



Sanitary and Phytosanitary Export Requirements

The Case of Cocoa, Cashew nuts,
and Tuna products



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Sanitary and Phytosanitary Export Measurement Requirements: The case of cocoa, cashew nuts, and tuna products

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Abbreviations

A.C.P: African, Caribbean and Pacific

A.F.RC.D: Armed Forces Revolutionary Council Decree

BRCGS: British Retail Consortium Global Standards

BRC: British Retail Consortium

CAC: Codex Alimentarius Commission

CBR: California Bearing Ratio

CSIR: Council for Scientific and Industrial Research

CSR: Corporate Social Responsibility

EBA: Everything But Arms

EC: European Economic

EEC: European Economic Commission

Economic Commission of Africa

ECOSHAM: ECOWAS Commission Standards Harmonization Mechanism

EPAs: Economic Partnership Agreements

EURPGAP/GLOBALGAP: Euro-Retailer Produce Working Group-Good Agricultural Practices

EU: European Union

FAO: Food and Agricultural Organization

FDA: Food and Drugs Authority

FSSC: Food Safety Management Systems Certification Scheme

GATT: General Agreement on Tariffs and Trade

GEPA: Ghana Export Promotion Authority

GFSI: Global Food Safety Initiatives

GIS: Geographic Information System

GlobalGAP: Global Agricultural Practices

GFSI: Global Food Safety Initiative

GLCS: Green Label Certification Scheme

GoG: Government of Ghana

GQSP: The Global Quality Standard Programme

GSA: Ghana Standard Authority

GSP: General System of Preferences

QMS: Quality Management System

GTA: Ghana Tourism Authority

GPPQCL: Good Practices for Pharmaceutical Quality Control Laboratory

HACCP: Hazard Analysis Critical Control Point

IEPA: Interim Economic Partnership Agreement

IPPC: International Plant Protection Convention

ISO: International Standard Organisation

LDCs: Least Developed Countries

LI: legal Instrument

MMDAs: Metropolitan/Municipal/District Assemblies

MoFA: Ministry of Food and Agriculture

MoH: Ministry of Health

MoTI: Ministry of Trade and Industry

MEST: Ministry of Environment, Science, Technology and Innovation

MFN: Most Favored Nation

MRLs: Maximum Residue Limits

MSMEs: Micro, Small and Medium Enterprises

NCCP: National Codex Contact Point

NEP: National Enquiry Point

NQP: National Quality Policy

NRCD: National Redemption Commission Decree

NTEs: Non-Traditional Exports

OIE: Office International des Epizooties / World Organization for Animal Health

PAH: Polycyclic Aromatic Hydrocarbons

P.N.D.C.L: Provisional National Defence Council

PPRSD: Plant Protection and Regulatory Services Directorate

SECO: State Secretariat for Economic Affairs (Bern, Switzerland)

SPS: Sanitary and Phytosanitary

QAI: Quality Assurance Institution

QI: Quality Insurance

TBT: Technical Barrier to Trade

TCS: Technology Coordination Services Department

UNECE: United Nations Economic Commission for Europe

UNIDO: United Nations Industrial Development Organisation

WHO: World Health Organization

WTO: World Trade Organization

SECTION 1

General Background

What are Sanitary and Phytosanitary Measures?

In today's increasingly globalised world, international trade negotiations are a key aspect of any country's development agenda, particularly those in the developing world. Historically, trade has been regarded as a means of boosting the economy and contributing substantially towards countries' development goals, especially for developing Countries. It is therefore not surprising that boosting export potential remains a priority for developing countries. The European Union (EU) provides African countries with preferential market access schemes and is the region's main exporter for food and manufactured products.¹ The EU also supports trade-driven development in Sub Saharan Africa with initiatives such as the Economic Partnership Agreements (EPAs), Generalised System of Preferences (GSP) and the Everything-But-Arms (EBA – specifically for LDCs) schemes. At present, the EU under the EPA, is the most open market for African exports as it provides the region with duty-free and quota-free access for exports².

Over time, African exports to the EU have increased and amounted to more than €116 billion in 2016.³ As of 2019, 65 percent of African exports to the EU were primary goods such as food and raw materials.⁴ Although the EU

provides a free and stable market to African exporters, a crucial component of international trade of food and raw materials are health and safety standards. Therefore, in a free and pro-trade environment, there is pressure on both importing and exporting countries to comply with international regulatory systems with regards to health and safety standards of traded goods.

Developing countries tend to be wary of trade regulations and often regard them as protectionist and exploitative measures. While there are restrictions and measures on trade that act as barriers to international commerce, Sanitary and Phytosanitary (SPS) measures are aimed at protecting human, animal and plant life and health, in a manner that does not necessarily create barriers to trade. SPS measures should be 'based on sound scientific methods' and are applied only to the extent necessary to protect human, animal or plant life or health' and are not 'created to arbitrarily or unjustifiably discriminate between countries where identical or similar conditions prevail.'⁵

While at the outset trade regulations could seem as protectionist measures, this study aims to highlight how compliance with the SPS measures strengthens both trade and market access, while simultaneously respecting health regulations. This study focuses on the international standards set under the SPS Agreement and the need for Small and Medium Enterprises with export

¹ https://trade.ec.europa.eu/doclib/docs/2017/november/tradoc_156399.pdf

² https://trade.ec.europa.eu/doclib/docs/2013/april/tradoc_151010.pdf

³ https://trade.ec.europa.eu/doclib/docs/2017/november/tradoc_156399.pdf

⁴ https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Africa-EU_-_international_trade_in_goods_statistics

⁵ https://connecting-asia.org/wp-content/uploads/2018/05/GIZ_ACFTA_SPS_Study_2017.pdf

potential in certain sectors, to better understand SPS and related issues, so as to leverage the EU market access.

On January 1, 1995, the World Trade Organization (WTO) established the Agreement on the Application of Sanitary and Phytosanitary Measures (the SPS Agreement). The SPS measures are applied to both domestically produced and imported goods to protect human and animal health (sanitary measures) and plant health (phytosanitary measures). These measures are aimed at preventing the spread of pests or diseases among animals and plants and include a range of criteria 'such as requiring products to come from a disease-free area, inspection of products, specific treatment or processing of products, setting of allowable maximum levels of pesticide residues or permitted use of only certain additives in food.'⁶

While these measures establish the basic rules for food safety and animal and plant health standards, they ensure that consumers are being supplied with safe and healthy foods and, also endeavour to avoid unnecessary and arbitrary barriers to trade.⁷ The Agreement calls on member countries to apply the appropriate level of SPS measures and simultaneously avoid 'discrimination or disguised restriction on international trade.'⁸ It has, indeed, been rightly acknowledged that technical measures such as the SPS measures do impede trade but non-compliance with these measures has far greater negative consequences. Not only does the rejection of an entire shipment at the port of entry result in a 'loss of both the revenue expected from the sale of the goods and the costs of their

transportation, especially when the goods have to be destroyed', repeated export refusals 'damage the reputation of the exporting country and, one would expect, its trade performance'.⁹ Empirical studies suggest that when developing countries strengthen their ability to meet the demands of the world trading system, in terms of both competitive prices and quality and safety standards, their export potential and market share increases.¹⁰ Analysis of the SPS measures concerning agricultural trade reveals that concerns of food safety related to disease outbreaks and pest control constitute the largest share of concerns. Therefore, compliance with the SPS Agreement boosts the trading potential of developing countries and LDCs.¹¹

The Agreement provides international regulations to member states but also recognizes their rights to use their own measures to protect plant, human and animal health, as long as those measures are based on science. Despite this, the Agreement encourages governments to 'harmonize' their national measures by basing them on international standards.¹² These international standards were developed in consensus with most of the WTO's 132 member countries along with the input of leading scientists and government experts on health.¹³ International standards are usually more stringent than national standards. However, in cases where national standards levy greater restrictions on trade, the country may be asked to provide scientific justification for their standards.

As the WTO is not a regulatory body with norm-setting capacity, it cannot harmonize the standards.¹⁴ Therefore, the WTO has relied upon

⁶ https://www.wto.org/english/tratop_e/sps_e/spsund_e.htm

⁷ <http://spsims.wto.org/>

⁸ WTO 'The Legal Texts' p62

⁹ http://www.cuts-geneva.org/pdf/KP2018-Paper-Importance_and_Implications_of_SPS_Measures_in_MENA.pdf

¹⁰ http://www.cuts-geneva.org/pdf/KP2018-Paper-Importance_and_Implications_of_SPS_Measures_in_MENA.pdf

¹¹ http://www.cuts-geneva.org/pdf/KP2018-Paper-Importance_and_Implications_of_SPS_Measures_in_MENA.pdf

¹² https://www.wto.org/english/tratop_e/sps_e/spsund_e.htm

¹³ https://www.wto.org/english/tratop_e/sps_e/spsund_e.htm

¹⁴ https://unctad.org/en/Docs/edmmisc232add13_en.pdf

three leading international standard-setting organisations in the fields of human, animal or plant health, to harmonize the standards and facilitate trade that safeguards the health of consumers. The international standard-setting organisations are- The Codex Alimentarius Commission, the World Organisation for Animal Health (IOE) and the International Plant Protection Convention (IPPC), each focusing on one aspect of the SPS issues- food safety; human and animal health; and plant health, respectively. Together these three organizations are referred to as 'The Three Sisters'.¹⁵

The Three Sisters

The Codex Alimentarius Commission (CAC)

The Codex Alimentarius Commission, a science-based organization and a subsidiary organ of the Food and Agriculture Organization (FAO), based in Rome, is the authority that drafts international food safety standards for the SPS measures. The Codex Alimentarius Commission consists of a number of food safety standards. The Commission is funded by both the FAO and the World Health Organization (WHO), which established the Codex in the 1960s after recognizing the crucial importance of international public health protection and the minimization of disruption of global trade in food products. The founders considered harmonization of food regulations as an efficient tool to address these two concerns.¹⁶ At present, the Codex Alimentarius Commission has 189 members, with 188 states and one member organization (the EU) among them.¹⁷

