



USAID
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Food Safety Network PAPA

Kenya

Sanitary and Phytosanitary (SPS)

Capacity Building Needs Assessment

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Acronyms and Abbreviations

APHIS	Animal and Plant Health Inspection Services
BFS	Bureau for Food Security
FAS	Foreign Agricultural Service
FDA	U.S. Food and Drug Administration
FSN	Food Safety Network
FSWG	Food Safety Working Group
GAP	Good Agricultural Practices
GFSS	Global Food Security Strategy
M&E	Monitoring and Evaluation
OCBD	Office of Capacity Building and Development
SPS	Sanitary and Phytosanitary
USAID	United States Agency for International Development
USDA	United States Department of Agriculture
USG	United States Government
WTO	World Trade Organization

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I. BACKGROUND

A modern and reliable food safety system is a mandatory prerequisite for access to global markets. The Food Safety Network (FSN) PAPA is an innovative funding mechanism established in October 2016 by the United States Agency for International Development's Bureau for Food Security (USAID/BFS), together with the United States Department of Agriculture (USDA) and the U.S. Food and Drug Administration (FDA), in order to support the food safety elements of the Global Food Security Strategy (GFSS). The mechanism is expected to promote this link between food safety and the GFSS more explicitly and along the value chains of different commodities, building on the founding principles of the GFSS.

The FSN is strongly positioned to add value when a partner starts designing its Sanitary and Phytosanitary (SPS) capacity building projects thanks to the expertise that USDA brings of U.S. agricultural producers, and USDA's ability to find win-win market-oriented development solutions that benefit U.S. agricultural exporters as well as governments, industry, and consumers in stakeholders' countries.

The FSN is a five-year Participating Agency Program Agreement (PAPA) with \$6 million in current funding to strengthen the capacity of SPS systems in selected countries around the world, focusing on a broad range of food safety measures, including those that lead to compliance with internationally-accepted and science-based food safety standards.¹

The FSN PAPA is a global mechanism and Washington-held seed funds will target activities across various regions. USAID Missions may "buy-in" to the Food Safety Network mechanism to mobilize their own resources to obtain additional SPS-related technical support from partner agencies. More specifically, the FSN provides a pathway for USAID Missions, Bureaus, government and private sector partners, and other stakeholders into food safety programming within the context of current projects and investments. This includes targeted funding to provide technical assistance such as: (i) Rapid SPS need assessments for countries that express a need; (ii) Development and dissemination of distance learning modules and knowledge management; and (iii) Program management, coordination, and reporting.

Under component I of the FSN, the program undertook an effort between March and July of 2018 to assess the SPS capacity building gaps of select GFSS focus countries in Africa - Kenya, Ethiopia, Senegal and Ghana - in order to produce a set recommendations and capacity building activity considerations for USDA and USAID (and other participating USG agencies) in the next phase of Feed the Future. The FSN team engaged with USG, private industry and civil society, and host country government stakeholders through phone and in-person consultations using a rapid assessment, open-ended survey approach as well as literature review and comparative analysis from a more in-depth assessment conducted by USAID, FDA and USDA in 2013.² Findings from West Africa were presented at a May 2018 regional USAID FTF event in Ghana and discussed individually with missions. The FSN envisions this document to serve as a resource and basis for ongoing conversations about how to best meet country objectives under the GFSS as well as regional and international trade objectives for US agriculture.

¹ To date, US \$3m has been provided in FSN core program funds and another \$3m through mission/HQ program related buy-ins to the FSN PAPA. In addition, the program has leveraged another \$1.2m from USDA-FAS and FDA resources.

² https://www.eatradehub.org/summary_east_africa_sps_policy_review

2. INTRODUCTION

Sanitary and phytosanitary (SPS) systems are a necessary and integral part of any agricultural value chain investment strategy. As a country's agricultural sector achieves greater production efficiencies and improved physical infrastructure, food yields and domestic food security will increase. To protect these investments, SPS systems and regulations must be in place to ensure production is not negatively impacted by plant/animal pests and diseases and that food is safe and wholesome for domestic consumption and trade. Strong SPS systems and regulations help increased agricultural productivity translate into higher farm incomes and reduced hunger in the form of local, regional, and international market access. As such, SPS capacity building bridges gaps between national capacity and internationally-recognized best practices. More specifically, SPS capacity building:

- breaks down constraints in value chain programming by enabling the supporting SPS market system;
- assists countries to adopt science-based regulatory systems to ensure that domestic food supplies are safe;
- harmonizes domestic regulations with international standards; and
- improves a country's ability to trade regionally and globally.

SPS capacity building is generally a government-to-government interaction and recognizes that countries must commit to regulatory frameworks governing animal health, plant health, and food safety in order to protect agricultural production and food supply.

In 2013, a team of experts from USDA, FDA, and USAID performed an SPS system review in East Africa. In April 2018, USDA traveled to Kenya and Ethiopia for the purpose of updating this report. Below are the findings of both trips and recommendations regarding gaps in the Kenyan SPS system.

3. THE STATUS OF KENYA'S SPS SYSTEM

Overall, SPS systems in Kenya are not clearly integrated in policy and SPS infrastructure is weak with redundant roles and overlapping responsibilities across agencies. Staffing shortages at various enforcement agencies, coupled with insufficient funding and opaque regulations, could have serious detrimental impacts on domestic food safety and trade in the coming years. Where there are laws and regulations governing SPS systems, they are often applied haphazardly or not at all. More specifically –

- Exported horticultural products are intercepted, detained, and/or rejected due to the presence of pests, microbial, and/or chemical contaminants. The presence of pest, microbial, and/or chemical contaminants can cause exported horticultural products to be intercepted, detained, and/or rejected, causing destruction of the food and loss of value. Domestic value chains are often even less organized, and increased capacity and better coordination among enforcement agencies is needed to meet the demand of the population for a safer and nutritious domestic food supply.
- Food inspections and disease surveillance usually focus on imported/exported food, crops, and animals/animal products, providing little inspection of the domestic food supply. When domestic inspections do occur, they are in many cases greatly limited due to logistical challenges resulting from a lack of inspectors, limited number of vehicles, and poor road infrastructure.

