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# ZIMBABWE AGRICULTURAL COMPETITIVENESS PROGRAM

ENVIRONMENTAL MITIGATION AND MONITORING PLAN

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# ZIMBABWE AGRICULTURAL COMPETITIVENESS PROGRAM

## ENVIRONMENTAL MITIGATION AND MONITORING PLAN

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## ACRONYMS

ACP	Agricultural Competitiveness Program
AMID	Ministry of Agriculture, Mechanization & Irrigation Development
CA	Commodity Association
CIBER	Competitiveness Impacts of Business Environment Reform
CIG	Commodity Industry Group
CFU	Commercial Farmers Union
DOHOPA	Domboshawa Horticulture Producers Association
EMA	Environmental Management Agency
FaaFB	Farming as a Family Business
FACHIG	Farmers' Association for Community Self-Help Groups
GLOBALGAP	Global Good Agricultural Practice
GMO	Genetically Modified Foods
HACCP	Hazard Analysis and Critical Control Point
LIT	Livestock Identity and Traceability
MAPA	Murehwa Agricultural Producers Association
MRLs	Minimum residue levels
NGO	Non Governmental Organization
PAPST	Public Affairs & Parliamentary Support Trust
RIA	Regulatory Impact Assessment
SAZ	Standards Association of Zimbabwe
SAPST	Southern Africa Parliamentary Support Trust
SIRDC	Scientific and Industrial Research and Development Centre
sms	short messaging service
SPS	Sanitary and Phytosanitary Standards
STTA	Short Term Technical Assistance
TA	Technical assistance
USAID	United States Agency for International Development
ZCFU	Zimbabwe Commercial Farmers Union
ZESA	Zimbabwe Electricity Supply Authority
ZFU	Zimbabwe Farmers Union
ZIMACE	Zimbabwe Agricultural Commodity Exchange
ZIM-ACP	Zimbabwe Agricultural Competitiveness Program
ZINWA	Zimbabwe National Water Authority

# ACP EMMP

## *Background*

Zim-ACP operates at policy and market levels promoting agriculture private sector competitiveness. Environmental issues impact directly on business and sector productivity and future sustainability and will therefore receive due attention in the implementation of the program. Preservation of the environment is also a key expectation of every USAID program. The EMMP describes the anticipated environmental impacts of ACP activities and outlines mitigation and monitoring measures to be taken. Zim-ACP quarterly reports to USAID will give brief updates on mitigation and monitoring measures being implemented and results of the environmental monitoring in line with the EMMP.

The EMMP is presented by each of the three ACP program components.

## *Component 1*

### **Strengthening Organizational Effectiveness for Service Provision**

Zim-ACP's Component 1 involves strengthening representative bodies of farmers unions, commodity and agribusiness associations to be better able to deliver services to their paying members as well as being able to lobby and advocate for a better operating environment for their members.

The approach to this work involves conducting an assessment of the capacity gaps in the partner organizations and supporting strategic planning with each organization to identify areas of focus to move the organization forward. Areas of interest and support for Zim-ACP include

- Organizational development, governance and management;
- Service provision for membership recruitment and retention;
- Resource mobilization;
- Gender mainstreaming; and
- Lobbying and advocacy for an improved business environment at national and local levels.

Possible services that unions and associations can provide in order to gain new members while retaining existing membership include offering technical and agribusiness training. This will attract new members who will pay membership joining and subscription fees in order to participate in the trainings while raising revenue through the training of non-members, for a fee. Other areas of service provision could include dissemination of market information and organising agricultural extension services for members.

Short-term Technical Assistance (TA) will be provided to assist the organizations identify the nature of services that will be viable and sustainable to offer to members on fee-paying basis or as commercial enterprises of the organizations. A consultant with experience in the development and provision of services by farmers' organizations and commodity associations will be hired to undertake the work and develop Action Plans for service delivery to be implemented mainly by CFU, ZCFU, ZFU and other independent commodity associations.

While Technical assistance aimed at building associations' capacity to provide agribusiness training and extension services; and disseminate market information, is expected to have no significant adverse effects on the environment, care will be taken in the provision of technical training.