¹⁵<https://www.carecinstitute.org/wp-content/uploads/2015/06/2015-SPS-TKM-2015-SPS-TKM-10-SPS-Agreement-and-Three-Sisters.pdf>

¹⁶https://www.wto.org/english/thewto_e/coher_e/wto_codex_e.htm

The World Organisation for Animal Health (OIE)

The World Organization for Animal Health (OIE) is, as the name suggests, the world organisation concerned with animal health. It was founded in 1924 and develops, amongst others, health standards for trade in animals as well as animal products. In addition, it develops recommendations and guidelines with regards to animal health. In 1998, a formal cooperation between the WTO and the OIE was agreed on.¹⁸ Currently, the OIE has 182 member countries.¹⁹

The International Plant Protection Convention (IPPC)

Introduced by the International Standards for Phytosanitary Measures (ISPMs), the International Plant Protection Convention (IPPC), is an intergovernmental treaty, signed by over 180 countries to 'protect the world's plant resources from spreading the introduction of pests and promoting safe trade'.²⁰ Established in 1992 and based in the Food and Agriculture Organization (FAO's) headquarters in Rome, the IPPC Secretariat, 'coordinates the work of IPPC contracting parties to achieve the Convention's goals.'²¹ As one of the 'Three Sisters' of the SPS Agreement, the convention plays a crucial role in international trade as it establishes the standards for phytosanitary measures and oversees their harmonization. While the IPPC standards are not legally binding, 'WTO members are required to base their phytosanitary measures on international standards developed within the framework of the IPPC'.²²

¹⁷ <http://www.fao.org/fao-who-codexalimentarius/about-codex/members/en/>

¹⁸ https://www.wto.org/english/thewto_e/coher_e/wto_oie_e.htm

¹⁹ <https://www.oie.int/about-us/our-members/member-countries/>

²⁰ <https://www.ippc.int/en/about/overview/>

²¹ <https://www.ippc.int/en/about/overview/>

²² <https://www.ippc.int/en/ippc-and-international-trade/>

The SPS Committee

The SPS Agreement established the SPS Committee in 1995 to function as a special forum to exchange information on all aspects related to the implementation of the SPS measures. The Committee meets three times each year and offers WTO members an opportunity to discuss trade concerns regarding the SPS requirements. Since its inception in 1995, over 340 trade-specific concerns have been raised by member states in the Committee.²³ All of the WTO's 159 member countries along with observer countries and international organizations are on the Committee.²⁴

The Committee 'reviews compliance with the agreement, discusses matters with potential trade impacts, and maintains close co-operation with the appropriate technical organizations.'²⁵ Under the SPS Agreement, the Committee also monitors the process of international 'harmonization' of measures and 'coordinates efforts in this regard with relevant organisations.'²⁶ The SPS Committee has developed a formal mechanism to safeguard the interests of developing countries by analysing how proposed or finalised SPS measures affect LDCs. The framework enables developing countries to discuss significant difficulties that they face due to the measures proposed by the Committee and to find possible solutions to them. The framework provides a

platform for discussions and policy ramifications on important issues.²⁷

Information on private standards

Notwithstanding the long history of private product standards, there is a recent rise of formal private standards.²⁸ Retailers as well as supermarkets require more and more compliance with private standards related to food safety, labour conditions, environment and animal welfare, as well as health.²⁹ There are a number of factors behind the rise in private product standards, including consumers' food safety concerns and companies' growing attention to Corporate Social Responsibility (CSR). Currently, there is an estimated number of 400 private schemes, which take on a variety of forms, including schemes developed by individual companies, and industry-wide collective schemes with international reach.³⁰ Despite the voluntary nature of the private schemes and the absence of a requirement by law to respect these standards, many private standards can be considered as being *de facto* mandatory. In cases where private standards become the norm in a particular industry, suppliers are left with little choice but to comply with the standards. Due to the rising importance of private standards, one can argue that they are at times even more powerful than public standards.³¹

²³<http://www.tradeforum.org/The-SPS-Agreement-WTO-Agreement-on-the-Application-of-Sanitary-and-Phytosanitary-Measures/>

²⁴http://www.fao.org/fileadmin/templates/est/meetings/cis_wto/5_Alcala_SPS_Agreement_and_Implementation.pdf

²⁵ https://www.wto.org/english/tratop_e/sps_e/spsund_e.htm

²⁶ WTO 'The Legal Texts' pg 61

²⁷https://www.wto.org/english/tratop_e/sps_e/spsagr_e.htm

²⁸<https://ictsd.iisd.org/sites/default/files/review/bridgesweekly/bridgesweekly12-12.pdf> ; <https://www.intracen.org/export-quality-management-a-guide-for-small-and-medium-sized-exporters-second-ed/> ;

https://docs.wto.org/dol2fe/Pages/FE_Search/FE_S_S009-DP.aspx?language=E&CatalogueIdList=60956,30105,87818,51372,55405,70258,72054,79449,60343,57815&CurrentCatalogueIdIndex=3&FullTextHash=1&HasEnglishRecord=True&HasFrenchRecord=True&HasSpanishRecord=True

https://docs.wto.org/dol2fe/Pages/FE_Search/FE_S_S009-DP.aspx?language=E&CatalogueIdList=60956,30105,87818,51372,55405,70258,72054,79449,60343,57815&CurrentCatalogueIdIndex=3&FullTextHash=1&HasEnglishRecord=True&HasFrenchRecord=True&HasSpanishRecord=True

²⁹ Fulponi, L. (2006). Private voluntary standards in the food system: The perspective of major food retailers in OECD countries. *Food Policy*, 31(1), 1-13.

³⁰https://docs.wto.org/dol2fe/Pages/FE_Search/FE_S_S009-DP.aspx?language=E&CatalogueIdList=60956,30105,87818,51372,55405,70258,72054,79449,60343,57815&CurrentCatalogueIdIndex=3&FullTextHash=1&HasEnglishRecord=True&HasFrenchRecord=True&HasSpanishRecord=True

³¹<https://ictsd.iisd.org/sites/default/files/review/bridgesweekly/bridgesweekly12-12.pdf> ; <https://www.intracen.org/export-quality-management-a-guide-for-small-and-medium-sized-exporters-second-ed/> ;

https://docs.wto.org/dol2fe/Pages/FE_Search/FE_S_S009-DP.aspx?language=E&CatalogueIdList=60956,30105,87818,51372,55405,70258,72054,79449,60343,57815&CurrentCatalogueIdIndex=3&FullTextHash=1&HasEnglishRecord=True&HasFrenchRecord=True&HasSpanishRecord=True

For suppliers in developing countries, private standards can have positive and negative impacts. A possible positive impact relates to the trade-creating effect of compliance with the standards. When suppliers succeed in improving their products' quality, for instance by investing in physical and human capital development, they can gain or maintain access to markets.³²

On the other hand, potential negative impacts are linked to the high burden of the costs of compliance with private standards for suppliers in developing countries. Suppliers can face heightened challenges in meeting the standards. This can result in additional barriers to market access, and the costs of compliance can hinder economic development. In addition, due to the numerous private standards, exporters are required to collect information on all relevant standards and ensure compliance with them.³³ Moreover, there are doubts about whether private standards go beyond what is scientifically justified. Concerns exist that standards might be manipulated by protectionist lobbies.³⁴

Within the SPS Agreement, it has not been specified whether private standards are SPS measures. This lack of clarity is reflected in ongoing debates about whether setting private standards is legitimate, or whether governments

are solely responsible for standards included in the scope of the Agreement.³⁵

EUREPGAP/GlobalGAP - one example of private standards

One instance of a private standard for good agricultural practices is the EUREPGAP/GlobalGAP farm assurance programme which focuses on food security of agricultural products, environmental management of the farms concerned, as well as the wellbeing, security and health of workers. In 1997, EUREPGAP (full name: Euro-Retailer Working Group Good Agricultural Practices) was initiated by retailers forming part of the Euro-Retailer Produce Working Group (EUREP), an association of European supermarkets. In 2007, in recognition of the increasing global reach, it was renamed as the Global Partnership for Good Agricultural Practice (GlobalGAP).³⁶

GlobalGAP has united a variety of voluntary private quality standards under one umbrella. It covers, amongst others, coffee, tea, fruits and vegetables, and is a so-called pre-farm-gate standard, meaning that the certificate applies to the planting of the seed until transportation of relevant produce away from the farm. An increasing number of products are certified with

DP.aspx?language=E&CatalogueIdList=60956,30105,87818,51372,55405,70258,72054,79449,60343,57815&CurrentCatalogueIdIndex=3&FullTextHash=1&HasEnglishRecord=True&HasFrenchRecord=True&HasSpanishRecord=True

³²<https://www.oie.int/doc/ged/D6061.PDF>
https://docs.wto.org/dol2fe/Pages/FE_Search/FE_S_S009-DP.aspx?language=E&CatalogueIdList=60956,30105,87818,51372,55405,70258,72054,79449,60343,57815&CurrentCatalogueIdIndex=3&FullTextHash=1&HasEnglishRecord=True&HasFrenchRecord=True&HasSpanishRecord=True
<https://ictsd.iisd.org/sites/default/files/review/bridgesweekly/bridgesweekly12-12.pdf>; Fulponi, L. (2006). Private voluntary standards in the food system: The perspective of major food retailers in OECD countries. *Food Policy*, 31(1), 1-13.

³³<https://ictsd.iisd.org/sites/default/files/review/bridgesweekly/bridgesweekly12-12.pdf>
<https://www.oie.int/doc/ged/D6061.PDF>
https://docs.wto.org/dol2fe/Pages/FE_Search/FE_S_S009-DP.aspx?language=E&CatalogueIdList=60956,30105,87818,51372,55405,70258,72054,79449,60343,57815&CurrentCatalogueIdIndex=3&FullTextHash=1&HasEnglishRecord=True&HasFrenchRecord=True&HasSpanishRecord=True

<https://www.intracen.org/export-quality-management-a-guide-for-small-and-medium-sized-exporters-second-ed/>

³⁴ Messerlin, P., Nielson, J., Zedillo, E., & Projet Objectifs du millénaire. (2005). *Trade for development*. London; Sterling: New York: Earthscan; Millennium Project.

