REGIONAL MAIZE TRADE POLICY PAPER

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LIST OF ABBREVIATIONS AND ACCRONYMS

ASERECA	Association for Strengthening Agricultural Research in Eastern and Central Africa
COMESA	Common Market for Eastern and Southern Africa
EAC	East African Community
FAO	Food Agricultural Organization
FTA	Free Trade Area
FEWSNET	Famine Early Warning System Network
IMF	International Monetary Fund
KEPHIS	Kenya Plant Health Inspectorate Services
MFN	Most favored Nations
NFCC	National Food Control Commission (Tanzania)
PHO	Port Health Office
RATES	Regional Agricultural Trade Expansion Support Program
REDSO	Regional Economic Development Services Office
USAID	United States Agency for International Development
VAT	Value Added Tax

EXECUTIVE SUMMARY

Introduction

Maize is one of the key staple food crops in Eastern and Southern Africa region and its availability in most countries is equated to food security. According to the FAO estimates, maize consumption as food in COMESA and EAC is estimated at an average of slightly over 14 million metric tones per year[1] and is growing at an average of 3% per annum. The main producers and consumers of maize in the region are Egypt, Ethiopia, Kenya, Malawi, Tanzania, Uganda, Zambia and Zimbabwe.

The region's maize demand and supply is characterized by deficits and surpluses. This phenomenon has stimulated cross border regional maize trade. Diversity of geographic and climatic conditions is another factor in the region's maize production, and is also a stimulant of cross border maize trade. There is a huge regional market that is currently being serviced from extra regional imports, estimated at 2.3million metric tons.

The challenge therefore is the development of an enabling trade policy and regulatory environment as an integral component of efforts to expand regional maize trade. Both COMESA and EAC have identified the need to address this challenge, through the resolution of the COMESA Council of Ministers meeting of 4th November 2002 and EAC study on '*Freeing Cross Border Trade Agricultural products'*.

Regional Agricultural Trade Expansion Support (RATES) project[2] working in collaboration with EAC and COMESA is articulating this challenge through commodity specific approach. Maize is one of the eight commodities targeted by RATES.

Objectives of the maize trade policy paper

The objectives of this paper are to: -

- Assess demand and supply situation of maize between countries in the COMESA and EAC region and determination of the regional maize trade potential.
- Identify and review maize trade policies and regulations**.**
- Assess maize trade policies and regulatory environment in the seven countries identified as key producer, consumer and/or exporters.
- Determine in consultation with the public and private sector the impact of these policies on maize trade and remedial measures that could be pursued at regional level as a strategy for enhancing regional and extra regional maize trade.
- Highlight the impact of trade policies and regulatory environment.
- Propose recommendations that lead to policy harmonization and simplification of trade regulations and procedures.

[1] Over the period 1997 to 2002 (see annex 1 table 2)

[2] RATES is a five year program funded by the United States Agency for International Development (USAID)/REDSO

- Draw an implementation plan matrix detailing activities and mechanisms to guide implementation of the proposed recommendations.

Methodology

National market assessment and baseline surveys in the following seven countries in COMESA and EAC were conducted: Ethiopia, Kenya, Malawi, Uganda, Tanzania, Zambia and Zimbabwe. The countries' share in production, consumption and the region's maize export was 59%, 88%, and 95 % respectively for the period 1997-2001.

The process of policy identification and review involved extensive consultations with government trade regulatory institutions and private sector trade flow leaders in the maize sector. In each country, national resource persons teamed up with regional resource persons in undertaking the review.

The country findings and recommendations were subjected to views and suggestions of the public and private sector in national consultative workshops, with exception of Ethiopia and Zimbabwe. For these two countries, stakeholders' comments on the country studies and this paper will be obtained ahead of the regional maize conference.

Summary of findings

Prospects for expansion of maize exports

1. There exists a regional trade potential at just over US$500mn or of 2.3million metric tons, excluding the Egyptian market whose maize is mainly destined for livestock feed
2. Geographic and climatic conditions have yielded a regional maize trade calendar that allows the region to trade in maize throughout the year.
3. Cereal sector reforms in all the key maize producing and exporting countries in the EAC and COMESA that allows private sector to engage in maize trade along side government agents.
4. Regional trade integration achievements under the COMESA and EAC that are characterized by zero or low intra-regional tariffs and other trade facilitation schemes.

Key Constraints

Regional maize trade is limited by lack of market information, infrastructural limitations and Policy and Regulatory constraints.

