

Proceedings of the
**HIGH LEVEL CONSULTATIVE WORKSHOP
ON THE STATUS OF THE COMESA SEED
POLICY IMPLEMENTATION PLAN**

Crowne Plaza Hotel
Nairobi, Kenya
13-14 December 2018



Daniel Kyalo Willy, Francis Nang'ayo, Edith Kouko and John Mukuka



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Executive Summary

Access to quality seeds and inputs is a critical determinant of agricultural productivity. However, many farmers in the Common Market for East and Southern Africa (COMESA) region face myriad policy and market related challenges in accessing quality seeds. One of these difficulties is lengthy procedures of variety release, testing and registration which hamper the efforts of deployment of technologies that can potentially solve farmers' production obstacles. As a remedy to this challenge, the Alliance for Commodity Trade in East and Southern Africa (ACTESA) initiated a process towards the harmonisation of seed policies in the COMESA region. The strategy – the COMESA Seed Policy Harmonisation Implementation Plan (COMSHIP) – aimed at shifting the nationalistic seed regulations to regionally harmonised regulations. Since the inception of COMSHIP in 2014, the process of implementing harmonised regulations has been steady but domestication in all the member states is yet to be achieved. In 2018, the African Development Bank (AfDB) initiated the Technologies for African Agricultural Transformation (TAAT) programme which placed Africa on an ambitious path towards increased agricultural productivity through the deployment of proven high impact agricultural technologies. The TAAT programme is in the process of deploying several technologies through nine value chains. The success of such an ambitious plan depends heavily on the policy and regulatory environment. It is against this background that the TAAT Policy Enabler Compact organised a high-level consultation workshop as a step towards fast-tracking COMSHIP implementation. The two-day workshop was attended by 85 delegates representing seed regulators (national plant

protection organisations (NPPOs), national seed authorities (NSAs) and private sector seed players from 16 COMESA Member States, representatives from CGIAR organisations, AGRA, the TAAT Programme and AfDB. The occasion was graced by the Principal Secretary in the State Department of Agricultural Research in the Ministry of Agriculture, Livestock, Fisheries and Irrigation, Republic of Kenya, Prof Hamadi Iddi Boga.

Participants were informed that since the inception of COMSHIP in 2014, the implementation path has been steady with member countries proceeding at different paces of implementation. So far, four stages of implementation are discernible. The first category comprises countries that have attained the full domestication by aligning their seed regulations and laws with the COMESA seed regulations and also listed their varieties in the COMESA catalogue. They include: Burundi, Kenya, Malawi, Rwanda, Uganda, Zambia and Zimbabwe. The next is a group of seven countries that are progressing steadily towards full domestication. These include Djibouti, DR Congo, Egypt, Ethiopia, Mauritius and the Kingdom of Eswatini (formerly Swaziland) and South Sudan and they are at an advanced stage of review and amendment of their seed laws to align with the COMESA seed regulations and laws. Another six countries (Comoros, Eritrea, Madagascar, Seychelles and Sudan) are at the take-off stage. These countries have launched COMSHIP and are still reviewing their national seed regulations to identify necessary reforms to align with the harmonized regulations. Finally, three countries (Libya, Tunisia and Somalia) have not yet launched COMSHIP.

The key challenges that have contributed to slow pace of COMSHIP implementation were identified as follows:

Seed Certification

Lack of harmonised 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 and certificates and multiple compliance costs (variety release costs) and COMESA catalogue fee.

To address the identified challenges, delegates came up with action plans consisting of prioritisation of actions to address these challenges, priority countries where the actions should be performed, timeframes on when these actions should be implemented, and a tentative budget required for the implementation of the priority actions. Once implemented, it is estimated that the list of varieties in the COMESA catalogue will grow from the current 57 to over 100. This will facilitate access to quality seeds by over 5 million farmers in the COMESA region, leading to improved food productivity. The cost of implementation of the work plan is estimated at USD 16.6 million distributed across the four areas of COMSHIP implementation as follows: Seed certification – \$9.9 million; Variety release – \$4.9 million; phytosanitary and quarantine issues – \$1.4 million, and private sector support – \$0.45 million. Once adopted, these costed action plans will be a blueprint for targeted interventions regarding the next steps in fast tracking the process of COMSHIP.

Introduction

Conference background

The Technologies for African Agricultural Transformation (TAAT) Program is an initiative of the AfDB under the Feed Africa Strategy. TAAT aims at facilitating accelerated economic development and poverty reduction in Africa through increased uptake of proven high impact agricultural technologies along nine commodity value chains: maize, wheat, rice, high iron beans, cassava, orange fleshed sweet potatoes (OFSP), sorghum/millet, aquaculture and small ruminant livestock/poultry. The commodity compacts under TAAT are responsible for the identification and deployment of proven technologies. However, to facilitate smooth deployment of technologies, the commodity value chains need support in different spheres. This support is provided through six TAAT enabler compacts: **Policy, Water, Soil fertility, Capacity building, and Youth**. The TAAT Policy Enabler supports the value chains by facilitating the creation of an enabling environment for technology deployment through policy reform interventions that will hasten variety release and registration, spur market incentives for agricultural produce, and essentially promote regional policy harmonisation for delivery of technologies across similar agro-ecological zones. This will be achieved through four objectives of the TAAT policy enabler:

1. Creating a strong seed system for the Bank's RMCs through an evaluation and preparation of interventions that can be financed as part of TAAT country programs and dissemination to the seed industry;
2. Increasing access to, and availability of quality seeds through the accreditation of seeds, fertilisers, and agro-input suppliers;

3. Harmonisation of regional technology release and registration policies through the study of existing protocols and enactment of relevant policies and laws that improve cross-boundary movement of seeds and agricultural goods; and
4. Facilitating competitive value-added chains through an analysis of existing value chain studies and synthesis of policies, regulations and laws that create market incentives for better performing value chains.