³⁵<https://ictsd.iisd.org/sites/default/files/review/bridgesweekly/bridgesweekly12-12.pdf>

<https://www.oie.int/doc/ged/D6061.PDF>
https://docs.wto.org/dol2fe/Pages/FE_Search/FE_S_S009-DP.aspx?language=E&CatalogueIdList=60956,30105,87818,51372,55405,70258,72054,79449,60343,57815&CurrentCatalogueIdIndex=3&FullTextHash=1&HasEnglishRecord=True&HasFrenchRecord=True&HasSpanishRecord=True

³⁶<https://ictsd.iisd.org/sites/default/files/review/bridgesweekly/bridgesweekly12-12.pdf>
<https://www.control-union.fr/control-union/Agriculture-GlobalGAP-fr>; Henson et al – Do Fresh Produce Exporters in Sub-Saharan Africa Benefit from GlobalGAP Certification?

the GlobalGAP standard, reflecting its growing relevance.³⁷

A number of requirements need to be fulfilled in order to obtain certification by the GlobalGAP standard. These include but are not limited to; the registration of the production farm, the use of plastic and containers, as well as social aspects. Farmers can apply for certification, after having carried out a self-inspection and undergoing an external inspection conducted by a certification body.³⁸

There exists controversy about the effects of GlobalGAP on producers in developing countries, particularly in Africa. There is evidence that smallholder farmers in particular face difficulties in achieving compliance with the standards. As Humphrey maintains, compliance by small farmers with GlobalGAP is almost unachievable without out-grower schemes.³⁹ Considering that compliance with GlobalGAP and other private standards has become a market access condition, failure to comply with the standards can have adverse effects on the economic performance of the smallholder farmers concerned. Once compliance is achieved, however, there is evidence of positive impacts on the productivity and market access of the respective farmers.⁴⁰

Why SPS measures?

The overall aim of SPS certification is to strike a balance between ensuring food safety and animal and plant health standards on the one hand and avoiding unnecessary barriers to trade on the other hand. The Agreement encourages countries to adhere to international standards, but allows them to adopt their own, national standards, as long as they are scientifically justified, and only to the extent necessary to protect human, animal or plant life or health.⁴¹ The emphasis on 'harmonization' as part of the SPS Agreement, facilitates trade and export competitiveness by reducing the need for governments and producers to adhere to different standards and procedures in different markets thus making trade more streamlined. The disagreements and conflicts of health and safety measures in international trade have huge costs in terms of lost markets, incomes and food security.⁴² With the global climate change crisis, the emergence and global dissemination of plant health hazards are an imminent risk, making the implementation or the harmonization of the SPS measures both crucial and timely.⁴³

Considering the general reduction of trade barriers, the use of sanitary or phytosanitary restrictions for protectionist purposes can appear attractive to governments. After all, due to the technical complexity, the scientific necessity of a particular trade restriction can be difficult to challenge. The SPS Agreement, however, seeks to

³⁷ <https://ictsd.iisd.org/sites/default/files/review/bridgesweekly/bridgesweekly12-12.pdf>
<https://www.control-union.fr/control-union/Agriculture-GlobalGAP-fr>
Henson et al – Do Fresh Produce Exporters in Sub-Saharan Africa Benefit from GlobalGAP Certification?
Humphrey – Private Standards, Small Farmers and Donor Policy: EUREPGAP in Kenya.
<https://opendocs.ids.ac.uk/opendocs/bitstream/handle/20.500.12413/4167/Wp308.pdf>

³⁸<https://ictsd.iisd.org/sites/default/files/review/bridgesweekly/bridgesweekly12-12.pdf>; Asfaw – Does EurepGap standard marginalize poor farmers? Evidence from Kenya

³⁹ Humphrey – Private Standards, Small Farmers and Donor Policy: EUREPGAP in Kenya. ;
<https://opendocs.ids.ac.uk/opendocs/bitstream/handle/20.500.12413/4167/Wp308.pdf>

⁴⁰ Henson et al – Do Fresh Produce Exporters in Sub-Saharan Africa Benefit from GlobalGAP Certification?

⁴¹ <http://www.cuts-geneva.org/pdf/SSEA-Geneva%20Note1.pdf>
https://www.wto.org/english/tratop_e/sps_e/spsund_e.htm
Athukorala, P., & Jayasuriya, S. (2003)

⁴² https://www.ipcc.int/static/media/files/publication/en/2017/10/5._Krivonos_IPPC_trade_revised.pdf

⁴³ https://www.ipcc.int/static/media/files/publication/en/2017/10/5._Krivonos_IPPC_trade_revised.pdf

avoid this abuse of sanitary and phytosanitary measures, in particular by clarifying which factors governments can take into account when assessing necessary SPS measures. According to the SPS Agreement, when changing trade-related sanitary and phytosanitary requirements, they are required to give notice to other countries, and also be open to scrutiny about their regulations.⁴⁴

This suggests that producers in developing countries should benefit from the SPS Agreement for several reasons. First, based on the Agreement, developing countries can challenge unjustified trade restrictions, irrespective of their economic and political strength. Second, if private standards are also considered as SPS measures, the Agreement can also lead to a protection from arbitrary private standards. Third, resulting from the increasing harmonization of SPS measures, uncertainty among producers in developing countries about the required conditions for exporting to particular countries is expected to be reduced. Looking beyond producers in developing countries, also consumers in developing countries are expected to benefit due to the improvements in the quality of food resulting from the measures applied.⁴⁵

The need for technical assistance

Developing countries tend to face a higher burden than developed countries resulting from SPS measures. This results primarily from two reasons. First, the requirements usually concern agricultural products, upon which developing countries are in many cases dependent. Second, the technical knowledge, adequate production facilities as well as necessary infrastructure are oftentimes lacking in developing countries. These challenges can even incentivise developing countries to specialise away from sectors with the

highest regulatory measures, leading to an alternation of countries' export patterns.⁴⁶

In response to these challenges, Article 9 of the SPS Agreement specifies that Members agree to facilitate the provision of technical assistance to other Members, especially developing country Members, either bilaterally or through the appropriate international organizations. Also, the WTO Secretariat provides technical assistance. This mainly includes workshops and seminars on provisions of the Agreement and implementation strategies.⁴⁷

This and further technical assistance are crucial for developing countries to meet the high compliance costs resulting from SPS measures. As Athukorala and Jayasuriya maintain, "this is an area where there is a clear need for providing 'aid for trade'".⁴⁸

⁴⁴ https://www.wto.org/english/tratop_e/sps_e/spsund_e.htm

⁴⁵ https://www.wto.org/english/tratop_e/sps_e/spsund_e.htm

⁴⁶ https://unctad.org/en/PublicationsLibrary/iitcdtab70_en.pdf ; Athukorala, P., & Jayasuriya, S. (2003) <http://www.cuts-geneva.org/pdf/SSEA-Geneva%20Note1.pdf>

⁴⁷ https://www.wto.org/english/tratop_e/sps_e/spsagr_e.htm

⁴⁸ Athukorala, P., & Jayasuriya, S. (2003), p. 1413

SECTION 2

The Case of Ghana

Trade relations between Ghana and the EU have gone through many phases. The earlier stages saw the signing of the Lomé Convention which underwent many revisions between 1975 and 1999.⁴⁹ However, this trade agreement was *non reciprocal* in nature i.e. Ghana enjoyed favourable access to the EU's market without being obligated to accord the same treatment to goods originating in the EU. This was conducted under a temporary waiver that the WTO granted EU, since such a preferential trade arrangement violated the GATT/WTO principles particularly because non-ACP developing countries and LCDS did not receive the same privileges⁵⁰. This deviation from the WTO principles including the desire of the EU to bring trade alliance into agreement with WTO rules informed a shift towards the Cotonou Agreement that obtained the last waiver from the WTO and came into effect in 2000 but expired in 2007. Under the said Agreement, ACP and EU consented to progressively eliminate barriers to trade between them and enhance cooperation in all aspects relevant to trade in consonance with Article XXIV of GATT⁵¹. An interim Economic Partnership Agreement (iEPA) was initiated between Ghana and EU in 2007 at the time of expiration of the Cotonou Agreement. The full EPA occurred in July 2014 when the Regional body,

ECOWAS, endorsed the Agreement. It seeks to increase productive investments and job creation in Ghana and West Africa by boosting and enhancing trade between the ECOWAS region (that includes Ghana) and the EU towards a win-win developmental relationship.⁵²

Critics posited that the EPA was not favorable for Ghana because of asymmetric negotiations including anticipated negative effects. However, if Ghana had not signed the economic agreement, it would have been left with only two options namely the General System of Preferences (GSP)⁵³ and the GSP+.⁵⁴ Nonetheless, Ghana could not be moved to the GSP+ scheme, unless it had signed the EPA. The dearth of an EPA would have left Ghana with only one option which is the GSP for Ghana-EU trade⁵⁵. In that regard, Ghana could have continued to export 67% of her exports to the EU via the MFN tariffs for duty free after the Cotonou Agreement had expired in 2007. Interestingly, the MFN covered just primary exports such as hardwood timber, cocoa beans, gold etc. Meanwhile the GSP could have allowed only 5% of Ghana's exports to the EU under duty free. Hence, 28% of goods from the country could have had no access to the EU market (see figure 1)⁵⁶.

⁴⁹ "The Lomé Convention sets out the principles and objectives of the Union (at the time Community) cooperation with ACP countries. Its main characteristics are: the partnership principle, the contractual nature of the relationship, and the combination of aid, trade and political aspects, together with its long-term perspective"

⁵⁰<https://op.europa.eu/en/publication-detail/-/publication/c030c886-b15c-4456-930d-c9488db9cd0a>

⁵¹ *ibid*

⁵² *ibid*

⁵³ "This trade scheme offers slight tariff reductions to developing countries. Products covered under the scheme offers lower than MFN tariffs, but its failure is that it is not contractual, hence Ghana's market access is not guaranteed".