- While the devolution of some of Kenya’s agricultural and food safety functions from the national level down to the county level has given local authorities greater autonomy, such an approach has opened gaps in Kenya’s food safety regulations, particularly around animals and animal products. The centralized, top-down approach that Kenya previously used led to a more consistent application of laws and regulations and inspections of animal-sourced food products, and greater national capacity to drive food safety. Devolution has resulted in a lack of clarity around regulations, uncertainty of which government agency is responsible for developing and enforcing regulations, and weak oversight slaughterhouses and processors at the county and sub-county levels.
- Robust risk management is lacking at all levels of the risk determining chain and regulatory authorities have very little capacity to manage rapid and/or emergency response. Technical people are capable, but need more training and have, for the most part, little to no influence on policy. Any risk management is done reactively as Kenya and other countries grapple with outbreaks of plant pests and animal diseases.
- The formal market for authentic and effective agricultural inputs is often very weak in remote areas, and the government is not able to regulate the quality or identity of products available to the farmers. Porous borders and poor quality assurance testing infrastructure allow in cheap products from other countries, and these products can consist of sub-standard generics at best to ineffective counterfeits to highly dangerous materials at worst. The need to respond to fall army worm has encouraged farmers to seek out pesticides to protect their crops, however, these pesticides are not always safe, effective, authentic, or permitted on crops that are to be traded outside of Kenya.
- There are many government laboratories and some private labs, however they are not well networked and often have redundant responsibilities. As such, there is little to no coordination in procedures and methods of testing and few mechanisms for sharing of knowledge or information within Kenya and with their neighbors, making it difficult to respond to and manage emergencies such as fall armyworm (FAW). Technical capacity varies widely among the myriad of labs as does how well each lab is equipped. Most of them lack a maintenance budget and resources – equipment, consumables and trained personnel. A fee-for-service approach offers potential for Kenya, but laboratories often do not collect fees charged for providing testing services and therefore cannot use that money to maintain or upgrade equipment or to retain staff. When such fees are collected, they are either only a fraction of the operating costs, thereby leaving laboratories with insufficient funds to perform routine activities.
- The private sector is interested in being involved in activities to strengthen the national SPS committee in Kenya. University laboratories, food processors, and horticultural producers are all eager to be involved in developing national regulations around SPS issues and having their voice heard in such processes. However, while opportunities for public-private engagement are promising in Kenya, there are few clear mechanisms for feedback available to the private sector to comment on rule-making and to have their concerns considered prior to the development and enforcement of regulations. As a result, the private sector is forced into a position of either responding to regulations it had no role in drafting, or going it alone in matters where government regulation and guidance are lacking, rather than proactively collaborating with GOK regulatory agencies to develop appropriate regulations that can be adhered to and efficiently enforced.

- Regional standards for the movement of agricultural commodities are addressed and acknowledged within regional discussions, but are not applied at a national level, particularly because the East African Community (EAC) SPS Protocol has not been ratified yet. Even when ratified, there will still be unequal capacity for SPS enforcement across the region, posing a challenge for harmonization between Kenya and its neighbors.

All this becomes a significant problem to USAID Kenya’s prioritized value chains because inadequate SPS systems constrain value chain development. For example, the presence of detectable pests, diseases, and contamination (natural or man-made) decreases productivity and compromises the food supply and thus food security within Kenya and across the East Africa region. For example, due, in part, to poor SPS infrastructure across Africa, catastrophic pests such as fall armyworm are able to run amuck across the continent, currently affecting all but two counties in Kenya. In September 2017, the Centre for Agriculture and Bioscience International (CABI) estimated the economic cost of FAW at US\$2,481-6,187M for just 12 countries over a three year period, (see sidebar)³.

The recent FAW problem highlights significant gaps in SPS systems in Kenya and regionally. These include:

- National Plant Protection Offices (NPPOs) in the region were unable to detect, identify and intercept the pest at the border or early in fields. It is likely that the inability to do so is rooted in the lack of coordination between SPS authorities.
- NPPOs in the region do not have proper risk management systems in place to adequately respond to this emergency.
- Farmers do not have access to the appropriate tools (pesticides, biocontrols) or information needed to control the insect due to long existing maximum residue level (MRL) issues that constrain access to the needed tools.
- Farmers’ response – to use whatever is available in the absence of safer/appropriate chemistries, along with the lack of government or extension education to disseminate information – to the outbreak has, in many cases, caused the significant overuse of toxic chemicals not intended for use against FAW or on susceptible crops. Widespread anecdotal reports of pesticide misuse indicate a lack of tools other than pesticides for control of FAW. Many producers and extension officers lack of understanding of the effects of pesticide misuse (and problems with pesticide residues). The lack of consequences for misuse, removes incentives to follow proper application procedures and precautions. Further, in the time it takes for the GOK to address root problems, the pest becomes resistant to the chemicals being used against it.
- The formal market for authentic and effective agricultural inputs is often very weak in remote areas, and the government is not able to regulate the quality of products available to the farmers. Porous borders and poor quality assurance testing infrastructure allow in imports from other countries that consist of sub-standard generics at best to ineffective counterfeits to highly dangerous materials at worst.
- Regionally, even if one country is able to identify the risk, if bordering countries do not have similar response protocols the whole region remains at risk – hence “you’re only as safe as your weakest link”.

³ [http://www.invasive-species.org/Uploads/InvasiveSpecies/Fall%20Armyworm%20Evidence%20Note%20\(Summary%20version\)%20September%202017.pdf](http://www.invasive-species.org/Uploads/InvasiveSpecies/Fall%20Armyworm%20Evidence%20Note%20(Summary%20version)%20September%202017.pdf)

This also fosters distrust between countries as they may try to blame others for problems related to the trade of their agricultural products – due to excessive pesticides or the presence of pests – rather than seeking to invest appropriately in strengthening their national SPS systems and working together to address regional issues. There is a need to encourage regional support and regional harmonization, training of trainers’ activities, laboratory exchanges, and other support to bring all countries in East Africa up to the same level of capability.

- The phytosanitary gaps noted in the movement of FAW through the continent will also serve as a barrier to expanding external trade routes from Africa to places such as the U.S., E.U. and the Middle East. As FAW is a quarantine species in the EU, consignments from Africa will face greater scrutiny. Should attempts to control FAW result in increased interceptions due to pesticide residues surpassing the allowed limits, exporters and farmers will face equivalent challenges for different reasons. Until these types of gaps - weak links - are addressed nationally and regionally, successful value chain programming can easily be compromised.

4. RECOMMENDATIONS TO STRENGTHEN KENYA'S SPS SYSTEMS

Kenyan officials understand the components and concepts of a basic SPS system, but the country is far from having an advanced system – however, an advanced system does not necessarily need to be the goal. SPS projects have often attempted to implement high-income country solutions in low/middle income countries. This can prove to be too costly and often inappropriate to the context. Therefore, while Kenya can strive for the “Cadillac” of SPS systems, a basic system could be established within a five year period that would allow the country to meet food security, food safety, nutritional, and trade requirements. Once a basic system is established, the GOK can consider additional improvements that will lead them to a more advanced system.

Recommendations included in the Annex of this document (and complementary Excel sheets) address the issues identified above and, for illustrative purposes, are provided at three “roadmap” destination points:

- A. Short term: these are goals that can be obtained by utilizing current USG resources or minimal financial inputs by USAID or other partners and could be achieved within months to two years.
- B. Medium Term: these are goals that will require some additional stretching of financial and planning resources - they would require moderate USG or partner financial inputs and could be achievable in the next 1-3 years.
- C. Long Term: these are goals that require a financial and project planning ladder – they would require substantial USG or partner financial inputs and may be achievable in the next 1-5 years.