Focusing on the third objective, the Policy Compact under TAAT recognises that the approach to scaling up technologies based on national boundaries needs to be replaced by an approach that involves agro-ecological zones that spread across multiple countries. The Bank, through TAAT, is currently working with Sub-Regional Organisations (SROs), Market Matters Inc (MMI) through The African Seed Access Index (TASAI), AATF, West and Central African Council for Agricultural Research and Development (CORAF) and International Institute for Tropical Agriculture (IITA) to review national and regional policies on variety release, registration, and the seed system with an aim of supporting implementation of harmonisation practices to fast track the release of improved technologies across similar agro-ecological zones. This is expected to help open up the regional seed industry and markets, consequently leading to faster uptake of production-enhancing technologies. For effective implementation of seed harmonisation, the TAAT Policy Enabler seeks to address seed policy harmonisation at the regional level through the existing regional economic communities (RECs): COMESA, Economic Community of West African States (ECOWAS),

Southern African Development Community (SADC) and East African Community (EAC). The compact started by identifying on-going efforts towards the harmonisation of seed policies within the target blocks, with an initial focus on COMESA.

In March 2008, the COMESA Council of Ministers declared that COMESA should urgently rationalise and harmonise seed regulations and policies in its 19 (then) member-states within two years to improve seed availability and flows, especially to benefit smallholder farmers. COMESA, with support from its Specialised Agency, ACTESA, and in conjunction with the African Seed Trade Association (AFSTA), led the baseline analysis development, stakeholder engagement, review, and finalisation of the COMESA Seed Trade Harmonisation Regulations. A COMESA Seed Programme initiative was created in response to the COMESA Ministers of Agriculture directive in Seychelles in 2008 for COMESA to have regionally harmonised seed trade regulations. In the period between 2010 and 2014, the Seed Trade Harmonisation Regulations were gazetted at COMESA level after approval by the COMESA Council of Ministers in Kinshasa, DR Congo on 24 February 2014. Along with this was the adoption of a strategic plan of action, the COMESA Seed Harmonisation Implementation Plan (COMSHIP). The overall goal of COMSHIP is to implement COMESA Seed Trade Harmonisation Regulations leading to increased seed production, trade and competitiveness of the Seed Industry in the COMESA region.

Conference objectives

While recognising that important milestones have been achieved towards harmonisation of seed policy in the COMESA region through COMSHIP, the high-level consultation workshop held on 14 December 2018 in Nairobi, Kenya aimed at convening delegates from COMESA member countries to:

- a) Review the current progress on the process of harmonisation of seed policies in the COMESA region.
- b) Identify any policy and operational related challenges towards full implementation of the COMSHIP.
- c) Set an action plan towards completing the remaining milestones towards the realisation of the aspirations of COMSHIP.

Structure of the conference

The workshop was opened with remarks from Dr John Mukuka (acting CEO ACTESA), Dr Francis Nang'ayo (representing the AATF Executive Director) and Ms Nnenna Nwabufo (Deputy Director General, AfDB East Africa). Prof. Hamadi Iddi Boga, representing the host country, Kenya, then delivered a key note speech. The official opening of the workshop was followed by high level presentations to give a background on the importance and current state of seed policy harmonisation in the COMESA region in order to bring some perspectives from COMESA, AATF, AfDB and other organisations that have been working on the seed systems within the region.

This was followed by country updates on the status of COMSHIP in the COMESA member states. These updates were structured along three focal areas of COMSHIP: COMESA seed certification system, COMESA variety release system and COMESA phytosanitary and quarantine measures for seed import and export. The country updates included a summary of country specific gaps, notably the operational and financial constraints that have been limiting the implementation of COMSHIP.

Finally, an action plan was developed through group discussions and later ratified in a plenary session. The action plan consisted of action areas that the TAAT Policy Enabler and the AfDB will follow up towards the full implementation of COMSHIP.



The Importance of Harmonisation of Seed Policies and Regulations: Highlights from the Opening Session

The High-Level Consultation Workshop towards Implementation of Harmonised Seed Regulations in COMESA Region opened on a high note with a call by all keynote speakers for urgency regarding implementation of harmonised regulations and protocols for hastened variety release and registration. The workshop was attended by 90 participants mainly delegates from 16 COMESA Member States representing National Seed Services (NSS), National Plant Protection Organizations (NPPOs), the National Seed Trade Associations (NSTA), African Seed Traders Association (AFSTA), Private seed companies and development partners. The opening session was graced by high-level representation from the host country Kenya, AfDB, the TAAT clearing house, AATF and the COMESA Secretariat. The event was widely covered by 10 media houses.

Right from the outset, it was noted that regional harmonisation is expected to positively impact agricultural productivity and production and thus ensure that the noble quest for Africa to feed itself is not hampered by slow adoption of improved technologies, especially improved seeds and good agricultural practices. Indeed, nothing captured the significance of harmonisation more than the words by Madam Nnenna Nwabufo, DDG AfDB East Africa. She said: 'Just imagine that it takes an average of two years to release a maize variety in one country. And this variety has to go through similar variety release process in other countries. It will take us at least 20 years to reach the tenth country. Africa cannot wait that long, and we pray that this meeting will help address this important issue.'

