to address shared problems, conduct joint actions, and lobby and advocate on behalf of the industry.

5 STRENGTHENING NATIONAL FOOD SAFETY SYSTEMS

5.1. Protecting consumer health is a constant concern for ACP States. With this in mind, they define the policies and requirements to be followed by the operators at each stage in the supply chain. The EU Official Feed and Food Controls Regulation came into force in 2006, covering both locally-produced and imported goods. This requires third countries that export to the European Union to adapt their sanitary and phytosanitary (SPS) related regulatory, supervisory and monitoring systems. Since March 2010, COLEACP has managed EDES, in collaboration with a consortium of European organizations specialising in food safety. EDES was instituted at the

request the ACP Group of States and is funded by the European Union to support the sustainability of ACP exports.

- 5.2. EDES aims to use risk analysis to strengthen food safety systems for export products in compliance with regional, international and European SPS standards. To this end, EDES helps ACP States to strengthen their national (or in some cases regional) policies in the area of food safety in order to ensure exports meet the standards in force in importing countries, as well as to consumer demands. This is with a view to encouraging growth in traceable and certified production for local, regional and international markets.
- 5.3. EDES plays a role in risk analysis at all three levels (risk assessment, risk management and risk communication). It begins by targeting one or more sectors that are considered important by the country concerned, which presents food safety risks, and whose production is dependent on small-scale growers. The aim is to enable the identification of critical control points and monitoring requirements at each stage of the supply chain.
- 5.4. EDES actions focus more specifically on: food safety governance, official controls, good corporate practices, laboratories, risk assessment, and risk communication. The development and reinforcement of national food safety systems for export crops is also recognised to benefit production for domestic consumption. The ultimate objective is to guarantee food safety for all consumers in the ACP and the European Union.

6 THE TRAINING SYSTEM

- 6.1. COLEACP has developed a training system that is coordinated by a central training team, and implemented primarily through local experts and service providers. The scope of the training covers a wide range of topics in the area of food safety and sustainability.
- 6.2. The training itself is backed by documents and training tools including course modules, training guides, training aids for company workers and smallholder, among others. There is also an e-learning platform for distance learning. These materials and the courses themselves are revised and updated, and new modules developed, according to needs and new market demands.
- 6.3. The COLEACP training system follows a cascade approach. It starts with the capacity building of local service providers which includes technical training in specific topics, training on the COLEACP course content (to ensure that this is consistent), and finally training in pedagogical skills. As well as having the required technical background, all local service providers must attend, and complete successfully, a COLEACP Training of Trainers course before they can deliver training for COLEACP programmes. Local service providers are then hired to deliver training and support to companies and other stakeholders. Following the cascade approach, support to a company begins with general information and awareness raising sessions for company directors. Without the buy-in of senior management, a programme of support to a company is unlikely to be successful; the necessary human and financial resources are unlikely to be mobilised. This is followed by specialist training for middle management notably food safety, packhouse, farm/production, and outgrower managers. Again this includes not only technical course content, but also training in pedagogical skills. Technical training at each level is accompanied by dedicated "train the trainer" courses to improve communication and training skills and ensure that company staff are better able to deliver training in the future. In this way COLEACP aims to create a sustainable in-company training system rather than to simply impart knowledge or skills. Following training, middle managers deliver training to staff under their responsibility (packhouse managers to packhouse workers, farm managers to their spray teams and field workers, and so on).
- 6.4. At each stage, COLEACP provides coaching and backup to help trainees cascade the training to the next level. This cascade approach described here for a company is applied in the same way to other situations and organizations, from professional associations to government extension services.

