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STANDARDS IN THE MULTILATERAL TRADING SYSTEM

Implications for the EAC

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INTRODUCTION

Standards in the international trading system are there to guarantee products are safe, reliable, healthy, fresh, etc. Protection of animal, plant, and human life is allowed in Article XX of the GATT, assuming the safety measures applied do not discriminate or do not amount to disguised protectionism. Similarly, guidelines on health and safety standards are stipulated in the WTO SPS (Sanitary and phytosanitary) and TBT (Technical barriers to trade) Agreements. Despite progress on tariff reductions, market access is now limited by non-tariff barriers, some of these being standards. In fact, SPS, TBT, and other non-tariff measures (NTMs) can form a greater restrictive effect on trade than tariffs. In light of this, the WTO, regional and national trade communities need to deal with NTMs, which is much more challenging than reducing tariffs. Especially considering NTMs raise a variety of issues beyond trade, since they are cross sectoral and often have a legitimate national policy purpose. Standards have the desirable purpose of protecting the lives and health of citizens, however, they often can restrict access of foreign competitors due to necessity to fulfil SPS and TBT measures for market access. Considering consumer preferences in the developed countries, the developed countries' private sector is already setting trade standards *de facto*. These standards, as they are not necessarily governed by the WTO can be much more exigent and for the East African

Community (EAC) can become an impediment for the smallholder farmers, the main suppliers of agro-products for EAC exports.

JUSTIFICATION OF STANDARDS IN INTERNATIONAL TRADE

The WTO SPS and TBT Agreements were part of the Uruguay Round outcomes (1986-1993) entered into force in 1995 and created legally binding commitments for the WTO members. During the Uruguay Round, the developed countries wanted standards to be based on science while the developing countries focused on international harmonization of SPS measures to prevent arbitrary standards. In both the TBT and SPS Agreements special and differentiated (S&D) treatment provisions are included for the developing countries.

The purpose of the TBT and SPS measures is to grant the sovereign right of every country to apply the 'appropriate level of protection' (ALOP) deemed necessary. This protection is granted to serve national public objectives of protecting safety of the population, workers and the environment. Standards also facilitate transmission of information between producers, suppliers, and consumers, which increases predictability, efficiency, compatibility, productivity, usability, market transactions, and export opportunities, thus reducing costs in the

long run. Standards also have national security implications and work to promote labour standards. Certain standards promote sustainability principles, such as organic agriculture or sustainable production processes. Consumer preferences also impose ethical standards that promote social justice in the provision of traded goods, but it is imperative to make sure that the sovereign rights to set health protection standards are not abused and used for protectionist purposes or result in unnecessary barriers to international trade. To ensure that the SPS and TBT agreement are not used for protectionist purposes several requirements are outlined in the WTO Agreements.

The SPS Agreement applies only to the food and agricultural sectors and is concerned with the health of plants, animals and humans. The TBT Agreement focuses on product specifications, weight, size, packaging materials, handling, and labelling, in addition to all technical regulations, voluntary standards and procedures.

The TBT Agreement is to ensure regulations, standards, and certification processes from becoming unnecessary obstacles to trade. Regulations are not prescribed by the TBT Agreement, therefore applying international standards is encouraged to harmonize the multitude of regulations and certification schemes of WTO member countries. However, this work can become very burdensome for exporters and manufacturers. The TBT Agreement tries to strike a balance between the policy goals of trade facilitation and

protecting some level of the policy space required for a country to designate technical regulations. In the agreement technical regulations and product standards of a country should not be unnecessarily restrictive of international trade; the TBT Agreement encourages standard equivalence, meaning accepting the standards of an exporting country that are similar and achieve the same product characteristics as equivalent in the importing country. Other TBT principles are non-discrimination, MFN, national treatment, protection of legitimate objectives, harmonization, mutual recognition, and transparency.