In his opening remarks Dr Dennis Kyetere, AATF Executive Director, affirmed the organisation's commitment to work with partners towards supporting African farmers to achieve prosperity through technology. Through the years, AATF has worked tirelessly towards deploying agricultural technologies in Africa impacting millions of farmers.

However, some challenges still exist owing to inefficient seed systems and lengthy procedures for variety release, testing and registration. He noted that seed systems on the African continent are still relatively inefficient and the movement of plant varieties across regions has generally been hampered by policy and operational bottlenecks. Therefore, regulatory systems for seed in Africa need to transform from nationalistic regulations to a more harmonised approach across the regions through initiatives such as the COMSHIP.

Towards this end, he reiterated the need for creating an enabling policy environment for speedy movement of seed-based technologies. He noted that the TAAT initiative, which AATF was proudly involved in, is a noble idea that may fast track the dream for widespread deployment of technologies. In relation to the challenges indicated above, COMESA updated the meeting on the winding road it had taken towards developing regionally harmonised seed regulations. Dr John Mukuka, the acting CEO, ACTESA, indicated that COMSHIP was an idea mooted in 2008 during the COMESA Ministers of Agriculture meeting in Seychelles.

The Ministers directed the COMESA Secretariat to expedite the harmonisation of seed trade regulations and standards to facilitate regional trade in the seed sector. Thereafter, the draft COMESA Seed Trade Harmonisation Regulations were endorsed by the COMESA Ministers of Agriculture in September 2013. The final endorsement of COMESA Seed Trade Harmonisation Regulations by the COMESA Council of Ministers and the Regulations were gazette in May 2014.

To crown it all, the Chief Guest, Prof Hamadi Iddi Boga, Kenya's Principal Secretary for Agriculture, called for commitments African Governments to the Comprehensive African Agriculture Development Programme (CAADP). He however pointed out that Kenya oscillated

on and off track from time to time, linking this trend to insufficient critical data for peer review process. Citing the case of maize price dynamics in Kenya, the Principal Secretary called for the need for an integrated approach that would adequately parameterise issues such as cost of seed, inputs and market trends in determination of commodity prices. He expressed the need for creating a political environment that favours agribusiness through creating efficient markets for seeds and other agro-inputs.

Finally, he noted that the **'Food security gap is actually a knowledge gap'** and there was need for timely generation of information to guide decision making to ensure that the African farmer is not handicapped by lack of knowledge.

Taking Stock of Agricultural Development and Technology Deployment in Africa

The session after the official opening was dedicated to presentations that set the stage by giving highlights on the current status of affairs in African agriculture and the state of harmonisation of policies in the COMESA region. Opening the session, Dr Jonas Chianu, the Chief Agricultural Economist at the AfDB, reiterated the importance of addressing the unfulfilled agricultural potential in Africa. He mentioned that despite the great potential that agriculture offers in the process of development, Africa remains a net food importer and that the agribusiness potential has not been fully exploited. To achieve the critical goal of feeding Africa, Africa must close the yield gap and transform its agricultural sector into a wealth creating agribusiness sector.

Towards this end, he indicated that through the Feed Africa initiative AfDB seeks to work towards transformation of African agriculture into a competitive and inclusive agribusiness sector that creates wealth, improves lives, and secures the environment. It is in line with this vision that the Bank's TAAT programme was initiated. The TAAT programme seeks to leverage the existing Regional Technology Delivery Infrastructure (RTDI) to get best bet technologies for priority commodities into the hands of millions of farmers in 31 Regional Member Countries (RMC). The three objectives of TAAT are:

1. To raise agricultural production and productivity through deployment of appropriate technologies.
2. To facilitate effective delivery of technologies to RMCs' farmers at scale, working with existing R&D centers in a new platform, the RTDI.

3. Create enabling environment for technology adoption through policies for deployment and adoption of technologies in a regionally harmonised manner.

This was followed by a presentation by Dr Mpoko Bokanga, the Head, TAAT Clearing House, who presented on the structure of the TAAT Programme. TAAT is structured into two technology delivery thrusts, composed of nine value chain compacts (Maize, Beans, Sweet Potatoes, Cassava, Rice, Wheat, Sorghum/Millet, Aquaculture and Livestock) and six enabler compacts (Policy, Fall Armyworm, Youth, Capacity Development, Soil fertility Management and Water). All these aim at enhancing agricultural production and productivity through deployment and accelerated uptake of proven agricultural technologies with an objective of reaching about 18 million farmers directly through the commodity compacts and another 59 million directly and indirectly through the enabler compacts. These efforts are expected to increase food production in Africa by 120 million metric tons by 2025.

Narrowing on TAAT compacts, there were two presentations to highlight what the compacts were aiming at achieving across the continent. The TAAT Maize Compact leader, Dr Gospel Omanyia, started by highlighting that TAAT Maize was focused on increasing the uptake of high yielding climate smart maize varieties, strengthening linkages across the maize value chain, particularly linking farmers to agricultural credit service providers and commodity off-takers.

Towards this end, the Maize Compact applies an innovative private sector-led approach that integrates the deployment of elite and climate smart maize varieties with that of appropriate fertiliser blends, efficient weed management practices, post-harvest management and supportive marketing. Finally, he highlighted policy issues that may inhibit the deployment of TAAT maize technologies touching on agricultural financing policies, tariff barriers in the seed industry and policies to limit government controls in the input sector.