Technical training will be aimed at promoting improved agricultural practices intended to result in more sustainable farming methods, higher yields and income. Zim-ACP is aware that potential, cumulative environmental impact of micro, small and medium enterprises is significant and may include pollution of air and water, drawdown of communal water resources, and poor management of organic waste. Without environmental due diligence in technical assistance, technical assistance may increase the numbers of enterprises (and the scale of individual enterprises) that have potentially significant adverse environmental impacts.

To mitigate negative impacts on the environment, Zim-ACP will ensure that the proposed curriculum for agronomic training only promotes adoption of agricultural inputs (seeds) suited to the agro-climatic zone to which they are being introduced. Excessive use of fertilizer and or manure will be discouraged. The training curriculum shall promote use of inputs in an environmentally sound manner. This will include:

- Avoiding indiscriminate use of chemical fertilizers
- Obtaining an assessment of soil conditions (fertility) so that the right quantity of fertilisers is applied based on site-specific factors
- Considering fertiliser application in the context of the overall farming system. This includes the use of organic manure and residues, soil cultivation, crop rotation and water harvesting.

To mitigate negative impact of pesticides on the environment:

- only PERSUAP-approved pesticides shall be included in the curriculum for agronomic training
- the training curriculum shall include safeguards for health and safety of workers and measures to protect the environment
- training curriculum shall include monitoring of efficacy of pesticides.

## **Strengthening Commodity Industry Groups for Evidence-based Advocacy**

In addition to work with the individual representative bodies of farmers and agribusiness, Zim-ACP is rebuilding the organizational infrastructure and capacity of representative bodies within a given commodity value chain or Commodity Industry Group (CIG) for collective action and to advocate for an improved agribusiness environment for their industry. This involves producers associations and agribusiness representative bodies of various players in six commodity industry groups, namely (i) Livestock & Meat, (ii) Horticulture, (iii) Cotton, (iv) Grain/Cereals, (v) Legumes and Oilseeds and (vi) Tree Crops (tea and coffee) adopting a value chain perspective for addressing issues facing their industry. Zim-ACP is adopting the CIBER Assessment approach as a framework for mobilizing, facilitating, coordinating and guiding the players in a given CIG to (i) identify and dialogue on issues and constraints, including regulations, facing their CIG, (ii) prioritize constraints and proposed interventions, including

regulatory reforms (iii) undertake applied economic analysis to assess economic impact of proposed reforms to generate the evidence for advocacy; (iv) synthesize the evidence into position papers for advocacy for improved business environment supportive or facilitative of competitiveness of the commodity value chains.

Zim-ACP will provide TA to the CIGs to facilitate the CIBER Assessments. The short term consultants will facilitate the process of identifying environmental, economic, social, technical and legal constraints and issues affecting competitiveness of businesses across the value chain. The consultants will work closely with stakeholders in the value chain and generate the evidence for use in the analysis and review of issues (environmental, economic, social, technical and legal) affecting the sector; proposing changes for implementation by industry players, business and/or their associations, service providers and government. Where there are gaps affecting competitiveness and sustainability of the sector, in existing regulations, new regulations will be proposed, subjected to analysis and presented to authorities for consideration.

To ensure that CIGs take a keen interest in regulatory formulation, analysis, implementation, monitoring, impact analysis and review, TA will include educating association leadership on how they are affected positively or negatively, by regulations; their role in the development, monitoring and impact assessment and review of regulations.

Importance of regulatory impact assessment (RIA) will also be included in the TA with the aim of encouraging CIGs to initiate and be involved in RIA so that they can feed into review of regulations, where regulations are found to be burdensome.

To ensure sustainability of the regulatory review process, Zim-ACP will largely rely on local consultants for the short term technical assistance. Where international consultants are brought in to provide specialist skills, they will be teamed with local consultants to ensure impartation of skills to locals who can be called upon to provide TA in future regulatory review by industry.

### **Capacity Building on policy analysis, research and evidence-based advocacy**

Zim-ACP works closely with the leadership of farmers' organisations, commodity and agribusiness associations and capacity-builds them for effective advocacy. This involves building the capacity of associations

- to take a keen interest in policies and regulations that affect their constituencies (including international agreements and treaties) and to understand their role (as associations) in the development; enactment; in follow-up actions to ensure implementation; in regulatory impact assessments and review of the policies or regulations;
- in lobbying and advocacy skills to approach key decision makers with well packaged, evidence-based messages to catalyze regulatory review on behalf of their constituencies.