A review of the trade policy and regulatory environment trade in the COMESA and EAC region revealed the following as key constraints to expansion of maize trade

1. Export/Import regulations through issuance of permits
2. Tariff and non tariff charges
3. Quality and Safety Standards

4. Phytosantiary requirements
5. Customs clearance procedures

Impact

1. Informal cross border trade
   The main effect of restrictive trade regulations and policies has been to encourage informal cross border trade, frequently results in high transaction costs. According to various sources, this trade is substantial (trade between Malawi and Mozambique is estimated at 80,000 metric tons and Zambia informal cross border maize trade is estimated at 100,000metric tons.

2. Private sector is discouraged investment in the maize value chain (storage, handling and marketing) Risks associated with restrictive trade practices in Zambia, Tanzania, Malawi and Zimbabwe were said to be discouraging private sector investments in the maize value chain, especially in the storage and marketing infrastructure.

Summary of recommendations

1. Relax import and export restriction

a) Export permits that are used as a means of generating export data for use in monitoring food situation should be **abolished** because they encourage informal cross border trade, which worsens food forecasting prospects. Instead a customs database should be used as the basis for tracking maize export.

b) Introduce regionally acceptable parameters that will be used as a guide in the invocation of maize export bans or import restriction, within the framework of ‚Safeguards Clause' of the EAC and COMESA Treaties. A regional food security information clearing system could form the source for statistics to be applied in computing the parameters.

c) In support of proposed recommendation for regional policy on export and import regulations, a regional crop forecasting system is required to provide reliable information on maize availability, which COMESA and EAC countries could in turn use in their projections of maize availability.

d) Harmonize COMESA and EAC member countries maize imports regulatory policies. Central to these negotiations will be a call for abolishing maize import permit requirement.

   A regional program linking various national warehouse receipt system regionally should be explored, as a means of addressing the reason behind import regulations.

e) Abolish import permit regulations and instead develop private sector marketing systems throughout the region, such as warehouse receipt system tied to a regional commodity exchange program. This arrangement

will attract funding into the maize trading from commercial banks and other lending institutions, which are now shying away from this sector because of the market risks associated with unforeseen government regulations and roles in the market.

2. Harmonize or eliminate regional tariff and non tariff charges on regionally sourced maize

a) Harmonize the internal tariff on maize by reducing it to zero, in line with the tariff rates of some countries in the COMESA and EAC region. Impact on government revenue would be negligible, as already tariffs on intra-regionally sourced maize are low. For instance using year 2001 imports statistics, the revenue loss for the countries that are reported in the COMESA data base as having sourced maize from the region would be negligible, as shown in section 3.2 of this report.

b) Import Declaration Fees or commission be can eliminated, following the traders strong recommendation (as revisited further on in the report) that Pre-Shipment Inspection on regionally sourced maize be abolished.

c) Policy for levying VAT on maize imports, in countries such as Ethiopia, should be reviewed, with a view to exempting maize imports from this tax.

3. Harmonize Quality and Safety Standards

a) It is recommended that COMESA and EAC spearhead negotiations leading to harmonization of maize quality standards and testing methods.

b) Enhance accessibility to standards inspection services. As a rule, COMESA and EAC countries should ensure presence of quality standards inspectors, backed with standards testing equipments at main borders or ports of entry, through which maize is exported/imported.

c) Safety standards for maize should be merged with quality standards and Bureaus of Standards assigned the enforcement responsibility. Requirement for sample testing for regionally sourced maize should be abolished, especially because even after issuing import permits against the results of the sample test, the imported consignment still has to be tested at the border or port of entry. Issuance of import permit should also be abolished. Instead, maize traders should be educated on regional safety specifications, and be made aware that such specifications are enforced whenever maize is imported into the country.

4. Harmonize Phytosanitary requirements and procedures

a) Harmonization of the phytosanitary regulations and requirements for maize imports is recommended. This will involve: -
   - Pest Risk Analysis of individual pests

- Development of standard protocols for diagnostic and inspection procedures
- Establishment of standard protocol for pest risk analysis for EAC and COMESA regions based on FAO guidelines
- Establishment of a regionally and internationally acceptable format of a phytosanitary certificate
- Establishment of a pest information system and network and public awareness procedures.

b) Introduce phytosanitary import permit and certification offices at border posts or ports of entry. Currently only phytosanitary inspection offices are at some of these points.

c) Through ASERECA, assist in the implementation of the EAC harmonized phytosanitary program on aspects that touch on maize grain.