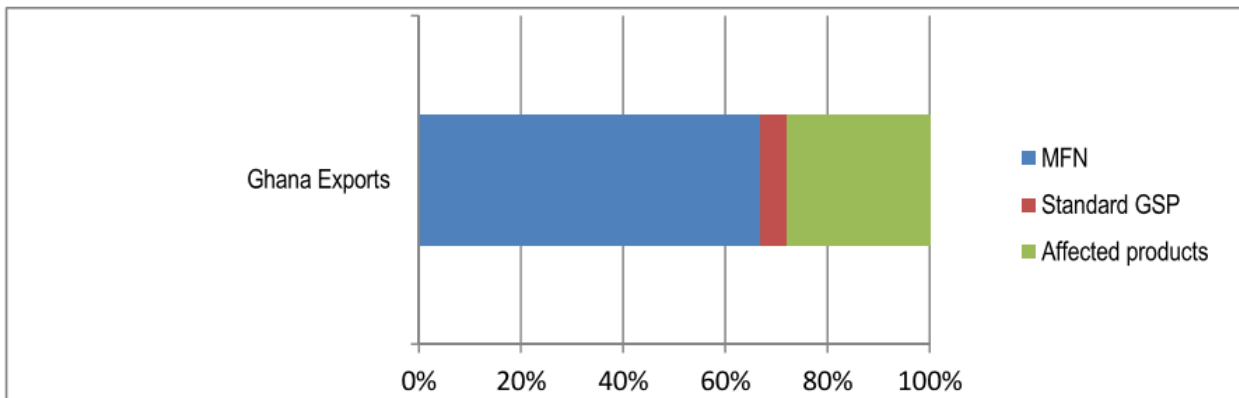
⁵⁴ "The GSP+ offers substantial or complete tariff removal on all products covered by the scheme. The GSP+ however applies to

only developing countries that are signatories to specific international conventions on human rights, good governance and environment etc" (Acheampong, T.; Omane-Achamfuor, M. and Tawiah N. A. (2014): The Economic partnership Agreement (EPA) between Ghana and the European Union: A Developmental Game Changer?)

⁵⁵ Acheampong, T.; Omane-Achamfuor, M. and Tawiah N. A. (2014): The Economic partnership Agreement (EPA) between Ghana and the European Union: A Developmental Game Changer?

⁵⁶https://ghana.actionaid.org/sites/ghana/files/actionaid_ghana_research_-_ghana_under_interim_epa_and_implications_for_socio-economic_development.pdf

FIGURE 1: CONDITIONS FACING GHANA'S TRADE IN THE ABSENCE OF AN EPA



Source: Action Aid- Ghana (2013).

Strikingly, these set of products make up the emerging non-traditional export sector of Ghana based on which the country constructs its industrialization policy. Hence, the absence of the EPA will make such goods highly uncompetitive in the EU market. Examples of the aforementioned goods including their shares of exports are as follows: preserved tuna (18-20%), cocoa butter and paste (4-6%), fresh vegetables (2-8%), pineapples (2.3-5.8%), plywood, aluminium, cassava and bananas and so on. Therefore, the EPA was necessary to maintaining their export competitiveness in the EU⁵⁷.

Currently, the EPA affords duty-free and quota-free access to Ghana's trade with the EU from 2008 to 2022. In the same vein, Ghana is to gradually liberalize 75% of exports coming from the EU, over a period of 15 years. The essence of the asymmetric market opening between Ghana (75%) and the EU (100%) is to demonstrate the divergence in developmental levels and the market sizes etc between them⁵⁸.

Among other benefits, the advent of the EPA has helped the growth of Ghana's non-traditional exports (NTEs). For example, the total amount of exports from Ghana to the EU quadrupled from nearly \$500m to over \$2billion between 2001 and 2012⁵⁹. Cocoa beans (46%), cocoa butter and paste(40%), tropical fruit, fresh or dried, nuts and spices (6%), vegetable oils other than palm and olive oils (4%) and so on have emerged as the top agri-food exports to the EU in 2019(See figure 2 for more details)⁶⁰

⁵⁷ ibid

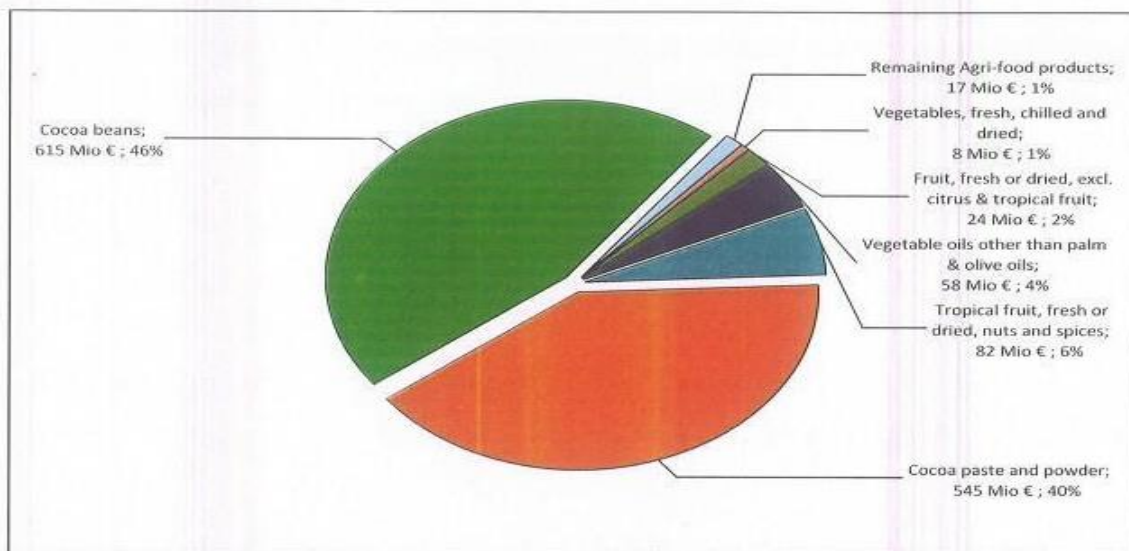
⁵⁸ Acheampong, T; Omane-Achamfuor, M. and Tawiah N. A. (2014): The Economic partnership Agreement (EPA) between Ghana and the European Union: A Developmental Game Changer?

⁵⁹ IMANI GHANA (2014). *IMANI Report: Evidence-based support for Ghana to RATIFY the EPA.*

⁶⁰ https://ec.europa.eu/info/sites/info/files/food-farming-fisheries/farming/documents/agrifood-ghana_en.pdf

FIGURE 2: EU AGRI-FOOD IMPORTS FROM GHANA BY PRODUCT CATEGORY

Top EU Agri-food imports from Ghana in 2019



Evolution of 20 top EU Agri-food imports from Ghana, 2015 - 2019

		Imports						
		Value Mio €					%	
		2015	2016	2017	2018	2019	Share in all Agri 2019	Change 2018-2019
1	Cocoa beans	819	1 010	583	651	615	45.6	-5.5
2	Cocoa paste and powder	405	339	454	486	545	40.4	12.1
3	Tropical fruit, fresh or dried, nuts and spices	42	45	58	63	82	6.1	30.2
4	Vegetable oils other than palm & olive oils	30	26	33	44	58	4.3	31.8
5	Fruit, fresh or dried, excl. citrus & tropical fruit	18	18	20	22	24	1.8	9.1
6	Vegetables, fresh, chilled and dried	6	4	6	8	8	0.6	0.0
7	Palm & palm kernel oils	3	12	6	3	3	0.2	0.0
8	Preparations of vegetables, fruit or nuts	1	2	2	3	3	0.2	0.0
9	Fruit juices	5	6	6	4	2	0.1	-50.0
10	Cut flowers and plants	1	1	1	2	2	0.1	0.0
11	Bulbs, roots and live plants	1	1	1	2	2	0.1	0.0
12	Fatty acids and waxes	0	2	1	2	1	0.1	-50.0
13	Flours and other products of the milling industry	0	1	1	1	1	0.1	0.0
14	Unroasted coffee, tea in bulk & mate	0	0	0	0	1	0.1	0.0
15	Oilcakes	0	1	1	1	1	0.1	0.0
16	Waters and soft drinks	0	0	0	1	0	0.0	-100.0
17	Chocolate, confectionery and ice cream	0	0	0	0	0	0.0	0.0
18	Infant food and other cereals, flour, starch or milk preparations	0	1	1	1	0	0.0	-100.0
19	Pasta, pastry, biscuits and bread	0	0	0	0	0	0.0	0.0
20	Cotton, flax and hemp, and plaiting materials	2	1	0	1	0	0.0	-100.0
	Remaining Agri-food products	39	39	0	1	1	0.1	0.0

Source : https://ec.europa.eu/info/sites/info/files/food-farming-fisheries/farming/documents/agrifood-ghana_en.pdf

In spite of the benefits derived from the preferential trade arrangement with the EU, Ghanaian exporters, especially SMEs, face certain challenges in their attempt to export to the EU market. The challenges are classified into two namely Sanitary and Phytosanitary measures and supply-side constraints such as productive

capacity constraints and trade related constraints⁶¹. This paper however, focuses on the former.

Like other EU trading partners, Ghanaian products must comply with SPS standards before gaining access to the EU market. Realizing the

⁶¹ <https://imaniafrica.org/2017/10/03/imani-report-maximising-gains-ghanas-trade-partnerships/>

importance of complying with the SPS requirements, government of Ghana (GoG) together with its allied institutions and development organisations have instituted projects and programmes aimed at promoting compliance with the aforementioned requirements especially for SMEs.