The WTO SPS Agreement recognizes the right of the WTO members to provide appropriate levels of desired health protection but also ensures these measures do not impose 'unnecessary, arbitrary, scientifically unjustifiable, or disguised restrictions on international trade,' the provisions lay out principles to follow. Members shall base their SPS measures on international standards. However, they may introduce or maintain higher SPS measures than that of international standards if there is scientific justification but without this justification, measures cannot be maintained. Measures need to be based on an assessment of risk and are applied only to the extent necessary to protect human, plant, and animal health. Some temporary 'precautionary' measures are allowed, as outlines in the Article 5.7 of the SPS Agreement. When determining the appropriate level of SPS measure, members shall take into account the objective of minimizing



negative trade effects i.e. the measures should not be more trade restrictive than required. There shall not be arbitrarily or unjustifiably discrimination between countries where identical or similar conditions prevail. The measures must not constitute a disguised restriction on international trade and members need to notify and provide information on their SPS measures to the other WTO member states.

In order to have a basis for SPS standards, the WTO members shall base their SPS measures on international standards, recognizing three international standard setting agencies, which are *Codex Alimentarius* Commission (CAC) for food safety, International Office of Epizootics (OIE) for animal health, and International Plant Protection Convention (IPPC) for plant health.

CHALLENGES OF CONFORMING WITH STANDARDS

International and/or importing country standards can be beyond the capacity of developing countries to implement. Not enough consideration is given to development and trade needs, technological problems, and capabilities of the developing countries. Article 10.1 of the SPS outlines S&D, stating that members shall take into account the special needs of developing countries, especially those of the LDC category, particularly providing longer compliance

time-frames on products of interest to the developing countries. In Article 9 of the SPS Agreement, members agree to provide technical assistance to other members when substantial investments are needed for the exporting country to fulfil the SPS requirements of the importing country. Provision in Article 11 of the TBT Agreement are similar, where member countries agree to give assistance to developing countries bilaterally or through international organizations to aid capacity building in processing, technology, infrastructure, etc. Despite these requirements, developing countries have been finding it increasing hard to access developed world markets, since the national standards of developed countries are beyond their reach.

Developing countries argue the TBT and SPS Agreements are dominated by the interests of the developed countries. Some also contest the degree TBT and SPS standards allow restrictions based on process and production methods (PPMs). Private sector exporters have a tendency to believe the real motives of imposing SPS measures in the importing countries are thinly veiled protectionism designed to shelter domestic competitors rather than protect public health. In developed countries, some are concerned international standards are too low to warrant adhering too, while developing countries criticise the developed countries as not adhering to international standards, and causing unnecessary delays because of their risk assessment studies.

Furthermore, since the revolution of global supermarkets chains and food service companies, following the high profile food safety scandals in 1990s, retail demand for improved food risk management and other such drivers, the world has experienced the development of private standards (PVSs) and the proper distinction between mandatory and voluntary standards has become blurred. WTO SPS obligations are in priority extended to the governments but often the local government, non-governmental entities, private sector, and other groups in the society are doing the informal standard setting on the ground and the WTO does not address these 'non-traditional' patterns of regulation. Private standards are country or retail specific requirements on product safety before access to importing country. The private standards are created by the private sector and driven often by the interest of developed country consumers. They are varied and equivalent standards are not accepted or require certifications of conformity to specific demands. It is problematic that these standards are developed without the input of the producers and worse, there are often no scientific justifications to validate the higher standards.

Thus, there are merits and drawbacks to standards, however, the full effect of standards (public and private) to economies is still not well known. A large-scale systematic collection of the SPS information needs to be undertaken to aid comparison and analysis efforts in the world and better estimate costs and benefits of possible measures. The construction of a

database on SPS measures is still in its beginning stages. There are initiatives in terms of NTB at UNCTAD through its multi-agency study team on NTBs; an analytical and methodological approach for NTBs is being developed on the EU initiative under the NTM-IMPACT study; USDA/ERS database in the USA focusing on US import regulations e.g. for fruits and vegetables; composite indicator of market access (CIMA) that focuses on collecting information on the cost of meeting importing country regulations.

