



# Strategic and Operational Guide to Assess the Conformity of Fishery Products

**IMPROVING TRADE UNDER THE ONE STOP BORDER POST  
IN THE SADC REGION**

ACKNOWLEDGMENTS

This report has been prepared by the UNIDO Directorate of Technical Cooperation and Sustainable Industrial Development, Division of SME Competitiveness, Quality and Job Creation under the overall guidance of its Chief, **Mr. Alejandro Rivera Rojas**, with inputs prepared by **Ms. Margarida dos Santos Correia**, UNIDO Technical Expert in Fisheries, Aquaculture, and SPS, and support provided by **Mr. Francois Denner**, UNIDO Chief Technical Advisor; **Dr. Sloans Chimatiro**, UNIDO Regional Fisheries Expert; **Ms. Raquel Barrios Gayo** and **Ms. Mikaela Arnstein**, UNIDO Project Administrators.

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Strategic and Operational Guide to  
Assess the Conformity of Fishery Products

IMPROVING TRADE UNDER THE ONE STOP BORDER POST (OSBP)  
IN THE SADC REGION

Vienna, Austria  
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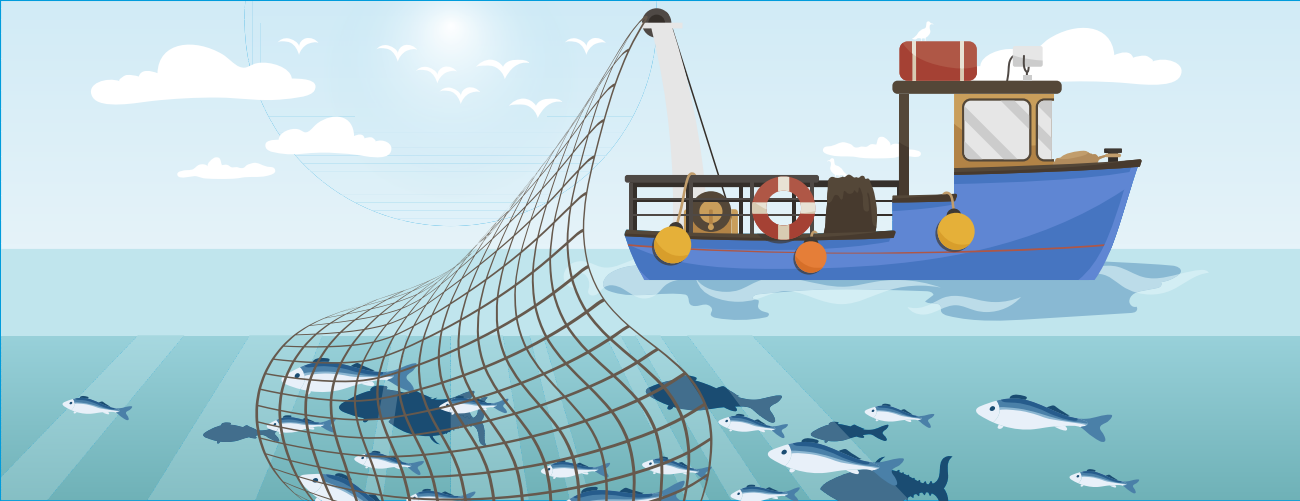


LIST OF ACRONYMS

ADF	African Development Fund	SADCA	SADC Cooperation in Accreditation
AfCFTA	African Continental Free Trade Area	SADCAS	SADC Accreditation Service
AfDB	African Development Bank	SADCMEL	SADC Cooperation in Legal Metrology
ARSO	African Organization for Standardization	SADCMET	SADC Cooperation in Measurement Traceability
ASYCUDA	Automated System for Customs Data	SADCSTAN	SADC Cooperation in Standardization
CA	Competent Authority	SADCTBTSC	SADC Technical Barriers to Trade Stakeholders Committee
CAC	Codex Alimentarius Commission	SADCTRLC	SADC Technical Regulations Liaison Committee
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora		
DRC	Democratic Republic of Congo	SME	Small and Medium Sized Enterprise
FAO	Food and Agriculture Organization of the United Nations	SSCBT	Small Scale Cross Border Trade
HACCP	Hazard Analysis and Critical Control Points	SPS	Sanitary and Phytosanitary
HTS	Harmonized Tariff Schedule	SQAM	Standardization, Quality Assurance, Accreditation and Metrology
ICBT	Informal cross-border trade	STR	Simplified Trade Regime
ICT	Information and Communications Technology	SWS	Single Window Systems
IPPC	International Plant Protection Convention	TBT	Technical Barriers to Trade
IUU	Illegal, Unreported and Unregulated Fishing	UN	United Nations
MSME	Micro, Small and Medium-sized Enterprises	UNCTAD	United Nations Conference on Trade and Development
NTB	Non-Tariff Barriers	UNECA	United Nations Economic Commission for Africa
OECD	Organization for Economic Cooperation and Development	UNIDO	United Nations Industrial Development Organization
OSBP	One-Stop Border Post	URT	United Republic of Tanzania
PROFISHBLUE	Program for Improving Fisheries Governance and Blue Economy Trade Corridors in the SADC Region	WHO	World Health Organization
QI	Quality Infrastructure	WOAH	World Organization for Animal Health
REC	Regional Economic Communities	WTO	World Trade Organization
RoO	Rules of Origin	WWF	World Wildlife Fund
SADC	Southern Africa Development Community		



# Relevant definitions



<b>Certification</b> (CAC/GL 20-1995)	The procedure by which official certification bodies or officially recognized certification bodies provide written or equivalent assurance that foodstuffs or food control systems conform to requirements. Certification of food may be, as appropriate, based on a range of inspection activities which may include continuous on-line inspection, auditing of quality assurance systems, and examination of finished products.
<b>Competent authority</b> (CXC 1, 1969)	The government authority or official body authorized by the government which is responsible for the setting of regulatory food safety requirements and/or for the organization of official controls including enforcement.
<b>Conformity assessment</b> (ISO/IEC 17000:2020)	A process that demonstrates whether a product, service, process, claim, system or person meets relevant requirements. Such requirements are stated in standards, regulations, contracts, programmes, or other normative documents.
<b>Inspection</b> (CAC 1995)	The examination of food or systems for control of food, raw materials, processing, and distribution, including in-process and finished product testing to verify conformity with requirements.
<b>Official inspection systems</b>	Systems administered by a government agency having jurisdiction and empowered to perform a regulatory and/or enforcement function.
<b>One Stop Border Post</b> (OSBP)	Border facility that combines two stops for national border control processing into one and consolidates border control functions in a shared space for exiting one country and entering another.

<b>Originating goods</b>	Goods of a Member State as provided for in Annex I on Rules of Origin.
<b>Quality infrastructure</b> (INetQI)	“The system comprising the organizations (public and private) together with the policies, relevant legal and regulatory framework, and practices needed to support and enhance the quality, safety and environmental soundness of goods, services and processes.”
<b>Requirements</b>	The criteria set down by competent authorities relating to trade in foodstuffs, and covering the protection of public health, the protection of consumers and conditions for fair trading.
<b>Risk</b> (FAO and WHO 1997)	The estimate of the probability and severity of adverse health effects in exposed populations, as a result of hazards in food.
<b>Risk analysis</b>	The process of evaluating, managing, and communicating risk; it consists of three components: risk assessment, risk management, and risk communication.
<b>Risk assessment</b>	The evaluation of the likelihood and severity of adverse effects on public health arising, for example, from the presence in foodstuffs of additives, contaminants, residues, toxins or disease-causing organisms.
<b>Standard</b>	A formally established document which provides guidelines, specifications, criteria, or characteristics for products, services, processes, or systems to ensure consistency, safety, quality, and efficiency. Standards are created in order to provide a common understanding or framework for all stakeholders and are voluntary in nature.
<b>Surveillance</b>	A systematic iteration of conformity assessment activities as a basis for maintaining the validity of the statement of conformity.
<b>Technical regulation</b>	A document which lays down product characteristics or their related processes and production methods, including applicable administrative provisions, compliance with which is mandatory.





## FOREWORD BY THE UNIDO DIRECTOR GENERAL, MR. GERD MÜLLER



Blue ecosystems which are sustainable are critical to the livelihoods, food security, and climate resilience of coastal communities around the world. They are critical aspects of human well-being and entire economies. This *Strategic and Operational Guide to Assess the Conformity of Fisheries Products: Improving Trade under the OSBP in the SADC Region* is UNIDO's second publication as part of the "Programme for Improving Fisheries Governance and Blue Trade Corridors in the SADC Region (PROFISHBLUE)". The first set of reports from this project highlighted the need for clear, concise, practical guidance for all stakeholders involved in the cross-border trade of fisheries products – which is precisely what this publication provides.

One of UNIDO's priorities is sharing knowledge and best practices. This publication showcases UNIDO's commitment with the PROFISHBLUE project to both high-level strategies and practical, step-by-step guides to instruct those who are engaged in daily fish trade across the One Stop Border Posts. It is foreseen that the publication will be used by high-level government officials, inspection authorities operating at OSBPs, and private sector fisheries traders and operators.

This project's work is further proof of UNIDO's commitment to creating decent jobs, ending hunger, and creating fair supply chains by fostering sustainable blue industry. By outlining the various testing, inspection, and certification requirements to move fisheries products across SADC borders, this guide will improve the livelihoods of SADC fisheries communities as well as ensure safer, stronger fisheries value chains with more local value. The guidelines laid out in this publication will help expand the trade of fisheries and aquaculture products, and thereby make a significant contribution to Sustainable Development Goal 2 on ending hunger, malnutrition, and food security – which is a UNIDO priority.

UNIDO is committed to creating and promoting a sustainable and thriving fisheries sector worldwide. This is a core tenant of UNIDO's Blue Industry portfolio. We are very grateful for the strong cooperation with our many partners, and I look forward to continuing our successful work with those with whom we have worked with on this project, such as the Southern Africa Development Community and the African Development Bank. This publication represents a step forward in the creation of a world without hunger.

**Gerd Müller**  
UNIDO Director General



## FOREWORD BY AfDB DIRECTOR, AGRICULTURE AND AGRO-INDUSTRY DEPARTMENT, DR. MARTIN FREGENE



The African Development Bank Group (AfDB) is proud to finance and partner with the SADC Secretariat on the *Programme for Improving Fisheries Governance and Blue Economy Trade Corridors in the SADC Region* (ProFishBlue). This \$10 million USD project is part of ADF 15 in support of Regional Public Goods especially on the Blue Economy and specifically on transboundary living aquatic resources. ProFishBlue aims to promote shared governance, improve food and nutritional security, create employment, facilitate intra-regional trade, and build adaptive capacity.

Given the importance of fisheries along the food-job-trade nexus in Africa, the African Development Bank is committed in supporting fish value chain through improved governance, technical capacity, and investment opportunities. This technical report on *Strategic and Operational Guide to Assess the Conformity of Fishery Products: Improving Trade under the One-Stop Border*

*Post (OSBP) in the SADC Region* is timely and important as it transforms fish commodity chains into competitive goods through overcoming barriers to trade and addressing standard and quality assurance. It provides various stakeholders along the fish value chain a step-to-step approach to coordination and conformity on sanitary and phytosanitary conditions, and technical barriers to trade. This is very important towards the African Continental Free Trade Agreement (ACFTA) as fish has now been considered in the OSBP with no restrictions if they have a common conformity assessment and certification scheme. By 2040, with institutional strengthening, AFCFTA is estimated to increase intra-African trade in agricultural products by up to 30%.\* These strategic long-term visions are also aligned with the SADC Regional Indicative Strategic Development Plan (2020-2030) and the SADC Industrialization Strategy and Roadmap (2015 to 20263). To this end, The African Development Bank would like to partner on the establishment of more fishing and landing ports in the region, both for measuring catches of foreign vessels for taxation purposes, compliance with the International Port State Measures for IUU fishing, further processing and storage, and for competitive value-added fish products

We take this opportunity to thank our partners at UNIDO for facilitating regional quality infrastructure and developing common standards for intra-regional fish trade in Africa. This is in direct support to the second Component of the ProFishBlue project, which promotes policy and regulatory harmonization of laws and standards for fish value chains traded within the SADC region.

This guide is the first of its kind to operationalize intra-regional fish trade across the OSBP and to provide technical advice and guidance to competent authorities

such as bureaus of standards, custom and border officials, value chain actors, and trade specialists. The report also provides tools to facilitate regional integration and to support SADC Member States to facilitate trade, addresses Rules of Origin for fishery products in support of the implementation of SADC's Protocol on Trade, as well as SADC Protocol on Fisheries. This is very much aligned with the strategic direction of the Blue Economy Flagship under *Feed Africa Dakar II* (2025 to 2030) to improve nutrition security and reduce on malnourishment, provide inclusive and resilient livelihoods along the fish value chain, and promote competitive fish value chains for intra-regional and international exports. It strongly builds upon the Bank's Technologies for African Agricultural Transformation (TAAT) policy work, especially the domestication of regional agricultural policies working with RECs such as SADC; as well support the use of high-impact technologies to boost output and productivity.

Furthermore, the report is very aligned with the AfDB strategic goals, notably the Ten-Year Strategy (2024 to 2033) on fostering inclusive growth and building resilient economies. In addition, the expected outcomes are

consistent with the goals of *Feed Africa Dakar II* (2025 – 2030) and the Regional Integration Strategy Paper for Southern Africa (2020 – 2025) focusing on enhanced intra-regional trade and increased share of high value manufactured goods through industrialization.

We thank the SADC Secretariat for an excellent partnership and look forward to a continuous collaboration on our mutual regional integration and development agenda.

Sincerely,

**Martin Fregene, PhD**

Director

Department of Agriculture and Agro-Industry  
African Development Bank Group, Abidjan

\*) UNECA, <https://archive.uneca.org/stories/african-trade-agreement-catalyst-growth>

## FOREWORD BY SADC EXECUTIVE SECRETARY, HIS EXCELLENCY MR. ELIAS M. MAGOSI



The *Strategic and Operational Guide to Assess the Conformity of Fishery Products* is a significant milestone in the SADC region's ongoing efforts to enhance regional integration and facilitate trade in the fisheries and aquaculture sector. This is in line with SADC Industrialization Strategy and Roadmap, 2015-2063, which was approved by the Extra-Ordinary Summit in Harare, Zimbabwe, in April 2015. It also comes at the time when the region this year celebrates **45 Years of Deepening Regional Cooperation, Integration and Development**. Since the launch of the OSBP initiative in SADC, there has been tremendous progress in OSBP development as the region strive towards streamlining border processes and promoting mutual recognition of conformity assessments to facilitate and promote international and intra-African trade.

The adoption by SADC Member States of a conformity assessment framework for mutual recognition strategically guide the member states through practical steps and techniques to advance formal fisheries trade

through the OSBP initiative. UNIDO, under the AfDB funded "Programme for Improving Fisheries Governance and Blue Economy Trade Corridors in the SADC Region" is contributing to policy harmonization and trade facilitation by optimizing the OSBP in six bordering countries namely, Democratic Republic of Congo, Malawi, Mozambique, United Republic of Tanzania, Zambia, and Zimbabwe.

Aquatic foods are key to any food system, as they address food security, support livelihoods, employment, economic and cross-border trade development for many SADC Member States. The products from this sector are one of the most informal and formal traded food commodities worldwide. However, the efficient movement of these products across borders has long faced challenges, including cumbersome procedures, delays, and non-tariff barriers.

This strategic guide serves as a crucial tool to help mitigate challenges such as delays, increased costs, and regulatory discrepancies that currently hinder trade in fish and fishery products at borders. Furthermore, as SADC strives towards its regional integration it aligns with our broader goals of reducing congestion, minimize delays, and eliminate duplicated procedures at border points, ultimately expediting trade and improving the movement of goods and people across borders. Therefore, this strategic guide is a vital tool towards a comprehensive framework for enhancing trade efficiency, ensuring compliance with standards, and promoting sustainable and inclusive economic growth competitive market, benefiting both current and future generations for the region.

I extend my sincere appreciation to the AfDB for its invaluable support in funding this initiative and to our implementing partner, UNIDO, for its technical expertise in developing this guide and other relevant stakeholders

for their contribution. Their collaboration has been instrumental in bridging the gap between high-level strategies and practical execution.

As we move forward, SADC Secretariat will support governments, private sector actors, and development partners in the region to actively utilize this living guide. It will endeavour to contribute actively to its effective

implementation to unlock the full potential of the region's aquatic foods and ensure our collective efforts yield tangible economic and regional integrated results.

**H.E. Mr. Elias M. Magosi**  
SADC Executive Secretary



# 1

## Introduction

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This strategic guide outlines practical steps and techniques which can be used by SADC Member States in order to advance formal fisheries trade through the OSBP initiative.





This document entitled *Strategic and Operational Guide to Assess the Conformity of Fishery Products: Improving Trade under the One Stop Border Post (OSBP) in the SADC Region* is an output under the project entitled *Programme for Improving Fisheries Governance and Blue Economy Trade Corridors in the SADC Region (PROFISHBLUE)*. This project is funded by the African Development Bank (AfDB) and implemented by SADC with support from 5 implementing agencies (UNIDO, FAO, WWF, WorldFish, ARSO). The overall objective of PROFISHBLUE is to promote the sustainable management of fisheries resources within the context of the Blue Economy, while UNIDO’s contribution relates to Component 2A and 2C, specifically policy harmonization and trade facilitation by optimizing the One Stop Border Post (OSBP) initiative in 6 bordering countries (Democratic Republic of the Congo, Malawi, Mozambique, United Republic of Tanzania, Zambia, and Zimbabwe) and the enhancement of business development services and incubation support to the ADF targeted countries, including Democratic Republic of the Congo, Malawi, Madagascar, Mozambique, United Republic of Tanzania, Zambia, and Zimbabwe.

One specific UNIDO intervention is “the adoption by SADC Member States of a conformity assessment framework for mutual recognition”. It is important to note that conformity assessment can take a wide variety of forms and use different methods, depending on the intended outcomes. This strategic guide outlines practical steps and techniques which can be used by SADC Member States in order to advance formal fisheries trade through the OSBP initiative. The framework presented herein can enable such states to demonstrate to one another that specified fish product requirements, processes, systems, persons, and bodies (including the procedures for moving fish and fishery products through OSBPs) have been fulfilled.

Acknowledging the abundance of existing relevant continental and regional trade strategies in the region, the key objective of this guide is to provide further high-level strategy, and to also bridge the gap between the vision and execution of such strategies, thus enumerating specific steps, practical procedures, example documentation, and useful tasks necessary for public and private sector stakeholders to successfully trade under formal blue corridors in the region.

The current deliverable was developed following UNIDO’s inception phase technical reports which informed mostly fish trade, OSBP interventions, and the status of quality infrastructure across the target countries.





# 2

## Context, Scope and Approach

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The main aim of this document is to contribute to enhancing the formal fisheries trade by outlining a strategic approach to conformity assessment of fishery products.