4.1 Porous Borders

Currently there is a patchwork of SPS regulations across the region. This lack of harmonization is prohibiting trade as it is often quite difficult for the private sector to negotiate the myriad of laws and regulations that govern regional agricultural trade. To further complicate the matter, the often capricious and arbitrary export and import bans only add to the difficulty for traders to move products legally across borders. This difficulty pushes trade to the informal market which makes traded goods much less safe for countries, as there are no regulations or restrictions applied to such movement. Kenya – particularly its major port of Mombasa – has become an entry point for not only legitimate products, but also smuggling of illegitimate products such as pesticides and counterfeit products. Informal markets also enable the practice of activities such as within-country repackaging, diluting and adulteration of products, and other things that affect the quality and authenticity of the products available to the bulk of farmers; Kenya’s porous borders then mean that such illegitimate and/or adulterated products can access not only the Kenyan market, but other markets in the region. The prevalence of informal trade is causing unpredictability and high costs as well as dangers of pest and disease transmission across borders. Additionally, it increases the threats of adulterated foods and counterfeit agricultural inputs; however borders lack the physical infrastructure to adequately address these risks and inspectors do not have the necessary skills to identify risks. Domestic enforcement mechanisms need to be implemented in a way that fosters greater compliance with both national and international SPS regulations, but do not result in increased black market activity by producers and distributors preferring to operate outside of a legal framework instead of complying with GOK regulations.

The magnitude of informal trade across borders is difficult to impossible to quantify. Pragmatic solutions need to be explored and encouraged to allow surveillance and inspection of plant and animal disease for early detection in East Africa on a participatory scale by farmers and inspectors.

Plant and animal pest and disease issues are also severely affecting food/feed productivity and trade; under-reporting of problems is a major problem in East Africa for both animal and plant diseases and pests. Even if countries know they have a disease outbreak some don't report this to their trading partners, OIE or IPPC. Due to the devolvement of some of Kenya's agricultural and food safety functions from the national level to the county level, instances of diseased animals are not always identified or tracked beyond the county level, leading to greater opacity in understanding the threat of diseases and the degree to which they are prevalent or becoming more common. This not only puts human and animal health at risk, but under-reporting of diseases and pests compromises science-based risk assessment efforts with inaccurate information and results in under-estimating the risk of movement of animals and plants within the region. The region is affected by a large number of pest and diseases impacting both plant and animal health.

The adoption of suitable and applied regulations which provide an incentive for traders to move from the informal to the formal movement of goods will improve the overall safety of agricultural inputs, agricultural production, and food products in Kenya. That said, the adoption of harmonized SPS regulations is an area that requires a regional approach to policy development with national level adoption and implementation - again, "you're only as safe as your weakest link". Unfortunately, government officials' inability to monitor borders and effectively manage outbreaks is severely hampering efforts to increase productivity as well as maintain and develop new markets for their products, and to collaborate with neighboring countries. Even if Kenya were able to manage SPS issues internally, cross-border pest management is needed to ensure these efforts are not wasted.

Because plant diseases and pests don't recognize political borders, USG-prioritized value chains are at risk. As efforts aimed at increased production through better performing seeds and the use of appropriate fertilizer take hold, the increased production remains at risk from pests such as fall armyworm or contamination from inappropriate chemical use, naturally occurring toxins (particularly aflatoxin), and/or microbiological hazards. Supporting market systems must be in place to ensure increased yields are fully realized in: nutritional value; consumer food safety; increased local, regional, and international trade; and greater incomes all along the value chain. Exploiting different value chain intersections with supporting market systems will help avoid redundancy in market systems development and leverage complementary project resources. For example, increasing risk management performance overall will support all value chains. So too, all value chains will benefit from activities enabling the use of safe agricultural inputs and improved laboratory infrastructure. As such, SPS capacity building provides a lot of "bang for the buck" because improvement in SPS systems for one value chain equals improvements for other value chains.

To address the problem, the overall SPS enabling environment must be strengthened so that Kenya is able to protect its food value chains and participate in regional SPS development efforts. Historically, the GOK – like many other African countries – has been found to only respond to agricultural emergencies as they arise rather than taking a proactive approach to preventing emergencies in the first place. That said, the GOK does recognize some of structural inefficiencies in their systems and is trying to engage different institutions and to define activity so that there is less redundancy. Efforts to capitalize on this initiative to foster greater incentives toward safe food should be made while some motivation exists. This can help ensure domestic and international producers are incentivized to address food safety issues. Therefore, we also suggest the development of and investment in an incentive program that takes a deep dive into how to best motivate officials to prioritize SPS systems for the protection of human health; such a program should target decision making officials at the highest levels. While Kenya is active in driving a national SPS committee, such efforts

have not yet identified a reliable, sustainable funding mechanism to support regular meetings and dedicated staff to respond to notifications, sort out redundancy in laws and regulations, and coordinate SPS activities across government agencies. Even when SPS meetings happen, there are often different people participating in the meetings, thereby limiting the effectiveness of the SPS committee to drive sustainable progress. Participants in national SPS activities should also receive guidance on how to package and communicate their priorities and recommendations to both politicians and the general public; this will ensure that non-scientific politicians better understand technical aspects of SPS issues to develop more appropriate and more effective regulations, as well as properly communicate food safety concerns to consumers without resulting in unnecessary fear of certain food products (such as aflatoxin in dairy).

4.2 Agricultural Inputs

To increase yields and decrease losses in order to sustain food security in the region, East African countries must utilize all agricultural tools available to them, particularly agricultural inputs. However, the use of contemporary agricultural inputs in Ethiopia is plagued by an inability to enforce laws and regulations, distribution problems, registration inefficiencies, informal trading systems, and low quality or counterfeit products. Other problems include farmers' and ranchers' misunderstanding of when, on what crops, and/or how to apply different agrochemicals, including biopesticides and on the use of antibiotics in animals. Additionally, the GOE has neither the necessary physical infrastructure nor the incentive to control illegal products. Although quality assurance testing of imported pesticide products is mandated and enforced in the formal market, officials have no access to informal markets, and in particular to smuggled or counterfeit products (which are by definition outside legal distribution systems). At the production and processing value chain level, many up-chain actors do not recognize or do not care about the consequences of pesticide misuse, and therefore do not provide any consequences for pesticide applicators who apply incorrectly, even if the applicators know what they are "supposed" to do.

Counterfeits and Product Quality

Counterfeit chemicals and poor quality of pesticide projects pose a major threat to the agricultural sector and public health – yet there is little capacity to stop it. Although testing of formally imported inputs is mandated and occurs, there is no monitoring of products in the informal marketplace and no enforcement of suspected violations. This is a very serious issue – in the best case scenario, counterfeits and mislabeled products lack efficacy; in the worst case scenario people and livestock are exposed unwittingly to highly toxic chemicals that are not allowed for use. Disincentivizing participation in informal input markets without destroying those markets or the benefits they provide is an issue that needs examining.