To ensure that leadership of farmers' organisations, commodity and agribusiness associations prioritise issues of environmental protection in their lobbying and advocacy work, capacity-building of leaders will incorporate extension messages on environmental protection including:

- environment management obligations under Zimbabwean law
- benefits (in terms of long-term sustainability of businesses) of environmental compliance
- cost of non-compliance in terms of e.g. environmental degradation, and heavy penalties.

Informed leadership will be expected to cascade the environmental education to members during meetings, workshops and other forums, in the course of their work. Environmental information dissemination to members can also be done through in-house magazines and other publications, as well as single line messages accompanying market information sms. Good environmental messages to be passed-on to members include

- promotion of good land husbandry practices
- containment of *veld* fires and overgrazing
- importance of tree planting and re-forestation
- complying with environmental laws as a good practice.

Zim-ACP will encourage association leadership to take a keen interest; participate and make representations on behalf of members; in various forums organized by EMA, Parliamentary Portfolio Committee on Environment and other environmental protection agencies, to discuss policy issues, some of which have far-reaching effect on business and sector viability.

On advocacy, the organizations are expected to identify issues (including environmental issues) at local, district and provincial levels that they will proactively advocate for on behalf of their members. The issues will be on policy or development strategies, regulations or administrative procedures whose reform will improve the business environment in which members operate. The issues could be on environmental concerns with a potential to negatively affect future productivity and sustainability of the industry or businesses.

Given the importance of building capacity for evidence-based advocacy and the organizations being encouraged to pro-actively identify national and local issues on which to base the advocacy, Zim-ACP proposes to put in place, a hands-on mentorship advocacy training program. The program will include support for research and analysis to generate evidence-based position papers for submission to relevant bodies, including Ministries, local and provincial governments as well as other government and regulatory bodies such as Zimbabwe National Water Authority (ZINWA), Zimbabwe Electricity Supply Authority (ZESA) Zimbabwe Revenue Authority (ZIMRA), Environmental Management Authority (EMA). Zim-ACP will provide TA to collect evidence for an objective review and analysis of the regulations including the cost of the current and benefits of the proposed new regulation. When required at district and provincial levels, Zim-ACP will engage the Public Affairs and Parliamentary Support Trust (PAPST) to facilitate the advocacy and lobbying for FACHIG, DOHOPA, MAPA as well as provincial leadership of ZFU and ZCFU with their local Parliamentarians on local issues. The Southern Africa Parliamentary Support Trust (SAPST) will facilitate engagement with the various Parliamentary Portfolio Committees on issues of interest at commodity industry or national level. The approach will be to hand-

hold the association leadership so that they gain skill on how to lobby and advocate in future, thereby building sustainability.

Technical assistance to associations for purposes of improving analysis and advocacy is expected to have no significant adverse effects on the environment. Advocacy capacity building is anticipated to have a positive impact on the environment as local leadership will be better equipped to advocate and engage on issues with potential negative effects on the environment.

## **Regulatory Review and Reforms**

A key activity under Component 1 is facilitating review/analysis of legislative acts and statutory instruments to identify aspects that need to be reformed in order to improve competitiveness of the agriculture private sector. The process of regulatory review will be guided by principles of environmental management as contained in the laws of Zimbabwe. The principles include public participation and polluter pays. Various stakeholders in the value chain will be brought together for consultations and discussions using technical, economic, gender and environmental tools in the analysis of (a) the current regulations of a particular value chain, highlighting gaps, inconsistencies, outdated and/or archaic provisions (e.g. where issues of gender and environmental are excluded) that impact on competitiveness and need to be reformed; (b) an assessment of the proposed changes to the regulations or proposed new regulations as to their implications for competitiveness and (c) making suggestion on aspects that need to be modified in order to enhance competitiveness (e.g. paying close attention to issues of gender and the environment). Where industry practices have a potential to affect the environment, penalties will be proposed or upheld, in the interest of environmental protection.

To ensure that environmental issues are adequately dealt with in the regulatory review process, stakeholder consultations will include representation from Environmental Management Authority (EMA), Ministry of Environment & Natural Resources, civil society groups working on environmental protection, as well as various other stakeholders in the value chain. Environmental issues raised during stakeholder consultations as well as during the technical, economic, gender and environmental analysis will be analysed to ensure that the proposed new or reviewed regulation has no adverse effect on the environment. Where there are conflicting regulations, ACP will facilitate (through evidence based position papers) adoption and lobbying for environmentally-friendly policies. Where limited environmental issues are anticipated, mitigating measures will be recommended and a monitoring and reporting mechanism put in place to ensure compliance.