Recognizing fish as a key natural resource, a major component of the environment, and a key commodity for livelihoods, food security and trade, it is critical for substantial work to be done to ensure that the cross-border flow of fisheries occurs sustainably. Conclusions drawn on relevant consultations and work conducted under the PROFISHBLUE project revealed that significant constraints lie in inefficient and time-consuming border procedures. The main problems identified in the selected OSBPs were congestion at points of entry, severe delays experienced by cross-border traders and duplicated procedures. These delays are caused by ineffective and inefficient facilitation of the movement of people and goods at various levels, mostly related to the lack of awareness about and access to digitalized (online) pre-border clearance processes and systems, along with poorly integrated and coordinated border management approaches.

With an increasing need for regional trade in fishery products and in line with the objectives of the African Continental Free Trade Area (AfCFTA), there is increasing demand to expedite trade through regional corridors. Inspection, sampling and testing at the border can no longer be the critical point at which risk mitigation is achieved. Although acknowledging the lack of capacity of some developing countries to undertake inspection throughout value chains, to improve trade, authorities and private sector actors must seek to address the causes of risks at the point in which they arise rather than mitigating the risk through interventions only at borders.

The main aim of this document is to contribute to enhancing the formal fisheries trade by outlining a strategic approach to conformity assessment of fishery products. This report aims to provide core requirements and architecture for overcoming barriers to trade and avoiding disruption to fisheries product flows between

Member States with operational OSBPs. Focus is placed on risk mitigation through the application of pre-border strategies (which target risks along the value chain) and SPS requirements applicable to products for human consumption and trade, which are of major importance to the region, including frozen, fresh and dried fish commodities.

This guide is not a high-level strategy document intended for theoretical application. Rather it is intended to provide examples of required documentation, step-by-step guidance, and practical insight into the processes and procedures required to trade fisheries products through formal OSBP channels. The information can be used by a range of stakeholders, including inspection officials, border agencies, and laboratory officials, as well as private sector fish traders. By providing an all-encompassing guidance document with practical steps for each stakeholder involved in the fisheries trade across OSBPs, the report ensures transparency in the wider formal trade process and provides stakeholders with simplified and tangible actions which can be taken to improve fisheries trade in the SADC region. While the document was designed with OSBP application in mind, it should be noted that much of the information presented herein can also be used by stakeholders not yet trading under an OSBP, including small and medium-sized enterprises (SMEs) interested in fish trading.

It is recommended that any large-scale regional application of this guidance document be preceded by an initial phase which identifies key issues and implements improvements. Suggestions for next steps to undertake in this initial phase are highlighted further in the last section (Roadmap for Compliance) of this document. A pilot phase will allow adjoining Member States to evaluate its design and performance as well as fine tune it before any commitment is considered to a regional scale deployment. Implementing a pilot phase is also crucial in order to evaluate the performance of coordination, stability, IT services and inspection procedures at OSBPs.

Effective strategy setting for regional cross border improvement is a long and complex process. The expected end results to be achieved through the use of this guidance document will depend on informed, preventive and compliant business operators and effective implementation of official controls of sanitary conditions of fisheries products under harvesting, processing, packaging and storage. Trade development relies on the overarching supporting umbrella of the mandated authorities' harmonization, coordination and collaboration, but can only be fully realized if it is integrated with broader interventions and cross-cutting agreements by bilateral governments.





# 3

## Prerequisites for Successful Regional Strategic Guide Implementation

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The establishment of OSBPs is intended to contribute to economic development by facilitating regional integration through the improvement of mobility and trade flows.





For the purposes of this document, the concept of border control involves the application of measures on the distribution of a product across borders so as to help to achieve a trade policy objective.

Controls (implying a consequential action, not simply a measurement such as collection of statistical data, or application of a tariff) at borders imply:



CONTROLS ON EXPORTS BY OFFICIALS OF THE EXPORTING COUNTRY

For example, prevention of the export of fraudulent or non-permitted goods (e.g. trade in endangered species, undersized fish) or checks that exported goods will comply with the SPS and TBT requirements of the importing country (to avoid reputational risks to trade by rejection, food safety incidents, etc.).



CONTROLS ON IMPORTS BY OFFICIALS OF THE IMPORTING COUNTRY

Specifically prevention of the import of products which do not comply with the SPS and TBT requirements of the importing country.

The work conducted at the pilot border posts revealed that there are considerable overlaps between export control and import control steps, leading to an inefficient process overall and a lack of coordinated border management. Some examples include the lack of information sharing between agencies and duplicated physical checks that cause unnecessary delays and can put the consignments at risk due to the perishable nature of fish products. The establishment of OSBPs is intended

to contribute to economic development by facilitating regional integration through the improvement of mobility and trade flows.

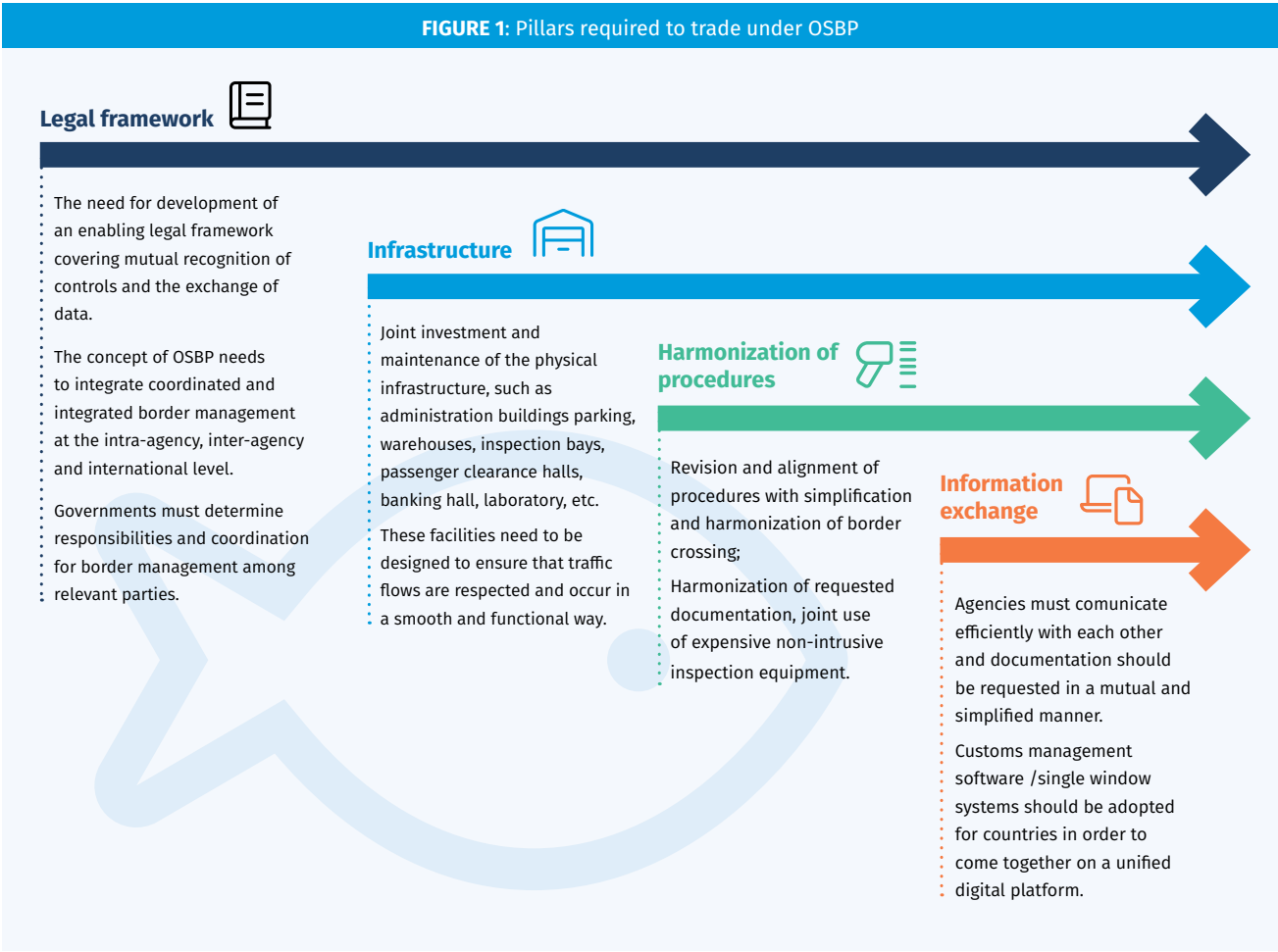
Given the current operational state of the selected SADC border posts and in order to upscale the proposed approach, some basic foundations described below are considered critical for ensuring its effectiveness and successful implementation.



3.1 PILLARS OF OSBP

The optimized approach to cross border cooperation relates to the One Stop Border Post concept, presented as a modern and unique trade facilitation initiative created to improve efficiency at land border crossings; it combines the stops required for processing exit and

entry formalities of the adjoining states at a single border crossing point. This arrangement requires close international cooperation in order to sustain the main pillars required to trade under OSBP; these are summarized in the figure 1 below.



Member States should conduct a thorough analysis of the current situation of each border, including strengths, weaknesses, opportunities, and threats (SWOT analysis),

define specific and measurable goals, and assess available resources in order to determine feasibility and priorities for investment.



3.2 TRADE AGREEMENTS

Many agreements (both international and regional) can have an impact on the fisheries trade. Of relevance for this document the following agreements are enumerated:

1

**WTO Agreement on Fisheries Subsidies**

a. focused on sustainability and the environment and aimed at curbing harmful subsidies that contribute to overfishing, overcapacity, and illegal, unreported, and unregulated (IUU) fishing.

2

**WTO Sanitary and Phytosanitary Measures and Technical Barriers to Trade Agreements**

a. key legally binding trade agreements aimed at ensuring food safety, animal and plant health, and non-discriminatory technical regulations, product standards and conformity assessment procedures while in order to preventing unnecessary trade restrictions.

3

**Agreement on Port State Measures to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing (PSMA)**

a. legally binding international treaty that aims to prevent IUU fishing by regulating foreign-flagged vessels' access to ports and ensuring compliance with international fisheries laws.

4

**Other notable international Agreements include:** The United Nations Framework Convention on Climate Change (1992); The Paris Agreement; Convention on Biological Biodiversity (1992); 2030 Agenda for Sustainable Development; the RAMSAR Convention; and the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) among others.

Of major importance at regional level, the following agreements can impact fisheries trade:

1

**SADC Protocol on Fisheries:** regional agreement aimed at promoting sustainable fisheries management and cooperation among SADC member states. Key objectives include sustainable management of fisheries, regional cooperation, combating IUU, food security and livelihoods and harmonization of policies.

2

**Sanitary and Phytosanitary (SPS) annex to SADC Protocol on Trade:** aligns regional food safety, animal, and plant health standards with WTO SPS Agreement principles while promoting regional trade and public health protection.

3

**Technical Barriers to Trade (TBT) Annex to the SADC Protocol on Trade:** complementarily to the above, the TBT annex to the SADC was adopted to ensure that technical regulations, standards, and conformity assessment procedures do not create unnecessary obstacles to trade within the Southern African Development Community (SADC).

4

**SADC Rules of Origin:** identified as a set of criteria used to determine whether goods qualify for preferential tariff treatment under the SADC Free Trade Area (FTA). Key objectives include the promotion of regional trade, prevent trade deflection and ensure fair competition whilst encouraging industrialization.

Most Member States of SADC are party to the above-mentioned international agreements as well as the regional SADC protocols. As previously mentioned, crossing borders through a OSBP recognizes that rather than having to stop at the point of exit and again at the point of entry, the rationale is that formalities (customs and immigration) for both countries ought to take place only once at the point of entry.

Considering the advances and successful implementation of operational OSBP in other RECs such as EAC, SADC should prioritize the development of a regional One Stop Border Post Act and support Member States to establish such bilateral arrangements as are necessary for the purposes of implementing the Act provisions.

To achieve this, the operationalization of OSBP requires countries to enter into formal agreements (regional, bilateral, memorandum of understanding or other) in order to ensure that officials of neighbouring countries can work alongside one another, enabling the rapid processing of goods and people according to the regulations governing trade, and that both parties understand which requirements apply. The lack of such legal clarity has caused some OSBPs to remain idle, thus failing to reap the benefits of this trade facilitation intervention and investment.

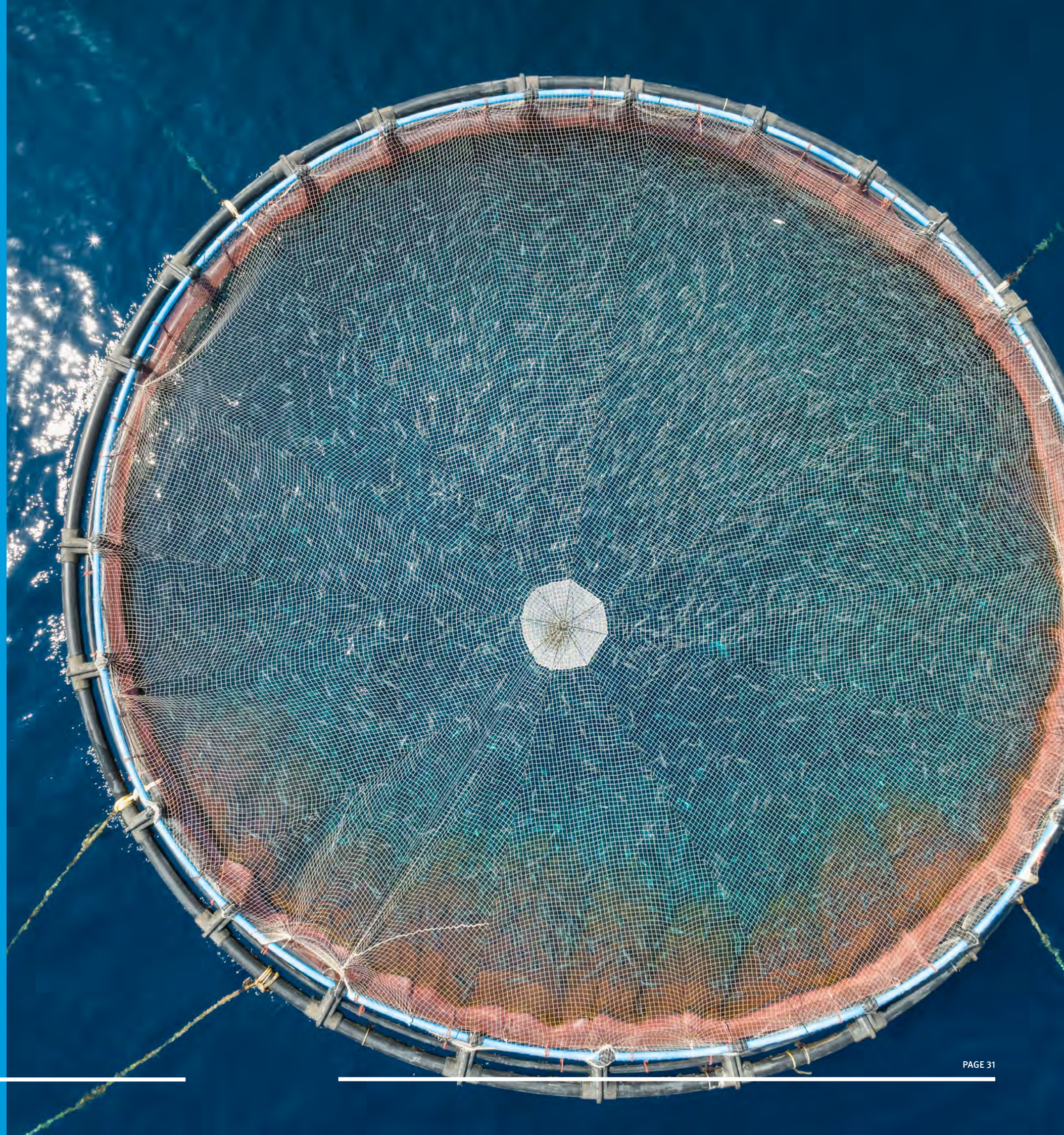


# 4

## Facilitating Compliance with Food Safety for Cross Border Trade of Fishery and Aquaculture Products

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The SPS Agreement encourages WTO Members to establish national SPS measures consistent with international standards, guidelines and recommendations developed by key standard setting organizations.





A customs duty, or tariff, is a financial charge imposed on products during the importation process into a customs territory and these constitute the most common and widely used barrier to market access for goods. Other so-called “non-tariff barriers” (NTB), cover numerous rather different measures and actions which restrict, to various degrees and in different ways, market access for goods, and which are not administered in the form of a tariff. Some examples include SPS measures (which protect human, animal, or plant health) and TBT measures (including technical regulations, standards, and procedures which assess compliance with those standards).

The World Trade Organization (WTO) is the only international organization dealing with the global rules of trade in order to provide assurance to consumers and stability to national economies. Its main function

is to ensure, through WTO agreements, that trade flows as smoothly, predictably, and freely as possible. In this regard, the provisions of Article 16 of the SADC Protocol on Trade require Member States to base their trade rules (e.g. sanitary or phytosanitary measures) on international standards, in accordance with WTO Agreements. According to the SADC Protocol on Trade (SADC 2014)<sup>1</sup>, trade in goods and services and the enhancement of cross-border investment are major areas of co-operation among the Member States of the Community. Therefore, all Member States have committed to further liberalize intra-regional trade in goods and services on the basis of fair, mutually equitable and beneficial trade arrangements, by eliminating tariffs and non-tariff barriers.

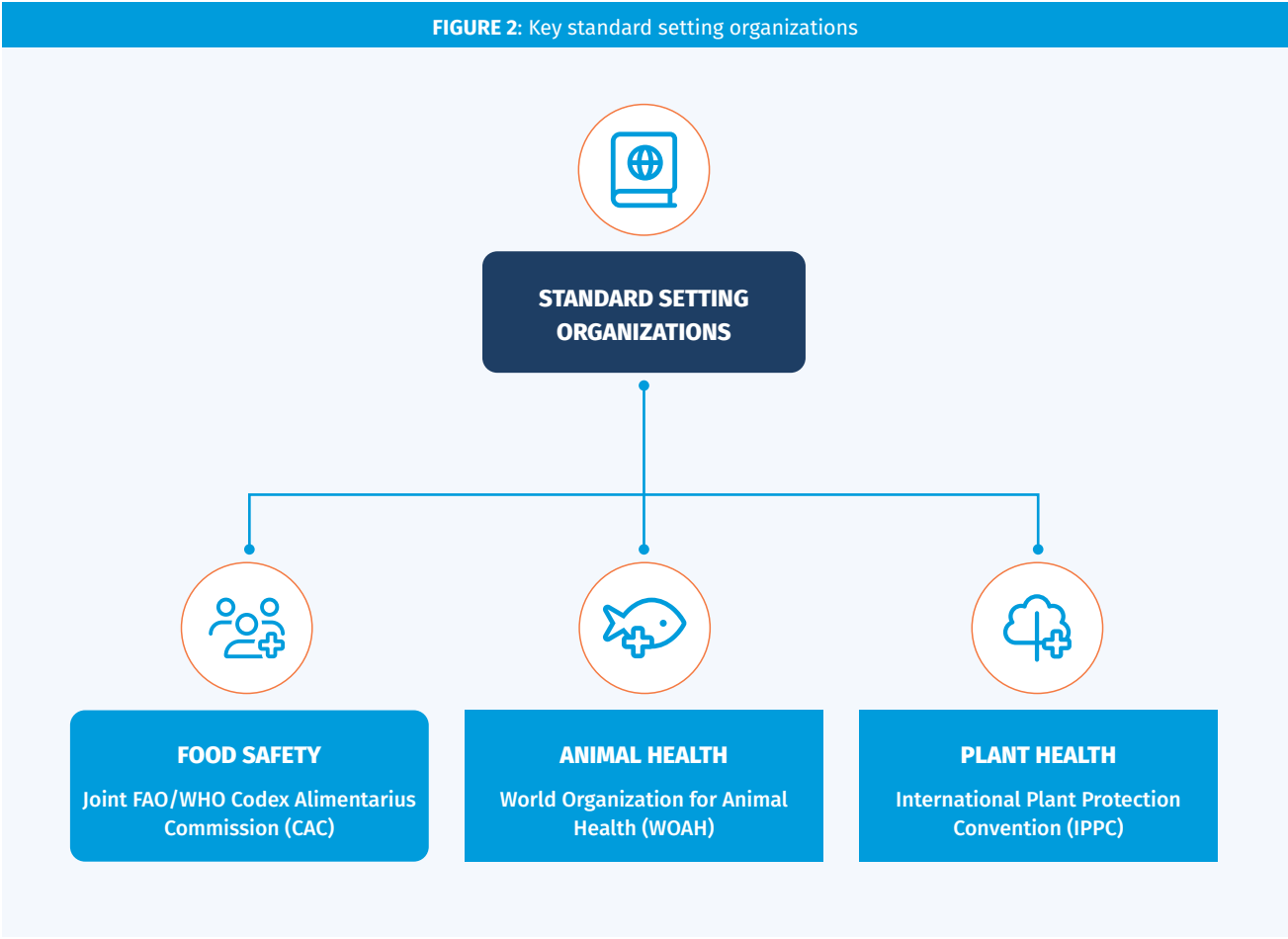


1) SADC. 2014. PROTOCOL ON TRADE (consolidated text), vers. July 2014. Southern African Development Community (SADC) Secretariat. Gaborone.