The TAAT Policy Enabler lead, Dr Francis Nang'ayo, picked from that point to showcase the approach that the compact is taking to facilitate the creation of an enabling policy environment in support of the commodity compacts. Given the critical importance of policy in the process of technology deployment, the TAAT Policy Compact has endeavoured to engage all the relevant stakeholders in the policy realm to ensure that all the policy related bottlenecks that could hinder technology deployment are eliminated.

The Compact focuses on four strategic areas namely: Creating an efficient seed system in Africa; accreditation of agro-dealers in Africa; creation of efficient commodity value chains in Africa and harmonisation of seed and commodity trade policies in regions across Africa. This workshop was one of the critical milestones in achieving the last strategic objective. It was expected that at the end of the workshop, a road map to fast track the implementation of policy harmonisation initiatives on the continent would be developed while taking into account the lessons learned from previous policy interventions.

The session was concluded with presentations to give the private sector and CGIAR perspectives on seed delivery. Kate Fleming, the Project Manager DTMASS at the International Maize and Wheat Improvement Center (CIMMYT), presented on the current status of digital tools for regional seed harmonisation as adopted by the CGIAR, particularly the Seed Assure, a digital seed map that offers advantages over the traditional seed road maps. However, to make the best of the digital road maps, certain aspects need to be addressed such as develop and adopt a unique identification for varieties, such as the Variety Identification Number System used by CIMMYT. While noting that varied national seed laws and regulations restrict seed movement by seed companies across borders in the COMESA region, Dr Grace Gitu indicated that AFSTA had been working closely with COMESA to achieve the COMSHIP goals. Although COMSHIP had taken off successfully in most countries, she indicated that the process of implementation of COMSHIP was slowed by impediments such as varied national bureaucracies, inadequate stakeholders' awareness, backsliding by some member states and challenges associated with COMESA member state multiple memberships in other regional blocks such as SADC, EAC and ECOWAS. The process can be fast tracked through benchmarking from other regions and by also addressing the private sector interests beside intensive awareness creation.

Some of the private sector interests were captured by the presentation by Dr Essam from Egypt that included simplification of procedures for product registration and testing procedures across countries. Luckily, all these are captured within the spirit of seed policy harmonisation under COMSHIP.

Current Status of COMSHIP Implementation

Overall status of COMSHIP at country level

After the launch of COMSHIP in 2014, member-states were tasked with the responsibility of domesticating the plan, instituting legislative and regulatory changes required to align with the COMESA Seed Trade Harmonisation Regulations, and monitoring and enforcement of implementation with technical support from ACTESA. In this process the Member States are usually represented by the National Seed Authorities (NSAs) involved in seed certification and variety release and the National Plant Protection Organisations (NPPOs) involved in phytosanitary/quarantine measures of seed import and export. The process of domestication of COMSHIP involves some critical steps including but not limited to: launching of COMSHIP at country level; reviewing seed laws and regulations to align with the COMESA seed regulations, provide physical and human resources for smooth implementation of COMSHIP; and consistently monitoring the implementation process.

Since the inception of COMSHIP, member states have progressed along the implementation path, albeit at different paces. The overall progress of the COMSHIP is presented in Table 1, where countries have been placed into four categories depending on their current status of COMSHIP implementation. A more comprehensive progress at country level is presented in Appendix 1.

Category A countries: full domestication stage

The seven countries (33%) in this category are Burundi, Kenya, Malawi, Rwanda, Uganda,

Zambia and Zimbabwe. Each of these countries has already gazetted COMSHIP, implying that the Seed Certification System, Variety Release System, and Phytosanitary and Quarantine Measures for Seed Import and Export have been aligned with COMESA Regulations.

Further, these countries reported they have achieved reasonable milestones towards the establishment of all the necessary institutional structures to support the full domestication and implementation of COMSHIP. The countries have already listed some varieties in the COMESA catalogue and some are even trading with member states.

Category B countries: tending towards full domestication stage

The six countries (28%) in this category include Djibouti, DR Congo, Egypt, Ethiopia, Mauritius and the Kingdom of Eswatini. They have made substantial initial progress towards implementation of COMSHIP beyond launching. Most of them have developed draft amendments to regulations which are either completed pending final steps or are undergoing legislative procedures before being gazetted. These countries have also started establishment of the necessary institutional structures such as the Variety Release Committees and the provided staffing for necessary Certification and Phytosanitary organs.

Category C countries: take-off stage

Another six countries (28%) are in this category: Comoros, Eritrea, Madagascar, Seychelles, Sudan and South Sudan. These countries have already launched the COMSHIP but are in the process of drafting regulations.

Category D countries: pre/take off stage

There are three countries (14%) in this last category: Libya, Somalia and Tunisia. These states have not started the process of COMSHIP implementation. The delay in these countries can be partly explained by the fact that these are the latest entrants into COMESA.