Proper Use of Inputs

Producers, particularly smallholder farmers, often do not use agricultural inputs for their intended purpose, either because of cost, improper labeling, and/or availability of allowed products. Farmers often do not understand, or have any incentive, to properly use chemical products, and are not fully aware of the health risks that could ensue through the misuse of inputs. An educational campaign is needed at regional, national, and local levels regarding the dangers of inputs misuse and how to use products safely, but in a context that is relatable and achievable by smallholder farmers. Full good agricultural practices (GAP) compliance is often unrealistic, but some very basic practices, explained in easily understood materials can assist farmers in making significant safety gains. In addition, all value chain actors need to be educated on the consequences of pesticide misuse to provide an incentive for applicators (farmers or professional spray service providers) to apply them properly.

Pest Control Availability

The weak pesticide regulatory structure in Ethiopia contributes to compromised farmer and consumer health at home, and results in import detentions/denials when commodities are exported outside of the region. This is because as newer, less toxic pesticides are developed and registered for use in the industrialized world, many older chemistries are restricted or banned in the global arena.

Due to complicated bureaucracies and high costs, manufacturers of new generation pesticides are not inclined to register these products in Africa; thus farmers are forced to continue using outdated, highly toxic formulations - as seen in the response to FAW. This results in export maximum residue level (MRL) violations, increased risk to worker safety and domestic and international food supplies as well as increased environmental degradation.

If international MRLs are established and adopted, registration requirements are consistent among national authorities, and data protection issues are addressed, pesticide manufacturers will face fewer constraints to registering products in African markets and African farmers will have increased opportunities to obtain safer products.

4.3 Scientific Capacity

There are many government and some private laboratories, however that are not well networked and often have redundant responsibilities. As such, there is little to no coordination in procedures and methods of testing and few mechanisms for sharing of knowledge or information within Kenya and with their neighbors, making it difficult to respond to and manage emergencies. There is not just a question of capacity to meet SPS requirements in Kenya, but also a question of scientific capacity to set and enforce SPS standards and to analyze risk. Furthermore, as there is not regular testing done and laboratory personnel cannot regularly apply the knowledge gained through previous training, investments in laboratory capacity building have not been sustainable. There are procedural obstacles and officials at all levels need more training and skills to perform necessary duties effectively, for example:

- Field extension officers are not adequately trained to identify potential risks in the field. There are few mechanisms to communicate the risks and provide solutions to the farmers or food producers;
- Laboratory/field technicians need to be trained in updated analytical methods and techniques and to participate in proficiency and validation programs ensuring they maintain relevant skills going forward;
- Regulatory officials, who assess risk and determine if actions need to be taken, lack an understanding to how best apply actions to specific cases.
- Strict government personnel regulations limit the ability of regulatory management to have staff at inspection points when needed as well as in hiring and compensating high performers and firing poor performers;
- Fees levied on services performed are often not immediately accessible by the laboratories generating the fees, greatly limiting the ability of testing and inspections management to invest in the technicians, laboratory equipment, consumables needed to support strong laboratory capacity and the inspectors, vehicles, and fuel needed to properly and efficiently inspect facilities.

To ensure consumers' access to safe and suitable food, a network of well-equipped SPS laboratories run by a trained and skilled staff in a transparent manner is necessary. An effective laboratory network tests and validates the safety of food from production through harvest and processing. Such a network characterizes risk and protects domestic crops from foreign pest and disease, helps monitor for and keep microbiological and

chemical contaminants and residues out of food and water supplies, and contributes to assessments of environmental impacts of, for example, agrochemicals.

In Kenya, there is little routine testing for microbial and chemical residues on food and roles and responsibilities around which organization should perform the testing, especially when it comes to animal-sourced foods. Nor is quality assurance of agricultural inputs regularly performed.

4.4 Transparency

Private sector engagement in SPS processes is limited which significantly contributes to the problems with implementation of regional and country-level SPS standards. The private sector is supportive, particularly from animal, animal products and horticulture and has actively supported technically the strengthening of Kenya's SPS committee. However, while opportunities for public-private engagement are promising in Kenya, there are few clear mechanisms for feedback available to the private sector to comment on rule-making. This results in push-back from stakeholders during implementation, particularly as the private sector feels like regulations are developed without any consideration of how they can abide by the regulations. In order to address issues surrounding the current lack of transparency, including mistrust of SPS decision making processes, a transparent, participatory approach to policy development that includes input from public and private entities at all levels of the value chain must be designed. While there have been previous efforts to encourage a participatory approach to developing food safety policy, such initiatives have been short lived. This is because they either have lacked a clear champion in the government to lead and drive initiatives, spotty communication with the private sector, or because some efforts have been confused with other regulations and laws which have been politically contentious.

5. ANNEXES

5.1 Activity Action Table: Suggestions for improving the overall SPS enabling environment and strengthening SPS practices

	A. Short Term Current/minimal financial input achieved within 1-2 years	B. Medium Term Moderate financial input achieved within 1-3 years	C. Long Term Substantial financial input achieved within 1-5 years
Basic System	<p>1A.a Support efforts to develop harmonized regional, SPS certificates and inspection protocols to facilitate regional trade within the GOK. One of the barriers to trade in the region is the lack of trust between countries of each other's phytosanitary certificates; this is due to, among other things, a language problem as well as lack of consistency of forms, or a lack of trust in the technical clearance processes deployed in other countries.. INCENTIVE⁴</p> <p>Activities might include:</p> <ul style="list-style-type: none"> Participate in regional workshops then define 	<p>1B.a Build the capacity of KEPHIS to perform the information gathering, evaluation, and record keeping necessary to develop recommendations for a position or action in response to a specific pest risk. This will ensure that policy makers have the proper information to allocate resources in the event of invasion, incursion or infestation. Encourage regional integration of plant quarantine policy, such as through a Regional Plant Protection Organization, which ensures dialogue on movements of commodities and cooperation to address mutual problems. RISK MANAGEMENT⁵</p> <p>Activities might include:</p> <ul style="list-style-type: none"> With technical assistance/training, assist the GOK in implementing actions to which they've 	

⁴ Recommendations that require GOK buy-in are marked INCENTIVE and should be addressed through a concurrent "incentive program".

⁵ It may be that a deep dive with a risk management program will be most effective. Suggestions throughout this document supporting risk management are marked RISK MANAGEMENT.