## 4.1 SPS MEASURES

Sanitary (human and animal health) and phytosanitary (plant health) risks, collectively known as SPS risks, can inadvertently be transported along with animals, plants, and foodstuffs, thereby directly or indirectly affecting trade and the production environment. SPS measures are meant to protect human, animal or plant life or health. These measures include all relevant laws, decrees, regulations, requirements, and procedures, such as production methods, testing, inspection, and certification amongst others, and need to be sustained by rigorous risk assessment.

In order to facilitate safe trade, the SPS Agreement encourages WTO Members to establish national SPS measures consistent with international standards, guidelines and recommendations developed by key standard setting organizations as outlined below:





## 4.2 TBT MEASURES

The TBT Agreement sets out the rules to ensure that technical regulations, standards, testing, and certification procedures are genuinely useful and do not become discriminatory and arbitrary obstacles to trade. Moreover, the agreement encourages countries to use international standards in order to recognize each other's

procedures for assessing whether a product conforms to requirements. Without conformity assessment recognition, products might have to be tested twice, first by the exporting country and then by the importing country.

### TBT IN THE CONTEXT OF SADC

Through the Technical Barriers to Trade (TBT) Annex to the SADC Protocol on Trade, Article 5 (Basic Rights and Obligations)<sup>2</sup>, SADC Member States confirm:

- 1 a commitment to apply **technical regulations, standards, and conformity assessment procedures** with respect to each other under the WTO TBT Agreement;
- 2 commitment to the principles of **non-discrimination, necessity, prevention of trade restrictiveness**, proportionality, the use of international standards, equivalence, and internationally harmonized measures, transparency and special and differential treatment;
- 3 the right to develop, adopt, implement, maintain and apply technical regulations at national level in order to **protect human, plant and animal health and safety, protect the environment and prevent deceptive practices**, provided that such technical regulations and their measures are not inconsistent with the provisions of the TBT Annex.

To further the objectives of the SADC Protocol on Trade, regional TBT Cooperation Structures have been established which provide for a formal framework, in order to ensure cooperation amongst regulators, stakeholders and the national institutions in Standardization, Quality Assurance, Accreditation and Metrology (SQAM). There are seven (7) Regional TBT Cooperation Structures under the coordination of the SADC Secretariat:

- **SADC Technical Regulations Liaison Committee (SADCTRLC)** which considers matters related to the approximation of technical regulations;
- **SADC TBT Stakeholders Committee (SADCTBTSC)** that provides for engagement and interaction with the private sector and business councils;
- **SADC Cooperation in Accreditation (SADCA)** with aim to foster confidence in accreditation bodies within the SADC region and internationally;
- **SADC Cooperation in Legal Metrology (SADCMEL)** with aim to promote fair trade and protect consumers by ensuring the accurate and consistent application of legal metrology regulations;

2) Technical Barriers to Trade (TBT) Annex to the SADC Protocol on Trade, APPROVED VERSION – COMMITTEE OF THE MINISTERS OF TRADE -17 JULY 2014 – SADC/CMT/26/2014/8.3.

- **SADC Cooperation in Measurement Traceability (SADCMET)** with aim to facilitate regional cooperation in metrology, ensuring accurate and reliable measurement and promoting traceability to the International System of Units;
- **SADC Cooperation in Standardization (SADCSTAN)** focused on the coordination and harmonization of standards;
- **SADC TBT Expert Group (TBTEG)** is the apex body of the cooperation structure, supporting the SADC Secretariat in addressing matters not covered by other structures, and those of an overlapping nature, in both voluntary and regulatory domains.

These structures are required to provide annual reports having a number of roles and responsibilities including to: (i) exchange professional and technical information and transfer expertise amongst Members; (ii) coordinate, endorse and harmonize SADC regional training and development activities in TBT-related areas; (iii) liaise with corresponding regional and international organizations; (iv) promote regional TBT requirements at the political level; and (v) promote and facilitate greater Private Sector/Industry participation in SADC TBT-related activities.

Internationally recognized quality infrastructure in a country is essential to provide for addressing TBTs because it facilitates harmonization, mutual recognition, and trust between trading partners. Such a quality infrastructure system is a combination of initiatives, institutions, organizations, activities and people. It includes a national quality policy and institutions to implement it, a regulatory framework, quality service providers, enterprises, customers and consumers (who include citizens as “consumers” of government services).





The various dimensions of Quality Infrastructure are listed below.

	<p><b>STANDARDIZATION</b></p> <ul style="list-style-type: none"><li>Development and implementation of standards for products, processes, and services.</li><li>Relevance: promotes compatibility, safety, and interoperability, reducing trade disputes over technical specifications.</li><li>Institutional framework provided through National Standard Bodies, and coordination activities in the SADC Region through SADCSTAN.</li></ul>
	<p><b>METROLOGY</b></p> <ul style="list-style-type: none"><li>The science of measurement, including calibration and traceability systems.</li><li>Relevance: ensures accurate measurements, which are critical for compliance with technical requirements and regulatory standards.</li><li>Institutional framework provided through National Metrology Institutions, National Legal Metrology Bodies and calibration laboratories (private and public sector), and coordination activities in the SADC Region through SADCMET and SADCMEI.</li></ul>
	<p><b>ACCREDITATION</b></p> <ul style="list-style-type: none"><li>Formal recognition of competence for conformity assessment bodies (e.g., testing, certification).</li><li>Relevance: provides trust in the reliability of test results and certifications, fostering acceptance across borders.</li><li>Institutional framework provided through National and Regional Accreditation Bodies, and coordination activities in the SADC Region through SADCA.</li></ul>
	<p><b>CONFORMITY ASSESSMENT</b></p> <ul style="list-style-type: none"><li>Testing, inspection, and certification to verify compliance with standards and regulations.</li><li>Relevance: demonstrates product compliance, facilitating market access by reducing the need for redundant testing.</li><li>Institutional framework provided through conformity assessment bodies (private and public sector) in relation to testing, certification and inspection services.</li></ul>
	<p><b>MARKET SURVEILLANCE</b></p> <ul style="list-style-type: none"><li>Monitoring and enforcement in order to ensure that products meet regulatory and safety requirements.</li><li>Relevance: prevents the entry of non-compliant goods into markets, protecting consumers and ensuring fair competition.</li><li>Institutional framework provided through various entities, including for example consumer protection agencies, sector specific regulators, custom authorities, environmental and health agencies.</li></ul>

**EXAMPLE OF TBT MEASURES IN RELATION TO CROSS BORDER TRADE OF FISH PRODUCTS: QUALITY STANDARDS AND LABELLING REQUIREMENTS**

An importing country in the SADC region might impose strict technical requirements to ensure fish products meet specific quality and consumer information standards. For instance:

- A Standardized Product Grades:** the importing country might require fish products to meet specific size, weight, or grading criteria (e.g. "Grade A fillets" must meet precise thickness and texture standards). If the exporter does not adhere to these technical standards, the product may be rejected.
- B Mandatory Labelling Regulation:** technical regulations may demand detailed labelling of fish products, including:
  - The name of the fish species, using standardized nomenclature;
  - Catch area or production method (e.g., "wild-caught" or "farmed");
  - Expiry dates, storage conditions, and production codes. If labelling is not consistent with the importing country's specifications, products could be barred from entry.
- C Conformity Assessment Procedures:** exporters may be required to have their fish products tested and certified by designated laboratories and conformity assessment bodies in the importing country to verify compliance with standards. This can lead to delays, increased costs, and additional administrative burdens.

Such TBT measures may pose challenges for exporters, including:

- D Standards and technical regulations not being harmonized,** creating confusion and increasing compliance costs;
- E Exporters potentially facing high costs** for obtaining conformity assessment certificates (for testing, inspection and certification), especially if mutual recognition agreements (MRAs) for accredited conformity assessment services are not in place;
- F Lengthy and non-transparent procedures** for testing, inspection, and certification which can delay shipments and affect product quality.



4.3 TECHNICAL REGULATION FRAMEWORK

A technical regulation framework is a legislative instrument which governs the development and implementation of technical regulations. Technical regulations are mandatory, and form part of a country's legislation. Article 6 of the TBT Annex to the SADC Protocol on Trade provides for such a framework for the SADC region with the main objective being the

identification, prevention and elimination of unnecessary TBTs amongst the Member States and between SADC and other Regional and International Trading Blocks through harmonized texts, technical regulations and conformity assessment procedures in order to facilitate and increase trade.

4.4 HARMONIZED REGIONAL AND CONTINENTAL STANDARDS APPLICABLE TO TARGET PRODUCTS

A harmonized regional standard is a standard developed and approved by a recognized regional standards organization, such as SADCSTAN,<sup>3</sup> carrying with it an obligation for implementation by SADC members as a national standard and the withdrawal of any conflicting national standards (as required by article 7 of the TBT Annex to the SADC Protocol on Trade). In addition, the African Organization for Standardization (ARSO) harmonizes national and/or sub-regional standards as African Standards and unifies conformity assessment procedures to reduce Technical Barriers to Trade in order to enhance intra-African and international trade.

Producers, manufacturers, other economic operators, or conformity assessment bodies can use harmonized standards in order to demonstrate that products, services, or processes comply with relevant requirements. Harmonized standards serve as practical schemes which can be followed in order to implement compliance requirements for specific products. However, the use of these standards remains voluntary in most Member States, and entities are free to choose another technical solution to demonstrate compliance with the mandatory legal requirements.

3) [Standards & Quality Infrastructure | SADC](#)

Complying with normative harmonized standards confers a presumption of conformity to the essential requirements of directives and regulations and in this section some examples of standards applicable to fishery products are listed (for reference purposes):

Standard	Product
<b>ARS 1106:2018</b>	<i>Tilapia production aquaculture farms – Good aquacultural practices</i>
<b>ARS 1107:2018</b>	<i>Freshwater aquatic animal production farms – Good aquaculture practices</i>
<b>ISO 12875:2011</b>	<i>Traceability of finfish products – Specification on the information to be recorded in captured finfish distribution chains</i>
<b>ISO 12877:2011</b>	<i>Traceability of finfish products – Specification on the information to be recorded in farmed finfish distribution chains</i>
<b>ARS/AES 01:2024</b>	<i>Agriculture – Sustainability and eco-labelling – Requirements</i>
<b>ARS/AES 02:2024</b>	<i>Wild capture fisheries – Sustainability and eco-labelling – Requirements</i>
<b>ARS AES 05:2024</b>	<i>Aquaculture – African catfish – Sustainability and ecolabelling – Requirements</i>
<b>ARS AES 06:2024</b>	<i>Aquaculture – Tilapia – Sustainability and ecolabelling – Requirements</i>
<b>ARS 1944:2024</b>	<i>Fish breeding and hatchery management (fish seed certification) – Ecolabelling and sustainability – Requirements</i>
<b>ISO 12875:2011</b>	<i>Traceability of finfish products – Specification on the information to be recorded in captured finfish distribution chains</i>
<b>ISO 12877:2011</b>	<i>Traceability of finfish products – Specification on the information to be recorded in farmed finfish distribution chains</i>
<b>ARS 1895:2024</b>	<i>Organic aquaculture – General principles, management standards and permitted substances lists</i>
<b>ARS 1782:2024</b>	<i>Good manufacturing practices (GMP) for small and medium-sized traditional fish product processing establishments</i>
<b>ARS 1783:2024</b>	<i>Good manufacturing practices of fish processing plants</i>

The catalogue of SADCSTAN and ARSO standards can be found through the following links:  
[Catalogue of African Standards – African Organization for Standardization \(arso-oran.org\)](#)



# 5

## Competent Authorities

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Whatever the nature of the fish products to be certified for export, this will require coordination between multiple competent authorities (CA).





## 5.1 DESIGNATION OF A CENTRAL COMPETENT AUTHORITY FOR CERTIFICATION

Whatever the nature of the fish products to be certified for export, it is clear that this will require coordination between multiple competent authorities (CA). In each country, different entities will be involved in ensuring multiple steps such as preliminary registration and licences, certification of origin, attestation of sanitary compliance of products, and final clearance of consignments. Ideally, some Member States should take steps to identify relevant authorities, functions and relevance in the certification role and consider the concept of a Pre-Certification Scheme, in which one of the CAs should be nominated as the Central CA which will undertake the attestation on their own behalf (where they are mandated) as well as on behalf of other CAs, on

the basis of their recommendations (for example via a system of pre-certification) applied to consignments to be certified with an official certificate. This will require significant coordination and communication between the different CAs. A system of self-declaration based on an approved exporter system and/or open to any operators (like the one used by some countries for certification of origin) could be utilized to facilitate part of the certification related procedures.



## 5.2 POWERS AND FUNCTIONS

The central competent authority (such as Ministry of Fisheries & Bureaus of Standards<sup>4)</sup>) plays an important role in as system related to verification and certification

and has the responsibility to establish and communicate the necessary information.

The nominated authority must:

- ▶ Have legal powers for the verification of compliance with the rules;
- ▶ Have procedures and/or arrangements in place to ensure the effectiveness and appropriateness of official controls and other official activities, as well as ways to ensure their consistency and impartiality;
- ▶ Ensure efficient and effective coordination and cooperation between different units;
- ▶ Have, or have access to, adequate laboratory capacity for analysis, testing and diagnosis;
- ▶ Have appropriate and properly maintained facilities and equipment to ensure that staff can perform controls and other official activities efficiently and effectively;
- ▶ Perform controls regularly, in accordance with documented procedures and with appropriate frequencies determined on a risk basis;
- ▶ Develop and implement training programmes for the purpose of ensuring that staff performing official controls and other official activities receive the necessary training.

## 5.3 DELEGATION OF TASKS

The central competent authority may delegate certain official control tasks to one or more delegated bodies or persons. This delegation should be done in writing and contain a precise description of control tasks and the conditions under which they may be performed.

Furthermore, when delegating, it must be ensured that the bodies or persons have the expertise, equipment and infrastructure required, act impartially, and are free of any conflict of interest. Mechanisms for ensuring effective coordination and communication must be in place.

4) For more information on powers and functions please consult Section 8.



# 6

## Operator Compliance Requirements

With the paramount objective of a high level of health protection, harmonization of sanitary and phytosanitary standards throughout the SADC region must cover the entire food production and processing chain from 'ocean to plate' but also considering lakes, rivers and ponds.



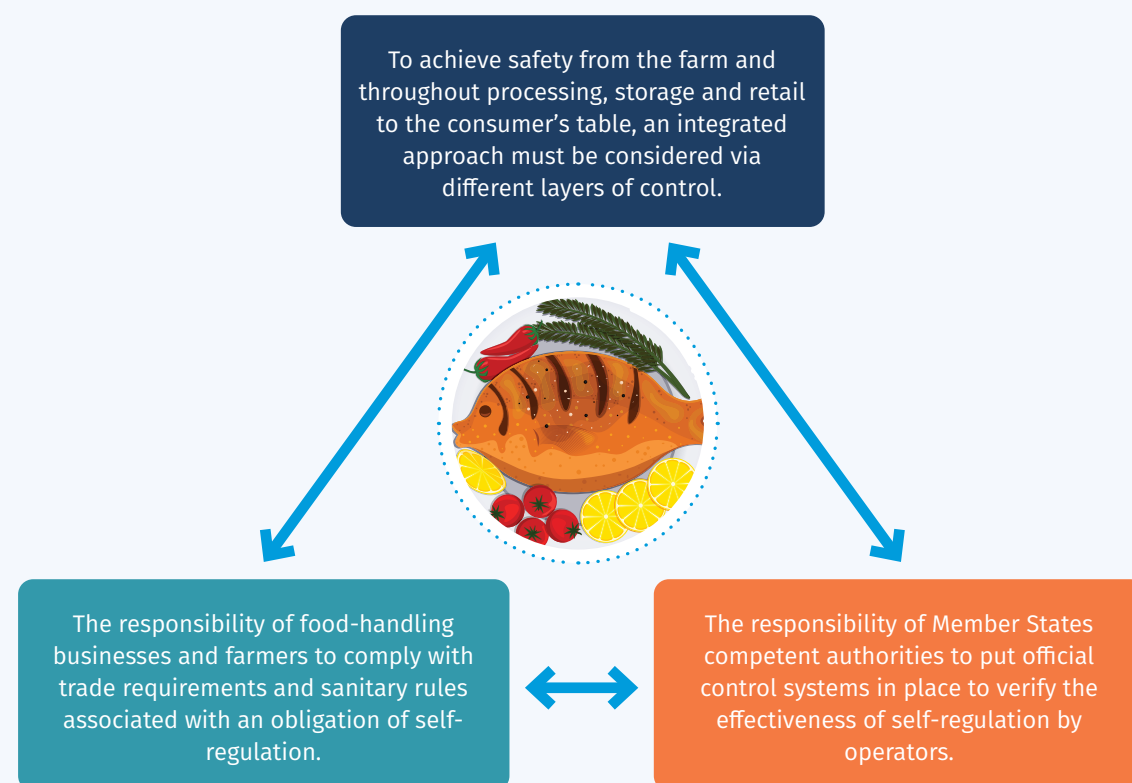


## 6.1 'OCEAN TO PLATE' APPROACH TO FOOD SAFETY WITH AQUATIC FOOD SYSTEMS

With the paramount objective of a high level of health protection, harmonization of sanitary and phytosanitary standards throughout the SADC region must cover the entire food production and processing chain from 'ocean to plate' but also considering lakes, rivers and

ponds. Each Member State operator is responsible for implementing these harmonized standards, and the competent authorities must establish robust official controls to verify compliance and enforce them. The following figure highlights the core responsibilities.