Table 1: Status of overall COMSHIP implementation in COMESA member states

	Country	Overall COMSHIP status
A	Burundi	Gazetted
	Kenya	Gazetted
	Malawi	Gazetted
	Rwanda	Gazetted
	Zambia	Gazetted
	Zimbabwe	Gazetted
	Uganda	Gazetted
B	Djibouti	National Seed Regulations being developed with support of FAO
	DR Congo	Draft aligned national seed regulations awaiting Parliament endorsement, Dec 2018
	Egypt	COMSHIP team to work with the CASC and Egyptian Seed Trade Association to be up with draft COMESA Aligned Seed Regulations
	Ethiopia	Draft aligned variety release and phytosanitary regulations to be validated in 2019
	Mauritius	National Seed Regulations being developed with support of FAO
	Eswatini	Roadmap for alignment agreed / developed with draft COMESA Aligned Seed Regulations in place
	South Sudan	Status of the Seed Industry assessed only
C	Seychelles	COMSHIP launched in July 2018
	Madagascar	COMSHIP launched in December 2014
	Eritrea	COMSHIP launched in March 2018
	Sudan	COMSHIP launched in November 2014
	Comoros	COMSHIP launched in July 2017
D	Somalia	COMSHIP not yet launched as the country joined COMESA in July 2018
	Libya	COMSHIP not yet launched and alignment not yet done
	Tunisia	COMSHIP not yet launched as the country joined COMESA in July 2018

Gaps and COMSHIP implementation challenges
Although substantial milestones have been achieved since the inception of COMSHIP, country level assessments reveal that some challenges have slowed down the pace of COMSHIP implementation. The last column of the Table in Appendix 3 presents these challenges at country level. The challenges are felt in all countries and across the four COMSHIP areas of implementation: Variety release, Seed testing, Phytosanitary and Quarantine services and the private sector. Some of the most common bottlenecks are expounded in detail next.

Insufficient physical and human capacity

Domestication of COMSHIP requires substantial human and physical capacity which is lacking and/or inadequate in most countries. Recruitment and training of seed inspectors and border surveillance/phytosanitary officials is a key priority for successful domestication of COMSHIP. Further, there is need for up to date laboratories which are appropriately equipped to facilitate the officers sufficiently to be able to provide the necessary analytical and testing services.

Limited awareness of COMSHIP by stakeholders

Smooth implementation of COMSHIP requires concerted efforts between all the relevant

departments and stakeholders, spanning from parliamentarians, variety release committees, revenue authorities, Border control officers , Seed inspectors, breeders, seed companies/traders and farmers. Thus, there is need to continue awareness creation forums to ensure that all the relevant stakeholders are adequately informed about COMSHIP.

Insufficient relevant institutional frameworks

Countries that lack the relevant institutional structures, such as constitution of variety release committees and seed committees, need to fast track the processes to pave way for the implementation of COMSHIP.

Slow review of the relevant regulations and laws

The process of reviewing seed legislations and alignment with the COMESA laws/regulations is critical especially for the category B and C countries.

Insufficient private sector support

The private and public seed companies in the countries that have already gazetted COMSHIP require support to access COMESA certificates and labels which will enable them to trade their seed in the region. The process of printing and distribution of the labels needs to be established while avoiding possibilities of counterfeits.

Action Plan towards Completing Implementation of COMSHIP

Based on the identified gaps and COMSHIP implementation challenges, some priority actions along four areas of COMSHIP implementation are presented in Tables 2-5. For each of the COMSHIP implementation areas, five main implementation challenges were identified and prioritised for action within the next three years (2019-2021). Some activities do not have financial requirements

for implementation, but some do. The cost of implementation of the work plan is estimated at USD16.6 million distributed across the four areas of COMSHIP implementation as follows: Seed certification – \$9.9 million; Variety release – \$4.9 million; Phytosanitary and quarantine issues – \$1.4 million and Private Sector support – \$0.45 million.

Table 2. Action plan on COMESA Seed Certification System

Implementation challenges/Priority actions	Responsible	Priority Countries	Timelines	Budget Estimate (USD)
Inadequate staffing of Seed Inspectors and Analysts				
• Recruitment of additional public seed inspectors and seed analysts	NSAs and Ministries of Agriculture (MoA)	ALL	2019-2021	In-country budget support
• Accreditation of private inspectors	NSAs	ALL	2019-2021	
• Training of seed inspectors and Analysts	COMESA, NSAs	Somalia, Tunisia, Libya, Comoros, Eritrea, Mauritius, Seychelles	2019-2020	150,000
Inadequate Physical Infrastructure				
• Acquisition of state-of-the-art laboratory and field equipment for seed testing	COMESA, Dev. Partn.	21 COMESA Member States	2019	3,150,000
• Construction and upgrading of laboratories	COMESA, Dev. Partn.		2020-2021	6,300,000
Lack of harmonised technical guidelines for seed certification				
• Development of manuals / guidelines complying with COMESA OECD and ISTA	COMESA, NSAs	ALL		210,000
Lack of Parental Descriptors in the COMESA seed catalogue				
• Provide a provision for descriptors in the COMESA seed catalogue	COMESA			105,000
Slow Adoption of HSRS System				
• Pilot the implementation of the system in countries fully aligned	COMESA	BU, KE, MAL, RW, ZM, ZIM, UG		N/A