IMPLICATION OF STANDARDS ON EAC EXPORTS

All EAC countries are WTO member countries and have obligations under the WTO Agreements. In addition to the WTO requirements, all EAC partner states are members of the following international standards setting organizations – the International Plant Protection Convention (IPPC), the World Animal Health Organization (OIE), FAO/WHO Codex Alimentarius Commission for Food Safety, and International Organization for Standardization (ISO). There are also commitments undertaken within the African Union. Exports from the EAC are obliged to comply with minimum SPS requirements of these organizations. However, in 2011 it was noted that in order for EAC exports to participate meaningfully at international standard setting bodies and work to create more



beneficial and appropriate standards for the EAC, they needed to improve their technical expertise, which is difficult due to the lack of capacity in the Partner States. Programs have been developed to facilitate EAC experts' participation in international standard setting organizations,¹ but they still have a weak negotiating position at these organizations. In March 2011, Dr. Kiguta, Director General of EAC Customs and Trade Directorate emphasized that "...unfortunately with regard to Sanitary and Phytosanitary (SPS) Agreement to which our Partner States are signatories, lack of participation by our technical and policy staff has been identified as the major cause of low compliance to Sanitary and Phytosanitary (SPS) standards."

One example is the EAC dairy standards mostly based on Codex Alimentarius, which is problematic since the Codex assumes that consumer income and production infrastructure are at the level of western states. This means the dairy sector standards created internationally cannot be implemented in the EAC, with the exception of some large-scale export

¹ The PAN-SPSO (Participation of African Nations in Sanitary and Phytosanitary Standard Setting Organizations) Programme, financed by the European Commission (EC), and implemented by the African Union and seven regional economic communities (RECs) in Africa, try to facilitate effective involvement of African countries in the activities of the OIE, IPPC, Codex and the WTO-SPS Committee. Also, In 2006 UNIDO launched a EAC region-wide program to enhance institutional capacity and services of EAC countries to implement the WTO SPS and TBT Agreements.

oriented producers, because most of the traders, producers and processors are unable to comply with labelling, transport, storing, and producing requirements. EAC consumption habits and practices are not considered in the Codex, since in developed countries milk products are pasteurized while in East Africa milk is always boiled before being consumed thus limiting health risks. Small producers in the EAC account for 80% of milk production and yet, were not consulted on standard setting until just recently. Provided EAC experts can effectively participate in the Codex negotiations, cultural and economic considerations will be taken into account and a new product labelled 'milk that needs to be boiled' before consumption, could be created. This would generate an opportunity for exports while not trying to create artificially high standards that are not attainable at this point.

Implementing harmonized SPS measures in the EAC is imperative for access to international, regional and local markets. Standard harmonization and administration has already been undertaken by many administrative bodies in the EAC.² By 2010, over 1,000 product standards had been harmonized and ready for implementation by the Partner States. An EAC SPS Protocol

² The East African Standards Committee and East African Accreditation Board to administer TBT measures, National Notification Authorities, National Enquiry Points, EAC SPS Committee, and National SPS/TBT Committees creating harmonization standards specific for the EAC. The East African Community Standardisation, Quality Assurance, Metrology and Testing Act, 2006 (SQMT) is a legal basis for the operation of the EAC Common market, which has provisions for ensuring standardization, quality assurance, testing of products traded in the EAC.



was adopted in March 2010, drafted on the basis of the WTO SPS guidelines including specific measures for animal and plant health and food safety. As of March 2011, the following SPS instruments were in place in the EAC: harmonized SPS standards, measures and procedures for plants (phytosanitary), mammals, birds and bees (sanitary), and fish and fishery products; standard procedures for evaluation and labeling of pesticides; business guidelines for SPS Protocol; standards for some fruits and vegetable; and, training has been conducted for EAC Partner States in terms of WTO TBT/SPS Enquiry Points. Alongside the Tripartite negotiations, a decision has been made to include a SPS Annex to the Tripartite Free Trade Area (TFTA) Agreement and a SPS work program will be implemented after the Tripartite negotiations have concluded.