FIGURE 3: Oceans to plate framework for responsible aquatic food safety<sup>5</sup>



5) See Charles 2023: Sustainable Fishery systems. Wiley. Khan and Chuenpagdee 2010: Ambio <https://pmc.ncbi.nlm.nih.gov/articles/PMC4132461/>

In addition, and to increase efficiencies and reduce trading costs by working towards a harmonized continental SPS system, the approach must ensure the collaboration of Member States and RECs in SPS matters, including information exchange and cohesive cooperation.

Whilst the **responsible party for food safety is the producer**, the objective of the oceans to plate control process is to ensure that all aquatic food business operators in the supply chain (both farmed and wild captured fisheries products) are complying with their legal obligations. These controls should apply the following measures.

- ▶ An examination of the self-regulations put in place by operators and of the results obtained.
- ▶ An inspection of:
  - equipment, means of transport, premises and other places under their control and their surroundings;
  - animals and goods, including semi-finished goods, raw materials, ingredients, processing aids and other products used for the preparation and production of goods or for feeding or treating animals;
  - cleaning and maintenance products and processes;
  - traceability, labelling, presentation, advertising and relevant packaging materials, including materials intended to come into contact with food.
- ▶ Controls on hygiene conditions in operators' premises.
- ▶ An assessment of procedures on good manufacturing practices, good hygiene practices, good farming practices, and of procedures based on the principles of hazard analysis critical control points (HACCP).
- ▶ An examination of documents, traceability records and other records which may be relevant to the assessment of compliance with the rules.
- ▶ Interviews with operators and with their staff.
- ▶ The verification of measurements taken by the operator and other test results.
- ▶ Sampling food, based on risk assessment, during harvest, processing, storage, transport, or sale, to establish compliance, to contribute data for risk assessments and to identify offenders.
- ▶ Monitoring audits of operators.
- ▶ Any other activity required to identify cases of non-compliance.



6.2 LICENCES AND PERMITS<sup>6</sup>

6.2.1 Business Licence

The entrepreneur should be required to apply for authorization to pursue an economic activity - a **business licence** - which constitutes the legal document issued by government agencies granting the user the right to operate any form of trade or commerce carried on for profit or gain within its government geographical jurisdiction. Upon submission of the required documents the operator is required to pay business licence fees and receives its business registration.

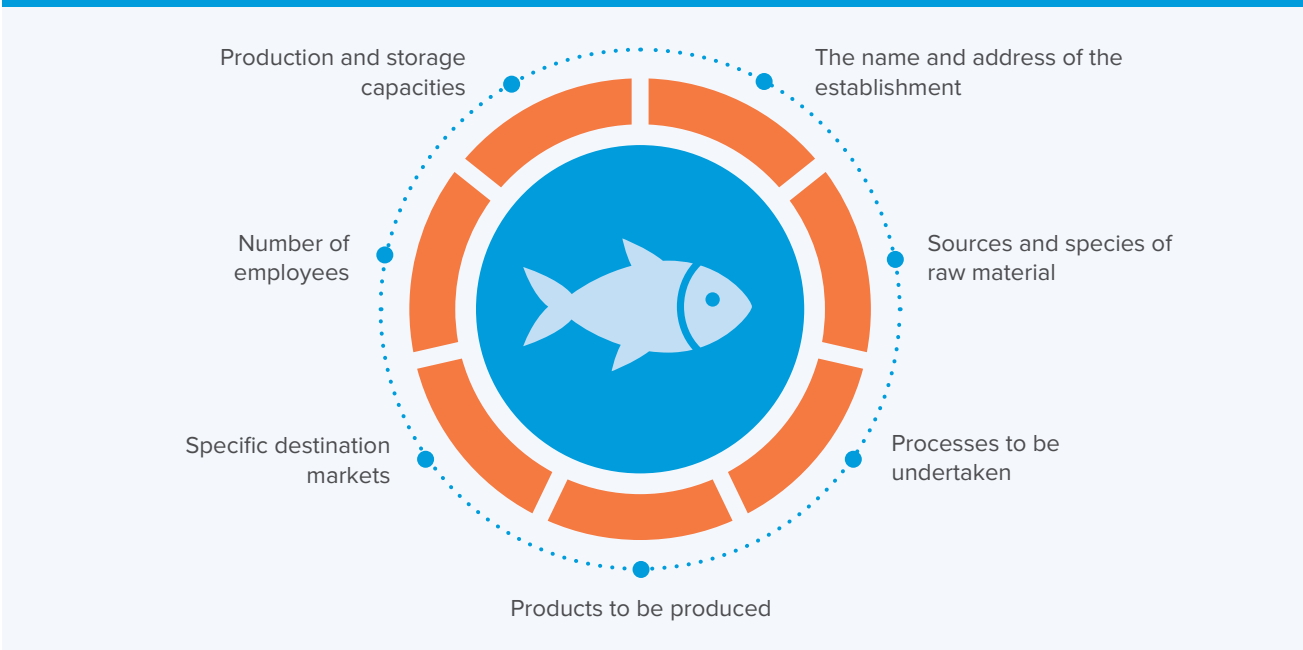
6.2.2 Sanitary establishment approval

All premises involved in the production of fish and fish products for export, including fishing vessels where fish is prepared for export, must be registered and approved. **Approval of establishments** is the formal procedure to confirm that the legal obligations of a fishery business operator have been met. It is a step which positively confirms compliance and thus serves as a kind of licence which provides a useful tool for controlling higher risk establishments.



6) Licences, permits and inspection fees based on national regulatory (fees and charges) framework and charged by authorities are not included in this document.

FIGURE 4: Process for sanitary establishment approval



Where applicable, the approval conditions will correspond to food hygiene requirements via the implementation of HACCP and various Pre-Requisite Programmes (also known as Standard Operating Procedures) concerning staff and plant hygiene, cleaning and sanitizing, pest control and water safety. Should the establishment wish to undertake any activities which are not within the terms of the approval, then a request for a variation of the approval conditions should be made to the Competent Authority. This procedure is necessary to prevent an establishment which has received approval only for low-risk products (e.g. frozen whole fish) from trying to market high risk products (e.g. smoked fillets).

The approval duration should be finite and subject to periodic renewal.

**Establishment sanitary and health approval and surveillance form the basis of the system of official controls for food safety purposes.** In a mixed authority approach, the activities of inspectors from the various Competent Authorities must be programmed to cover the entire chain of operators, placing emphasis and priority on those points which are known to present the highest risk.

- The Competent Authorities must make public, and more importantly, share with trading Member state partners, the list of approved establishments, providing the following information:
- Establishment approval number;
  - Legal name of the business;
  - Physical site address of the establishment;
  - Establishment type;
  - Validity of approval certificate.



6.3 EXPORTER/IMPORTER REGISTRATION

An **export/import registration licence** is a vital shipping document issued by government agencies which authorizes the trade of certain goods. Traders engaging in any export/import business must apply for a permit,

ensuring compliance with applicable export control measures. Preliminary contacts between an applicant and the relevant customs authorities are recommended before submission of an application.

Export/import licence/permit requirements depend on several factors, such as:

- ▶ The item being imported/exported;
- ▶ Where it is exported;
- ▶ Who is the consignee;
- ▶ The intended usage of the traded item.

Some essential documents are generally required for obtaining an import-export licence, as follows:

- ▶ Business registration documents;
- ▶ Product information (Harmonized Tariff Schedule (HTS) codes and country of origin for the products planned for import/export);
- ▶ End-use statement: a statement outlining the intended use of the imported or exported goods;
- ▶ Clearing agent/broker’s licence, if used.



6.4 CODES OF PRACTICE

Codes of practice can play a significant role in improving the trade environment by establishing guidelines and standards which govern requirements, processes, and interactions among fishery industry key players.

As an example, the Codex Alimentarius (“the food code”) Code of practice for fish and fishery products,<sup>7</sup> has a fundamental role in protecting consumers and ensuring fair practices in the food trade by providing technical guidance on every stage of the value chain. Member States, competent authorities and operators are encouraged to use this reference and benchmark in the WTO SPS agreement as a sound scientific source of information to ensure compliance.

In addition to this guide, Member States should engage in developing codes of practice providing advice and best practice guidance on the way in which operators must ensure that they have suitable procedures in place to guarantee compliance to export their products.

6.5 PRODUCT SPECIFICATIONS

Product specifications are one of the most important requirements for enabling every fishery trader to achieve compliance. The objective of this section is to provide operators and competent authorities with a baseline of written specifications which should be developed for each product in a manner which avoids ambiguity and thus facilitates trade. It should be noted that product specifications may include sanitary and conformity conditions and also operational requirements related to the quality of products.

Product specifications should be based on regional/continental/international standards and when necessary, individually adapted to suit specific trade circumstances. They should include at least the information listed in Figure 5 below.

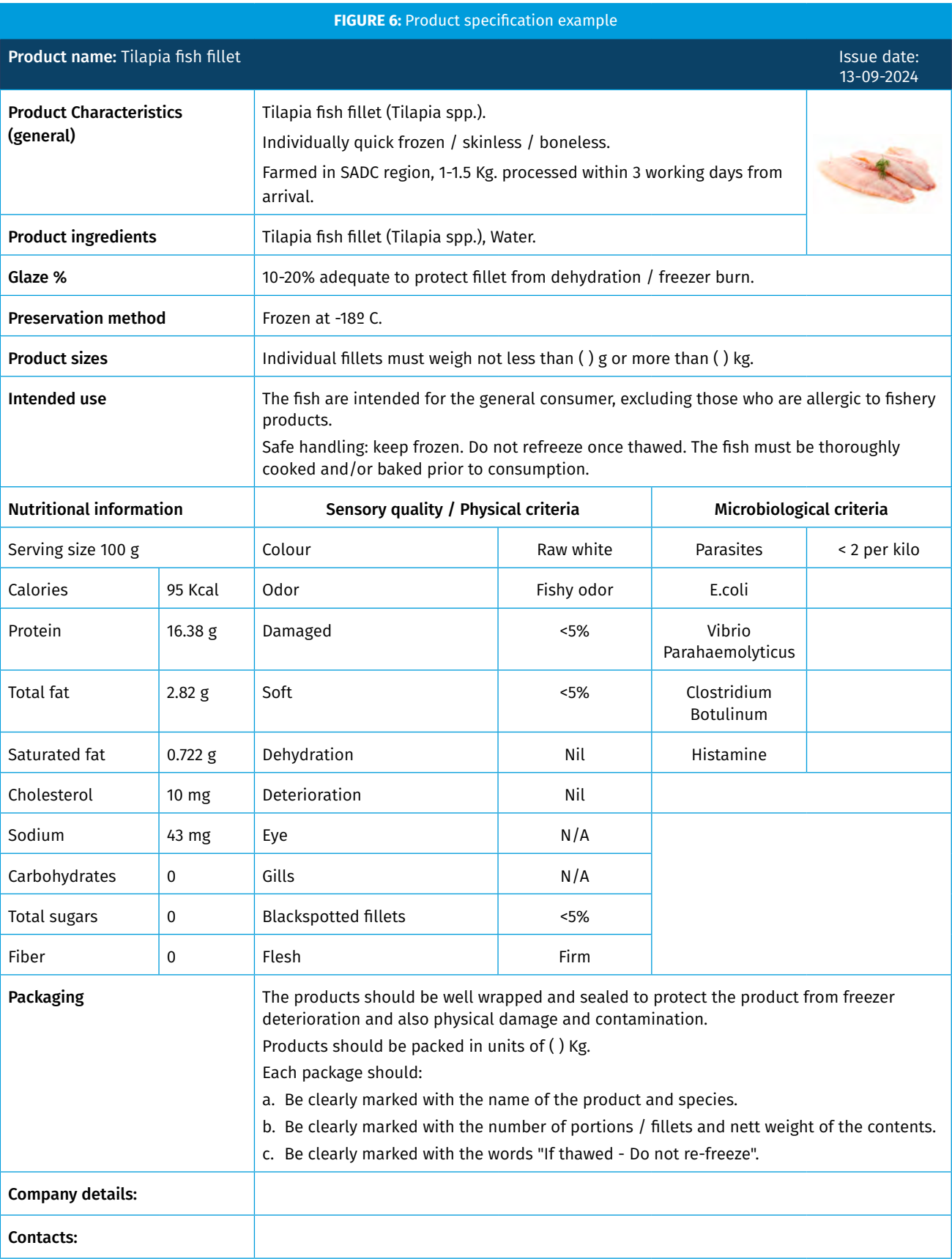
7) [Code of practice for fish and fishery products.](#)





An example of a detailed product specification for frozen fish is presented below.<sup>8</sup>

8) The proposed product specification is based on requirements extracted from international codes of practice and therefore the information provided is intended for general guidance only.





6.6 RULES OF ORIGIN

Rules of Origin (RoO) is a term used to determine the country where goods have been manufactured or produced. SADC encourages Member States to adopt many strategies to foster trade and the adoption of common RoO is one of them.

Goods that fall under SADC Rules of Origin<sup>9</sup> are considered to have preferential treatment by not being subject to tariffs when imported or exported within the Free Trade Area. Effective and uniform implementation

of the provisions of Annex 1 of the Protocol on Trade (i.e. Rules of Origin) by Member States is important, as it helps strengthen the SADC trade regime. It is expected that Member States will effectively and uniformly implement their commitments to the Protocol on Trade. This section aims to provide a guide to practical application of the provisions of the SADC Rules of Origin, including the administrative and regulatory aspects under the SADC trade regime.

6.6.1 Technical issues relating to SADC Rules of Origin

Rules of Origin can be defined as a set of criteria used to distinguish goods produced within the SADC Member States which are entitled to preferential tariff treatment. Rules of Origin are mainly applied to a group of countries

belonging to the same regional trade grouping (i.e. SADC), where the countries have agreed to reduce or remove trade barriers among themselves.



9) [www.sadc.int/pillars/customs](http://www.sadc.int/pillars/customs)

General Criteria for Qualifying under SADC Rules of Origin

- Wholly produced or obtained within a Member State. Items such as minerals, fish, livestock, fruit and vegetables, or products made with these locally sourced items fit this criterion;
- Produced in a Member State using non-originated materials but have been substantially processed within one;
- Changed tariff headings due to the processing that occurred in a Member State.

General Principles

- Predictability:** Clear and predictable rules of origin and their application are desirable, as they facilitate the flow of regional trade and economies of scale in the SADC region.
- Transparency:** RoO should be governed by transparent laws, regulations and practices.
- Non-discriminatory:** RoO themselves should not create unnecessary obstacles to trade and should also facilitate the implementation thereof by Customs administrations by providing an exhaustive and complete text.

Processes which do not qualify Fish and Fishery products as originating from a Member State

- Packing, packaging and other preparations or processes for shipping and for sales: the processes here may include:
  - packing, repacking or retail packaging, including placing in flasks, bags, cases and boxes, or fixing on cards or boards and all other simple packing operations;
  - changes of packing and breaking up or assembly of consignments;
  - processes which ensure preservation of the fish and fishery products in good condition during transportation and storage, including ventilation, drying, freezing, sorting, or loading and reloading.
- Mere blending and other types of mixing: these may include:
  - simple mixing of fish products imported from outside the Member States;
  - mere mixing with another product that does not materially alter the characteristics of the fish products;
  - the addition of substances such as anti-caking agents, preservatives, wetting agents and/or preservatives.
- Simple assembly or combining operations.
- Testing, sorting or grading.
- Marking, labelling or affixing similar distinguishing signs on the fish and fishery products or their packages.
- Slaughter of animals (in this case, fish).
- Any process or work in respect of which there is evidence of the intention to circumvent these rules.
- A combination of two or more insufficient working or processing operations does not confer origin, regardless of whether the product-specific rules of origin have been satisfied or not.





### Fish and Fisheries Products Wholly Produced in the Member States


According to Rule 4 of the Annex 1 of the SADC Protocol on Trade, fish and fishery products may qualify as being wholly produced in Member States if they satisfy the following conditions:

- Products obtained by fishing conducted there.
- Products of sea (lake, river or waterbody) fishing and other products taken from the sea, lake, river or waterbody by their vessels.
- Products made onboard their factory ships (or any fishing vessels) exclusively from products referred to in the previous subparagraph.
- Waste and scrap (including by-products or by-catch) resulting from fish processing operations conducted there.
- Products produced there exclusively from one or both of the following:
  - products specified in the previous sub-paragraphs.
  - materials containing no element imported from outside Member States or of undetermined origin.
- A fishing vessel of a Member State shall be regarded as part of the territory of that Member State and qualifies for the origin of production of marine, river, or lake products and goods in relation to a Member State.
- Place of origin of marine, river or lake products qualify if taken from the sea, river or lake or goods produced there from at sea or on a river or lake, if they have been brought directly to the territory of the Member State. For example, if a Mozambican vessel catches fish in South African waters (i.e. under Access Agreement) and brings the products directly to Mozambique, the products may be considered as originating from Mozambique. This may include waste or by-products resulting from manufacturing operations conducted there.
- A vessel shall be regarded as a vessel of a Member State if it is registered in a Member State and satisfies one of the following conditions:
  - The vessel sails under the flag of a Member State.
  - At least 75 percent of the officers and crew of the vessel are nationals of a Member State, or as a minimum, the majority control and equity holding in respect of the vessel are held by nationals of a Member State or an institution, agency, enterprise or corporation of the Government of such a Member State.

6.6.2 Administrative guidance to the SADC Rules of Origin


The implementation of the RoO entails that Member States apply common procedures in determining whether or not fish and fishery products originate from the SADC region and whether they should be granted preferential tariffs. To give confidence to each other, Member States need to ensure that they apply common administrative

procedures as intended by the Protocol on Trade. This will further create incentives among fish producers and traders for only fish and fishery products originating from the SADC region to benefit from preferential tariff treatment.




### Registration of fish producers

All fish producers, processors and traders who wish to export under the SADC preference regime should be encouraged to register with the relevant Designated Issuing Authority (DIA) in their own Member State. The ministries responsible for fisheries should assist fish producers in their countries to identify the correct DIA in order to avoid use of fake documentation. Depending on the country, DIAs may either be the Ministry responsible for Trade, Customs, the Revenue Authority or Chamber of Commerce. Registration ensures that only approved fish and fishery products originating in Member States and exported by entities operating within the SADC region benefit from preferential tariff treatment.



### Proof of Origin

Registered fish producers should be issued with the SADC Certificate of Origin as and when their fish and fishery products are accepted as meeting all the requirements of the Rules of Origin. The certificate of origin should be attached to the import goods declaration to enable the Customs authorities of the importing Member State to grant preferential tariff treatment to the shipment.



### Producer/Exporter's Instruction

Fish producers or exporters who have been registered by the DIAs in their countries and wish to produce and/or export fish and fishery products, should do the following:

- Ensure that their products have been approved by the relevant authorities.
- Complete a Certificate of Origin for each shipment based on the approval issued by DIA.
- Quote the registration number in the appropriate box of the certificate.
- Attach the Certificate of Origin to the export bill of entry.
- The export declaration, together with the Certificate of Origin and other supporting documents should be submitted to the DIA for authorization of the export.