	<p align="center">A. Short Term</p> <p align="center">Current/minimal financial input achieved within 1-2 years</p>	<p align="center">B. Medium Term</p> <p align="center">Moderate financial input achieved within 1-3 years</p>	<p align="center">C. Long Term</p> <p align="center">Substantial financial input achieved within 1-5 years</p>
<p align="center">Basic System</p>	<p>and agree upon what consistent certificates and form look like, as well as uniform standard operating procedures for certification.</p> <ul style="list-style-type: none"> ▪ Technical guidance to GOK to move “harmonized” forms toward adoption ▪ Build capacity for Kenya’s alignment and compliance with WTO standards and procedure. 	<p>committed at the regional level.</p> <ul style="list-style-type: none"> ▪ Meet with NGOs, such as CABI or IITA to define areas of mutual concern and collaboration. ▪ Expand basic understanding on pest identification to build upon past training. This will include efforts to improve the ability for inspectors to identify pests and distinguish between quarantine and cosmopolitan pests. As well as the importance of creating working relationships with universities. ▪ Technical assistance on how to strengthen an early warning system, surveillance system and pest monitoring systems within the country at both a general and pest specific levels, and to make current efforts financially and operationally sustainable. ▪ Support efforts underway by KEPHIS’s Center of Phytosanitary Excellence (COPE) that is helping other countries in the region to understand plant health SPS issues 	

	A. Short Term Current/minimal financial input achieved within 1-2 years	B. Medium Term Moderate financial input achieved within 1-3 years	C. Long Term Substantial financial input achieved within 1-5 years
Basic System		and responses and becoming a regional center of excellence on such topics.	
	<p>1A.b Build the capacity of plant health officials to accurately characterize pest risk, such as the ability to conduct pest risk assessments (PRAs), risk-based inspections, pest surveillance, and prepare pest lists, and to communicate the actual risks to higher-level political levels that often play a role in import decisions. RISK MANAGEMENT AND RISK COMMUNICATION</p> <p>Activities might include:</p> <ul style="list-style-type: none"> ▪ Trainings on how to incorporate risk in decision making. This would include communication – both to the general public as well as to higher political levels – and management of risks. Utilizing risk-based inspection methods for screening passengers/ baggage as well as shipments. 	<p>1B.b Focus SPS policies and regulations on domestic issues and harmonization with international standards. While the government and private sector often work together effectively to overcome SPS issues when exports are at stake, little monitoring of food/feed sold in the domestic market is performed. This is a significant problem to domestic public health and food security. SPS systems that meet international standards will also protect domestic food supplies. This must be done in such a way that limits “red tape” which could drive private entities toward informal trade. INCENTIVE</p> <p>Activities might include:</p> <ul style="list-style-type: none"> ▪ Technical assistance to the GOK to help define how existing regulations for exported goods can be tweaked/ changed to also protect domestic food supplies. ▪ Technical assistance related to pest surveillance for products destined to the local market. 	

	A. Short Term Current/minimal financial input achieved within 1-2 years	B. Medium Term Moderate financial input achieved within 1-3 years	C. Long Term Substantial financial input achieved within 1-5 years
Basic System		<ul style="list-style-type: none"> ▪ Guidance on strengthening Kenya’s existing passenger inspection system and recommendations on developing the capacity of the inspection system, including training personnel and procuring appropriate technology to reduce the risk of entry of exotic pests. ▪ Guidance on the development of manuals and guides at the regional level and to work towards domestic adoption. This would include border inspection manuals and other tools. 	
	<p>1A.c Establish viable relationships and collaboration between GOK’s various agencies and organizations at the airport and seaports. Many government agencies share various jurisdictions at the country’s ports of entry. While there is clear distinction between the various offices, there is strikingly little coordination and collaboration between these offices, despite their goals being aligned. This is an opportune time to develop these relationships as direct</p>	<p>1B.c Strengthen existing record-keeping systems. In addition to human capital investments, in order to effectively perform pest identification and surveillance, plant quarantine divisions require strengthening Kenya’s “digitized” record keeping system and seeking opportunities to roll this out to include activities which are currently in the informal trade sector. Such a database is used for interception records of plant pests, an electronic phytosanitary certification system, and to determine regulatory actions. INCENTIVE</p>	

	A. Short Term Current/minimal financial input achieved within 1-2 years	B. Medium Term Moderate financial input achieved within 1-3 years	C. Long Term Substantial financial input achieved within 1-5 years
Basic System	<p>flights between the United States and Kenya are anticipated to commence in the near future.</p> <p>Activities might include:</p> <ul style="list-style-type: none"> Education and awareness guidance to various agencies at the airport and seaport about the interrelationships, as well as information sharing as to each agency's dependency on others. This would include NPPO, customs, immigration, security officials, airlines as well as the airport (or seaport) authorities. 	<p>Activities might include:</p> <ul style="list-style-type: none"> Ensure that KEPHIS has the authority to host a database with interception and surveillance data. The database should be electronic with the ability to track and analyze data. Consider existing models for databases, including ones established by USDA (PIMS), CABI and others. Provide technical guidance to link the stakeholders currently collecting the data (inspectors, plant protection officials, extension, universities, exporters) to begin setting up the system. 	
Intermediate System		<p>1B.d Assist in establishing Areas of Low Pest Prevalence (ALPP)/Pest Free Areas (PFAs) where appropriate. PFAs and ALPPs are technical and administrative processes to achieve acceptance of the phytosanitary status of a delimited area. This is outlined in ISPM No. 29 and serves as a powerful tool for addressing pest pressure and establishing the ability to export commodities (e.g. citrus to the EU).</p>	<p>1C.a Support KEPHIS efforts to identify and realign efforts to build the capacity of the quarantine office, laboratories, training centers. INCENTIVE</p> <p>Activities might include:</p> <ul style="list-style-type: none"> Technical guidance to the GOK on what authorities/responsibilities fall under a well-functioning NPPO, including a viable risk management and surveillance

	A. Short Term Current/minimal financial input achieved within 1-2 years	B. Medium Term Moderate financial input achieved within 1-3 years	C. Long Term Substantial financial input achieved within 1-5 years
Intermediate System		Activities might include: <ul style="list-style-type: none"> ▪ Technical assistance to learn about pest free areas, their benefits, how to set-up and monitor, etc. 	systems. Discussion on importance and need of quarantine systems and spaces. <ul style="list-style-type: none"> ▪ Supporting KEPHIS efforts to roll out regional trainings on risk identification, communication, and response; ▪ Develop the capacity of Kenya and other countries in East Africa to conducting quarantine treatments and application, including instructions on conducting treatments safely. This will assist in countries' abilities to access US and other markets where treatments are necessary. Will additionally decrease likelihood of pest introduction to own country. ▪ Training and technical assistance on utilizing an integrated pest management approach, covering techniques and technologies other than pesticides.
			1C.b Assist in strengthening post-entry quarantine (PEQ) centers. Kenya requires a mechanism to conduct PEQ assessments of preparative material. In accordance

	A. Short Term Current/minimal financial input achieved within 1-2 years	B. Medium Term Moderate financial input achieved within 1-3 years	C. Long Term Substantial financial input achieved within 1-5 years
Intermediate System			<p>with ISPM No. 34 Kenya needs to adopt guidelines for the design and operation PEQ stations for holding imported consignments of plants, mainly plants for planting, in confinement in order to verify whether or not they are infested with quarantine pests.</p> <p>Activities might include:</p> <ul style="list-style-type: none"> ▪ Inspector trainings to understand what is/is not quarantinable. ▪ Assistance for them to work with other authorities at inspection facilities (such as Airport and Seaport authorities) to ensure adequate space and access is provided to KEPHIS's inspectors and consignments.
Advanced System	<p>1A.d Assist Kenya in making its National SPS Committee (NSC) viable. The efficient organization and functioning of NSCs is essential in enabling greater and more productive coordination at all levels of engagement in order to achieve the goals of food security, increased trade and</p>		