In March 2007, the GoG partnered with UNIDO to undertake a trade capacity-building programme (TCB) to help address issues with SPS compliance. It was implemented in Ghana from 2007 to 2018 and was funded by the Swiss Confederation through the State Secretariat for Economic Affairs (SECO). The main idea was to strengthen the national institutions so that they can further train local enterprises to adopt quality standards. It was also expected to establish traceability system at GEPA for export products, and to ensure that producers and exporters apply these traceability schemes. These programmes have produced the following outcomes;

In September, 2016, Ghana Export Promotion Authority (GEPA) conducted training activities for exporters, to improve the capacities they require to meet the needed global standards⁶². The Geographic Information System (GIS) has partnered with the GEPA to establish a database for exporters in food and agro-processing products with the aim of reducing the risk of exports to the EU emanating from the lack of traceability⁶³. The Green Label Certification Scheme (GLCS) project has been implemented by the Crops Services Directorate of the Ministry of Food and Agriculture (MoFA) and is designed to help increase competitiveness and quality of fruits and vegetables that are produced locally. It has also produced 500 guides and trained 400 farmers on Green Label Certification⁶⁴. In March 2016, the

Ministry of Trade and Industry (MoTI) commissioned the Ghana Green Label Farmer's Manual, which is a training instrument that informs farmers about how they can become certified⁶⁵. The manual is publicly available, and can be accessed at the Green Label Secretariat at the Ministry of Food and Agriculture.

Furthermore, UNIDO in collaboration with MoTI and SECO launched the Global Quality and Standards Programme (GQSP) in Ghana in September, 2019 that will end in March 2022. This builds on the trade capacity-building programme to fortify the ability of SMEs to adhere to market requirements along the cashew, oil palm and cocoa value chains. Like the TCB project, it seeks to build the quality and standards compliance capacity of the national quality institutions for them to in turn empower SMEs accordingly⁶⁶. In this regards SMEs that want to benefit from this programme may contact the Industrial Development Directorate of MoTI.

In spite of the aforesaid initiatives, SMEs in Ghana encounter some obstacles in participating in the supply chain because of SPS requirements mounted by trade partners especially the EU. Against this backdrop, CUTS International Genève, with the support of the Alliance for Product Quality in Africa, sponsored this national study. The objective is to identify the legislative and regulatory framework on product quality in Ghana, identify the Quality Assurance Institutions (QAI) and the difficulties encountered in Ghana and to develop good practices manuals that will guide the SMEs in the five selected products/sectors targeted in the study in order to improve their practices and to have more chances of entering the market. The methodology of Ghana's SPS study will be based mainly on both

⁶² <https://www.ghanabusinessnews.com/2016/09/29/gepa-holds-training-session-for-exporters/>

⁶³ <https://newsghana.com.gh/gis-creates-national-product-traceability-system-for-ghana/>

⁶⁴ TRAQUE (nd), Ghana Green Label Scheme for fruits and vegetables.

⁶⁵ <https://newsghana.com.gh/training-tool-launched-for-ghanaian-farmers/>

⁶⁶ <https://www.unido.org/news/new-programme-improve-standards-and-quality-cashew-palm-oil-and-cocoa-exports-ghana#:~:text=ACCRA%2C%2024%20September%202019%20%E2%80%93%20The,standards%20and%20quality%20of%20exports.>

desk research and field interviews with the responsible officials and service providers to ensure that the latest developments with regard to SPS measures and related processes are incorporated. A good practices manual would also be developed by: (i). Conducting a documentary analysis and an inventory of relevant SPS regulations and standards for the five covered sectors (ii). An appropriation of recent field investigations in the main production areas, to categorize and identify risk profiles and (iii). An engagement with the competent authorities of the targeted sectors, and recommendations for corrective measures according to the assessed risk.

The Legislative and Regulatory Framework on Product Quality in Ghana

The national legislative and regulatory framework for SPS measures

Ghana as a member of the WTO is a signatory to the WTO agreement on SPS which establishes a framework for food safety and standards including plant health⁶⁷. In that regard the SPS regulatory regime in the country covers food safety and standards, animal and plant health. The products covered in this study fall under the aforementioned categories.

Legislative framework on food safety

Several Acts have been established to regulate the food safety in Ghana. Particularly, cocoa paste, wholly or partly defatted, cocoa butter, fat and oil

and prepared or preserved tuna/skipjack/bonito, are required to comply with the Food and Drugs Act, 1992 (P.N.D.C.L. 305B) as amended, the Local Government Act, 1993 (Act462) and various Local Government (/Municipal/ Metropolitan /District Assemblies (MMDAs)) Instruments. *The Public Health Act, 2012 (Act 851)*. This Act has replaced the Food and Drugs Act, 1992 (P.N.D.C.L. 305B) and Food and Drugs Amendment Act, 1996 (Act 532). Part 7 of the Act creates the Food and Drugs Authority (FDA). The Act stipulates that a person shall not manufacture, import, export, distribute, sell or supply food unless the FDA has registered the food. Furthermore, the Act empowers the FDA to prosecute any person who goes contrary to the provision of part 7 of the Act, subject to subsection 56 of the Criminal and other Offences (Procedure) Act 1960 (Act 30)⁶⁸.

The Local Government Act, 1993 (Act462) and various Local Government (/Municipal/ Metropolitan /District Assemblies (MMDAs)) Instruments: Under this Act, the MMDAs are mandated to inspect all meat, fish, vegetables including every other foodstuffs and liquids of any form purported for human consumption even if they are for sale or not. Liquids and foodstuffs that are deemed unfit for human consumption could be seized and destroyed by the MMDAs⁶⁹.

Legislative framework on food standards

Two Acts have been instituted to ensure compliance of food standards. These are Standards Authority Act, 1973 (N.R.C.D 173) as amended and its ancillary legislation in addition to Weight and Measure Decree, 1975 (N.R.C.D 326)

⁶⁷https://www.researchgate.net/publication/283405943_Food_Safety_and_Plant_Health_in_Ghana_-_Analysis_of_the_Sanitary_and_Phytosanitary

⁶⁸ *ibid*

⁶⁹ *ibid*

Standards Authority Act, 1973 (N.R.C.D 173) as amended by Ghana Standards Board (Amendment) Decree, 1979 (A. F.R.C.D. 14)

Together with the aforementioned Acts, the subsequent ancillary legislation are applicable for food standards namely Ghana Standards (Certification Marks) Rules, 1970 (L.I. 662); Ghana Standards (Certification Marks) (Amendment Marks), 1970 (L.I. 664); Ghana Standards Board (Food, Drugs and Other Goods) General Labelling Rules, 1992 (L.I.1541)⁷⁰. Ultimately, the Ghana Standards Authority (GSA) (in revised laws of Ghana) has been mandated to establish and promote standards with the overarching objective of guaranteeing high quality of goods produced in Ghana. The N.R.C.D 173 also grants power to the GSA to regulate sale, manufacture, exportation and importation of foods. There is also a draft Standards Authority Bill, 2020 pending in Parliament awaiting Cabinet approval⁷¹.

Weights and Measures Decree, 1975 (N.R.C.D. 326) as amended by Weights and Measures (Amendment) Law, 1992 (P.N.D.L. 301): This is the law that sets up the units and measurements to be employed in Ghana as the International System Units. It declares that no other units of measurement or their multiples shall be used apart from what is has entrenched.⁷²

Legislative framework on pests affecting plants and plants products

The laws established to safeguard the health of plants include Environmental Protection Agency (EPA) Act, 1994 (Act 490) and the Plants and Fertilizers Act, 2010 (Act 803)

EPA Act, 1994 (Act 490): The EPA Act combines the laws concerning environmental protection and

pesticide control and regulation. It also enacts the EPA and empowers it to perform many anti-environmental pollution and pest management functions⁷³.

Plants and Fertilizer Act, 2010 (Act 803): The overarching objectives of the Act are to ensure plant protection, so as to avoid the emergence and spread of plant pests and regulate the import and export of plants and its materials. It also establishes that a person shall not import a plant and plant material or transport without an import permit and phytosanitary certificate. The Act sets up the Plant Protection and Regulatory Services Directorate (PPRSD) under the Ministry of Food and Agriculture (MoFA).

Legislative framework on animals and animal products

There are many laws that regulate animals and animal products in Ghana. However, the ones that specifically regulate Fishery products including Tuna products are the Fisheries Act, 2002 (Act 625) Fisheries (Amendment) Act, 2014 (Act 880), Fisheries Regulations, 2010 (Lt 1968) and Fisheries (Amendment) Regulations, 2015 (L.I 2217); The legislative frameworks regulate and manage fisheries with the intent of developing the fisheries industry and the sustainable exploitation of fisheries resources. The Act also establishes the Fisheries Commission with the Ministry for Fisheries given the mandate to institute regulations to enforce the Fisheries Regulations, 2010 (L.I. 1968) as amended. Concerning fish exports to the EU, the fisheries regulators in Ghana play a minor role. This is due to the fact that the European Commission protocol EC91/493/EEC mandates only the GSA to ensure compliance requirements established in directive 91/493/EEC before fish can be exported to the EU⁷⁴. Box 1 below

⁷⁰ ibid

⁷¹ ibid

⁷² ibid

⁷³ ibid

⁷⁴ ibid

summarizes the legislative and regulatory framework on product quality in Ghana particularly on the selected products.