FIGURE 7: RoO supporting documentation.<sup>10</sup>

DECLARATION BY PRODUCER

Appendix B

I, the undersigned, exporter of the goods described overleaf,  
DECLARE that the goods meet the conditions required for the issue of the attached certificate;  
SPECIFY as follows the circumstances which have enabled these goods to meet the above conditions:

.....

.....

.....

.....

SUBMIT the following supporting documents (1 )

.....

.....

.....

.....

.....

UNDERTAKE to submit, at the request of the appropriate authorities, any supporting evidence which  
these authorities may require for the purpose of issuing the attached certificate, and undertake, if  
required, to agree to any inspections of my accounts and to any check on the processes of  
manufacture of the above goods, carried out by the said authorities;

REQUEST the issue of the attached certificate for these goods.

.....  
(Place and date)

.....  
(signature)

(1) For example, import documents, movement certificates, manufacture's declarations, etc. Referring to the products used in manufacture or to the goods re-exported in the same state.

6.6.3 SADC Certificate of Origin

Goods that have been accepted as meeting all the requirements of the Rules of Origin are entitled to a SADC Certificate of Origin. A SADC certificate gives an exporter a great competitive advantage, as there is little, or no import duty charged on a consignment accompanied

by a SADC certificate in other SADC countries. A SADC certificate is divided up into sections (refer to image below); the producer/exporter should complete the certificate and guidelines<sup>11</sup> are available to support the operator in completing each section.

10) Extracted from TRADER'S GUIDE on SADC Rules of Origin.

11) [TRADER'S GUIDE on SADC Rules of Origin](#)

FIGURE 8: Example of SADC certificate of origin

Registration No.: ..... 1. Exporter (Name and office address)		3. Country Ref. No. (e.g. ZW 0000001)  SOUTHERN AFRICAN DEVELOPMENT COMMUNITY (SADC)  CERTIFICATE OF ORIGIN		
2. Consignee (Name and office address)		4. Particulars of transport:  5. For official use only		
6. Marks and numbers; number and kind of package, description of goods:		7. Customs tariff No.	8. Origin criterion (see overleaf)	9. Gross weigh other quantity
(i) Marks and Nos.	(ii) Description of goods			10. Invoice No. and date
11. DECLARATION BY EXPORTER / SUPPLIER  I, the undersigned, declare that the goods described above meet the conditions required for the issue of this certificate, and are originating in  ..... (Country)  Place and date: .....		12. CERTIFICATION OF ORIGIN Declaration certified:  <div></div> (Origin stamp and signature)  Certificate of customs or other designated authority  ..... Signature		13. FOR CUSTOMS PURPOSES  Export document no: ..... Date: ..... Customs office: .....  Country: ..... Date: .....  Signature  <div>Stamp</div>



6.6.4 Institutional Requirements for the Implementation of the Rules of Origin

The effective implementation of the Protocol on Rules of Origin by the Member States requires that the issuing of certificates of origin and the verification of the certificates be recognized as two distinct functions, which should be carried out in Member States by appropriate authorities.

SADC’s intentions to streamline customs procedures and trade facilitation are, therefore, outlined in the Protocol on Trade, Annex II Concerning Customs Cooperation within the SADC region.

For effective implementation by Member States, countries are required to have efficient national systems for administration of the RoO. This entails Member States meeting at least the following institutional requirements:

- The DIA should be organized in such a way that there are **Headquarters and regional or local offices** responsible for the administration of the RoO.
- The **Headquarters** will be responsible for:
  - the overall responsibility for the proper implementation of the RoO;
  - preparing national administrative guidelines on the interpretation of the laws and regulations for use by officials of the DIA;
  - keeping national database of all registered fish and fishery product exporters;
  - carrying out origin verification at the request of other Member States;
  - where possible, participating in national and/or regional TBT committee meetings.
- **Regional or local offices** will be responsible for:
  - approving and registering exporters;
  - being a point of contact for inquiries which should be dealt with in coordination with Headquarters;
  - carrying out origin verification at the request of other Member States.
- DIA should have **competencies for common measures** through which Member States undertake to comply in the formulation of their Customs laws and procedures. These include:
  - The Harmonized Commodity Description and Coding System (Harmonized System or HS);
  - Customs Valuation of Goods;
  - Technical Information on Manufacturing Processes to verify whether manufacturers meet the requirements of the RoO eligibility of fish producers, processors and exporters.
- DIA should have the **legal power** to carry out inspection of fish and fishery products as well as to verify the records and accounts of the exporter; they should be able to check the contents and authenticity of supporting documents accompanying the Certificate of Origin at the time of export.
- **Customs Cooperation at common border crossings:** Customs Administrations at common border crossings shall, wherever possible, operate joint controls. These operations are easier at One-Stop Border Posts (OSBPs) where Customs offices are located at common land or waterway borders. Alternatively, the Customs Administrations of respective offices may arrange joint hours of business to assist fish traders.

6.7 CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) is a global treaty to ensure that international trade in wild plants and animals is legal, traceable, and biologically sustainable. In an integrated border management system, CITES must be implemented alongside other international frameworks to ensure efficient, secure, and sustainable border

controls. A permit from the CITES management authority is required to import or export a CITES-listed species. It should be noted that no international commercial trade is allowed for species listed on Appendix I<sup>12</sup> and trade in species listed on Appendix II must be regulated for sustainability and legality.

6.8 TRACEABILITY


Traceability is the ability to fully trace a product from the point of sale back to its point of origin. The effective implementation of a traceability system requires that businesses at each stage of the supply chain, from catching or harvesting, to processing and retailing, are clear about their responsibilities regarding fisheries and aquaculture traceability and consumer information.

for capture fisheries, and pond and day of harvest for farmed fish. Whatever the basic unit chosen, it needs to be provided with an identity, a unique code which distinguishes it from other batches. It is against this batch code that all other information about the batch is recorded. The batch code is the only piece of information passed to the customer at the time of sale, thus allowing customer records (and their batch codes) to be linked to the records of their suppliers.


Most operators these days seem to consider the vessel and day of catch as the most basic unit of traceability

FIGURE 9: Minimum information for traceability


At a minimum, systems of traceability should record the following essential information:




Name of supplier




Date and time of receipt



Divisions/additions to batch



Name of consignee



Date and time of dispatch

12) Checklist of CITES species



The complexity of fisheries supply chains often requires collaboration among various stakeholders. Specifically for capture fisheries, a robust traceability system must also ensure that:

- Only legally caught fish enter the global supply chains
- Consumer and businesses can verify products origins
- Governments have the information required to improve fisheries governance and sustainability
- IUU related vessels face greater enforcement and market exclusion.

Aquaculture operators face particular challenges in respect to traceability due to the complexity of the value chain, inputs required to produce fish and other potential steps that need to be considered. The traceability system must include systems for identifying the separate batches of various input supply by the farmer, such as fish feeds, veterinary medicines, juveniles, eggs, and brood stock.

Data recording and record maintenance are crucial to ensure transparency of information and to allow tracking of the movement of fishery and aquaculture products along the supply chain.

6.8.1 Batch identification and traceability systems

Batch IDs are unique codes that allow a group of products made or processed together to be identified. As a unique identifier, it allows food products to be tracked and traced throughout the supply chain, thus ensuring food safety, quality and compliance. The data to be included in the batch code will depend on the specific circumstances

of the operator/enterprise. Where standard products are produced with raw materials from many suppliers, the key requirement is that the code should identify the supplier. In general, batch codes (and their associated data records) should uniquely identify the parameters listed below.

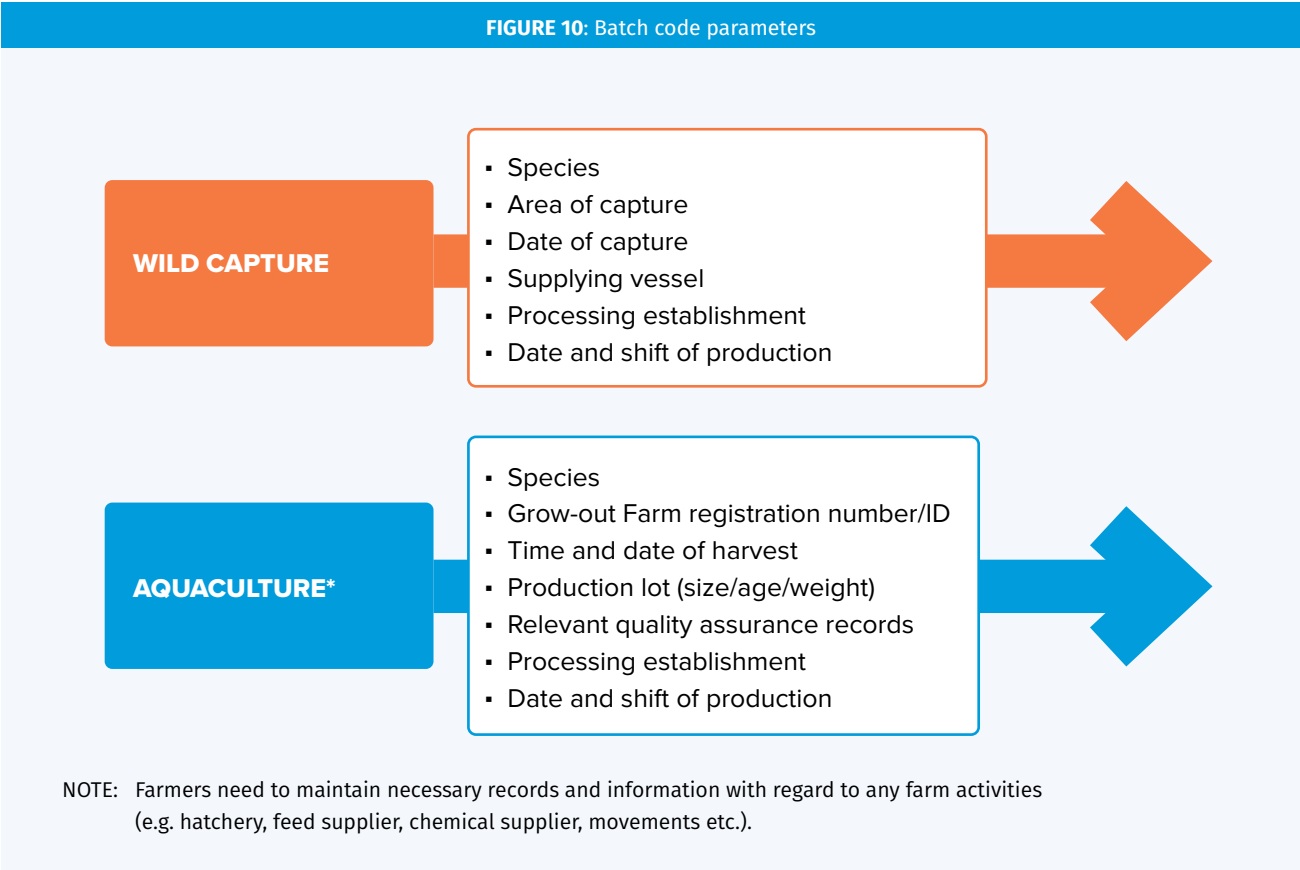


TABLE 1: Requirements for compliant batch code

An example of a simple but compliant batch coding system is given below:

DWWYYPPXXSSFF

Where:

D	Day of the week	1: Sunday; 2: Monday; 3: Tuesday; 4: Wednesday; 5: Thursday; 6: Friday; 7: Saturday
WW	Week number	1 to 53
YY	Year	1,2,3 etc.
P	Production shift	1 – Day; 2 - Night
XX	Supplier code	01, 02, 03 etc.
SS	Species code	01, 02, 03 etc.
F	Fishing day n°	1, 2, 3, 4, etc.

Traceability systems can be paper or computer based or a mixture of both. In general, company size and costumer/target market preferences are the key factors determining the type of traceability systems to be adopted.

6.8.2 Traceability to export consignments

The provenance of the different batches which make up a consignment must be identifiable. Given the perishable nature of fish products and their complex supply chains, effective traceability systems help to monitor and manage the movement of these products from origin

to destination. Operators’ traceability mechanisms and the existence of a batch code must be integrated in the export and import declarations, health certificates and certificates of origin which should be further identifiable in the system used for customs data.





6.9 LABELLING, PACKAGING AND MARKING



6.9.1 Labelling

All prepacked fishery products to be traded require a food label which displays certain mandatory information. Key elements of labelling include those listed in Table 2 below.

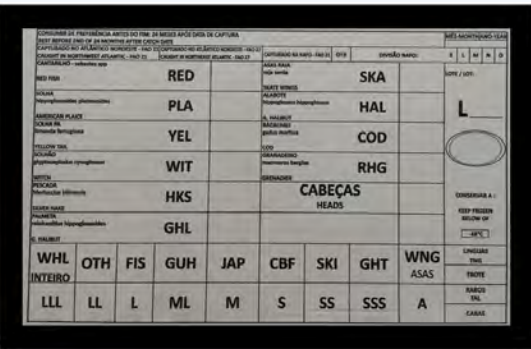
TABLE 2: Key elements of labelling	
Name of product	Labelled information
Commercial designation and scientific names	Both the commercial and scientific names must be displayed
Production method	The production method should be displayed, using the following designations in particular: <ul style="list-style-type: none"><li>▪ “caught ...”; or</li><li>▪ “caught in freshwater ...”; or</li><li>▪ “farmed ...”.</li></ul>
Catch area / country and body of water / country of production	<ul style="list-style-type: none"><li>▪ The catch area for fish caught at sea is the FAO area, sub-area or division where the fish were caught.</li><li>▪ Fish caught in freshwater must display both the name of the body of water (river, lake, etc.) and the country where the product was caught.</li><li>▪ Farmed fish (aquaculture) must display the country of production.</li></ul>
Fishing gear	Wild fish must display one of the following fishing gear categories used to catch the fish: “seines”, “trawls”, “gillnets and similar nets”, “surrounding nets and lift nets”, “hooks and lines”, “dredges”, and “pots and traps”.
Defrosted	The label should show whether the product has been defrosted.
“Best before” date / “Use by” date:	The date of minimum durability corresponds to the “best before” date or “best before end” date. Note: all prepacked products which are not highly perishable must display the “best before” date. By contrast, highly perishable products should display the “use by” date.
Name or business name and address of the food business operator	The name and address of the food operator responsible.
Country of origin or place of provenance	The country where the fish was caught or farmed, and sometimes, where it was processed.
Identification mark	Approval number of the establishment.
Net quantity: (Net weight)	The quantity of the fish should be expressed as net weight in kilograms on a label. This means the weight should be the total weight of the product, without the addition of its container or packaging.
Conditions for storage and use	Information on how the product should be stored (e.g., frozen, refrigerated).
Nutrition declaration	This includes the energy value and the amount of fat, saturates, carbohydrates, sugars, protein and salt per 100g or 100 ml. Unprocessed products which include a single ingredient or category of ingredients are exempt.
Allergens	A clear reference to the name of any allergens should be included in the list of ingredients. This should appear in a typeset (e.g. font style, or background color) which clearly distinguishes it from the rest of the list of ingredients. Not required when the food name clearly refers to allergen(s).
Lot Number and Traceability	Identification of lot numbers or barcodes to identify specific batches.



In addition to the mandatory information required, the operator may provide additional voluntary information which it considers useful for the consumer, such as date of harvest, date of landing, production techniques, complementary nutritional content etc. The operator must ensure that the information provided is not displayed to the detriment of the space available for mandatory information and that the information provided is clear, unambiguous and verifiable.

The label may be applied directly to the wrapping or the packaging or be printed on a label affixed to the product, the wrapping or the packaging. For products placed in transport containers or large outer packages and intended for further handling, processing, wrapping, or packaging in another establishment, the mark may be applied to the external surface of the container or packaging. Below are some examples of labels for both wild captured and farmed fishery products.

FIGURE 12: Labelling wild fishery products frozen on vessel



6.9.2 Packaging

Packaging plays a critical role in preserving the quality and safety of fishery products and options for packaging fish products need to meet the needs of both retail food distributors and consumers. Effective packaging involves:

- Selection of materials suitable for maintaining freshness and preventing contamination;
- Integrity of the seal to prevent leaks, contamination, spoilage and fraud;
- Preservation methods to extend shelf-life;
- Compliance regarding packaging materials, ensuring that they are safe and suitable for food use and contact.

Packaging also allows for marketing and product differentiation and creates a more efficient, hygienic and less wasteful fish supply chain (by extending shelf life and reducing food waste at the retail and consumer level). Additional information regarding developing sustainable and practical packaging options for seafood products which meet the needs of both retail food distributors and consumers can be found at [2022-Guide-to-Packaging-Technology.pdf \(eurofish.dk\)](#).

6.9.3 Marking

The identification marking of products of animal origin is an important part of the traceability system and is also an international requirement under which food business operators must ensure that products of animal origin have an identification mark applied at the production establishment, and not at a later stage.

marked with the Country and Establishment of Origin at all stages from production to delivery to the final consumer, and that these marks are clearly displayed to the enforcement officer. Below are some relevant points on examining compliance with identification marking rules for fishery products.

Inspectors at border posts must confirm that identification marking rules are met, which in brief consists in ensuring that a product is permanently

TABLE 3: How to examine compliance with identification marking rules for fishery products

✓	The identification mark must be applied to the product before it leaves the establishment.
✓	The mark must be legible (clear enough to read) and indelible (unable to be removed) and the characters easy to understand or interpret.
✓	It must be clearly displayed for the competent authorities.
✓	The mark must indicate the name of the country in which the establishment is located, which may be written out in full or shown as a two letter code in accordance with the relevant ISO standard.
✓	The mark must indicate the approval number of the establishment.
✓	The mark may, depending on the presentation of different fish products, be applied directly to the product, the wrapping or the packaging, or be printed on a label affixed to the product, the wrapping or the packaging.
✓	In the case of transport containers or large packages intended for further handling, processing, wrapping or packaging in another establishment, the mark may be applied to the external surface of the container or packaging.
✓	Where goods are transported in bulk, the relevant identification marks are to be located on the documentation. This information will always be present on the Health Certificate.
✓	When products of animal origin are placed in a package destined for direct supply to the final consumer, it is sufficient to apply the mark to the exterior of that package only.



# 7

## Verification of Conformity and Approvals by Competent Authorities of Exporting and Importing Countries

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Verification of Conformity is a comprehensive assessment procedure verifying product compliance with specific quality and safety regulations before exportation.





Verification of Conformity is a comprehensive assessment procedure verifying product compliance with specific quality and safety regulations before exportation. These assessments, achieved by means of **Inspection, Testing** and

**Certification**, ensure food safety, quality, sustainability and compliance with specific standards and regulatory requirements set by both the exporting country and the destination market.

7.1 INSPECTION

Inspection is the examination of food or systems for control of food, raw materials, processing, and distribution, including in-process and finished product testing, in order to verify that they conform to requirements.<sup>13</sup> Inspection of fish products may occur at any stage in the production and distribution process as long as it provides the most appropriate means of ensuring food safety.

**Risk-based inspections are one way of ensuring effective food safety controls while expediting trade in low-risk products.** SADC countries should consider adopting terms

such as high, increased or low regulatory considerations to incorporate the concepts of risk profiling for both the type of fish products and also the country of origin.