	A. Short Term Current/minimal financial input achieved within 1-2 years	B. Medium Term Moderate financial input achieved within 1-3 years	C. Long Term Substantial financial input achieved within 1-5 years
Advanced System	<p>income growth. INCENTIVE</p> <p>Activities might include:</p> <ul style="list-style-type: none"> ▪ Training on the SPS agreement and the various aspects of how the different stakeholders and actors (from across public and private) interact. This will include benefits of the agreement and will focus on both front-line officials as well as management level and at the decision making levels (though, separate to address individuals’ job duties). ▪ Workshops that educate stakeholders about the benefits of and functioning of the NSC domestically and internationally, and how to communicate SPS issues and priorities to non-technical politicians – so that they understand the role of the NSC – and 		

	A. Short Term Current/minimal financial input achieved within 1-2 years	B. Medium Term Moderate financial input achieved within 1-3 years	C. Long Term Substantial financial input achieved within 1-5 years
Advanced System	<p>the general public.</p> <ul style="list-style-type: none"> ▪ Training for GOK officials to understand how to effectively participate in bi-annual WTO SPS Committee meetings. ▪ Trainings for GOK on inquiry point and notification systems as well as how to build capacity to respond to notifications with current trading partners and identify opportunities to trade with other countries that Kenya is interested in trading with. This could potentially include working with GOK to develop a more functional chain of reporting. ▪ Guidance on the coordination of SPS issues within Kenya to more effectively represent their positions and issues in international fora. 		

	A. Short Term Current/minimal financial input achieved within 1-2 years	B. Medium Term Moderate financial input achieved within 1-3 years	C. Long Term Substantial financial input achieved within 1-5 years
Advanced System	<ul style="list-style-type: none"> ▪ Support on identifying areas of overlap between different government agencies and stakeholders and how best to streamline SPS issues to foster effective development and implementation of regulations as well as efficient coordination, particularly for food safety. 		

5.2 Activity Action Table: Suggestions to address agricultural inputs access and use

	A. Short Term Current/minimal financial input achieved within 1-2 years	B. Medium Term Moderate financial input achieved within 1-3 years	C. Long Term Substantial financial input achieved within 1-5 years
Basic System	<p>2A.a Counterfeit and Poor Quality Products:</p> <p>Document the extent of counterfeit and poor quality input products within Ethiopia – building on recent similar efforts in the region. This is essential in order to prioritize interventions.</p> <p>Activities might include:</p> <ul style="list-style-type: none"> Stakeholder workshop to outline product counterfeit/quality study to identify representative pesticide, fertilizer, vet drug or other inputs to evaluate. Workshop on mechanisms (looking at global models elsewhere) on how monitoring and enforcement programs are funded. 	<p>2B.a Counterfeit and Poor Quality Products:</p> <p>Implement pilot inputs monitoring program that targets the highest risk products in the markets.</p> <p>Activities might include:</p> <ul style="list-style-type: none"> Workshop to develop sampling and testing program – identifying targeted inputs and sampling/testing design with participating stakeholders, including results packaging and delivery to enforcement agencies. Training for monitoring officials on identifying questionable products and protocols for collection. Training of chemists in national laboratories on how to conduct analysis following protocols that will produce legally defensible results and reports. Training of enforcement officials on 	<p>2C.a Counterfeit and Poor Quality Products:</p> <p>Develop sustainable national monitoring and enforcement program.</p> <p>Activities might include:</p> <ul style="list-style-type: none"> Assist GOE in developing legislation that funds monitoring/enforcement work. Assist GOE in establishing national monitoring/enforcement program, including identifying roles and responsibilities of agencies. Assist GOE in piloting full monitoring and enforcement program with technical, legal, and regulatory support.

	A. Short Term Current/minimal financial input achieved within 1-2 years	B. Medium Term Moderate financial input achieved within 1-3 years	C. Long Term Substantial financial input achieved within 1-5 years
Basic System		<p>confiscation protocols of suspect products.</p> <ul style="list-style-type: none"> Public education campaign, through retailers and the media, on the importance of using authentic inputs, and how to recognize counterfeits. 	
	<p>2A.b Proper Use of Inputs:</p> <p>Develop and/or strengthen pest/disease identification and soil nutrient needs, in the context of pest/disease control and soil improvement. Simple manuals can be developed (or adopted from others) that identifies pests/diseases/deficiencies with listed recommendations.</p> <p>Activities might include:</p> <ul style="list-style-type: none"> Exercise to identify key pests and diseases that affect priority crops and livestock. Develop list of currently registered and available pesticides, veterinary drugs, 	<p>2B.b Proper Use of Inputs:</p> <p>Develop (or adopt from others) informational materials to disseminate best input options for crops and livestock.</p> <p>Activities might include:</p> <ul style="list-style-type: none"> Develop a mitigation handbook that provides pest/disease/nutrient deficiencies with options for inputs that are low-risk and effective for farmers, agro-input dealers, extension. Training of extension and agro-input dealers on how to utilize and distribute the manual to farmers. Trainings to educate the full value chain on the negative consequences of pesticide misuse, how to monitor for misuse, and remedies to prevent 	<p>2C.b National Monitoring Programs:</p> <p>Develop sustainable national monitoring and enforcement program.</p> <p>Activities might include:</p> <ul style="list-style-type: none"> Assist GOE in developing legislation that funds monitoring/enforcement work. Assist GOE in establishing national monitoring/enforcement program, including identifying roles and responsibilities of agencies. Assist GOE in piloting targeted monitoring and enforcement program with technical, legal, and regulatory support.

	A. Short Term	B. Medium Term	C. Long Term
	Current/minimal financial input achieved within 1-2 years	Moderate financial input achieved within 1-3 years	Substantial financial input achieved within 1-5 years
Basic System	<p>or fertilizers that are lowest-risk and effective.</p> <ul style="list-style-type: none"> If low-risk and most effective control products are not available, then develop strategies with stakeholders to encourage new registrations of promising inputs. 	<p>misuse.</p>	
	<p>2A.c Pest Control and Fertilizer Availability:</p> <p>Review national registration lists of currently available inputs, determine relative risks and benefits (e.g., cost) of these products vs. potential lower-risk and more effective alternatives.</p> <p>Activities might include:</p> <ul style="list-style-type: none"> Exercises conducted by pest, disease, and nutrient experts to review currently registered input products, identify alternatives that exist outside of the country, and conduct a pricing study of the current 	<p>2B.c Pest Control and Fertilizer Availability:</p> <p>Conduct risk assessments of currently used inputs, considering farmer/family exposure, and consumer and environmental safety.</p> <p>Activities might include:</p> <ul style="list-style-type: none"> Provide training on input risk assessment to regulators, targeting input products identified in previous earlier activities (hazard and exposure). These would include thorough case examples for regulators to work and make risk determinations. Series of consultations conducted to cover more risk assessments of inputs 	<p>2B.c Establish national pesticide monitoring program.</p> <p>It is difficult to prioritize pesticide interventions without scientifically-backed knowledge of the specific pesticide residue levels on domestically consumed products. Ethiopia's FDA has requested assistance in developing a national monitoring plan to determine the extent and levels of pesticide contamination of the food supply.</p> <p>Activities might include:</p> <ul style="list-style-type: none"> Guidance on establishing a national monitoring program. Piloting a monitoring program on a few targeted crops throughout the