## **Regulatory Database development**

One of Zim-ACP Component 1's major activities is creating a database of legislative acts and statutory instruments in the agricultural sector in Zimbabwe. The comprehensive database will be uploaded onto the Zim-ACP's website and will be available for stakeholders' retrieval and reference. The database, the first of its kind in Zimbabwe, will serve as a one-stop-shop for individuals and groups with interest in agricultural regulations (including those related to environment and animal welfare issues in the agriculture sector).

The Zim-ACP website, when ready, will be launched at a well publicised event where stakeholders will be informed of the availability and potential use of the agricultural regulatory database.

## **Provision of support to farmers' unions, commodity and agribusiness associations on management of pertinent regulations**

Because of Zim-ACP's work on compiling the agricultural regulatory database and providing support to selected CIGs in the regulatory review process, Zim-ACP is well placed to provide initial advice/interpretation of regulations as well as an advocacy strategy to value chain players whenever they have issues with regulations. Zim-ACP, through their regulatory researcher will provide the following support to partners (i) in-house regulatory research and technical assistance to ZCFU, ZFU, FACHIG, DOHOPA, MAPA and other stakeholder organizations in line with their Advocacy Action Plans for review of regulations and/or administrative procedures at local government levels and (ii) supporting the evidence-based research and analysis of the commodity industry groups for their ongoing advocacy work on regulatory issues.

Interaction with the Livestock and Meat CIG early in the program indicates that they require more extensive support. The Livestock and Meat CIG has identified several issues (including environmental and health issues) deemed to have negative impacts on the industry that need attention. These issues include:

- Burden of regulations and costs of compliance or non-compliance arising from multiplicity of regulatory agencies, some with roles that are duplicative or raising levies not based on any consultations with the industry players;
- Implications of surtaxes or increased duties on the cost of production, overall viability and competitiveness;
- Continued importation of meat products (poultry offal and pig bones) that are not permitted by the Animal Health Act and selling of ungraded beef and pig meat products posing a high risk to humans and the animal industry;
- Continued restrictions on the use of GMO-based ingredients in animal feed.

Because of the multiplicity of issues affecting the livestock and meat industry, Zim-ACP will facilitate production of short-term technical papers to generate the evidence for presentation to the various regulatory agencies, Ministry of Agriculture Mechanization & Irrigation Development (AMID) and Parliamentary Committees at their request or as part of advocacy and lobbying.

Zim-ACP will monitor and report on positive and negative developments in the environmental and health regulations review, and potential mitigating activities.

### ***Component 2***

ACP's Component 2 deals with improving market infrastructure and institutions for competitiveness of the agriculture private sector. The market institutional infrastructure considered for development or revamping include (i) national and sectoral systems for ensuring food safety, animal health and crop Sanitary and Phytosanitary standards (SPS); (ii) the adoption of standardized and verifiable processes that will enable horticulture farmers to meet established technical requirement and good agricultural practices

for the local, regional and global markets; (iii) commodity exchange and warehousing receipt systems, (iv) market institutional infrastructure support services that could be offered through collective actions of commodity producers, industry or trader associations and farmers' organizations. The planned activities and expected outcomes are outlined below.

## **Quality Standards**

Information from the agriculture private sector indicates discontent with deterioration of services for testing for minimum residue levels (MRLs) in horticulture produce being sent to markets in Britain and EU and lack of confidence in laboratories for testing for microbial contaminants, pesticide residues and naturally-occurring toxicants in food and meat products. The horticulture industry is also facing uncertainty in South Africa markets due inadequate measure to control the fruit fly in fruits and aflatoxin in groundnuts. In addition to compliance with globally accepted private standards, such as Hazard Analysis and Critical Control Point (HACCP) and Global Good Agricultural Practice (GLOBALGAP) exporters have to comply with standards implemented and enforced by dominant buyers (e.g. Tesco of UK, SPAR and Woolworth of South Africa)

As Zimbabwe is putting efforts to resuscitate horticultural, livestock and meat products exports, weaknesses in SPS standards would erode international competitiveness and/or impinge on the ability of the country to access potential and/or maintain access to markets for higher-value agricultural and food products, especially in Europe. There is therefore need to enhance capacity to undertake food safety, animal health and plant health controls in Zimbabwe. Efforts to enhance food safety, animal health and/or plant health capacity, across both the public and private sectors include the review and updating of legislative and regulatory frameworks and enhancement of laboratory facilities.