BOX 1: LIST OF LAWS AND REGULATIONS WITH A BEARING ON FOOD SAFETY AND STANDARDS

Legislative Framework on Food Safety

- Public Health Act, 2012
- Local Government Act, 1992 (Act 462) and Establishment Instruments for Metropolitan/Municipal/District Assemblies

Legislative framework on Food Standards

- Standards Authority Act, 1973 (N. R. C. D 173)
- Ghana Standards (Certification Marks) Rules, 1970 (L.I. 662)
- Ghana Standards (Certification Marks) (Amendment Rules), 1970 (L.I. 664)
- Ghana Standards Board (Amendment) Decree, 1979 (A.F.R.C.D. 44)
- Ghana Standards Board (Food, Drugs and Other Goods) General Labeling Rules, 1992 (L.I. 1541)
- Weights and Measures Decree, 1975 (N.R.C.D. 326)
- Weights and Measures (Amendment) Law, 1992 (P.N.D.C.L. 301)

Legislative Framework on Controlling Pests affecting Plants

- Environmental Protection Agency Act, 1994 (Act 490)
- Plants and Fertilizers Act, 2010 (Act 803)

Legislative Framework on Health and Safety of Animals and Animal Products

- Fisheries Act, 2002 (Act 625) Fisheries (Amendment) Act, 2014 (Act 880)
- Fisheries Regulations, 2010 (Lt 1968) and Fisheries (Amendment) Regulations, 2015 (L.I. 2217)
- Public Health Act, 2012 (Act 851)

Source: Ministry of Health, Ghana (2013), Fisheries Management Plan of Ghana (2015-2019)

Actors/authorities responsible for the implementation of SPS measures

Figure 3 below illustrates the actors and authorities responsible for implementing the SPS measures including their mandate.

FIGURE 3: GHANAIAN PUBLIC SECTOR INSTITUTIONS INVOLVED IN SPS

Institution	SPS relevant Responsibilities& Mandate	Ministry
<p>Food and Drug Authority</p> <p>Address: Behind Tullow Oil, Tetteh Quarshie Interchange</p> <p>Telephone: 0302 233200 0302 235100</p> <p>Mobile: 024 4310297</p> <p>Website: fdaghana.gov.gh</p>	<ul style="list-style-type: none"> Regulatory Authority for monitoring quality and Food safety compliance of food and drugs to both operating domestic and international standards for all food types including fruits and vegetables in the fresh, semi-fresh and processed forms covering, domestic, exports and imports products. This includes: <ul style="list-style-type: none"> Food premises inspection & registration Food post market surveillance Food safety and quality management Food standards and legislation research 	<p>MoH</p> <p>P.O.Box M 44 Ministries Accra, Accra, Ghana</p> <p>TEL: +233 302 665651</p> <p>Website: www.moh.gh.gov</p>
<p>Ghana Standards Authority (GSA)</p> <p>Address: P. O. Box MB, 245, Accra</p> <p>Digital address: GA-288-5605</p> <p>Website: gsa.gov.gh</p> <p>Tel: (+233-302) 506991-5/500065/6</p>	<ul style="list-style-type: none"> Competent Authority for standards and method development, testing and analysis Demand-driven analysis of all products, both non-food and foods products; including fresh fruits, vegetables and their processed products covering domestic, exports and imports Conducts pesticide, microbiological, heavy metals, histamine and mycotoxin analysis on food and food products on client own samples delivered to the Authority Conformity assessment. Tasks include: <ul style="list-style-type: none"> Standards development Certification services Inspection services Laboratory services 	<p>MoTI</p> <p>Address: Ministries Accra, Ghana.</p> <p>GPS Address: GA-144-0150</p> <p>Website: moti.gov.gh</p> <p>Tel:+233 302 686-528</p>
<p>Plant Protection & Regulatory Services Directorate (PPRSD)</p> <p>Contact information:</p> <p>Pokuase Mayera Road</p> <p>P. O. Box M 37, Accra</p> <p>Tel: +233 (0) 243 305 049</p> <p>Website: waapp.org.gh</p>	<ul style="list-style-type: none"> Capable Phytosanitary Authority managing diseases and pests, especially quarantine, of all crops including exports and imports Regulates the quality and safety of plant protection products; especially inputs like pesticides and fertilizer and the associated challenges after their application on crops. Competent authority for registration of fertilizers Conformity inspection at KIA of EU SPS requirement Training of farmers when related to quarantine pests and safe application of pesticides 	<p>MoFA</p> <p>P. O. Box M 37, Accra</p> <p>Tel: 021-662961, 663036, 662810</p> <p>Website: www.mofa.gov.gh</p>

<p>Environmental Protection Agency (EPA) Address: No. 91 Starlet Street, opp Ghana News Agency P. O. Box M 362, Accra Tel:0302664697/0302 664698/0302 662465 Mobile: 028 9673960/0289673961 www.epa.gov.gh</p>	<ul style="list-style-type: none"> ● Competent National Agency charged with the responsibility for regulating the procurement, importation, storage, sales, distribution, disposal and application of all pesticides or plant protection products (PPP) covering all crops including cocoa in a manner that they do not harm the environment, pose health hazard and safety risk to human beings, crops, animals, plant and fish products for consumption. This includes: <ul style="list-style-type: none"> - Pesticide registration & licensing - Inspection & monitoring of (agro)chemicals - Management of hazardous chemical waste disposal and - obsolete (agro)chemicals - Post registration enforcement - Analysis of pesticides 	<p>MEST Post Office Box M232 Ministries, Accra Ghana. 0302-666 049 0302-688913/688 663 contact@mesti.gov.gh www.mesti.gov.gh</p>
<p>Customs, Excise and Preventive Service (CEPS) Address: Location: Off Starlets' 91 Road, near Accra Sports Stadium Postal: P. O. Box 2202, Accra-Ghana Telephone: +233- (0) 302 904545 OR +233- (0) 302 904546 Email: info@gra.gov.gh Website: gra.gov.gh</p>	<ul style="list-style-type: none"> ● Collecting import & export duties and taxes ● Prevention of smuggling ● Enforcement of laws on import and export restrictions and prohibitions 	<p>MoF Contact. Address. 28th February Road, Finance Drv, Accra. Phone. +233 302 747 197. Email. info@mofep.gov.gh. Website: mofep.gov.gh</p>
<p>Food Research Institute (FRI) Address: Gulf Street Adamafo Link, Okponglo, Accra GhanaPost GPS: GA-107-2878 Website: foodresearchgh.org Tel: +233-243-302-980</p>	<ul style="list-style-type: none"> ● Advise Government on national food Policy ● Support the food and agricultural sectors ● Conduct applied research into problems of: <ul style="list-style-type: none"> - Food processing, preservation and utilization - Storage, marketing and distribution - Food safety & quality assurance - National food and nutrition security - Micro, small, medium & large-scale industrial food processing 	<p>MEST</p>
<p>Council for Scientific and Industrial Research (CSIR) P. O. Box M32 Accra-Ghana / Location Agostinho Neto Road, Council Close, Airport Residential Tel: +233-302-777651- 4 Website: csir.org.gh</p>	<ul style="list-style-type: none"> ● Responsible for the overseeing of agricultural technology diffusion through the management of an extension delivery service in the country ● There are 13 research institutes of which FRI & WRI are relevant for SPS 	<p>MESTI</p>
<p>Water Research Institute (WRI) 2nd Csiir Close, Behind Golden Tulip, Airport Residential</p>	<ul style="list-style-type: none"> ● Conduct research into water and related resources, including contamination of water ● Generates and provides scientific information, strategies and services toward the rational 	<p>CSIR, MESTI</p>

<p>Postal Addresses: P.O. Box AH 38, Achimota-Ghana Telephone: (233-302) 775351, 775352, 779514, 779515, 775511 Website: www.csir-water.com Ghana Post GPS ; GA-018-9651</p>	<p>development, utilization and management of the water resources of Ghana in support of the socio-economic advancement of the country, especially in the agriculture, health, industry, energy, transportation, education and tourism sectors</p>	
<p>Directorate of Agricultural Extension Services (DAES) The Director, Directorate of Agricultural Extension Services (DAES) MOFA- ACCRA P.O. Box 199, Accra 0302 662325 / 664217 Website: http://www.e-agriculture.gov.gh/</p>	<ul style="list-style-type: none"> ● Responsible for the overseeing of agricultural technology diffusion through the management of an extension delivery service in the country 	<p>MoFA</p>
<p>Directorate of Crop Services (DCS)</p>	<ul style="list-style-type: none"> ● To promote the production and facilitate the processing, distribution and marketing of food, industrial and export crops; quality planting materials and the efficient use and management of soil and water resources for sustainable agriculture production ● Responsible for the development of the Green label – good agricultural practice development for fruit & vegetables, including development of standard operating practices (SOPs) 	<p>MoFA</p>
<p>Women in Agricultural Development (WIAD) Mrs Azara Ali-Mamshie National Project Coordinator Ministry of Food and Agriculture Accra E-Mail: alimamshie@yahoo.com Office No.: + 233 (0) 302668248</p>	<ul style="list-style-type: none"> ● Nutrition improvement ● Food safety along the agricultural value chain ● Value addition to agriculture produce ● Gender mainstreaming 	<p>MoFA</p>
<p>Ghana Irrigation Development Authority (GIDA) P.O.Box MB 154 Accra Tel: (233-0302) 662050/668661 Website: www.gida.gov.gh</p>	<ul style="list-style-type: none"> ● Provide efficient technical services in irrigation infrastructure development to enhance water and soil conservation best practices ● Assist farmers and other clients in irrigation and other agricultural water management technology transfers ● Provide Consultancy Services in irrigated agriculture 	<p>MoFA</p>

Source: Edwin van der Maden, et al. (2014)

Regulations/requirements related to private standards

In order to gain access to the EU market, food products must not only meet public mandatory safety and quality standards but must also comply with private standards. One of such requirements is food safety certification since food safety is a prime concern in all EU food sectors. This comes in the form of the implementation of product specific quality standards and quality Management Systems (QMS) concerning the production and handling process. However, certification requirements differ for processors, producer organisations and exporters⁷⁵.

Processors: Most buyers from Europe (especially food processors and retailers), demand the implementation of an HACCP-based food-safety management system. The following are the most predominant food safety management systems in Europe which are also identified by the Global Food Safety Initiatives (GFSI) and widely accepted by most retailers⁷⁶:

- BRC Global Standard for Food Safety
- International Food Standard (IFS)
- Food Safety System Certification 22000 (FSSC 22000)
- Safe Quality Food Program (SQF)

Producer organisations and exporters: Producers are required to keep to good agricultural practices to ensure food safety. GLOBALG.A.P. provides the primary standards in this area. These are

voluntary standards needed for the certification of agricultural production processes to ensure that products are safe and traceable. For cocoa, a unique standard is given by GLOBALG.A.P. and this involves all levels of production starting from pre-harvest activities including soil management and plant protection product application to post-harvest produce handling, packaging and storage. Besides, cashew and cocoa products that have been organically produced must possess an electronic certificate of inspection (eCOI) before being allowed to be imported into the EU⁷⁷.