Despite the institutional setups and the harmonisation processes taking place in the EAC, Dr. Peter Kiguta noted in March 2011, that “[p]artner States have not been very successful in accessing lucrative regional and international markets for agro-products notably because of non-compliance to international standards and regulations.” EAC countries have huge potential in agriculture and a majority (80%) of their population are dependent on agriculture for their livelihoods. EAC exports to developed country markets are largely agricultural products (Table 1). Considering the EU is the biggest importer of agriculture and fishery products in the world, it is imperative the

EAC secures access to these markets.³ The EU is already one of the largest EAC trading partners in agricultural products (Tables 2). EAC exports to the EU are governed by the Framework Economic Partnerships Agreement (FEPA) under which duty-free quota free (DFQF) market access is provided to EAC exports into the EU however, market access is still constrained by EU SPS and TBT requirements.

Table 1: EAC’s exports to the developed market economies and to the world

Product label	EAC's exports to Developed Market Economies		EAC's exports to world	
	Value in 2009	Value in 2011	Value in 2009	Value in 2011
Gold	591651	900857	888771	1856842
Coffee	553695	814622	669993	991306
Cut flowers	418513	446735	435624	474821
Tea	225025	267125	1105148	1361293
Precious metal ores	177283	235765	498193	541040
Manganese ores	0	213112	352	477798
Fish fillets and pieces	169203	179508	233707	247679
Leguminous vegetables	42327	148407	44011	160366
Tobacco unmanufactured	134721	135887	197056	207139
Plants, live, nes (incl their roots), cuttings & slips; mushroom spawn	117733	117719	123924	124169

*The values given are in thousands of US\$
 *Values originate from ITC’s Trade Map, 2012

³ Many of the following paragraphs borrow from the CUTS ARC Nairobi 2009 study by Victor Ogalo under the BLEAC project called ‘Standards and Market Access: Opportunities and Challenges for East African Exports into European Union.’

Table 2: EAC's exports to the EU27 and EAC exports to the world

Product label	EAC's exports to EU 27		EU 27's imports from world		EAC's exports to world	
	Value in 2009	Value in 2011	Value in 2009	Value in 2011	Value in 2009	Value in 2011
Coffee	346732	457350	11119370	18790345	669993	991306
Cut flowers	397048	414499	4642818	4916267	435624	474821
Tea	193824	240243	1252999	1528388	1105148	1361293
Fish fillets and pieces	153773	152895	8723687	10178863	233707	247679
Leguminous vegetables	41160	145014	824180	888191	44011	160366
Tobacco unmanufactured	124754	117368	4284127	4581721	197056	207139
Plants, live, nes (incl their roots), cuttings & slips; mushroom spawn	110103	112376	5233599	5594472	123924	124169
Precious metal ores	12058	92212	1272531	1360946	498193	541040

*The values given are in thousands of US\$
 *Values originate from ITC's Trade Map, 2012

The EAC agro-traders, processors and suppliers have to try to comply with SPS requirements, especially in high value agro-foods such as, fish, animal, poultry, and horticultural products to avoid access barriers to high value markets in EU, US, Japan, Canada, etc. Since foods are sourced globally, efforts are needed to ensure traceability and food safety rules are followed throughout the value chain. Potential food safety risks have increased due to high demand in processed foods which entail elevated levels of contamination. From the EAC, there has been a higher trade in perishable goods, which are more vulnerable to pathogens. Keeping in mind EAC Partner States are tropical countries where pests, fungi, viruses multiply with vigour, they need to use chemicals, which creates a problem in exporting to developed countries

considering consumers there are not accepting of chemical use. Therefore, adhering to minimum residue limits (MRL) is important. Specific health concerns from the region's exports have been in aflatoxin in maize, day old chicks and quality of milk. Further health concerns for consumers and producers in terms of EAC exports have been in avocado exports to South Africa, horticulture and fishery products to Europe, and mangoes to United Arab Emirates.