In enhancement of laboratory facilities, Zim-ACP will ensure that the proposed design/upgrading takes into account potential environmental and health impacts associated with the facility. Depending on market size and associated volume of traffic, laboratory facilities may generate significant quantities of wastewater as well as human and organic waste, which, if improperly managed, can contaminate water supplies and/or provide ready habitat for disease vectors such as flies, mosquitoes and rats. This situation be mitigated by proper design (e.g. adequate provision of latrines, wash water and drainage) and with proper operation and maintenance.

To deal with both the market and food safety issues affecting the export market, Zim-ACP will hire short term technical assistance (STTA) to undertake a capacity assessment of existing and needed institutional infrastructure for Quality Standards, Food Safety Plant and Animal Health Safety Management and Control Systems in Zimbabwe. The STTA's brief will include (i) assessing the status and gaps in compliance with SPS standards in regional and key export markets; and (ii) assessing investment needs for enhancing the private sector capacity to provide and or contribute to the food safety, animal health and plant health management controls in Zimbabwe.

Calls are equally loud for local industry-wide standards from both a food safety and market competitiveness point of view. Developing local quality standards (and certification systems) for livestock, meat, animal feeds, processed grain (maize meal), flour and horticulture produce will serve to assure food safety and help improve market behavior of players and enhance competitiveness and in local

and export markets. Smallholder horticulture producers' concern is that lack of industry-wide accepted and transparent standards place at a disadvantage in supplying local high value markets. For smallholder farmers, participating in local high value markets is a first step towards participating in high value external markets.

Zim-ACP will approach the Standard Association of Zimbabwe (SAZ), the Scientific and Industrial Research and Development Centre (SIRDC), the Livestock Identification and Traceability Trust (LIT) to explore opportunities for providing technical assistance for strengthening national and sectoral systems for ensuring food safety, animal health and SPS standards to enhance competitiveness. The collaboration between SAZ and industry is envisaged to focus on development and registration of new standards as well as updating of existing ones to be consistent with regional and international standards.

Food safety, animal health and SPS standards, that are issues central to Component 2 of ACP, are environmental concerns that will be monitored and reported on quarterly.

### **Livestock Identity and Traceability**

Zim-ACP has also identified Livestock Identity and Traceability (LIT) as an important factor for accessing regional and global markets since traceability of livestock and livestock products is a market requirement for food safety and quality assurance. To this end, Zim-ACP will support technical studies to look at how current LIT can be improved and expanded for more livestock producers across the production systems, to access the service.

### **Commodity Exchange and Warehouse Receipt Systems**

The Grain Commodity Industry Group stakeholders, in particular the Grain Millers' Association, are calling for the re-establishment of a Grain Commodity Exchange supported by a functioning Warehouse Receipt Systems. Such an exchange operated as ZIMACE (Zimbabwe Agricultural Commodity Exchange) prior to 2001. The grain commodity exchange reduces transaction costs by facilitating contact between buyers and sellers, enabling centralized grading of products, ensuring that contracts are enforceable, providing mechanism for price discovery, simplifying transactions with standard contracts and transmitting information about prices and volumes. A functional Warehouse Receipt System in support of the Grain Commodity Exchange would create trust, order, and integrity in the grain market as well as provide a mechanism for increasing market liquidity.

Zim-ACP has familiarized with regional experiences and is exploring potential areas of collaboration in the development of a Grain Exchange and Warehouse Receipt System in Zimbabwe. Zim-ACP is aware of local initiatives involving the re-creation of a Grain Exchange and Warehouse Receipt System in Zimbabwe but plans to facilitate stakeholders to make their own assessment and participate in the shaping of any proposed system.

Following consultations and discussions with the Grain Millers, Stock feeds Manufacturers Associations, and farmers' organizations (mainly ZCFU and ZFU), Zim-ACP sees scope in undertaking an assessment of demand, technical and political feasibility of a commodity exchange and warehouse receipt system to identify areas that may need further investment and technical support to establish or improve the functions of these market institution infrastructure.