7 CASE STUDIES

7.1 Upgrading Value Chains: The Case of Kenyan French Beans

- 7.1. In 2009, 34,997 tonnes of French beans were exported from Kenya to the European Union. This made an important contribution to the national and rural economies, and to jobs. Beans are grown mainly by smallholder farmers. According to a study by SNV in 2012, an estimated 50,000 farmers may be involved in the horticultural export sector as a whole, mainly involving households with under two acres. Participation in exports makes an important contribution to household food security, with a typical farmer making an average profit of US\$750 (Ksh.60000) a year from French beans. The industry also employs large numbers of people in commercial farms and packhouses, of whom an estimated 60% are women.
- 7.2. Over the past decades, Kenya developed a thriving and successful horticultural export industry, supplying quality produce to high-value global supply chains. However, between 2008 and 2012, there was an increase in the number of interceptions of Kenyan beans at EU border controls due to pesticide MRL exceedances. In January 2013, Kenyan beans were listed as "high-risk" under Regulation EC 669/2009, and subject to increased testing on EU entry at a level of 10%. PIP monitored the impact of this over the coming months, and found worrying trends. It caused a substantial decline in export volumes and income, alongside a significant increase in costs. It also began to squeeze an export sector that was already suffering in a challenging economic climate, affecting some of the most vulnerable stakeholders including the (predominantly female) packhouse and farm labourers, and smallholder farmers.
- 7.3. Various factors contributed to the problem including the setting of EU MRLs for the main pesticides at LoD; the lack of accessible or available alternatives in the face of increasing pest pressure and more stringent quarantine controls; breakdowns in traceability and supply chain management due to EU buyer practices; and declining profits that were leading to supply-chain instability and poaching of produce. The complexity of the issue meant that addressing it had no simple solutions. It required the involvement of multiple stakeholders, and a combined effort to tackle problems along the supply chain, from field to export.
- 7.4. Once the controls were imposed, Kenyan authorities responded proactively to the crisis. Public and private sector stakeholders came together to form a consortium to develop and oversee a coordinated and cohesive national MRL action plan. The European Union required evidence of improved practices and procedures in the supply chain, as well as in public sector inspection services and pesticide residue monitoring. PIP joined other national and donor initiatives (including its sister EDES programme) to support this effort by providing:
 - Intensive training of producers and exporters in Good Agricultural Practice, crop protection, IPM, safe and effective use of pesticides, and traceability, among others
 - Development of targeted teaching aids and information bulletins
 - Coaching of 37 individual export companies to raise awareness of the problem, its impact, and remedial measures
 - "Training trainers" for 60 government extension officers
 - Training of 40 officers from the government inspection service
 - Field trials to validate or challenge EU MRLs, and to identify alternative products
 - Support for the national pesticide residue monitoring system, and quality control
- 7.5. The EU authorities monitored and audited the public and private sector actions. They recognised the considerable progress made and, in July 2015, Kenyan beans were de-listed.

7.2 Upgrading Value Chains: The example of litchi in Madagascar

7.6. Madagascar is the third largest producer of litchi. Around 100,000 tonnes are harvested per year, of which 20% is exported fresh to the European Union. The sector is of considerable importance to the national economy and as a generator of rural income and jobs. An estimated 30,000 families are involved in production, with a further 3,000 people working as collectors and transporters. However, harvesting and export take place over a short period in November and December, and the very seasonal nature of production and trade leads to some inherent problems and inefficiencies. Up to 50% of production is wasted, and prices received by producers can halve

or double from one day to the next, discouraging investment. Despite its overall success, there are significant opportunities to improve and grow the sector.

- 7.7. Intermediaries (collectors and brokers) sell to export companies, most of whom (32) are members of the association "Groupement des Exportateurs de Litchis" (GEL). COLEACP worked with GEL and export companies from 2006 onwards to put in place the food safety systems needed to access EU markets but, during the 2010 Berlin international trade fair (Fruit Logistica), GEL asked for additional help. Sulphur residues were being detected in export consignments, which exceeded the permitted levels for EU markets. This could potentially result in a restriction or ban on exports. Sulphur is applied as a post-harvest treatment and excessive residues can be caused by a number of factors including maturity of the fruit, transport delays, inadequate or poorly maintained equipment, improper application methods, poor storage, and lack of alternative disease control options.
- 7.8. Once COLEACP began to work with GEL, it became clear that addressing the sulphur problem was complex and required the involvement of diverse players from public and private sectors, higher education, and civil society. Through a multi-stakeholder effort, a programme of support was put in place to develop solutions over the short- and long-term:
 - In partnership with GEL: organization of the sector through development of a supply-chain self-assessment guide; improved sulphur application practices by informing, training, and coaching operators; research implemented to find alternatives to sulphur; GRASP (GLOBALG.A.P. social audit) national interpretation sector guidelines developed;
 - With 24 export companies: practices, procedures and produce aligned with EU regulations and private standards through quality management systems; paper and IT-based traceability systems; training of company staff in risk management, internal audit, HACCP, hygiene and traceability; and installing internal company training systems;
 - With the Ecole Supérieure des Sciences Agronomiques de l'Université d'Antananarivo (ESSA) and the Centre Technique Horticole de Tamatave (CTHT): course content aligned with industry needs; improved teaching skills; experts coached to deliver PIP support;
 - With service providers: 25 experts from ten consultancy companies trained to support the sector over the short- and long-term in topics critical to the sector; and
 - With EDES, improved public sector systems and procedures for inspection and control.
- 7.9. COLEACP contributed to the reorganization and "professionalization" of the sector leading to an increase in confidence among EU buyers, adoption of Good Agricultural Practices, improved social practices, and a decline in MRL exceedances.