In the EU, in addition to a tight public standard regime for agricultural products there has been a proliferation and evolution of private food safety and agricultural standards measures. The reason for private standard (PVS) proliferation is elevated consumer concern and awareness in the OECD countries. PVS are driven by increased demand for quality and safe food but also by consumers' willingness to pay a premium price for foods, which contribute to ethical standards in fair trade, environment, health, worker's rights, etc. These private standards do not have scientific basis, but are simply consumer perceptions of safety and production practices. For EU and OECD country businesses, there are risks associated with ignoring these factors. On another note, advances in science and technology are helping to identify additional risks to health, which is providing justification for even stricter standards to be implemented. The situation is made even more difficult by active lobbying efforts from OECD food and agro-business to their governments

to impose stricter SPS and TBT requirements.

Complying with these processes is expensive and requires increased certification processes, monitoring, and overall ability to participate in the export market systems. PVSs are more exigent, going beyond international standard requirements. However, since they are required to export to the EU market, they are *de facto* market access requirements, despite being 'voluntary.' Further overlaps and confusions are caused by different EU supermarket chains having their own specific standards. Though in the EAC, standard harmonization has taken place and the private sector should be able to get needed information on legislation, challenges still remain for connecting the smallholder farmers with these standard compliance systems. As a result thousands of smallholder farmers are neglected the opportunity to source to export markets.

While the WTO SPS and TBT Agreements require WTO member states to take reasonable measures to ensure that non-governmental entities in their territories are in compliance with the relevant provisions of the Agreements and do not take measures that encourage direct or indirect inconsistency with the relevant provisions. A problem area is that while WTO TBT and SPS Agreements urge for assistance to redress development needs through the S&D treatment clause, private voluntary standards do not share this requirement. The PVS can create unjustified certification,

testing, or approval procedures, which are forbidden under the WTO TBT and SPS requirements.

EU Food Law No 178/2002 necessitates equivalent level of consumer health protection be assured by imported as well as domestically produced food. Equivalency of standards is recognized in the EU legislation but these need to be passed by the competent authority on an annual basis. One of the main requirements is the entire food production chain has to be under control in terms of hygiene and hazards monitored by the Food Business Operator as well as the competent authority in charge of food safety requirement implementation. There are further animal health requirements for exports of food with animal origin into the EU and the country must be on a list of permitted countries to export to the EU. In addition to public standards are private (industry) standards, which outline some phytosanitary standards, Maximum Residue Limits (MRLs), standards on labour rights, traceability and labelling requirements. Compliance is required with the British Retail Consortium (BRC) covering food safety management, safe quality food (1000/2000) quality code, which is a HACCP food quality and safety certification code for primary producers, and international food standards (IFS).

One private standard is the (EUREPGAP) GLOBALGAP, which has become the accepted standards in fruit and vegetable trade. GLOBALGAP is an independent verifiable private standard created in Europe that many European

wholesale companies require suppliers to comply with. It has mostly been adopted by the EAC suppliers in agricultural products supplied to the EU markets. Since 2005, European supermarket made GLOBALGAP certification mandatory for suppliers, including small-scale suppliers from developing countries. This is hard for small-scale farmers to comply with because this PVS was created with the large-scale farming practices in mind. Small-scale farmers do have the option to comply as a unit, but in 2006 the cost of compliance for a smallholder farmer through this scheme cost £636 to establish and £175 annually to maintain. GLOBALGAP is not static and evolves every year and is revised every three years. Due to pressures from the GLOBALGAP, smallholder vegetable growers in Kenya have fallen from 11,600 in 2004 to 5,500 in 2006. In Kenya, the primary cause of the reduction of smallholders was financial. The division of costs for a Kenyan small holder farmer to receive GLOBALGAP certification was 36% for the farmer, 44% for the exporter, and 20% for the donor. The maintenance cost of the certificate puts about a 14% extra financial burden on the farmer. Therefore, export companies and donors need to provide significant aid to keep program going. However, on the flip side, in Kenya GLOBALGAP standards have had an tremendous positive effect on smallholder farmers, because farmers that have been able to become certified have seem a continuous outlet of their produce to the lucrative fresh fruits and vegetables export markets in the OECD countries

and conforming to standards has helped inject cash into rural areas. Farmers that do not have GLOBALGAP certification still export to less stringent markets found in the EAC and South Africa, which may become enlarged due to the ongoing Tripartite talks.

