

Accelerating Seed Policy Harmonization: Key Challenges and Action Plan for COMESA

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Why Seed Policy Harmonization?

Growth in agricultural productivity in most African countries remains low despite many concerted efforts to improve food production and productivity. Whereas these efforts have yielded technologies that can potentially deal with the main causes of low productivity in agriculture (such as high incidences of pests and diseases, frequent drought and the use of traditional varieties), these technologies have not diffused fast to reach a critical mass of farmers. In a bid to accelerate technology transfer in Africa, Technologies for African Agricultural Transformation (TAAT), a programme of the African Development Bank seeks to facilitate mass deployment of proven high impact agricultural technologies in Africa, most of which are seed based. Many farmers in Africa face challenges in accessing quality seeds due to policy and market related constraints. Most critical are the lengthy procedures of variety testing, release and registration and barriers to variety movement as a result of country specific regulations. The movement of seeds across countries and regions in Africa is hindered by policies that focus on national boundaries rather than agro-ecological zones that spread across multiple countries. Full harmonization of seed policies will imply that a variety released in one country can be accessed by farmers in another country within a framework agreed mutually to utilize the data already available on the variety. This will avail more than 100 high quality varieties to over 5 Million farmers in the 21 Common Market for Eastern and Southern Africa (COMESA) member states.

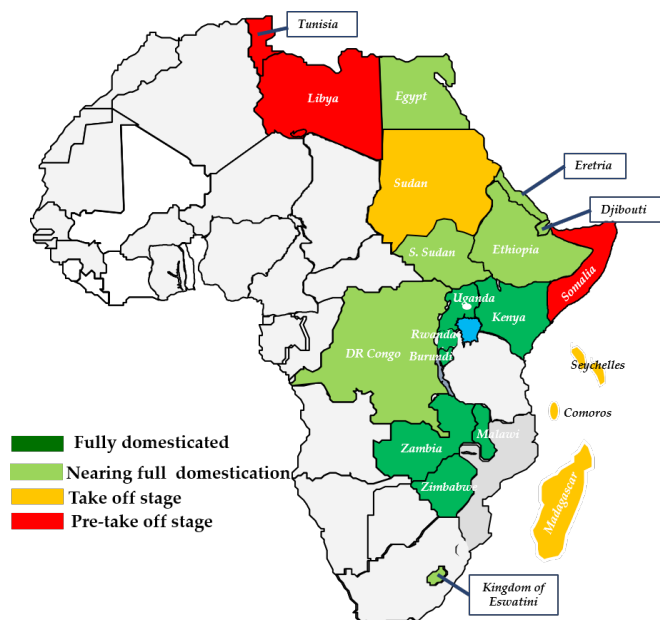
Genesis of Policy Harmonization in COMESA

The efforts towards harmonized seed policies in COMESA region started in March 2008, when the COMESA Council of Ministers declared that the region should urgently rationalize and harmonize seed regulations and policies in its 19 (then) member-states within two years, to improve seed availability

and flows, especially to smallholder farmers. With support from its specialized agency, the Alliance for Commodity Trade in Eastern and Southern Africa (ACTESA), and in conjunction with the African Seed Traders Association (AFSTA) and support from USAID, a COMESA Seed Programme initiative was created. The COMESA Seed Trade Harmonization Regulations were gazetted in 2014. These regulations established a strategic plan, the COMESA Seed Harmonization Implementation Plan (COMSHIP) to implement COMESA Seed Trade Harmonization Regulations leading to increased seed production, reliability, trade and competitiveness of the Seed industry in the COMESA region.

Current Status of COMSHIP Implementation

Since the inception of COMSHIP, member states have progressed well along the implementation path, albeit at different paces. The overall progress of the COMSHIP is presented in the map below. COMESA member states are in four stages of implementation: Full domestication, nearing full domestication, take off and pre-take off stages.



Challenges towards Implementation of the Harmonized Seed Regulation

While cognizant of the COMSHIP achievements and the ground covered so far, a meeting was organized jointly by the African Development Bank, African Agricultural Technology Foundation (AATF) which coordinates the TAAT Policy Enabler and COMESA-ACTESA. The meeting was attended by over 85 delegates representing public and private seed systems experts from 16 COMESA member states. Challenges along four COMSHIP areas were identified.

Seed Certification : Lack of harmonized technical guidelines for seed certification; Lack of Parental Descriptors in the COMESA seed catalogue; Inadequate staffing of Seed Inspectors and Analysts and Inadequate physical infrastructure.

Variety release systems: Limited awareness of COMSHIP by stakeholders involved in seed industry on variety release systems in member states; No clarity on registration of public bred varieties traded in more than one country and lack of unique coding system.

Phytosanitary and quarantine measures for seed import and export: Lack of information exchange mechanisms within COMESA; Lack of common legislative framework; Inadequate capacity of NPPO Officers and Inadequate physical infrastructural development.

Private sector participation in moving COMSHIP forward: Limited awareness of COMSHIP among stakeholders.; Regulatory constraints /barriers to entry for foreign seed investors ; Unavailability of and lack of clear system for access to COMESA labels & Certificates and Multiple compliance costs (Variety release costs and COMESA catalogue fee.

Costed Action Plan to address the challenges

Action	Priority Countries	Cost Estimate (USD)	Time Frame
Training of seed inspectors and analysts	Comoros, Eritrea, Mauritius, Somalia, Tunisia, Libya, Seysch.	150,000	2019-2020
Acquisition of state of the art laboratory and field equipment for seed testing	21 COMESA member states	3,150,000	2019
Construction and Upgrading of laboratories	21 COMESA member states	6,300,000	2020
Development of manuals / guidelines complying with COMESA, OECD and ISTA	21 COMESA member states	210,000	2019
Provide a provision for descriptors in the COMESA seed catalogue	21 COMESA member states	105,000	2019
Pilot the implementation of the HSRS system in countries fully aligned	BU, KE, MAL, RW, ZM, ZIM, UG	None	2019
Fast track alignment of regulations of member countries lagging behind to COMESA seed regulations	SOM, Tun, Lib, Com, Ert, Mrt, Sey, Djbt, Mdg	1,080,000	2019-2021
Awareness creation forums targeting all key stakeholders in the provincial and districts	21 COMESA member states	500,000	2019
Develop and adopt procedures for registration (unique coding system) using Variety Identification Number (VIN)	21 COMESA member states	180,000	2019
Establish reporting obligation using existing platforms (e.g.IPPC)	21 COMESA member states	None	2021
Development of SI that leads to harmonization with COMSHIP and adaptation of ISPM No. 38 on international movement of seeds	21 COMESA member states	None	2020
Training in PRA, E-Phyto, Inspection, Surveillance and Pest diagnostic, Taxonomy and pest list updates	21 COMESA member states	300,000	2019
Acquisition of post quarantine and laboratory equipment for plant health inspectors at border points, development of e-phytos, adoption of an alert system for emerging pests	Djibouti, DR Congo, Egypt, Ethiopia, Mauritius and the Kingdom of Eswatini	1,050,000	2020-2021
Awareness creation forums among policy makers and private sector	21 COMESA member states	450,000	2019
Lobby for elimination of entry barriers to seed businesses in the relevant COMESA member states.	21 COMESA member states	None	2019-2020
Strengthen the system for production and distribution of COMESA seed labels and Certificates.	21 COMESA member states	None	2019
Review and harmonize variety release costs in the COMESA Member States	21 COMESA member states	None	2019-2020
Review cost of variety release in the COMESA catalogue	21 COMESA member states	None	2020