Insofar as the importer is responsible for confirming the safety and suitability of the food, and it complies with requirements, countries can implement risk management activities at the pre-border, border and post-border level, by targeting “high risk” foods based on the trader’s record, the type of food and its origin. Some examples are given below:

- **High risk foods** are those which present an increased risk to human health, based on their inherent nature and associated hazards, as well as the nature of their processing or handling. Examples include histamine susceptible fish and fish products, ready to eat products, smoked fish, and bivalve molluscan shellfish. Additionally, the nature of the food safety controls in the country of origin should be taken into account.
- **Medium /increased risk foods** can be used to categorize food for which there is uncertainty or concern regarding their safety or suitability.
- **Low risk /general clearance foods** are those where hazard evaluation indicates a minimal risk of human illness, and specific clearance procedures at the border are not required.

It is worth noting that categorization involves a high level of collaboration with international government agencies, cooperation and data sharing between post border, at-border and pre-border activities. Moreover, it should

be based on accumulating hazard-based information at the border or through the gathering of information from official controls, which can lead to an indication of increased risk in relation to a particular food or source.

7.2 TESTING

Operators need to have systems in place in their processing establishments, and upstream in the supply chain, to ensure that end products meet microbiological and chemical requirements. Some countries set out mandatory minimum testing requirements for export establishments which prepare fish products and are commonly part of the establishment’s quality

management system (HACCP verification), and approval arrangements within the official controls in place, audited by the competent authorities. A regular program of product testing provides certification bodies with a level of assurance, which allows them to issue export health certification. Common testing for fish products can include those listed below.

- Microbiological requirements
  - Listeria monocytogenes
  - Salmonella
  - E. coli
  - Histamine
- Parasites
- Maximum levels for chemical contaminants
  - Contaminants (heavy metals, dioxins, PCBs, PAHs)
  - Food additives
  - Therapeutants and antibiotics

Testing is an integral part of official controls conducted by the competent authorities and also of operators’ own checks. Laboratories designated by the competent authorities to carry out analyses, tests and diagnoses on

samples taken in the context of official controls must be accredited according to standard EN ISO/IEC 17025 on “General requirements for the competence of testing and calibration laboratories”.



13) Principles for food import and export inspection and certification CAC/GL 20-1995



7.3 CERTIFICATION OF CONFORMITY

An operator has the responsibility to carry out a risk analysis and to ensure that products comply with certain rules before placing them on the market. The use of harmonized standards, although voluntary, proves to be the best technical solution to demonstrate compliance with mandatory legal requirements.

Certification is the procedure by which official certification bodies or officially recognized certification bodies provide written or equivalent assurance that products meet the necessary regulatory and quality criteria. Many countries require conformity certification as part of their import process.

Fish and aquaculture products fall under the “products of animal origin” category and SADC countries and operators exporting fish products will need to apply for an export health certificate (EHC) before they export.

An export health certificate is a physical document which proves that products are from an approved food establishment and that the food business operator has met all relevant requirements. The EHC covers one consignment sent to a specific consignee in a single destination. Figure below is an indicative example of a typical health/sanitary certificate for export (non-EU).



FIGURE 13: Example of sanitary certificate covering fish and fishery products

SANITARY CERTIFICATE COVERING FISH AND FISHERY PRODUCTS

N° / ..... / 200

Country of dispatch: ..... Competent Authority :.....

1. Details identifying the products

Description of product	Species (scientific name)	Conditioning	N° units	Codes / Lots	Net weight

Temperature or other parameters relevant for fish preservation:

Required..... Observed.....

Specific verifications: .....

Sensory evaluation: .....

Chemical tests: ..... Microbiological tests: .....

Observations: .....

2. Provenance of the products

Name and approval number of establishment/vessel/cold store: .....

.....

Name /address of exporter: .....

3. Destination of the fishery products

Export from: ..... to ..... transport means: .....

Name /address importer: .....

.....

4. Attestation

Name of Official inspector: .....

The undersigned hereby certifies that:

- i. The products described above originate from (an) approved establishment(s), complying with good regulatory standing of the export country
- ii. They have been handled, prepared, processed, identified, stored and transported under sanitary conditions in accordance with the requirements set out in national directives.

Important: Refer to the Regulation/Directive concerned

Place ..... , Date.....

Official / Stamp

Signature (C.A; Official Inspector)

.....

Note: The CA stamp and signature colour should be different to the colour of the general certificate text.

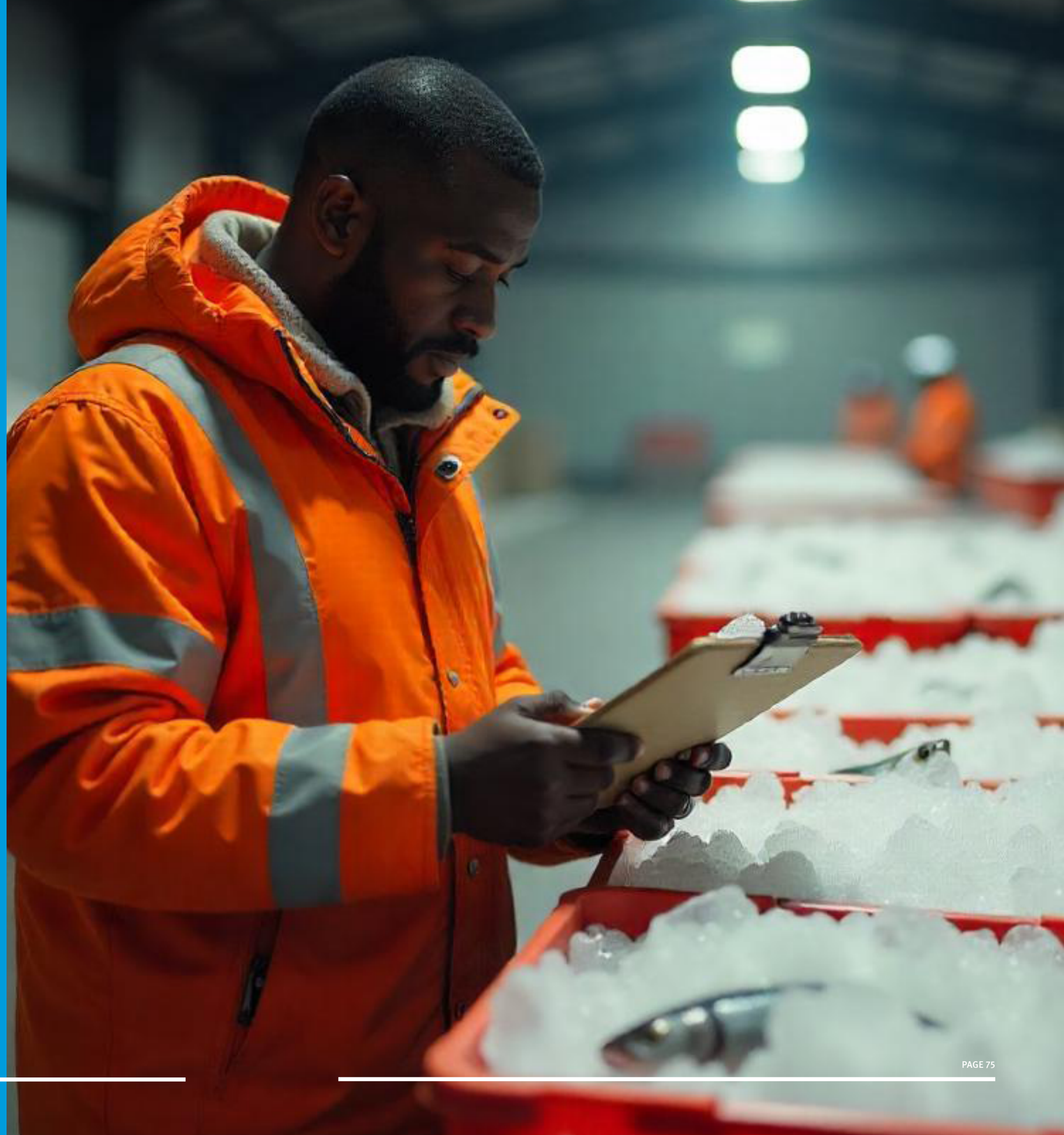


# 8

## Clearance Systems

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It is necessary for all mandated government agencies to inspect compliance at relevant points and to automate their processes for improved service delivery.





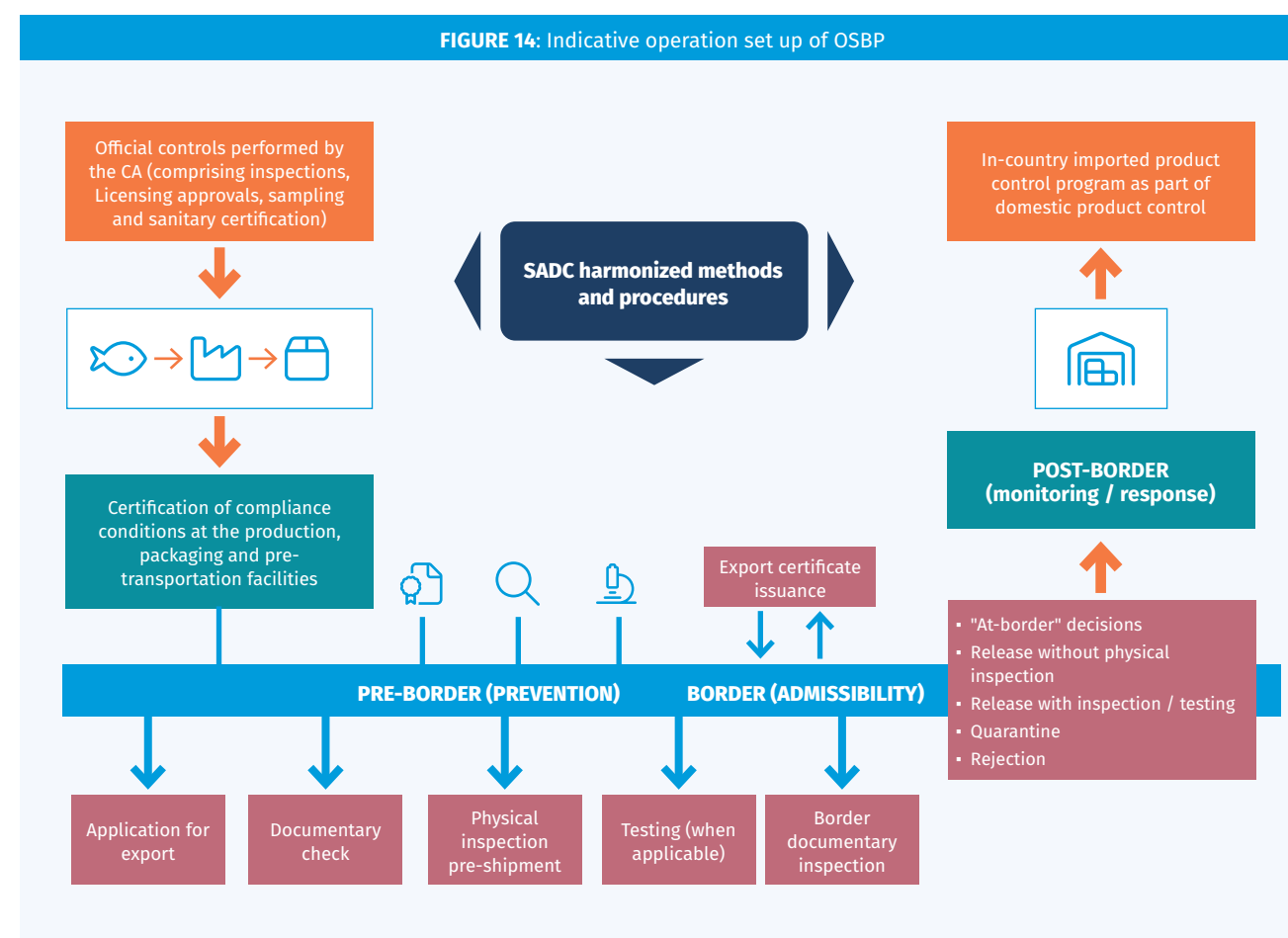
Clearance systems in trade refer to the set of processes, procedures, and technological tools used by customs and border agencies to manage the movement of goods and people across borders. At

present the multiple agencies set up operating in OSBPs have dissimilar clearance systems, which compromises the efficiency of regional cross border trade.

## 8.1 ONE STOP BORDER POSTS TO FACILITATE INTRA-REGIONAL TRADE

Integrated operational procedures to ensure compliance are based on the responsibility of food business operators, and on efficient control systems carried out by competent authorities. Conformity assessment procedures related to the acts of inspecting, testing and certifying fish products should be developed and

implemented throughout the value chain to minimize undue delay at the point(s) of exit/entry without jeopardizing the effectiveness of controls to meet sanitary requirements. An indicative operational set up is graphically represented below.



In a One Stop Border Post, travellers and consignments meet the required immigration and customs procedures for both countries in one stop, saving time and avoiding redundant checks. The goal is to improve trade efficiency and reduce waiting times.

It is necessary for all mandated government agencies to inspect compliance at relevant points and to automate their processes for improved service delivery. The

next cornerstone is information sharing, having the information collected throughout the value chain, certified for compliance by mandated authorities and made ready for the clearance process, which will result in a smooth submission of data, captured once at the entry port within a corridor.

## 8.2 AUTOMATED AND INTEGRATED CUSTOMS OPERATIONS

The automation of processes expedites customs procedures and helps to improve compliance, ensuring that trade management is carried out more efficiently. In practice, the use of technology and software systems reduces paperwork, has the potential to minimize human error, and speeds up processing times whilst increasing transparency. Specifically, in relation to SPS compliance, digital technologies can assist in multiple stages of the SPS regulatory framework (risk assessment, risk management and the verification of SPS compliance in the movement of products) and can furthermore facilitate communication and information sharing between stakeholders, particularly in inspection and approval procedures for the movement of products.

The UNCTAD Automated system for Customs Data (ASYCUDA)<sup>14</sup> covers most foreign trade procedures and can be configured to suit the national characteristics of individual customs regimes, national tariffs and legislation. This integrated customs management system is widely adopted in the SADC region to catalyze cross border trade efficiency. Moreover, some SADC countries

use ASYCUDA as part of Single Window Systems (SWS), enabling traders to submit all the necessary documents and information through a single portal, simplifying the import and export process. Although some African countries have experimented with various models to implement electronic single window systems,<sup>15</sup> the benefits of using such systems have not been accrued due to insufficient government buy-in and low financial capacity (e.g. to ensure training and connectivity) and also lack of harmonized procedures with low data quality.

Improving the use of information and communications technology (ICT) infrastructure and equipment is not merely an obligation for most countries to be able to trade, but also a crucial part of the process of overcoming the obstacles to trading through OSBPs.

<sup>14</sup> [www.asycuda.org](http://www.asycuda.org)

<sup>15</sup> AUDA NEPAD



8.2.1 Pre-Border application for export

The identification marking of products of animal origin is an important part of the traceability system and is also an international requirement under which food business operators must ensure that products of animal origin have an identification mark applied at the production establishment, and not at a later stage.

Inspectors at border posts must confirm that identification marking rules are met, which in brief

consists in ensuring that a product is permanently marked with the Country and Establishment of Origin at all stages from production to delivery to the final consumer, and that these marks are clearly displayed to the enforcement officer. Below are some relevant points on examining compliance with identification marking rules for fishery products.

1 REGISTRATION AND IDENTIFICATION OF VALID ECONOMIC OPERATORS

Where certification of compliance within the official control system is put into place by competent authorities, fish products being exported will need to be dispatched from an establishment approved under food hygiene regulations and listed for export purposes. To be added to the list of exporter establishments, the operator must contact the competent national authority. The process to be added to the list of exporters may take several days during which time the operator cannot export the goods.

2 PREPARATORY AND ADMINISTRATIVE ASPECTS OF EXPORT SPS CERTIFICATES

The **exporter** should check in advance with their relevant authority to identify which type of certificate is needed (based on the products and country of destination) and clarify the timescales for conducting inspections and establishing Export Sanitary (Health) Certificates. This can vary based on the availability of the certifying officer and the nature of the consignment. Often, the authority reviews the application and assigns an inspector to check the import requirements of the importing country and conduct physical inspection (as is often the case for products of animal origin). Upon verification of compliance and after payment, a certificate is issued and sent to the importer.

The **importer** should pre-notify his competent national authorities of the intention to import, the nature of the consignment and an estimation of the arrival date. This information sharing will provide the basis for a decision-making process in relation to risk-based physical inspections to be conducted at the border, thus with the potential to improve the overall process of export and import customs clearance.

For the purpose of this strategic approach and easier reference, a table with relevant authorities and contacts can be found in Annex I. The transmission of official documentation represented in the export SPS certificates is a cross-border, government-to-government exchange between the competent SPS authorities of importing and exporting countries. Digitization of SPS certification and shifting towards e-SPS certification should be considered under SWS and is regarded as having a huge positive impact not only by smoothing and assisting in the harmonization of trade procedures but also as a way to offer assurance of product authenticity to all food chain actors.<sup>16</sup> The potential for digital technologies to create efficiencies in SPS systems must be looked into by SADC Member States with a view to enhancing harmonization and faster OSBP clearance times for consignments of exported goods going through trade corridors.

16) OECD (2021) Digital Opportunities for Sanitary and Phytosanitary (SPS) Systems and the Trade Facilitation. Effects of SPS Electronic Certification

3 PRE-EXPORT PHYSICAL INSPECTION

Pre-export inspection of fishery products can play a large role in speeding up trade at OSBPs by ensuring that goods meet required quality safety and regulatory standards whilst avoiding physical inspections of all consignments at the border. Visual inspection of products should be carried out to assess factors such as appearance, texture, odour, colour, temperature control and storage conditions. Packaging and labelling compliance should also be evaluated to confirm that it meets the destination country's requirements. Inspectors verify that all required export documentation is complete and accurate, including export permits, certificates of origin, and quality certifications.

Samples of fish may be taken for testing in laboratories to check for contamination, heavy metals, microbiological pathogens, or other residues. The results of these tests can affect the approval or rejection of the consignment. Once the physical inspection is complete, and the consignment is deemed compliant, the exporter receives a health certificate, which certifies that the fish products meet the requirements for export.





### 8.2.2 Border admissibility and checks

Border checks are key components designed to protect national security, public health, the economy, and the environment, as well as to enforce compliance with national laws and international/regional agreements. Ideally, real-time digital monitoring systems should be in place so that both the documentation and physical flow are coordinated at all border posts. Despite various ICT interventions having been piloted with success in

OSBPs throughout African corridors, they require well-maintained and upgraded infrastructure and continuous financial investment; the ideal implementation model to ensure sustainability is thus yet to be put into place. For the purpose of this guidance document, only key aspects of border admissibility and checks for consignments of fish related products will be considered.

#### 1 IMMIGRATION VISA

The movement of persons includes many categories (citizens, visitors, traders, migrant workers etc.) and ideally a fast-track clearance system should be in place to ensure the seamless movement of people.