Table 3. Action plan on COMESA Variety Release System

Implementation challenges/Priority actions	Responsible	Priority Countries	Timelines	Budget Estimate (USD)
Some member countries not aligned to COMESA variety release system				
<ul style="list-style-type: none"> Fast track alignment of member country seed certification, variety release systems and phytosanitary / Quarantine measures for seed import and exports to COMESA regulations 	Member states, COMESA	Somalia, Tunisia, Libya, Comoros, Eritrea, Mauritius, Seychelles, Djibouti, Madagascar	2019-2021	1,080,000
<ul style="list-style-type: none"> Support hard and software equipment for tracking of COMESA traded Seed Consignments 	COMESA, NSAs, Customs Officials	21 COMESA Member States	2020	3,150,000
Limited awareness of stakeholders involved in Seed industry on Variety release systems in member states				
<ul style="list-style-type: none"> Awareness creation forums targeting all key stakeholders in the provincial and districts 	COMESA, NSAs	ALL		500,000
No clarity on registration of public bred varieties traded in more than one country/ No Unique coding system				
<ul style="list-style-type: none"> Develop and adopt procedures for registration (unique coding system) using Variety Identification Number (VIN) 	COMESA, NAS, NARS and IARCs	21 COMESA Member States		180,000

Table 4. Action plan on Phytosanitary and Quarantine Measures for Seed Import and Export

Implementation challenges/priority actions	Responsible	Priority Countries	Timelines	Budget Estimate (USD)
Lack of information exchange mechanisms within COMESA				
<ul style="list-style-type: none"> Establish reporting obligation using existing platforms such as IPPC 	NPP0	21 COMESA Member States	2021	N/A
Lack of common legislative framework				
<ul style="list-style-type: none"> Development of SI that leads to harmonisation with COMSHIP and adaptation of ISPM No. 38 on international movement of seeds 	COMESA, NPP0, IPPC and IAPSC			N/A
Inadequate capacity of NPP0 Officers				
<ul style="list-style-type: none"> Training in PRA, E-Phyto, Inspection, Surveillance and Pest diagnostic, Taxonomy and pest list updates 	COMESA; Member states	21 COMESA Member States	2019	300,000
Inadequate Physical Infrastructural development				
<ul style="list-style-type: none"> 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 	Dev. Partners, COMESA	Category B Countries		1,050,000

Table 5. Action plan on enhancing Private Sector Participation in COMSHIP

Implementation challenges/priority actions	Responsible	Priority Countries	Timelines	Budget Estimate (USD)
Limited awareness of COMSHIP among stakeholders				
<ul style="list-style-type: none"> Awareness creation forums among policy makers and private sector 	COMESA, National Seed Trade Associations, AFSTA	21 COMESA Member States	2019-2021	450,000
Several regulatory constraints /Barriers to entry for foreign seed investors				
<ul style="list-style-type: none"> Lobby for elimination of entry barriers to seed businesses in the relevant COMESA member states. 	COMESA, AFSTA, Govts.			N/A
Unavailability of and lack of clear system for access to COMESA labels & Certificates				
<ul style="list-style-type: none"> Strengthen the system for production and distribution of COMESA seed labels and Certificates. 	COMESA, Devt. partners		2019	N/A
<ul style="list-style-type: none"> Facilitate companies to access COMESA seed labels and Certificates 	COMESA, Devt. partners	BU, KE, MAL, RW, ZM, ZIM, UG	2019	N/A
Multiple compliance costs (Variety release costs and COMESA catalogue fee)				
<ul style="list-style-type: none"> Review and harmonise variety release costs in the COMESA member states 	COMESA,		2019-2020	N/A
<ul style="list-style-type: none"> Review cost of variety release in the COMESA catalogue 	COMESA Secretariat		2020	N/A

Summary, Conclusions and Way Forward

The high-level consultation workshop on seed policy harmonisation brought together key seed stakeholders in the COMESA region to take stock on the current status of implementation of COMSHIP. Further, delegates identified the implementation challenges at country level and developed action plans towards moving COMSHIP forward.

It was noted that since the launch of COMSHIP, COMESA member states have initiated the process of domestication and are at different levels. Seven countries, Burundi, Kenya, Malawi, Rwanda, Uganda, Zambia and Zimbabwe, have fully aligned and gazetted the regionally harmonised COMESA Seed Trade Regulations. Seven other countries, Djibouti, DR Congo, Egypt, Ethiopia, Mauritius, Sudan, South Sudan and Eswatini, are advancing steadily to domesticate the process by aligning their national seed regulations to COMESA Seed Trade Harmonisation Regulations. Five countries, Comoros, Eritrea, Madagascar, Seychelles and Sudan, having launched COMSHIP. Three countries, Libya, Somalia and Tunisia, are yet to launch COMSHIP. Implementation challenges

along four COMSHIP areas were identified as Variety Certification systems, Variety release systems, Phytosanitary and quarantine measures for seed import and export and involvement of the private sector on COMSHIP implementation. Based on these challenges, costed action plans were developed.

At the end of the workshop, the following emerged as the key points for action:

1. Delegates agreed to fast track the process of harmonisation of seed policies in the region.
2. Development of a follow up plan based on the challenges identified and the costed action plans developed.
3. Priority will be given to countries that have lagged in the process of implementation of COMSHIP with an aim of attaining full domestication in all COMESA member states.
4. The TAAT policy enabler compact will engage all the relevant stakeholders to facilitate implementation of the action plan.