5. Improve Customs clearance procedures

a) The Single Entry Document should be reviewed to ensure that the required details do not discourage small and medium traders from using formal customs clearance procedures. For instance the call for PIN number should be made optional and introduction of details such as ID number and other forms of identification should be explored, to cater for individual traders and small businesses that may be operating under sole proprietor mode of business registration.

b) Requirements for customs documents to be lodged by licensed clearing agents should be reviewed, with the aim of making the requirement optional for agricultural consignments that are less than US$5000. This policy change should however be backed by extensive education of customs entry documents and procedures.

c) Requirement for original invoice on maize imports should be limited to consignments that exceed US$5000. This will encourage cross border traders who currently shy away from using customs entry documents just because they may not have invoices. It is worth noting that even where original invoices are lodged, customs officials have the liberty to revise the figures should they suspect under-invoicing.

d) Pre-shipment inspection should be eliminated for regionally sourced maize. Along with this policy measure, the requirement for IDF and IDF fees should also be phased out, for regionally sourced maize, especially because IDF is merely a record of intention to import. Actual imports are captured through customs statistics.

e) All trade regulatory institutions, which have to inspect maize (as indeed all other commodities) before release, should carry out inspections at the same time to avoid delays.

f) For the few countries, which are still enforcing foreign exchange controls, mandatory requirement of irrevocable LC before issuance of an export permit for regionally destined maize exports should be dropped. Other less punitive trade finance instruments, such as Cash Against Documents (CAD) should be applied.

g) Issuance of the certificates of origin for agricultural produce need to be decentralized and made more accessible to traders. Efforts should be made to have these certificates issued close to the ports of exit. In case the issuing authorities may not have offices at these localities, this responsibility should be assigned to customs offices.

6. Implementation Plan for the proposed recommendations

For each of the recommendations, COMESA and EAC policy organs will be used to facilitate policy harmonization or rationalization across the region. Where recommendation entails harmonization or rationalization of policies, issued based working groups under appropriate committees of EAC and COMESA will meet to negotiate. The end product will be a regional policy or regulation for adoption at national level. A detailed implementation plan matrix is attached to this report, showing proposed activities aimed at implementation of the recommendations.

1.0 INTRODUCTION

1.1 Preamble

Maize is one of the key staple food crops in the Eastern and Southern Africa region. Its availability in most countries is equated to food security. According to the FAO estimates, maize consumption (as food) in COMESA and EAC is estimated at an average of slightly over 14 million metric tones per year[3] and is growing at an average of 3% per annum. The main producers and/or consumers of maize in the region are Egypt, Ethiopia, Kenya, Malawi, Tanzania, Uganda, Zambia and Zimbabwe.

The region's maize demand and supply is characterized by deficits and surpluses. As illustrated in section 2.0 of this report, there are instances where one country experiences deficit in a given year, while its neighbor or another country in the region has surplus maize to export. This phenomenon has stimulated cross border regional maize trade. Diversity of geographic and climatic conditions is another factor in the region's maize production, and is also a factor that stimulates cross border maize trade. This is manifested through maize trade flow from perpetual maize deficit countries to surplus countries, mainly at harvest season. A case in point is Kenya which although experiencing deficit for most of the period 1997-2001 recorded some cross border exports in all the years, except the year 2000. During the same period, the country also imported from within and outside the region.

There is a huge regional market that is currently being serviced from extra regional imports. In the period 1997-2001, extra regional maize imports amounted to US$3.2billion with Egypt accounting for US$2.5billion of that figure. The US$700million balance went to the rest of the COMESA and EAC countries. Regionally sourced imports stood at US$107million. Regional maize trade potential can be estimated at just over US$500million or 2.3million metric tones, excluding the Egyptian market whose maize is mainly destined for livestock feed.

A review of the trade regulatory environment for maize trade in all the key maize producing and consuming countries reveals that substantial reform has taken place, mainly under the IMF Structural Adjustment Programs which called for liberalization of the cereals sector. As a result, government monopoly in maize trade has been dismantled (with the exception of Zimbabwe where it was re-introduced in the year 2000). This has paved the way for the private sector to play a key role in regional and extra regional maize trade.

Another key beacon in the maize trade landscape in the region has been the tariff reform program in the COMESA and EAC regions, where import duties on maize is zero or less than 5% of the *cif* value.

Despite these factors, maize trade has been hampered by a myriad of constraining factors, which range from infrastructural difficulties and lack of market information to an adverse trade policy and a regulatory environment.

[3] over the period 1997 to 2002 (see annex 1 table 2)

With the exception of the tariff program, where efforts to harmonize regional tariffs have been taken, minimal time has been devoted to address other equally critical maize trade policies and regulations. These include export and import restrictions premised on food security grounds, maize quality and safety standards, phytosanitary requirements and customs clearance procedures.