	A. Short Term	B. Medium Term	C. Long Term
	Current/minimal financial input achieved within 1-2 years	Moderate financial input achieved within 1-3 years	Substantial financial input achieved within 1-5 years
	<p>products vs alternatives.</p> <ul style="list-style-type: none"> Stakeholder workshops to gain real experience from farmers on what products are actually being used and their views on efficacy of those products, identify the priority gaps in product availability, and identify marketability of alternatives. 	<p>one-by-one with regulators and risk assessment experts. The goal will be to determine which input products to prioritize for registration re-evaluation and alternative requests.</p>	<p>domestic market chain.</p> <ul style="list-style-type: none"> Training and policy guidance to improve the data required for efficacy and environmental effects trials.
Basic System	<p>2A.d National Monitoring Programs:</p> <p>It is difficult to prioritize input interventions without scientifically-backed knowledge of the specific residue levels on domestically consumed products. Ethiopia’s FDA equivalent has requested assistance in developing a national monitoring program to determine the extent and levels of residues in the food supply.</p> <p>Activities might include:</p> <ul style="list-style-type: none"> Workshop on mechanisms (looking at global models elsewhere) on how residue monitoring and enforcement programs are funded, 	<p>2B.d National Monitoring Programs:</p> <p>Implement pilot inputs monitoring program that targets the highest risk commodities in the markets.</p> <p>Activities might include:</p> <ul style="list-style-type: none"> Workshop to develop sampling and testing program – identifying targeted commodities and sampling/testing design with participating stakeholders, including how to prepare reporting and delivery to enforcement agencies. Training for monitoring officials on sampling design and developing 	

	A. Short Term Current/minimal financial input achieved within 1-2 years	B. Medium Term Moderate financial input achieved within 1-3 years	C. Long Term Substantial financial input achieved within 1-5 years
	<p>designed, and prioritized.</p> <ul style="list-style-type: none"> Stakeholder workshop to develop a pilot monitoring and enforcement program, identifying priority crops/livestock. 	<p>protocols for collection.</p> <ul style="list-style-type: none"> Training of technicians in national laboratories on how to conduct analysis following protocols that will produce legally defensible results and reports. Training of enforcement officials on confiscation protocols of unsafe commodities. 	
Intermediate System	<p>2A.e Assist the GOE to establish programs to identify pest control needs, identify trade standards gaps, and become more proactive in making newer pesticides available to growers. Such a program will lead to increased yields (less crop damage), increased trade opportunities (less illegal residues on exported products), and a safer domestic food supply. RISK MANAGEMENT INCENTIVE</p> <p>Activities might include:</p> <ul style="list-style-type: none"> Convene stakeholder meetings (similar to the process in the US) to identify national pest control 	<p>2B.e Develop legislation for control of and strong oversight of pesticide use as well as extension staff training on proper use of pesticides. There is little guidance on the use of pesticides or GAPs at the farm level. Nor is there governance of pesticide suppliers (product control, use, and application training) in Ethiopia. This is a significant gap which has implications not only for food safety, but also farm worker safety and environmental health. Such legislation should support formal stakeholder processes to identify and prioritize pest control as well as establish trade standards. These can be complemented by national programs to develop Codex maximum residue level (MRL) standards. RISK MANAGEMENT INCENTIVE</p>	<p>2C.d Pest Control and Fertilizer Availability:</p> <p>Removal or modification for allowed uses of the highest risk inputs, and facilitation of new registration incentives and processes.</p> <p>Activities might include:</p> <ul style="list-style-type: none"> Consultations with risk managers and industry stakeholders on input product registration strategies that allow better control over products in the market (e.g., limiting the number of products containing the same/similar active ingredients), and develop timeline and strategies for removing/limiting highest risk

	A. Short Term Current/minimal financial input achieved within 1-2 years	B. Medium Term Moderate financial input achieved within 1-3 years	C. Long Term Substantial financial input achieved within 1-5 years
Intermediate System	priorities.	<p>EDUCATION⁶</p> <p>Activities might include:</p> <ul style="list-style-type: none"> ▪ Technical assistance to help the GOE develop self-funding mechanisms so that they can adequately monitor and enforce pesticide product regulations. (For example, Costa Rica imposes a 0.5% tax on pesticide imports or sales which is used to manage pesticides). ▪ Develop pesticide application manuals that are appropriate for real-world situations and conditions of Ethiopia, rather than based on unrealistic expectations of farmers. 	<p>products.</p> <ul style="list-style-type: none"> ▪ Strengthen national research teams, through training and assisting in actual projects, to coordinate with product manufacturers in generating efficacy and/or residue data to support new registrations and establish trade and national standards.
	<p>2A.f Educate policy makers regarding the problems of toxic pesticide use and support Ethiopian officials' participation in Codex. The GOE has an opportunity to influence MRLs set for pesticide residues through attendance at Codex forums. Delegates should attend on a regular,</p>		<p>2C.e Strengthen national pesticide research teams to coordinate with pesticide manufacturers in generating residue data to facilitate new registrations and establish trade standards. Registrations cannot be established without a recognized MRL, either in another country or Codex. Many tropical fruits and</p>

⁶ Several recommendations in this document suggest developing educational programs. Do agricultural education/training projects already exist? Could the subject matter marked with EDUCATION be incorporated into these?

	A. Short Term Current/minimal financial input achieved within 1-2 years	B. Medium Term Moderate financial input achieved within 1-3 years	C. Long Term Substantial financial input achieved within 1-5 years
Intermediate System	<p>long-term basis in order to develop effective relationships and deep understandings of technical and political issues. Ethiopia must begin to contribute to the development of standards, not only the adoption of standards. INCENTIVE</p> <p>Activities might include:</p> <ul style="list-style-type: none"> Conduct pesticide risk assessment in the context of phasing out the highest risk pesticides, identifying lower-risk alternatives, including new active ingredients not currently available. 		<p>vegetables do not have MRLs because they aren't grown in developing countries, and hence no Codex either because no data has been generated. Ethiopia has successfully partnered with the US IR4 program to generate such data under a pilot project, and this project needs to be institutionalized in order to further gain access to newer pest control tools.</p> <p>Activities might include:</p> <ul style="list-style-type: none"> Annual projects conducted jointly with the Ethiopia study teams and IR4 partners, targeting priority pests/pesticides/crops.
Advanced System		<p>2B.f Develop and/or strengthen agricultural practices. Knowledge of and capacity building in foundational food safety systems is needed at all levels – from farm to processors to national governments to regional communities. Emphasis must be placed on the importance of a solid food safety foundation that includes GAPs, Sanitation Standard Operating Procedures (SSOPs), GMPs and Hazard Analysis Critical Control Point (HACCP).</p>	<p>2C.g Proper Use of Inputs:</p> <p>Develop a plan for input stewardship, including container return/collection, appropriate packaging requirements, agro-input licensing/ training.</p> <p>Activities might include:</p> <ul style="list-style-type: none"> Stakeholder workshop to identify incentives for container return and