Appendix

Appendix 1. Status of COMSHIP implementation at country level

Member state	Key achievements since launch of COMSHIP	GAPS in COMSHIP implementation
Uganda	<ul style="list-style-type: none"> • Six varieties registered on the COMESA Catalogue. • MAAIF in collaboration with the Law Reform Commission has developed a legislative roadmap to review legal frameworks that require amendments such as the Seed and Plant Regulation 2006. • MAAIF embarked on capacity building process for strengthening the regulatory services of the Department of Crop Inspection and Certification (5 seed certification inspectors and 10 new phytosanitary services inspectors recruited). • Funds earmarked for construction or refurbishment of and procurement of equipment for seed laboratory and phytosanitary and diagnostic laboratories. 	<ul style="list-style-type: none"> • Finalise the amendment of some provisions in the Seed and Plant Act 2016 to match with the new Regulations. • Translation of the Seed and Plant Regulations into local languages for ease of understanding. • Physical and human capacity building through recruitment and training of personnel and equipping of physical facilities such as laboratories for seed testing.
Burundi	<ul style="list-style-type: none"> • First national seed catalogue launched in Nov 2016. • Training of stakeholders (Plant and Plant products Importers & Exporters, Seed Farmer Organisations and Customs/ Clearance staff). • Training of DPV & DPEAE staff on phytosanitary surveillance and control procedures. • Regulations on Plant protection reviewed. 	<ul style="list-style-type: none"> • Raising awareness of key stakeholders on regulation aligned with COMESA seed regulation. • Translation of the ministerial orders /legal instruments and tools related to seed into local language (Kirundi). • Construction of the laboratory with international standards and its equipment • Recruitment and assignment of phytosanitary inspectors at borders where they do not exist; • Availability of fast detection kit and phytosanitary inspection equipment. • Training of more seed inspectors and phytosanitary staff.
Zambia	<ul style="list-style-type: none"> • Domestication of COMESA seed regulations to Zambia legislation. • Training of key stakeholders. 	<ul style="list-style-type: none"> • Availing the COMESA seed labels and certificates for implementation. • Need to review the entire Plant Pests and Diseases Act, CAP 233 to ensure it is in tandem with what is occurring at international level. • Need for more awareness across the country and to Zambia Revenue Authority (Customs Officials)

Member state	Key achievements since launch of COMSHIP	GAPS in COMSHIP implementation
Zimbabwe	<ul style="list-style-type: none"> • Awareness raising to Seed Company inspectors. • Reactivation of Zimbabwe's participation in implementation of OECD Seed Schemes. • Maintenance of accreditation to ISTA for ZW's Seed Testing Lab. • Awareness raising to Seed Company inspectors • Some varieties adopted on the National Plant Variety List and Commercialised through the COMESA VRS. • Varieties registered on the COMESA Variety Catalogue with ZW being either the 1st or 2nd Country of registration. • Awareness raising to Seed Company inspectors. 	<ul style="list-style-type: none"> • Need Seed labels and certificates. • Building analytical capacity through training of key staff and provision of additional state of the art Laboratory equipment. • Awareness to Variety Release Committee, and Plant Breeders' Association. • Awareness creation for border managers and inspectors.
Rwanda	<ul style="list-style-type: none"> • The necessary regulatory framework established through seed and plant health laws and ministerial orders. • Variety Release & Registration Institutionalised through the establishment of the National Plant Variety Release Committee. • Variety registration & Release activities on-going (> 150 entries from 9 private and 1 public seed company received by NPVRC, 85 entries have been approved for release & registration); • Seed Inspection & Certification done as per harmonised regulations; • Law & Structure of the Independent Authority for Seed Inspection Certification gazetted; • Awareness creation among the public and private sector stakeholders; • Accession to the Arusha Protocol on the Protection of Plant varieties. 	<ul style="list-style-type: none"> • Inadequate capacity (human, technical, Institutional & Infrastructural) for accreditation to ISTA membership & effective delivery of system. • Limited financing (Capacity building & operational needs). • Need for continuous review & alignment of the regulations with evolving regulatory frameworks at local, regional or International level. • Development & adoption of crop-specific testing protocols (VCU & DUS). • Capacity building for the Private Sector & Awareness Creation among all seed/Plant variety stakeholders (Public & Private).
Malawi	<ul style="list-style-type: none"> • National Seed Policy developed, approved and launched, May 2018 • Seed Bill reviewed, national validation workshop conducted. • Gazetted COMESA seed standards. • Conducted some awareness creation. 	<ul style="list-style-type: none"> • Limited enforcement capacity of standard due to lack of mobility • Human Resource Capacity • Old/limited laboratories and equipment not capable of handling seed testing activities. • Limited awareness among the key players. • Seed Bill yet to be enacted by Parliament.
Kenya	<ul style="list-style-type: none"> • Harmonised seed certification regulations • The Seed and Plant Varieties Act (Cap 326) laws of Kenya was amended to align to COMESA provisions in seed certification regulations. • The aligned Seed and Plant variety regulations were gazetted in 2016. • The Seed and Plant Varieties Act (Cap326) Laws of Kenya was amended to align to COMESA provisions in seed certification in 2016. • The aligned Seed and Plant variety regulations were gazette in 2016 	<ul style="list-style-type: none"> • Sensitisation and capacity building for small and medium seed companies. • Support to increase the number of public and private inspectors for implementation of COMSHIP. • Support to Improve on Seed infrastructure to sufficiently handle the COMSHIP. • Building the capacity of breeders and plant examiners. • Support to Increase the number of plant examiner for implementation of COMSHIP. • Support to Improve on variety release infrastructure to sufficiently handle the COMSHIP.