Sustainability certification schemes have also been set up by Fair Trade and Rainforest Alliance. Fair Trade International has established standards for small-scale nut producer organisations which stipulates protective measures for cashew nut processing companies. Particularly, the standard outlines the terms of payment and FairTrade Minimum Price for traditional and organic raw cashew nuts kernels from Africa⁷⁸. Furthermore, several European companies have instituted minimum sustainability requirements for their suppliers that address major issues including child labour, healthy and safe working conditions, deforestation and pesticide use in line with cocoa production. UTZ and Rain Forest Alliance- now merged into a single organization and certification entity called Rainforest Alliance- are the largest employed certification schemes for cocoa⁷⁹. Other sectoral initiatives intended for sustainable cocoa production and trade include International Cocoa Agreement 2010, the European Standardization Committee (CEN) among others. For example, the CEN has developed a European standard for traceable and sustainable cocoa.⁸⁰

⁷⁵<http://bilateral-chamber-of-commerce-el-salvador-holland.nl/wp-content/uploads/2019/03/Requirements-EU-Cacao-in-English.pdf>

⁷⁶ *ibid*

⁷⁷ <https://www.cbi.eu/market-information/processed-fruit-vegetables-edible-nuts/cashew-nuts/market-entry>

⁷⁸ *ibid*

⁷⁹ <http://bilateral-chamber-of-commerce-el-salvador-holland.nl/wp-content/uploads/2019/03/Requirements-EU-Cacao-in-English.pdf>

⁸⁰ *ibid*

The Quality Assurance Institutions (QAI) in Ghana

General Background

Ghana developed a draft National Quality Policy (NQP) in 2017. The primary aim of the policy is to bolster National Quality as a way of driving export-led economic growth. Additionally, it also intends to guarantee supply of quality products and service at competitive prices as well as protect consumers and the environment.

Institutional Framework and QAI Characteristics

Quality Infrastructure (QI) refers to the system encompassing public and private organizations including policies and relevant legal regulatory framework and practices required to uphold and strengthen the quality, safety and environmental healthiness of goods, services and processes⁸¹. This is needed for efficient operation of domestic markets which in turn helps give international recognition for the local market (products) and thus enhances access to foreign markets⁸². Numerous institutions have been set up by governmental Ministries in Ghana to ensure that goods and services produced in the country meet both local and international standards and are of good quality for human consumption as well as protect plants and animals. The various institutions and organizations involved in quality assurance including their responsibilities are examined below:

A. Standardization

Ghana Standards Authority under the Standards Directorate is the body responsible for the

development, publishing and promotion of standards in accordance with the Standards decree of 1973 (NRCD 173). Its main aim of standardization is to establish and promulgate standards with the objective of ensuring the high quality of goods produced in Ghana for local consumption and export. The directorate has three (3) different departments namely (1). Food, agriculture, chemistry and material standards department (2). Engineering and basic standards department and the technical coordination services department⁸³.

Food, agriculture, chemistry and material standards department

The department develops, maintains and disseminates Standards on food, Agriculture, Chemistry and Materials. It also makes input into international and regional standardization endeavor in the development and harmonization of International and Regional standards. The department collaborates with organizations, some of which are; International Organization for Standardization (ISO), African Organization for Standardization and the ECOWAS Commission under the ECOWAS Standards Harmonization Mechanism (ECOSHAM). Additionally, the department hosts the National Codex Contact Point (NCCP) which acts as an intermediary between the CAC Secretariat in Rome and Ghana. Furthermore, the NCCP coordinates all important activities at the national level whilst serving as a connection with the food industry, consumers, traders and other relevant stakeholders⁸⁴.

The engineering and basic standards department.

This department is in charge of development, maintenance and dissemination of Standards in the areas including metrology and measurement

⁸¹ https://www.unido.org/sites/default/files/files/2018-06/QP_PRACTICAL_GUIDE_08062018_online.pdf

⁸² *ibid*

⁸³ <https://www.gsa.gov.gh/standards/>

⁸⁴ *ibid*

among others. It also liaises with the relevant regional and international bodies to ensure that the right standards are developed⁸⁵.

The Technical Coordination Services department (TCS).

The TCS coordinates the standards development work. It also manages and disseminates standards and other trade related information. For example, it manages all international affiliations and agreements concerning standardization, technical regulations, conformity assessment and metrology. Moreover, it serves as the National Enquiry Point (NEP) for WTO/ TBT issues⁸⁶.

B. Metrology⁸⁷

Metrology is undertaken by the Metrology Directorate under the GSA. Three (3) departments perform the functions of the Directorate including Scientific Metrology, Industrial Metrology and Legal Metrology. Scientific Metrology undertakes the organization and development of measurement standards as well as their maintenance. Examples include moisture meters for cereals, cocoa, coffee, and cashew, calibration of Analytical Balance, Platform Weighing Scales, Comparators, Moisture Analyzers, and Test Weights. Industrial Metrology is tasked to make sure that measurement instruments employed in industry, in production and testing processes, are adequately functioning so as to guarantee quality of life for citizens and for academic research. Examples are calibration⁸⁸ of weighing scales,

calibration of meters, prover tanks, syrup tanks and other storage tanks, calibration of compression machines and calibration of California Bearing Ratio (CBR) machine. Legal Metrology on the other hand is the use of lawful requirements and measurement instruments. It involves the implementation of regulations to ensure rightful level of credibility for measurement results. Some of these include inspections⁸⁹ of weights, measures, weighing and measuring instruments used for trade; verification⁹⁰ of and trading scales; and Pattern⁹¹ approval certification⁹².

C. Technical Requirements

The GSA General Labelling Rules, 1992 (L.I.1541), requires that imported goods should meet the following labelling requirements⁹³:

- Name of product
- List of ingredients in food
- List of active ingredients and their levels in drugs
- Date of manufacture and Expiry date/Best before/Use by date in respect of food
- Date of manufacture and Expiry date in respect of drugs
- Storage conditions

⁸⁵ ibid

⁸⁶ ibid

⁸⁷ **Metrology is the science of measurement, embracing both experimental and theoretical determinations at any level of uncertainty in any field of science and technology (See: <https://www.gsa.gov.gh/metrology/>)**

⁸⁸ **Calibration** is an operation that, under specified conditions establishes a relation between the quantity values with measurement uncertainties provided by measurement standards and (See: <https://www.gsa.gov.gh/metrology/>)

⁸⁹ **Inspection** is an examination of a product design, product, process or installation and determination of its conformity with specific requirements or, on the basis of professional judgment,

with general requirements (See: <https://www.gsa.gov.gh/metrology/>)

⁹⁰ Verification is a conformity assessment procedure (other than type evaluation) which results in the affixing of a verification mark and/or issuing of a verification certificate (See: <https://www.gsa.gov.gh/metrology/>)

⁹¹ **Pattern approval**:-Decision of legal relevance, based on the review of the type evaluation report that, the type of a measuring instrument complies with the relevant statutory requirements and results in the issuance of the pattern approval certificate (See: <https://www.gsa.gov.gh/metrology/>)

⁹² <https://www.gsa.gov.gh/metrology/>)

⁹³ <https://www.gsa.gov.gh/import-inspection/>

- Instructions or directions for use
- Net content
- Name and address of manufacturer
- Country of Origin
- Date of manufacture (as applicable)
- Batch/Lot number
- Electro-technical or chemical; characteristics for goods other than food and drugs
- The trade mark or brand name shall not be substituted for the name of a food
- Marks or labels shall be printed, impressed, embossed, or stamped
- Where marks or labels are stamped, they shall be in indelible ink and legible
- All information on the label in a foreign language other than English shall be translated into English. Failure to comply may lead to impoundment of such goods/products

Similarly, part Seven, Section 103 of the Public Health Act, 2012, Act 851 mandates the Food and Drugs Authority (FDA) of Ghana to ensure that prepackaged food manufacturers, producers, exporters, processors and prepackaged food importers comply with the established labelling requirements. The labelling requirements are in consonance with those which have been established under the GSA⁹⁴. However, two general principles guide the labeling requirements. The first principle establishes that prepackaged food shall not be described or

presented on any label or in any labelling in the following manner⁹⁵:

- False
- Misleading or deceptive
- Likely to create an erroneous impression regarding its character in any respect

The second principle stipulates that aforementioned food shall not be described or presented on any label or in any labelling by words, pictorial or other devices which refer to or suggestive either directly or indirectly of⁹⁶:

- Any other product with which such food might be confused,
- Or in such a manner as to lead the purchaser or consumer to suppose that the food is connected with such other product

D. Conformity assessment

Conformity assessment in Ghana is largely done by different bodies which are GSA, FDA, and QCD of the Ghana COCOBOD. This includes laboratory analysis and testing, inspection, and certification

Laboratory analysis and testing

Laboratory analysis and testing of food, plants and animals and their related products are carried out by the various departments and divisions under the GSA and FDA

Ghana Standards Authority: The Testing Directorate of the GSA conducts test and analysis on divergent products with the aim of quality evaluation and certification. This is done for individuals, manufacturers or industry, importers, exporters, institutions and Government Agencies.

⁹⁴<https://fdaghana.gov.gh/images/stories/pdfs/downloads/food%20guidelines/GUIDELINES%20FOR%20THE%20LABELING%20OF%20PREPACKAGED%20FOODS.pdf>

⁹⁵ ibid

⁹⁶ ibid

Products tested and analyzed comprise but not limited to farm produce, manufactured products for either local consumption or export, imported products, forensic products or tissues for Histopathology⁹⁷. The Directorate has six (6) separate departments namely Food and Agriculture Department, Microbiology Department, Drugs, Cosmetics and Forensic

Department, Engineering Department, Material Science Department and Laboratory Equipment Services Department. Figure 4 below illustrates the various departments, their laboratories, functions and the type of accreditation.