	A. Short Term Current/minimal financial input achieved within 1-2 years	B. Medium Term Moderate financial input achieved within 1-3 years	C. Long Term Substantial financial input achieved within 1-5 years
Advanced System		<p>Activities might include:</p> <p>Trainings in GAPs, Sanitation Standard Operating Procedures (SSOPs), GMPs and Hazard Analysis Critical Critical Control Point (HACCP).</p>	<p>recycling programs.</p> <ul style="list-style-type: none"> ▪ Stakeholder workshops to determine the most effective and appropriate packaging, and develop strategies to incentivize government and industry to adopt such packaging. <p>Consultation meetings with government and industry to better understand agro-input dealer qualifications and licensing, and develop strategies to strengthen the process through regulations, fee structures, and training programs.</p>

5.3 Activity Action Table: Suggestions to improve scientific capacity in Ethiopia

	A. Short Term Current/minimal financial input achieved within 1-2 years	B. Medium Term Moderate financial input achieved within 1-3 years	C. Long Term Substantial financial input achieved within 1-5 years
Basic System	3A.a Pursue the development of labs with other donors (e.g. the World Bank).	<p>3B.a Review and update national SPS policies and regulations in order to provide a solid management base for decision makers and clarify enforcement roles and responsibilities. Strong enforcement mechanisms must be implemented to enforce updated policies. Activities might include:</p> <ul style="list-style-type: none"> ▪ Review existing policies in terms of international requirements and identify where strengthening may be needed. ▪ Provide technical guidance to help strengthen policies/regulations. ▪ Assist in the development of a communication plan and SOPs for new/modified regulations. 	<p>3C.a Establish a sustainable lab training program and prioritize laboratory technician salaries in national budgets that can help address the issue of high staff turnover, INCENTIVE EDUCATION</p> <p>Activities might include:</p> <ul style="list-style-type: none"> ▪ Integrate universities in the education scheme to build greater capacity for laboratory/diagnostic testing and pest identification outside of the government. ▪ Inventory capabilities across the region to determine where expertise lies. Ethiopia does not need to be expert in everything if other expertise exists.
		<p>3B.b Develop and enforce policies that support the implementation of mechanisms by which public service agencies may retain service fees for the purpose of reinvesting in their facilities and hiring/training staff. Revenue generated from fees needs to</p>	

	A. Short Term Current/minimal financial input achieved within 1-2 years	B. Medium Term Moderate financial input achieved within 1-3 years	C. Long Term Substantial financial input achieved within 1-5 years
Basic System		<p>support the service provided. Too often government agencies have no mechanism to provide services within the public sector because the fees for service go back into general funds, thus there is no ability for these agencies to expand and improve services. INCENTIVE Activities might include:</p> <ul style="list-style-type: none"> ▪ Perform an assessment that considers lab funding under different mechanisms – e.g. public/private partnerships. 	
		<p>3B.c Assist national laboratories to implement consistent diagnostic methodologies that will lead to mutual recognition of test results in the region. RISK MANAGEMENT</p> <p>Activities might include:</p> <ul style="list-style-type: none"> ▪ Review diagnostic methodologies across the region to determine consistencies and differences. ▪ Convene a stakeholder meeting that brings pertinent individuals to consider what methodologies are most useful and could be implemented nationally. 	

	A. Short Term Current/minimal financial input achieved within 1-2 years	B. Medium Term Moderate financial input achieved within 1-3 years	C. Long Term Substantial financial input achieved within 1-5 years
		<ul style="list-style-type: none"> Pursue the implementation of agreed upon diagnostics. 	
Intermediate System		<p>3B.d Develop and implement programs to attract and retain talent in the government. Due to high staff turnover, sustainable training programs need to be established, particularly in the case of laboratory expertise. The GOE needs to prioritize laboratory technician salaries in their budget or establish adequate user fee schemes. INCENTIVE EDUCATION Activities might include:</p> <ul style="list-style-type: none"> Review existing training programs to determine if/where appropriate training could be added or individuals included. Review salary structure within scientific organizations to determine what monetary or other incentives could be utilized in retaining staff. 	<p>3C.b Development of an East African Reference Laboratory. Support the development on a reference lab in the East Africa region. While Bless Agri Food Laboratory Services maintains reference cultures and support other laboratories in Ethiopia – including government laboratories – its reference cultures are imported from Europe and it does not act as a reference laboratory. Bless is well positioned to develop into a regional reference laboratory, but would need higher-level political support from the government of Ethiopia and from the African Union to do so.</p>
			<p>3C.c Develop sustainable training models within national governments, RECs, and the AU. These training models could include partnering with universities (particularly lab facilities) and using extension services to</p>

	A. Short Term Current/minimal financial input achieved within 1-2 years	B. Medium Term Moderate financial input achieved within 1-3 years	C. Long Term Substantial financial input achieved within 1-5 years
Advanced System			reach more recipients and impart critical SPS knowledge such as risk assessments, proper certifications, and use of inputs. EDUCATION Activities might include: <ul style="list-style-type: none"> ▪ Identify existing resources that can be used for training, such as distance learning modules.
			3C.c Support the establishment of some labs for ISO accreditation. INCENTIVE

5.4 Activity Action Table: Suggestions for improving transparency

	A. Short Term Current/minimal financial input achieved within 1-2 years	B. Medium Term Moderate financial input achieved within 1-3 years	C. Long Term Substantial financial input achieved within 1-5 years
Basic System	<p>4A.a Perform a mapping exercise to identify relevant policy formulating stakeholders. Inter-Ministerial communication and coordination is a major constraint as well as stakeholder involvement in the policy development process. A mapping exercise could reveal, at a minimum, where the duplication and gaps exist in the current structure and identify tools to get Ethiopia on the path to strong policy development and implementation. This could include literature reviews, interviews, workshops, etc.</p>	<p>4B.a Implement suggestions from the previously performed mapping exercise.</p> <p>Activities might include:</p> <ul style="list-style-type: none"> ▪ Assist in the development of a cross-agency communication plan (e.g. to include customs). ▪ Include non-agricultural border officers in SPS inspection trainings. 	

	A. Short Term Current/minimal financial input achieved within 1-2 years	B. Medium Term Moderate financial input achieved within 1-3 years	C. Long Term Substantial financial input achieved within 1-5 years
Advanced System			<p>4C.a Assist Ethiopia in making its National SPS Committee (NSC) viable. The efficient organization and functioning of NSCs is essential in enabling greater and more productive coordination at all levels of engagement in order to achieve the goals of food security, increased trade and income growth. INCENTIVE</p> <p>Activities might include:</p> <ul style="list-style-type: none"> ▪ Workshops that educate stakeholders about the benefits of and functioning of the NSC domestically and internationally. ▪ Training for GOE officials to understand how to effectively participate in bi-annual WTO SPS Committee meetings. ▪ Trainings for GOE on inquiry point and notification systems.