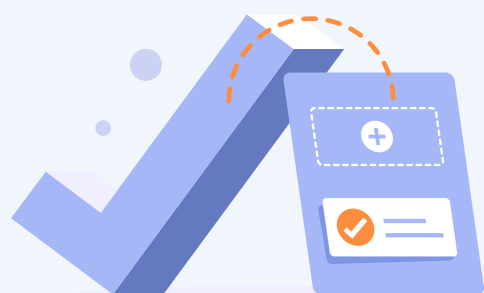
Although belonging to the same regional economic community, some countries still have entry visa requirements, mostly because of the pace at which bilateral agreements are being concluded. States operating within an OSBP examine travellers according to their respective immigration laws and policies and the application may involve filling out forms, submitting necessary documents (like passport, photographs, and supporting materials), and paying visa fees.

It should be noted that a traveller who has been cleared to exit the adjoining state by immigration officers may still be refused departure if other controls, including those related to goods and transport, are not met.

#### 2 DOCUMENTARY CHECKS

Upon the arrival of the consignment, a **documentary and identity check** must be carried out on 100% of consignments. This should be done to ensure consistency of documentation, that the correct sanitary certificate accompanies the consignment, that it comes from an approved establishment and that the data on the sanitary (health) certificate match with those on the packages/labels of the consignment. When available, border agency inspectors cross-check documents against the unique identifiers assigned to each shipment in the ASYCUDA system to ensure that the information is consistent and correct.

In addition, **integrity checks** should be carried out on the consignment to confirm that it conforms with the description in the documentation, including quantities, batch numbers, and that there has been no unauthorized breach of seals.



#### 3 PHYSICAL CHECKS

The selection of consignments for physical checks must be risk-based, so that lower risk goods receive a lower frequency of checks. Additionally, a history of compliance is a significant factor in determining risk. As part of physical checks the inspector can undertake some measurement of a parameter relating to safety or characteristic of the product. This could occur on the spot (for example checking the temperature of the products to make sure that it is within safe limits) or sampling and submitting for testing in an authorized laboratory. Key factors influencing decision making for testing consignments at borders should be done with a risk-based assessment and practical examples include the following:

- Inherent risks of the fish products (high risk, medium risk and low risk goods);
- Country of origin (international alerts, trade agreements, assessment of the official inspection system);
- Countries/operators with a history of non-compliance or high risk of noncompliance (e.g. fraud, contamination etc.);
- Record of violation with exporters failing consecutive inspection procedures;
- Transportation failures/suspicious storage conditions;
- Questionable authenticity of Sanitary Certificates;
- Discrepancies in manifest (documentary or physical cargo);
- Triggered by suspicious screening (X-ray Scanner, sniffer dogs etc.);
- Random physical inspection and sampling to ensure compliance.

Sampling, and, particularly, testing also affect the trade costs of fishery commodities by delaying trade. Cases that require sampling and testing should be comprehensively documented and should specify:

- Decision making for testing consignment at border;
- Sampling protocol (no. of packs, units);
- Sample method and treatment (sterile packaging, transport conditions);
- Test parameter;
- Test laboratories authorized to conduct the test;
- Compliance limits;
- Reference to national international standard/legislation;
- Non-compliance responses and options.

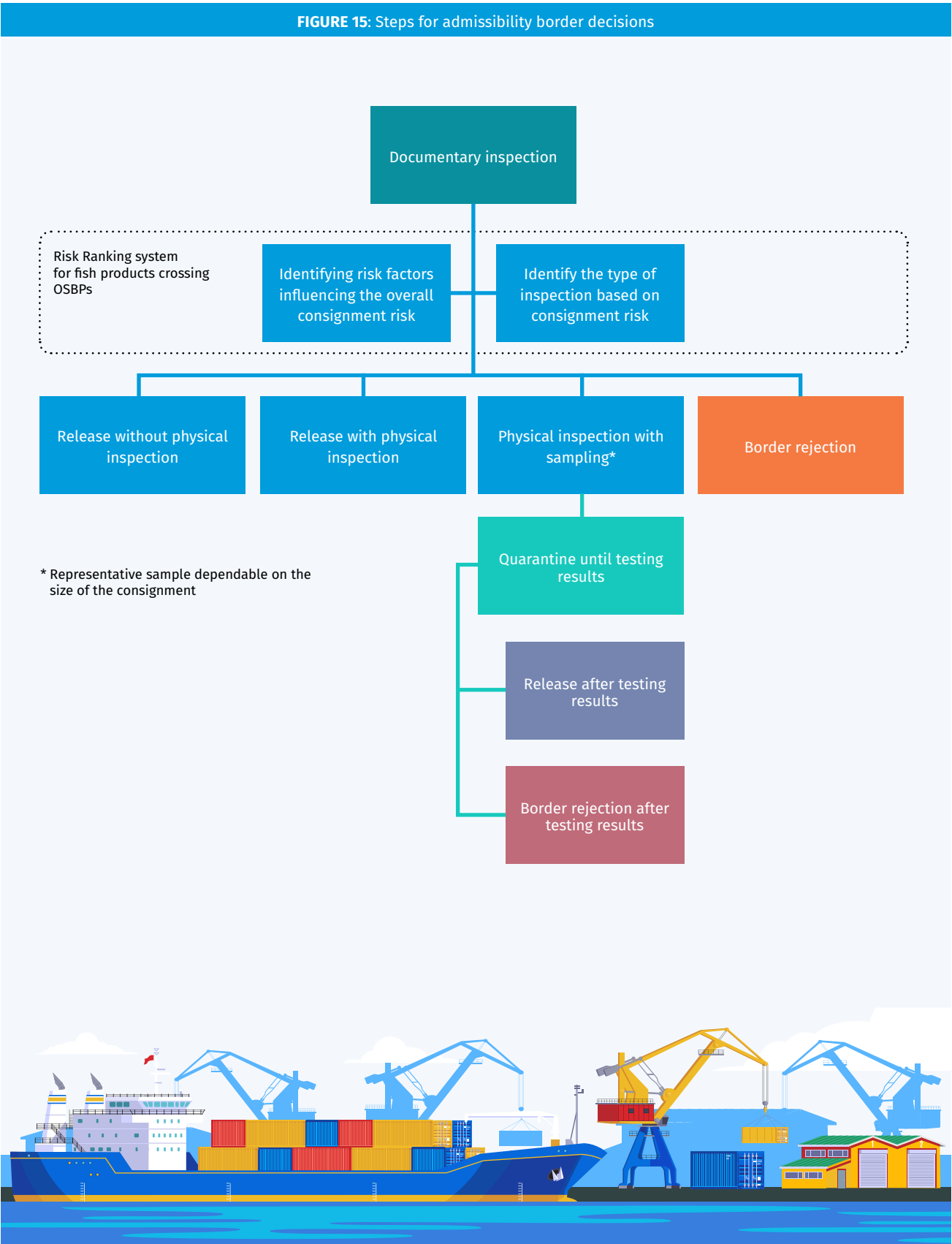
Goods inspected at an OSBP, which subsequently need to be held pending a laboratory diagnosis, will be required to stay in quarantine. In general, all expenses related to testing and withholding of cargo are the responsibility of the exporter.

#### 4 ADMISSIBILITY BORDER DECISIONS

As mentioned, risk levels must be assessed, and fish products should be categorized based on the assessment of their inherent food safety risk. Further work must be done to include the other factors in a form of risk algorithm to help border authorities to identify and prioritize high-risk consignments, thus reducing the need for exhaustive checks on low-risk cases and improving the efficiency of operations.

Once the verification processes are complete - i.e. documentary inspection and physical inspection as deemed necessary - a decision is to be made on whether to admit or deny entry of the blue food products.







# 9

## Post Border

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The main purpose of post-border checks should be to ensure after importation that imported goods are compliant with national regulatory standards, to prevent fraudulent activities.





Post-border checks must be part of the monitoring and control program for in-country imported products. The main purpose should be to ensure after importation that imported goods are compliant with national regulatory standards, to prevent fraudulent

activities (undervaluation or misdeclaration of goods) and monitor the quality and safety of imported products at the market level preventing unsafe products from reaching consumers.



Post-border checks can include:

- ▶ Checks in the domestic market (such as retail outlets, warehouses, distribution points).
- ▶ Sampling and testing of imported goods (as part of an annual monitoring plan).
- ▶ Random /unannounced inspections on importers or manufacturers to ensure that the entire supply chain is compliant.
- ▶ Supplier audit (for major supplying countries, the Competent Authority may send a team of inspectors to assess the conditions leading to the acceptance of a list of approved suppliers).
- ▶ Inspections based on product recalls.
- ▶ Supply chain traceability checks.

The main challenge of implementing post-border checks is that they rely on limited resources in relation to supply chains, with fishery products often passing through multiple intermediaries before reaching consumers. These challenges can potentially be mitigated by improving data collection and traceability, data sharing between importing and exporting countries and risk based targeted inspections.



# 10

## Impact on, and Inclusion of, Vulnerable Groups

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Small Small scale and informal cross-border trade play vital roles in the fisheries sector across Southern Africa, providing livelihoods to millions, including women, youth, and marginalized communities.





Small Small scale (SSCBT) and informal cross-border trade (ICBT) play vital roles in the fisheries sector across Southern Africa, providing livelihoods to millions, including women, youth, and marginalized communities. The AfCFTA offers a unique opportunity to enhance trade and investment while improving the inclusion of vulnerable groups involved in informal trade and small-scale fisheries. Considering that SSCBT and ICBT are daily occurrences between neighbouring African countries, any strategic approach to improving regional trade must not overlook their potential to transform trade. While tariff reduction and simplified trade regimes (STR) have been put in place to lower the incentive for informal cross border trade, there is a need for more targeted and inclusive actions that address the specific challenges faced by these vulnerable groups. Notably, at continental level, women make up 59% of the workforce in fish processing, underscoring their critical role in sustaining local economies.<sup>17</sup>

Informal trade, particularly in fisheries, is often the sole livelihood option for marginalized communities, especially women and youth. However, this trade is largely unregulated, limiting growth opportunities and exposing traders to risks such as exploitation, market instability, and food safety concerns. The lack of access to formal markets forces traders to operate at a disadvantage, often unable to secure fair prices or long-term supply chains.

Women face unique barriers, including limited access to business financing, gender-based discrimination in market systems, and underrepresentation in decision-making processes related to trade policies. Youth, on the other hand, often lack the skills and resources needed to scale their businesses or engage with formal trade channels. Both groups are also vulnerable to climate change, which disproportionately affects small-scale fishers due to their limited capacity to adapt to shifting fish stocks or extreme weather events.

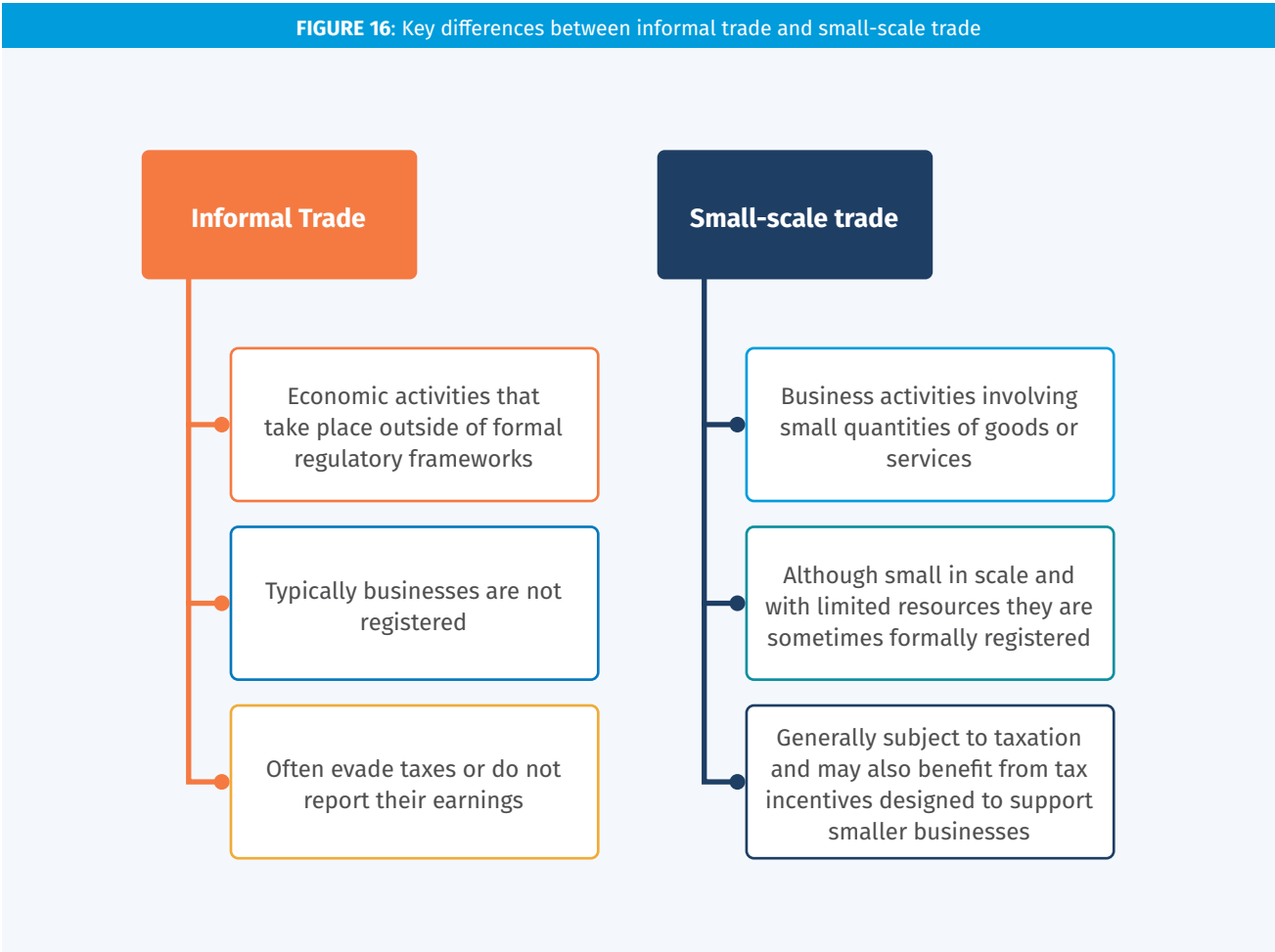
The AfCFTA offers an opportunity to address these challenges by reducing tariffs and non-tariff barriers, improving market access for small-scale fishers and informal traders, and facilitating greater integration into formal regional and international trade networks. However, there remain significant barriers to formalizing informal trade, particularly in fisheries. Issues such as inadequate infrastructure, inconsistent policies, and inefficient border procedures complicate compliance with regulations, especially without streamlined systems for export certifications and health measures. For women and youth traders, these barriers are often exacerbated by a lack of resources and information to navigate complex regulatory environments.

The AfCFTA’s focus on inclusive trade, particularly for women and youth,<sup>18</sup> can reduce the incentives for ICBT through the reduction of NTBs, where SPS and TBT measures are often seen as significant burdens for operators.

Informal trade and small-scale trade, women and youth

Trade in fishery and aquaculture products in the southern African region remains largely dominated by informal and small-scale traders where women and youth play a major

role. While small-scale trade often shares characteristics with informal trade, some key differences are identified in figure 16.



Numerous micro- and small businesses which are currently not legally registered, and which rely on market price and availability to sustain their business, are those which handle and trade much of the food consumed by local and regional communities. Additionally, consumers are mostly focused on price and have limited knowledge or ability to pay higher prices to protect themselves from unsafe food.

Simplified trade regimes (STR)<sup>19</sup> have been implemented in several Regional Economic Communities (RECs), however SADC does not yet have a STR in place that covers fishery products. Furthermore, the STR does not exempt the trader from compliance with other obligations and requirements at the border. Compliance with measures to ensure food safety, and the procedures in place to check compliance, inevitably result in costs.

17) <https://www.undp.org/africa/blog/what-fishery-industry-can-teach-us-about-afcftas-implementation-regional-blue-economy-value-chains>  
18) AfCFTA defines youth as people between the ages of 15 and 35.

19) Some examples include COMESA Simplified Trade Regime and EAC Simplified STR.



Assumed externalities such as better-informed traders and reduction in tariffs have proven insufficient to combat informal trade, therefore posing significant challenges both for food safety and as a result to simplifying, formalizing and legitimizing cross-border trade through OSBPs.

Specific challenges are associated with gender equality and the integration of youth in formal trade policies. Part of the challenge comes from the unregulated and often hidden nature of informal trade which creates a shortage of border-by-border information. Information gaps persist due to insufficient data collection at borders regarding the behaviours of the informal fish traders,

the experiences between small traders and border agents (which can vary by the type of products traded and the border post), and a lack of information about how adaptive approaches can capture the dynamics around ICBT. Furthermore, informal trade corridors do not currently assess the transaction costs and benefits of small-scale fish trade, instead perceiving it merely as lost revenue. Better-targeted data on informal cross-border trade can support more informed and appropriate policy decisions in order to help the informal sector to transition into the formal economy, thus sustaining dedicated regional approaches which can impact on job creation, inclusivity and development of micro, small and medium-sized enterprises (MSMEs).

### Recommendations for action

To support the formalization of fishers, it is crucial to leverage business development structures and cooperatives as key players in raising awareness and providing support and opportunities for economies of scale at the community level. By strengthening fishery associations, cooperatives and establishing business development units within them, fishers can receive training on business registration, financial literacy, and compliance with regulations sustainably. Moreover, cooperatives can reduce operational costs of small traders and increase collective bargaining power, making them more competitive in formal markets. Cooperatives can also serve as hubs for educational programs, helping fishers understand the benefits of formalization, such as

access to formal markets and government support. Peer-led awareness campaigns, where successful formally-registered fishers mentor others, can further encourage the transition to the formal economy. Strengthening linkages between cooperatives and government agencies ensures fishers receive the necessary guidance, while incentives for cooperatives that actively support formalization can boost their engagement. This holistic approach can empower fishers to formalize their operations, improving livelihoods, food safety, and regional trade integration.



As part of this strategic guide, **the following actions are recommended in the short-to-mid term:**

- Conduct gender-sensitive, census-style surveys/data collection for informal and small-scale trade, focused on blue trade corridors in the SADC region (which must include tracking of informal trade routes). The data should be disaggregated by gender and age to better capture the dynamics of informal trade and its impact on vulnerable groups. This information should complement the existing data collected via Zambia's Small Scale Cross Border Trade Survey, 2019-2021;<sup>20</sup>
- Capture real-time data (e.g. spot checks) on informal trading behaviours (patterns, prices and practices) through spot checks to help understand the informal fisheries trade dynamics and inform better policymaking;
- Support Business Development Institutions (BDIs) in providing training, awareness, and mentorship to help fishers transition to the formal economy, ensuring access to markets, financial services, and regulatory compliance;
- Design targeted training programs focusing on business development, financial literacy, and compliance with trade regulations specifically for women and youth involved in fisheries. These programs should build their capacity to engage with formal trade systems and comply with necessary regulations;
- Arrange for focused group discussions with groups of informal traders on each border to gain insights (experiences, challenges, decision making and barriers to formalization);
- Pilot a STR in the SADC region that specifically includes fishery products and conduct awareness campaigns and training on the STR's provisions to ensure its effective uptake.
- Collect border post records of small-scale imports and exports;
- Empower Cross-Border Traders' Associations, BDIs and fishery cooperatives by providing them with the tools and resources to support women and youth in accessing markets, finance, and business development opportunities;
- Collect specific information to support the design, and pilot the implementation, of simplified export health certificates at selected border areas and reinforce capacity building for border management authorities to ensure that small-scale traders are supported through efficient and transparent procedures;
- Promote the adoption of (offline) digital technologies to streamline pre-border clearance and border management, reducing the time and cost involved in trade transactions.