FIGURE 4: GSA TESTING DIRECTORATE AND ITS COMPONENTS

Department	Laboratory	Functions	Accreditation
Food and Agriculture Department	Food laboratory	Undertakes chemical analysis, organoleptic test etc. on food and agricultural products and produce	X
	Mycotoxins and Histamine laboratory	Performs various chemical analysis and organoleptic tests on beverages (alcoholic and non-alcoholic).	ISO/IEC 17025 in the area of Fish and Fishery products, cereals and cereal products, nuts and derived products.
	Drinks laboratory	Performs analysis to ascertain the level of toxins in food products and agricultural produce (e.g. cereals and legumes, fish and fishery products)	X
	Metallic Contaminants Laboratory	Performs analysis to ascertain level of contaminants as well as essential and other elements in various products/produce.	ISO/IEC 17025 in the area of heavy metals in Fish and Fishery products
	Pesticides Residues Laboratory	Performs analysis to ascertain level of pesticides residues and other residues including veterinary drug residues as well as active ingredient in formulations. The laboratory also undertakes analyses for PAH and related compounds e.g. in smoke fish as well as quantification of level of poisons etc. in various samples/products	X
Microbiology Department	Microbiology Laboratory	Undertakes Microbiological analysis on various ranges of products including Food, Drugs, and Materials to ascertain level of safety.	ISO/IEC 17025 in the area of Yeast and moulds, APC, S. aureus, E. Coli, coliforms and salmonella in Food and Environmental swabs; APC, E. coli and coliforms in water
Drugs, Cosmetics and Forensic Science Department	Drugs laboratory	Undertakes analysis on drugs and related products	X

⁹⁷ <https://www.gsa.gov.gh/testing/>

	Cosmetics Laboratory	Undertakes chemical analysis on cosmetics and related products	X
	Forensic Laboratory	Undertakes analysis on forensic samples including tissues and narcotics	X
	Histopathology laboratory	Undertake tests on tissues and other samples for medical diagnoses.	X
Materials Science Department	General Chemistry laboratory	Undertakes chemical tests on wide range of products including household chemicals, paints, fertilizers etc	X
	Water laboratory	Undertakes chemical analyses on water to ascertain quality and level of compliance with applicable standards	X

Source: GSA

Note 1: For the sake of this paper some departments and laboratories were not presented in the table

Note 2: Places marked X means no accreditation system was found

Food and Drugs Authority: The Laboratory Services Department has been established at the FDA to conduct analysis in food and drugs. The laboratory was established based on the Public Health Act 851-2012, Part 7 of the FDA section 127, which permits the Authority to establish

Food and Drug Laboratory and to perform functions related to the quality of products under Part 7⁹⁸.

⁹⁸ <https://fdaghana.gov.gh/qc-labs.php>

FIGURE 5: PRODUCTS THAT UNDERGO LABORATORY ANALYSIS AT THE FDA

Drugs Related Substances	Food Substances
<ol style="list-style-type: none"> 1. Drug 2. Medical devices, 3. Herbal medicinal products 4. Cosmetics 5. Cosmetics 6. Raw materials 7. Medicine adjuvants 8. Packaging materials 9. Medicine delivery systems 10. Systemic diagnostic agents 11. Any other product that the Authority considers a product of drugs for the purposes of this Part 	<ol style="list-style-type: none"> 1. Foods 2. Food packaging materials, and 3. Raw materials used in the manufacture of food

Source: FDA

Moreover, the laboratory has 7 units comprising six (6) testing units and one (1) Quality Assurance Unit. The testing units include the following:

- Drug Physicochemical
- Food Physicochemical
- Pharmaceutical Microbiology
- Food Microbiology
- Cosmetic / Household Chemical Substances
- Medical Devices

The Quality Assurance Unit on the other hand develops and implements a Quality Management System in accordance with the requirements of the International Standard – ISO/IEC

17025:2017 and WHO-GPPQCL(Good Practices for Pharmaceutical Quality Control Laboratory)⁹⁹.

Inspection

Both the GSA and FDA undertake inspection activities. The Inspection Directorate at the GSA offers Inspection Services to Manufacturing and Service Industries, Regulatory Bodies to ensure consumer protection. The objectives of carrying out inspections are as follows:¹⁰⁰

- To offer assurance of safety and quality of locally manufactured, imported and exported products.
- To improve the level of compliance with both national and international standards

⁹⁹ ibid

¹⁰⁰ <https://www.gsa.gov.gh/inspectorate/>

- To improve the level of compliance with regulations on imported and exported products
- To support the certification of locally manufactured products through inspection
- To obtain and maintain accreditation to ISO 17020:2012 (Conformity assessment- Requirements for the operation of various types of bodies performing inspection)

Three departments carry out the inspection activities namely Product Inspection Department, Fish Inspection Department and Import Inspection Department. The departments undertake the following activities¹⁰¹:

- Import inspection of High-Risk Goods (i.e. on imported goods)
- Inspection of Local Factories for Certification purposes
- Inspection of Fish and Fishery Products for local consumption and Export
- Consignment Inspection of manufactured goods and Issuance of Export Certificates
- Issuance of Health Certificates
- Market Surveillance

The Drug Inspectorate Department of the FDA undertakes drug inspection activities. The law that mandates the department to carry out inspections are found in the following sections of Part 7 of the Public Health Act, 2012, Act 851¹⁰²:

- Section 115 (1) Control of manufacturing
- Section 130 Registration of premises

- Section 131 Licenses and permits
- Section 147. (1) - (3) Regulations
- Section 148. (1)-(4) Guidelines and Codes of Practice

The department undertakes the below listed operational activities:

- Audit of local and foreign manufacturing facilities for compliance to Good Manufacturing Practice requirements
- Audit of local dry/cold storage facilities for compliance to Good Distribution Practice requirements
- Issuance of license for approved manufacturing and storage facilities
- Registration of importers of active pharmaceutical ingredients, finished pharmaceutical products, food supplements and herbal products
- Certification of qualified persons for manufacturing facilities. The department has two operational units; the Warehouse Inspection Unit and Manufacturing Inspection Unit.

Certification

This activity is also carried by the GSA, COCOBOD and the FDA. The GSA has three (3) departments under the Certification Directorate. The first department, which is the Product Certification Department, offers examination and unbiased third-party attestation that particular requirements have been met. Product certification conforms to ISO IEC 17065. The second department is the Management System Certification which undertakes third party certification of management systems of organizations to the

¹⁰¹ ibid

¹⁰² <https://fdaghana.gov.gh/drug-registration.php>

germane standards. This department is accredited by Deutsche Akkreditierungsstelle GmbH (DAKKS), a German accreditation organisation. The accredited system is ISO 9001:2015. The scope of certification scheme covers¹⁰³:

- ISO 22000 (Food Safety Management System)
- Hazard Analysis & Critical Control Point (HACCP)
- ISO 14001 (Environmental Management System)
- ISO 9001 (Quality Management System)

The third department is the Industrial Support Department. Its major aim is to support GSA's mandate of promoting standardization¹⁰⁴.

Part 7 of the Public Health Act, 2012, Act 851, also mandates the FDA to carry out inspection activities to regulate and control the manufacturing of food and drugs in the country either for domestic consumption or export. Similarly, drugs or food that are imported into the country are also inspected by the Authority¹⁰⁵. The Quality Control Division of the Ghana COCOBOD inspects and takes samples of Cocoa bean, prior to shipment, for analysis and grading to determine quality before an appropriate certificate is issued for export. This is done to ensure that Cocoa beans meet all appropriate national and international quality standards.

E: Accreditation of Conformity Assessment

The Standards Authority Act, 1973 authorizes the GSA to undertake conformity assessment activities. Products that meet the required regulation are given a mark of conformity known

as Standard Mark. This gives evidence of compliance to specifications. Such products bear a third-party guarantee, an assurance that the product has been inspected, tested and conforms to the requirements of an accepted standard. Also, it indicates that production has been supervised and controlled and thus assures safety and value for money. Similarly, it gives consumers confidence that products and services meet national regulations¹⁰⁶.

¹⁰³ <https://www.gsa.gov.gh/certification/>

¹⁰⁴ *ibid*

¹⁰⁵ <https://fdaghana.gov.gh/drug-registration.php>

¹⁰⁶ <https://www.gsa.gov.gh/certification/>

SECTION 3

Conclusion

Ghana has taken steps to amend and modernize its legislative and regulatory framework on food safety, animal and plant health. This stems from the fact that, the country recognises the importance of meeting the SPS requirements particularly for agricultural products such as cocoa beans and cashew nuts, as well as processed and semi processed products including tuna, cocoa butter, and cocoa paste among others. The country has the opportunity to export these products to lucrative markets such as the EU that are liberalised, however, this is only possible if both mandatory and de-facto SPS requirements are complied with.

To modernize the regulatory framework, the government of Ghana has partnered with International organisations such as UNIDO, and SECO to develop the quality and standard infrastructure of the country with the ultimate aim of helping SMEs to conform to the quality and standards set up by international partners.

Notwithstanding the modernization and presence of regulatory frameworks related to SPS measures, there is limited utilization of these measures especially by SMEs. The low application of the SPS measures could be due to the lack of information and education and the cost involved. Meanwhile, the institutional framework of SPS in Ghana consists of overlapping legislation and fragmented institutions full of ambiguity and poorly coordinated organizations. That is, SPS management, standards and measures in Ghana are complicated and cut across departments. In this regard, a good practice manual/guide delving into detailed analysis of SPS issues on the five covered products has been developed to complement this study. The manual identifies the good practices of

safety and hygiene procedures at all stages of the product marketing circuit (production, harvesting, transport, packaging, and export) through the understanding and monitoring of the various stakeholders in the selected sectors.

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