

IMPORTANCE OF REGIONAL TRADE

Various factors have facilitated an increasing movement of fish and fishery products across borders. Increased consumer spending power, increased consumption of fishery products, trade liberalization policies, regional free trade initiatives, globalization of food systems, technological innovations, improvements in the efficiency of processing, packaging, transportation and changes in distribution and marketing chains have all helped influence the way in which fishery products are prepared, marketed and delivered to consumers. Regional trade has also been boosted by the growth in aquaculture and by increased fish imports, particularly frozen fish from Asia.



Salted fish trader © Smartfish database

Key players in cross border trade in fresh fish as well as processed products such as dried, salted, smoked and frozen, are traders, route managers and transporters. Fish may be taken across a border using one of a variety of means, including refrigerated containers and trucks, pick-ups, cars, motorcycles, bicycles and by pedestrians on foot as head loads.

Border Fisheries Inspectors (BFI) are responsible for facilitating and monitoring cross-border trade. The primary role of a BFI is to assess the food safety, quality and legality of a product and the associated documentation against the legal requirements (regulations, standards, guidelines, and codes of practice). A BFI is expected to take appropriate action(s) to prevent harm to the final consumer and prevent illegal or unsafe products entering the market.

REGIONAL TRADE AND BORDER INSPECTION CHALLENGES

Regional fish trade is fraught with challenges for both the public and private sectors. Cost is a key factor including tariff and non-tariff (non-direct financial) barriers, which includes challenges with export licensing, logistics, technical requirements, documentation, and poor infrastructure throughout the value-chain. Increases in cost mean less competitive traders. Another challenge is ensuring quality and sanitation as higher quality standards are becoming an integral part of cross-border as well as national trade. In addition, border inspection authorities lack basic infrastructure and equipment in order to perform their inspection duties. Documentation requirements are often confusing and there is a lack of harmonized procedures, which means that the requirements of one country are different from the next, thus creating unnecessary bureaucracy and often lengthy delays. There is also the challenge of illegal unregulated and unreported (IUU) fish trade. This is the trade in undersized fish, caught using illegal fishing gears. Not only does this fish cross borders, but the illegal fishing gear is also traded between countries. Many inspection services also lack operational funding, there is often no or limited access to laboratory testing facilities, as well as limited skills and knowledge in modern food safety requirements amongst inspectors.



Cross border trade relies on transport and traders © SmartFish database

It is not unusual for fish traders to operate outside the formal economy and informal cross-border trade is common. Such consignments of fish escape the regulatory framework set by government, avoiding certain taxes and regulatory procedures. This trade also goes unrecorded in official government records and revenue is therefore lost to the state. Fish consignments may also pass through the official border crossing but is "under-invoiced" (i.e. reporting a lower quantity, weight or value of goods in order to pay lower tariffs), misclassified (i.e. falsifying the description to attract lower tariffs), or are mis-declared with a fake country of origin. Not only is revenue lost, but there is a heightened risk of harmful and illegal products reaching the consumer.

A great deal of development support and attention has been given to helping countries meet the stringent food safety and quality requirements of major seafood markets such as the EU. Less attention and resources however, have been given to the development of regional fish trade within Africa and strengthening the associated food safety and quality systems. Emerging international food safety practices such as traceability, product recalls and food safety alert notifications, as well as effective monitoring, control and surveillance (MCS) practices to combat IUU have yet to be applied in regional trade.

HARMONIZED PROCEDURES PROCESS

The need for a harmonized regional border fishery inspection guide and standards was identified as a priority during a regional SmartFish Border Fisheries Inspectors meeting held in Kitwe, Zambia in 2012. As a result of the meeting, a team of inspectors from the region were mobilized to develop a draft procedures manual that has now been finalized. A harmonized Border Inspectors Procedures Manual (BIPM) was launched in December 2012 at a training workshop in Jinja, Uganda. To date SmartFish workshops have helped to train inspectors from 10 countries and have provided an opportunity to further refine the guide and clarify related intervention opportunities.