The Grain Commodity Exchange, because of its impact on food safety through the centralized grading of products, is an environmental concern that will be monitored and reported on quarterly.

## **Market Information Systems**

The need for market information system, based on up-to-date dissemination technology, providing reliable, analytical and impartial commodity price and market information on a sustainable basis, rank highest as needed to facilitate improved market efficiency and competitiveness in a commodity value chain. Farmer organizations are interested in having the information systems as part of the services offered on cost recovery basis to members. The agribusiness commodity associations are interested in the collation and analysis of the market information to monitor and analyze trends in the various commodity markets for the purpose of informing and advising industry and government on emerging commodity issues.

Currently, CFU and ZFU collate and disseminate commodity and market information to members via various media. Both have interest in and have investigated possible dissemination through electronic technology, including bulk short messaging service (sms). Zim-ACP will explore available avenues in providing technical support to the producer organizations' initiative. The technical feasibility and required technical support will be assessed as part of the planned STTA for services that can be offered by the farmers' organizations, outlined above.

Provision of technical assistance in market information dissemination through electronic technology, including bulk sms is expected to have no significant adverse effects on the environment.

## ***Component 3***

The thrust of Component 3 is training, aimed at increasing the capacity of private sector agri-business development service providers (training consultants) to deliver training to agri-business enterprises across the country. Training offered by training consultants will equip agribusiness enterprises with essential knowledge and skills for increased business productivity and income. The component involves training of trainers (training consultants) on training methods and tactics as well as training on Farming as a Family Business (FaaFB). The trained trainers are then required to cascaded the FaaFB training to agribusiness enterprises. In the first two years of the program, business training will be cascaded to business enterprises on a subsidized basis (subsidy being gradually reduced). In subsequent years of the program, business enterprises will be paying the full cost of the training.

While training activities are expected to have no significant adverse effects on the environment, where business enterprises benefit through subsidized training, trainers will be advised to be on the lookout for any environmental issues in the course of their training activities. Anticipated issues include soil erosion resulting from deforestation and soil exposure as trees are cut for cooking fuel and expansion of agricultural land; and veld fires. Other issues could relate to unsafe disposal of waste (feathers for poultry producers and waste matter for horticulture producers); and pollution of surface and ground water through use of agro chemicals. Business enterprises will be informed of any environmental obligations under Zimbabwean law and will be expected to comply. Trainers' reports on cascaded training activities will include a section on environmental issues encountered and mitigation measures taken.

## EMMP: Zimbabwe Agricultural Competitiveness Program

Activity	Mitigation measure(s)	Monitoring indicator(s)	Monitoring and Reporting Frequency	Party(ies) responsible.
<b>Development of Policy, Legislation, and Institutional Capacity Building</b>				
Macro-economic policy/trade and investment policy	Negative Determination with Conditions  Major legislation, policy, or regulations intended to facilitate trade and investment will include an analysis of the possible environmental effects and recommendations to mitigate these impacts.	-occurrence of identified environmental effects at business firm level  -adoption of recommendations to mitigate identified impacts	Monitor quarterly and report in quarterly reports	Parties responsible for mitigation– Business enterprises, monitoring – Zim-ACP, Reporting-Zim-ACP
Legal and regulatory reform/activities to improve ease of doing business	Negative Determination With Conditions  Business should be informed of any environmental management obligations under Zimbabwean law.  Businesses should have the capacity to meet	-compliance with environmental management obligations -adoption of recommended mitigation measures	Monitor quarterly and report in quarterly reports	Parties responsible Mitigation– Business enterprises, Monitoring – Zim-ACP, Reporting-Zim-ACP

	such obligations before any technical assistance is given. For the businesses that we will work with under Zim-ACP, firm-level assessments will include environmental practices followed by recommendations on mitigation measures			
Technical assistance to associations for purposes of improving analysis and advocacy	Categorical Exclusion	Technical assistance and training programs under ACP are categorically excluded as these programs will not include activities directly affecting the environment		
Institutional strengthening of sector associations to improve production, marketing, etc.	Categorical Exclusion	Institutional strengthening of sector associations under ACP are categorically excluded as these programs will not include activities directly affecting the environment		