20) (2022) Zambia Statistics Agency, Zambia's Small Scale Cross Border Trade Survey, 2019-2021



# 11

## Roadmap for Compliance

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The proposed procedures within this document should build on complementary interventions focused on designing appropriate models, infrastructure requirements and legal frameworks, as Member States implement trade strategies.





Specific tactics proposed to implement the regional strategic guide objectives

This document has outlined a strategic approach to conformity assessment steps for fishery products so as to improve trade between Member States with operational OSBPs. The focus has been on removing the burden of procedures undertaken at borders using the application of pre-border strategies to comply with SPS requirements applicable to fish products for human consumption. This document should be seen as relevant to bridge the gap between the vision and execution of existing high-level strategies, a “how-to” framework, showcasing step-by-step guidance and practical insights into the necessary procedures related to inspection, testing and certification for trading safe fisheries products through formal OSBP channels. The information can be used by a range of stakeholders, including inspection officials, border agencies, and laboratory officials, as well as private sector fish traders.

The proposed procedures within this document should build on complementary interventions focused on designing appropriate models, infrastructure requirements and legal frameworks, as Member States implement trade strategies. It should also be noted that implementing a full regional strategy (which goes beyond SPS and TBT measures) better to trade fishery products through OSBPs is a complex multilateral process and will require a combination of specific tactics aligned with the goals set out in this document, as well as the priorities of other relevant OSBP strategies being developed in the SADC region

The expected end results to be achieved through the use of this guidance document will depend on the development and integration of broader interventions and cross-cutting agreements by bilateral governments. Below are some suggested next steps which will allow SADC Member States to improve compliance throughout the value chain and maximize the trade benefits of blue trade corridors of the region:

- 1
- Conduct SWOT analysis per Member State and border post, to define specific and measurable goals and assess available resources to determine feasibility and priorities for investment. This should include a maturity/readiness assessment of each of the OSBPs in that Member State.
- 2
- Development of SADC One Stop Border Post Act and SADC to support Member States in order to establish bilateral arrangements necessary for the purposes of implementing Act provisions.
- 3
- Development of SADC OSBP regulations.
- 4
- Development of Baseline bilateral agreements which will ensure that Member States overcome the main challenges, including:

▪ Undertaking an impact assessment to understand the implications of the agreement;

▪ Ensuring that agreements lead to developing complementarities which favour economies of scale and strengthening productive capacities, leading to enhanced intra-regional trade opportunities and development gains from trade;

▪ Ensuring coherence between negotiations of different agreements, including the interface with multilateral rules.
- 5
- Designation/clarification of mandates and establishment of competent authorities to perform official controls of fishery products.

▪ Harmonization of official control procedures based on the SADC Manual for inspection (under development).

▪ Considering the concept of a Pre-Certification Scheme for countries with more than one nominated CA.

- 6
- Publication and communication among SADC Member States of the list of approved establishments for export.
- 7
- Development of SADC code of practice providing advice and best practice guidance on how operators are to ensure that they have suitable procedures in place in order to guarantee compliance when exporting their products.
- 8
- Harmonization of risk profiling (inherent food safety risk) in relation to products and origin (Risk Ranking System for fish products crossing OSBPs).
- 9
- Creation of a SADC OSBP clearance model (operating and legislative) to be agreed upon and adopted by neighbouring countries.
- 10
- In close coordination with Member States, development of an implementation model to ensure sustainability of ICT systems as a crucial part of the process of overcoming the obstacles to trading through OSBPs.
- 11
- Explore the potential for digitization of SPS certification system. An Electronic SPS Certificate (e-CERT) guide can be found [here](#).
- 12
- Member States to work towards the adoption of harmonized standards and technical regulations preferable also in the Pan-African context.
- 13
- Member States to work towards mutual recognition of conformity assessment services, specifically for such services to be accredited and for accreditation bodies to maintain mutual recognition agreements.
- 14
- Development of Inspection Manual of Procedures for OSBPs (Border Inspection SOPs).
- 15
- Development and implementation of a monitoring/evaluation system for assessing benefits of the OSBP improved approach.



# 12

## Summary and Key Take Aways

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To foster a more inclusive trade environment and empower vulnerable groups, strategic interventions and targeted actions are necessary across the value chain. These include reducing trade barriers, improving access to markets and resources, and strengthening the capacity of traders.





The fisheries sector plays a critical role in providing livelihoods in Southern Africa. Fish and fishery products are well positioned to meet the needs for high protein and affordable foods in the context of rising populations and growing regional demand for food products.

To foster a more inclusive trade environment and empower vulnerable groups, strategic interventions and targeted actions are necessary across the value chain.

These include reducing trade barriers, improving access to markets and resources, and strengthening the capacity of traders.

This foresight section can be used to guide future strategy design and investment prioritization. It complements broader African and SADC goals on trade, food security and industrial development.

### Summary of actionable insights to be undertaken



#### COMPETENT AUTHORITIES

- ▶ Align SPS and TBT measures, safety and quality controls at regional level and/or seek agreement on mutual recognition of equivalence of measures
- ▶ Harmonize and domesticate regional standards
- ▶ Simplify certification and inspection procedures with risk-based inspections and approval of production conditions as well as pre-clearance mechanisms.
- ▶ Encourage mutual recognition of procedures and official control actions between neighbouring countries
- ▶ Recognize the value of joint inspections and strengthen the role of RECs in policy coordination
- ▶ Ensure regular capacity building of inspectors and agents in charge of official controls, including evolution of regional hazards and risk
- ▶ Provide knowledge and useful resources to operators to ensure compliance with export requirements
- ▶ Promote the appropriate use of regionally recognized certified laboratories to ensure official control of product safety
- ▶ Use digital solutions like electronic certificates and data sharing platforms to ensure transparency, improved integrity of controls and cross border communication
- ▶ Define dedicated small trade corridors proportionate to SPS risks and establish simplified processes to encourage small scale and informal traders to scale up and meet market demands.
- ▶ Where feasible eliminate or reduce compulsory and /or arbitrary physical inspections for SPS and TBT compliance at border points
- ▶ Where physical inspections of products are foreseen, ensure appropriate facilities in place to maintain product integrity and safety
- ▶ Create independent oversight to tackle corruption
- ▶ Ensure operators are fully informed of up-to-date procedures and Competent Authority contacts, and have means to check validity of stamps and signatures.



#### BORDER PATROL AND CUSTOM OFFICERS

- ▶ Cooperate with Competent Authorities to develop SOPs, with the aim to strengthen effectiveness, consistency and transparency of checks (documentary, and physical) and to reduce delays
- ▶ Ensure border officers are informed on national and regional SPS and TBT requirements, procedures and the documentation required (Licenses, sanitary certificates RoO documentation etc) and can verify authenticity of stamps and signatures
- ▶ Apply risk-based sampling and inspection methods, as specified by the CAs, prioritizing risks based on hazards and frequency, and as far as possible minimizing mandatory inspection of perishable products.
- ▶ Recognize approved economic operators and implement the relevant streamlined procedures e.g. OSBPs
- ▶ Assist in the collection of data related to small scale and informal traders and support small scale traders to help the transition to formal trade
- ▶ Maintain records and embrace e-clearance systems and digital customs platforms to streamline procedures
- ▶ Collaborate with the CA officers to improve coordination with relevant agencies and reduce delays
- ▶ Undergo regular training in export requirements for fishery products, NTBs, gender sensitivity and customer service.



#### INDUSTRIAL PRODUCTION AND VALUE CHAIN ENTREPRENEURS

- ▶ Ensure businesses are licensed and operations comply with food safety standards and requirements as specified by the regulation
- ▶ Invest in proper infrastructure, equipment and human resources to meet export requirements
- ▶ Ensure that consignments destined for cross border trade meet the SPS and TBT standards required by the destination market, and that their origin is clearly identified in documentation and labelling
- ▶ Communicate relevant information to the Competent Authorities to ensure meaningful certification of compliance and cooperate with compliance checks (including sampling and testing)
- ▶ Maintain input, production and sales records and all required export documentation to ease compliance and allow for accurate and rapid follow up in case of product rejection or SPS incident
- ▶ Use digital tools where required and feasible to facilitate effective acquisition, storage and communication of data regarding consignments and compliance to Competent Authorities
- ▶ Stay informed on processes, customs, sanitary certification and relevant information to meet each target market demands
- ▶ Provide regular training to the workforce regarding obligations and compliance with SPS/TBT requirements.





### REGIONAL INTEGRATION AND TRADE FACILITATION SPECIALISTS

- ▶ Facilitate implementation of trade agreements such as AfCFTA on fishery goods with specific focus on SPS and other NTBs
- ▶ Support regional alignment of requirements, identify and reduce unnecessary procedures and documentation
- ▶ Invest in the development of digital platforms to standardize data collection and for real time sharing of trade documentation
- ▶ Facilitate regional platforms and centres of excellence to ensure joint capacity building activities, policy updates and regular consultations are held at regional level
- ▶ Assist in bilateral agreements specifically dedicated to OSBPs and inclusive of fishery products
- ▶ Promote simplified trade regimes and design inclusive trade policies that recognize and integrate women traders, artisanal fishers, and small processors.



### QUALITY INFRASTRUCTURE EXPERTS (WORKING IN METROLOGY, STANDARDS, TESTING, CERTIFICATION, AND ACCREDITATION)

- ▶ Promote adoption of international SPS standards (based on Codex Alimentarius, WOH and IPPC)
- ▶ Eliminate or reduce regulatory fragmentation by seeking the alignment of national standards and technical regulations with regional frameworks, or by recognition of equivalence
- ▶ Ensure collaboration with regional bodies to develop relevant regional standards for SPS requirements for fishery and aquaculture products and ensure the domestication of such documents at MS level
- ▶ Support strengthened intra-regional collaboration and coordination between QI services providers
- ▶ Ensure rational investment in capacity of national QI infrastructure and equipment tailored to ensure a comprehensive, effective and efficient provision of services, in line with demand for official and private sector requirements, including support to ISO/IEC 17025 accreditation.
- ▶ Support mutual recognition of conformity assessment results (test reports, inspection certificates) across borders
- ▶ Ensure a level playing field in regional markets for conformity assessment related services which are accessible to Competent Authorities and private sector operators
- ▶ Ensure that protocols applied for border controls are financially and economically viable for all parties, including Competent Authorities, border agencies and private sector operators, and account for associated investment and operational costs
- ▶ Collaborate with competent authorities and border agencies to integrate QI related information into inspection protocols
- ▶ Develop modular training services and capacity building packages tailored to ensure effective controls and account for risk, whilst reflecting the needs of sensitive groups (including cooperatives youth and women-led fishery and aquaculture business enterprises).



### KEY POLICY IMPLICATIONS

- ▶ Integrate regional blue economy value chains and fish trade, including small-scale and informal traders into boarder AfCFTA implementation frameworks, whilst maintaining safe trade carried by vulnerable groups
- ▶ Promote mutual recognition of sanitary and quality regulations, standards and certificates across Member States
- ▶ Fast track the development and implementation of African and Regional (REC) SPS and TBT regulations and standards for fishery and aquaculture products
- ▶ Promote development of networks between QI service providers (particularly accredited testing) and training services addressing SPS issues
- ▶ Support the development of intra-regional centres of excellence in specific testing methodologies, with a view to providing reference laboratory functions (method development and training)
- ▶ Where financially justified, modernize and equip OSBPs with facilities dedicated to perishable consignments such as fish (example, cold chain facilities and specific perishable inspection zones)
- ▶ Make provisions for a SADC Simplified Trade Regime (STR) for small fish traders, (including gender-sensitive specifications)
- ▶ Provide regular training to border management authorities on supporting small-scale traders, especially in navigating SPS and TBT requirements, and offer efficient, transparent procedures for export certification
- ▶ Include fish and aquaculture products and trade in industrialization plans and regional integration policies
- ▶ Create a regional observatory to collect trade data, establish a risk ranking system for OSBPs and track sanitary incidents
- ▶ Address informal trade challenges by collecting and analyzing data to better track and understand informal and small-scale trade patterns, and consider SSCBT and ICBT in policy design and implementation
- ▶ Strengthen business development institutions and cooperatives that can support the transition of small-scale fishers from informal to formal businesses, particularly for women and youth.
- ▶ Develop gender-sensitive trade policies that recognize and address the specific barriers women face in accessing markets, business financing, and decision-making processes.



Opportunities and horizon scanning

Achieving the desired trade liberalization impacts from the AfCFTA and SADC Free trade area is highly dependent on ensuring transparent, effective and efficient border controls.

Within the stage setting of emerging global challenges such as climate change, the constantly evolving export market demands, including more stringent social and

environmental requirements, and the need for stronger domestic SPS compliance, relevant stakeholders may wish to consider the following opportunities and considerations:

In light of these opportunities and emerging issues, it is clear that achieving the full potential of the fishery sector and the Blue Industries at large requires proactive collaboration among regional stakeholders, policy-makers, and industry players. Africa has a unique chance to drive economic growth, strengthen food security, preserve the environment and integrate regional economies more effectively. It is imperative that stakeholders, from governments to private sector actors, seize these opportunities and prioritize the investments

and reforms needed to overcome challenges. A concerted effort towards aligning trade policies, enhancing regulatory frameworks, and fostering innovation will be key to unlocking the full potential of the blue economy and ensuring that the benefits of trade liberalization are widely distributed.

OPPORTUNITIES	FURTHER CONSIDERATION SHOULD BE GIVEN TO SEVERAL EMERGING ISSUES
<ul style="list-style-type: none"><li>▪ Expanding regional and continental demand for fish and fish products, offering potential for scaling up intra-African trade</li><li>▪ Catalyzing the impact of the AfCFTA and SADC Free trade area to streamline trade liberalization and advance regional productive integration</li><li>▪ Promoting sustainable aquaculture development for increased production, diversification and trade of fish and fish products</li><li>▪ Facilitating the formalization of small scale and informal trade, with a focus on inclusive policies considering vulnerable groups</li><li>▪ Investing in the expansion of cold chain and logistics infrastructure, particularly in underserved border areas and transport corridors</li><li>▪ Increasing the value-addition of traded fish products with bioeconomy and circular economy innovations</li><li>▪ Promoting joint management and effective governance mechanisms to ensure regional integration, peace and sector sustainability</li><li>▪ Tapping into the momentum of blue economy initiatives, including increased interest on sustainable fishing practices</li><li>▪ Leveraging the dynamics and potential of small-scale and informal traders for economic integration and local development</li><li>▪ Expanding the use of digital solutions for traceability, e-certification, and trade facilitation</li><li>▪ Strengthening cross-sectoral linkages between fisheries, tourism, shipbuilding, ocean-based renewable energy, waste management, and transport, to create synergies that boost competitiveness, innovation, and environmental sustainability across the blue economy.</li></ul>	<ul style="list-style-type: none"><li>▪ Accelerating climate change and impacts in aquatic ecosystems and the resilience of coastal communities, affecting species availability and livelihoods</li><li>▪ Persistent threats to sustainable fisheries management such as IUU fishing, pollution and habitat degradation and destructive development</li><li>▪ Disparities and inconsistencies in sanitary regulations, quality standards and border procedures</li><li>▪ Logistical bottlenecks related to inadequate infrastructure and lengthy clearance times</li><li>▪ Geopolitical factors including the impact of trade disputes and agreements with external partners</li><li>▪ Gender inequality and youth exclusion in fisheries value chains and trade systems, requiring specific support mechanisms and empowerment programs</li><li>▪ Emerging requirements for environmental sustainability, fair labor practices, and due diligence in global fish markets, requiring enhanced compliance capacity at national and enterprise levels.</li></ul>







ANNEX I. RELEVANT AUTHORITIES FOR EXPORT SPS CERTIFICATES














TABLE A.1: Relevant authorities for export SPS certificates			
Country		Authority in charge of issuing export health certificates	Contact
Angola		Ministry of Fisheries and Marine Resources (Minpermar)	<b>Mr Antonio Honde</b> Chief of National directorate of Aquaculture Email: honsanto@yahoo.com.br
Botswana		<ul style="list-style-type: none"><li>Fishery division of the Ministry of Environment, wildlife and Tourism</li><li>The Botswana Bureau of Standards (BOBS)</li></ul>	<b>Ministry of Environment, Natural Resources Conservation and Tourism</b> Private Bag BO 199 Gaborone, Botswana Plot 13064 Government Enclave Tel: +267 3647900 / +267 391 4955 Fax: +267 3951092 Email: MENT_PR@gov.bw <b>BOBS</b> Plot No, 55745, Block 8, Mail Airport Road Gaborone, Botswana Tel: (+267) 390 3200 Fax: (+267) 390 3120 Email: enquiries@bobstandards.bw
Comoros		Fishery division of the Ministry of Agriculture, Fisheries and Environment	<b>Monsieur Ambadi Issouf Miradji</b> Head of Sustainable Development Department Office of the Directorate General of Environment B.P; Moroni Union Des Comores Email: ambadi_issouf@yahoo.fr Tel: +269 33380 69
Democratic Republic of the Congo		Ministry of Fisheries and Livestock	<b>Mrs. Pascaline MBANGU KIKUMBI</b> Secretary General at the Ministry of Fisheries and Livestock Tel: +243 9987 01322 Email: passymbangu@yahoo.fr
Madagascar		Malagasy Agency of Fisheries and Aquaculture/ Ministry of Fisheries and Blue Economy	<b>ANDRIANALINERA Mirantsaina</b> Email: mpeb.ampa@gmail.com
Malawi		Department of Animal Health and Livestock Development	<b>Dr Julius Chulu, Director</b> Department of Animal Health and Livestock Development Email: juliuschulu09@gmail.com

TABLE A.1: Relevant authorities for export SPS certificates			
Country		Authority in charge of issuing export health certificates	Contact
Mauritius		Ministry of Blue Economy, Marine resources, Fisheries and Shipping, Competent Authority Seafood	<b>Officer-in-Charge</b> Competent Authority Seafood Ministry of Blue Economy, Marine Resources ,Fisheries and Shipping 4th Floor, Trade and Marketing Centre Mer Rouge Tel: 2062812/15 / Fax: 2162293 Email: caseafood@govmu.org
Mozambique		Institute of fish Inspection, I.P.	<b>Director: Lúcia Sumbana</b> Rua do Bagamoyo nrº 143 Maputo, Mozambique +258 21 315 226 / 233 24116 Email: lucysantosmz@gmail.com
Namibia		NSI Inspection Centre	<b>Mr Abed Shiyukifeni</b> Manager: Inspection Centre +264 64-216650 email: ShiyukifeniA@nsi.com.na +264 811243998
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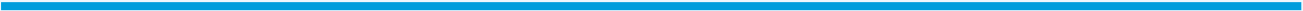


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