The BIPM provides procedures and information to help BFI carry out their duties effectively and according to agreed standards. It is designed to help ensure fish and fishery products that cross borders are safe to eat and of the required standards; ultimately helping to ease trade, improve transparency and reduce costs.

Harmonizing inspection procedures for regional trade

Based on the core principles of food inspection as well as internationally recognized best practices for safe and wholesome food, the BIPM promotes the recommendations of the Codex Alimentarius Commission and the UN FAO Code of Conduct for Responsible Fisheries. The guide provides countries and regional trade organizations such as COMESA, SADC, IGAD and EAC with information to strengthen policy, procedures and practices and promote more free and fair regional trade in fish and fishery products.

Available in both French and English, it is intended for fisheries inspectors working at border posts, as well as for anyone else involved in fish, food and trade such as environmental health departments, extension workers, local authorities and the private sector. For the latter, the guide helps understand what is expected when trading fish across national borders. The guide has been informed by international food safety standards and aspects of MCS, which is traditionally a fisheries resource management tool, but has been adapted to the trade arena.

An important success of the work has been the involvement of the Lake Victoria Fisheries Organization (LVFO), which has agreed to assist with the ratification of the BIPM on behalf of the East African Community (EAC). At some point in the near future the BIPM will therefore become mandatory for Burundi, Kenya, Rwanda, Tanzania and Uganda; a major achievement.

TRAINING

A six-day training course has been developed based on the BIPM. It involved learning by doing using case studies, working group activities, role play, fieldwork and plenary discussion. Training sessions are linked to particular sections of the manual. A final assessment process is used during the training to assess participants learning and recap on the main issues covered.

To date 81 public sector inspectors have been trained from ten countries (see Table below). These inspectors are associated with 52 important border posts in the eastern and southern Africa region through which fish and fishery products are exported or imported.

Country	No. of Inspectors trained	No. of keyborder posts
Burundi	4	2
DRC	11	6
Kenya	7	5
Malawi	5	4
Rwanda	7	6
South Sudan	5	1
Tanzania	4	4
Uganda	24	17
Zambia	9	7
Zimbabwe	5	2
Total	81	54

For some countries such as Burundi, Malawi and South Sudan the training has raised awareness of the need for border inspection controls. In Malawi for example, the training has inspired the establishment of a border fish inspection service, which did not previously exist.

WHAT CAN GOVERNMENTS DO?

Despite the work to harmonize border inspection procedures, there is still a need for other, and varied, interventions to ensure cross border trade is properly monitored, made easier and standards are met. Many of these require high level political intervention and support, including:

- Sensitization and capacity building of all stakeholders in inspection and the importance of fisheries resources and deployment of well-trained and properly motivated inspectors at all relevant border points;
- Provision of necessary infrastructure, equipment, services and logistical support for border inspection and sufficient inspectors to ensure compliance to the rules;
- Common legislation within the region and between countries developed based on harmonized procedures and stronger enforcement of legislation through regional collaboration and joint patrols/task forces;
- Increased collaboration and networking between countries and between different agencies and fisheries inspectors in the region.



The importance of regional trade cannot be overemphasised © SmartFish database

These issues should form the basis of future regional and national initiatives and efforts to improve regional fish trade and sustain the contribution of fish to regional food security.

CONCLUSIONS

Regional trade in fish and fishery products is important but associated with numerous challenges. Harmonised fish inspection procedures for cross-border trade are an important contribution to improved regional trade and the uptake of these by the EAC and other regional economic communities (REC) will be an important step forward. Thanks to SmartFish a cadre of trained inspectors now exists and a training course has been developed for future capacity building.

Other intervention opportunities exist that are as equally important and that also require action, particularly high level political support. If these other interventions are taken seriously and implemented then there will be a strong likelihood that the harmonised procedures will be implemented and regional trade will become more transparent and contribute to sustainable fisheries and sustainable livelihoods.

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