But there is still a long way to go as seen from the words of Deputy EAC Secretary General (Planning and Infrastructure) Dr Enos Bukuku, who on June 8, 2012 stated "...it [is] unfortunate that many products from the EAC member states do not meet the international standards of certification. The African Growth and Opportunity Act (AGOA) has granted the region opportunity to export to the US more than 1,700 products, as long as they meet the required standards but we cannot make these huge sales because goods produced here do not meet the required criteria."

SOME CHALLENGES FOR EAC EXPORTER TO EU

A major challenge for the EAC exporters in terms of the EU market is a lack of knowledge of EAC national standards, which are equivalent of those of the EU or other OECD countries. There remain non-harmonisations of EAC Partner States' national standards with the SQMT Act. The OECD countries' consumers recognize and prefer the standards of EU rather than those of the EAC. Despite the EU being a single

market, the individual EU countries have different legislation uniquely defined by what is demanded by their consumers, which for their multiplicity are hard to follow [Germany, UK, France, 2009]. Also, largest amount of agro-food imports to the EAC market comes from the EU thus there are fears that the smallholder farmers are not capable of keeping up with the fast evolutions and thus be rendered uncompetitive on the EAC market with the influx of EU imports.⁴

Additionally, other issues are the proliferation of private voluntary standards, weak monitoring and enforcement capacity, overlapping and duplicated standards, lack of bilateral investment and technical assistance to catch up with the more stringent requirements, high upfront capital investments required [fish bans], limited capacity to carry out and do research analysis in terms of risks assessments, limited awareness among farmers of the impact of standards and how to comply with them, high costs of supply management for the smallholder farmers to connect to market chains, supply-side constraints to meet the SPS requirements, more pressing national issues and governments have not allocated sufficient funds to deal with the new SPS challenges.

⁴ There can be very high economic costs associated with standards since in the EAC there is only a limited level of production and when a unit cost of production or processing increases the competitiveness and access to the EU market will be reduced.

WAY FORWARD AND CONCLUSIONS

Compliance with standards can lead to new possibilities of competitive advantage, for example organic farming. Moreover, compliance can contribute to sustainable and profitable trade in the long run. But there is even a stronger need to encourage developed countries to deliver on technical and other bilateral assistance as well as respect the S&D provisions outlined in the WTO SPS and TBT Agreements so that EAC can develop sustainable production methods and realize benefits to EAC and OECD consumers in the long term. To achieve this, measures should be taken against standard collusion.⁵ PVSs can largely inhibit production and WTO members should make sure their non-governmental entities do not arbitrarily limit access to markets for goods from the developing countries. More research and expert capacity building for the EAC experts is needed to ensure they can contribute to standard development in international organizations. There is a need for better publicity for the standards and certification schemes developed in the EAC so they can be better accepted by the consumers in developed country markets. Standards which are too costly, not economically viable or cannot be attained by the government or the donors should be discarded. Standards need to be

⁵ Concept referred to by Victor Ogalo in the *'Standards and Market Access: Opportunities and Challenges for East African Exports into European Union'*.

appropriate to the EAC realities and it is important there are bottom up processes in standard creation that include all relevant stakeholders. Since small scale producers are constitute the majority of producers in the EAC it is imperative they have opportunities to be better connected and participate in the export markets. The donors and exporters can do their part here, but the EAC governments need to allocate adequate resources for training and certification to guarantee that systems are working for smallholders to get their produce to the markets.

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