Member state	Key achievements since launch of COMSHIP	GAPS in COMSHIP implementation
Kenya	<ul style="list-style-type: none"> • Have provided some data for listing of Kenyan varieties on COMESA Catalogue. • Movement of seed across COMESA region picking up. • Kenya is trading with some COMESA countries including, Uganda, Zambia and Rwanda. 	<ul style="list-style-type: none"> • Support regular periodic meeting of seed industry actors/experts to review progress and address challenges to enable fast implementation of COMSHIP. • Support to Improve on Phytosanitary infrastructure to sufficiently handle COMSHIP
Eswatini	<ul style="list-style-type: none"> • In the process of seeking approval from the cabinet to amend the law. • A National committee established to spearhead the implementation of COMSHIP and review the relevant legislations. • Awareness creation workshop conducted. • Draft amendments prepared and submitted to the PS. 	<ul style="list-style-type: none"> • Conduct a National validation workshop. • Submission of the Draft to the Attorney General and Cabinet for approval. • Finalise on draft amendments. • Financial and technical support challenges under phytosanitary measures. • Capacity building for key personnel involved in seed certification, phytosanitary and variety release. • Train local seed companies/ farmers/ agro dealers about regional HSRS quarantine pests.
Egypt	<ul style="list-style-type: none"> • All the variety release and seed certification systems and phytosanitary and quarantine measures for seed import and export established. 	<ul style="list-style-type: none"> • Awaiting the issuing of a Ministerial decree for publication of the COMESA Seed Harmonisation system in the Official Gazette. • Awareness creation and national dialogue to address fears and challenges such as intellectual property rights.
Ethiopia	<ul style="list-style-type: none"> • Framework for the establishment of Ethiopian seed and other agricultural input and quarantine service Authority has been developed and submitted for council of ministers for ratification and implementation. • Process of key staff started with some recruitments. • Phytosanitary laws amended to align with COMESA regulation and incorporated in the draft plant quarantine proclamation. This proclamation has already been submitted for council of ministers for action. 	<ul style="list-style-type: none"> • Additional qualified personnel in each discipline (Certification, Variety release, Phytosanitary). • Amendment on variety release and phytosanitary laws still pending, process slow because of high turnover of MOA. • Awareness creation and seeking buy in by the Ethiopian standard agency.
Mauritius	<ul style="list-style-type: none"> • Consultative meeting was held in Mauritius on the 02 June 2017 where COMSHIP was launched. 	<ul style="list-style-type: none"> • The National Plant Varieties and Seeds Office (NPVSO) yet to be established. • National Plant Varieties and Seeds Committee yet to be established.
Seyschelles	<ul style="list-style-type: none"> • COMSHIP was launched in Seychelles 28th June, 2017. • COMSHIP is being implemented through NBA who is in charge of the phytosanitary / quarantine measures for seed import and export/ assisted by the SAA. • NPPO in place (PHs under NBA) • Seed policy nonexistent. • Seed import procedures existing. 	<ul style="list-style-type: none"> • Develop and/or integrate seed policy into agriculture policy. • Align seed import procedures with COMESA regulations. • Establishment of seed regulations, while ensuring that they are aligned to COMSHIP. • Modernisation of the SAA research station and recruitment of staff at the SAA existing laboratory for soil and seed testing. • Revitalisation of the national Seed Committee and to include representatives from all stakeholders. • Awareness creation of the COMESA Seed Trade Harmonisation at country level and all levels

Member state	Key achievements since launch of COMSHIP	GAPS in COMSHIP implementation
Sudan	<ul style="list-style-type: none">• New revised Seed Act in legislative process.• A Plant Variety Protection Act in place.	<ul style="list-style-type: none">• DUS system development.• Domestication of COMSHIP.
Comoros	<ul style="list-style-type: none">• Initial workshop organised and currently the country in evaluating the sector.• Laws and regulations not yet aligned to the COMESA regulations.	<ul style="list-style-type: none">• Strengthening capacity to develop and release local varieties instead of importing.• Strengthening capacity to improve quality control at the boarder
DR Congo	<ul style="list-style-type: none">• Draft aligned national seed regulations awaiting Parliament endorsement, Dec 2018	<ul style="list-style-type: none">• Develop capacity• Advocacy with the Parliament for passing of the seed regulations.• Facilitating the updating of National Seed Catalogue.

List of Acronyms

AATF	African Agricultural Technology Foundation
ACTESA	Alliance for Commodity Trade in East and Southern Africa
AfDB	African Development Bank
AFSTA	Alliance for Seed Traders in Africa
CAADP	Comprehensive African Agriculture Development Programme
CEO	Chief Executive Officer
CIMMYT	International Maize and Wheat Improvement Centre
COMESA	Common Market for East and Southern Africa
COMSHIP	COMESA Seed Harmonisation Implementation Plan
CORAF	West and Central African Council for Agricultural Research and Development
DTMASS	Drought Tolerant Seed for Africa Scaling
EAC	East African Community
ECOWAS	Economic Community of West African States
FAO	Food and Agriculture Organisation
HSRS	Human Services Reporting Systems
IAPSC	Inter-African Phytosanitary Council
IARCs	International Agricultural Research Centres
IITA	International Institute for Tropical Agriculture
IPPC	International Plant Protection Convention
MAAIF	Ministry of Agriculture, Animal Industry and Fisheries-Uganda
MoA	Ministry of Agriculture
NARS	National Agricultural Research Services
NPPOs	National Plant Protection Organisation
NSA	National Seed Authority
OECD	Organisation for Economic Co-operation and Development
RMCs	Regional Member Countries
RTDI	Regional Technology Deployment Infrastructure
SADC	Southern African Development Community
SROs	Sub-Regional Organisations
TAAT	Technologies for African Agricultural Transformation
TASAI	The African Seed Access Index
VIN	Variety Identification Number

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