Previous studies (Ackello C. et al 1997; EAC, 2002; Whiteside M, 2002) have shown that trade regulatory requirements have been an impediment to regional maize trade. These findings are corroborated by the RATES country market assessment and baseline studies in Kenya, Uganda, Tanzania, Malawi, Ethiopia, Zambia and Zimbabwe.

Both COMESA and EAC have identified the need to address this challenge, through the resolution of the COMESA Council of Ministers meeting of 4th November 2002 and the EAC study on '*Freeing Cross Border Trade Agricultural products'*.

The Regional Agricultural Trade Expansion Support (RATES) project funded by the United States Agency for International Development (USAID) seeks to address this challenge in collaboration with EAC and COMESA. RATES recognizes that for most of the Eastern and Southern African (ESA) countries, maize is a main staple with major implications on food security in the region. This is an opportunity for regional trade, which can only be exploited if maize traders are able to move maize from surplus to deficit regions more freely.

1.2 Objectives of the maize policy issue paper

The objectives of this paper are to: -

a) Assess demand and supply situation of maize between countries in the COMESA and EAC region and determination of the regional maize trade potential.
b) Identify and review maize trade policies and regulations**.**
c) Assess maize trade policies and regulatory environment in the seven countries identified as key producer, consumer and/or exporters.
d) Determine in consultation with the public and private sector the impact of these policies on maize trade and remedial measures that could be pursued at regional level as a strategy for enhancing regional and extra regional maize trade.
e) Highlight the impact of trade policies and regulatory environment.
f) Propose recommendations that lead to policy harmonization and simplification of trade regulations and procedures.
g) Draw an implementation plan matrix detailing activities and mechanisms to guide implementation of the proposed recommendations.

1.3 Methodology

The policy review is based on in-depth study of the following sample countries in the COMESA and EAC region: Ethiopia, Kenya, Malawi, Tanzania, Uganda, Zambia and Zimbabwe. A key fundamental in the selection of the sample countries was the existence of opportunity for enhancement of maize trade. Based on this fundamental, the share of COMESA/EAC countries in production, consumption and export of maize was used on a non exclusive basis. The countries' share in production, consumption and the region's maize export was 59%, 88%, and 95 % respectively for the period 1997-2001.

The process of policy identification and review involved extensive consultations with government trade regulatory institutions and private sector trade flow leaders in the maize sector. In each country, national resource persons teamed up with regional resource persons in undertaking the review.

The country findings and recommendations were subjected to views and suggestions of the public and private sector in national consultative workshops, excluding Ethiopia and Zimbabwe. For these two countries, stakeholders' comments on the country studies and this paper will be obtained ahead of the regional maize conference.

The rest of this report is organized as follows:

- Section 2.0 evaluates demand and supply of maize in the COMESA and EAC region;
- Section 3.0 documents and reviews trade policies and regulations;
- Section 4.0 highlights the impact of trade and policy regulations on maize trade;
- Section 5.0 is a summary of all the recommendations and an implementation plan for consideration at the regional maize conference.

2.0 ASSESSMENT OF THE MAIZE SUPPLY AND DEMAND SITUATION

2.1 Production

Over the period 1997-2002, maize production in the COMESA and EAC region totalled 126million metric tons or an annual average of 21million metric tons. The main producing countries are Egypt, Ethiopia, Kenya, Malawi, Tanzania, Uganda, Zambia and Malawi. As illustrated in table 1 these countries account for about 89% of the regions maize production.

Table 1

Maize production by key producing countries in COMESA and EAC.
Figures in 1000Metric Tonnes.

	1997	1998	1999	2000	2001	2002	Period Total	%share in COMESA & EAC total
Egypt	5806	6337	6143	6474	6842	6800	38403	30
Ethiopia	2,987	2,344	2,832	2,683	3,298	2,600	16,744	13
Kenya	2,214	2,400	2,322	2,160	2,776	2,800	14,672	12
Malawi	1,226	1,772	2,479	2,501	1,589	1,603	11,172	9
Tanzania	1,831	2,685	2,452	2,551	2,698	2,701	14,917	12
Uganda	456	480	505	526	564	535	3,067	2
Zambia	960	638	822	882	602	900	4,804	4
Zimbabwe	2,192	1,418	1,520	2,108	1,467	499	9,203	7
Total	11,866	11,738	12,932	13,411	12,994	11,638	74,579	89
COMESA and EAC Total	19,836	20,355	21,250	22,002	21,998	20,589	126,029	100

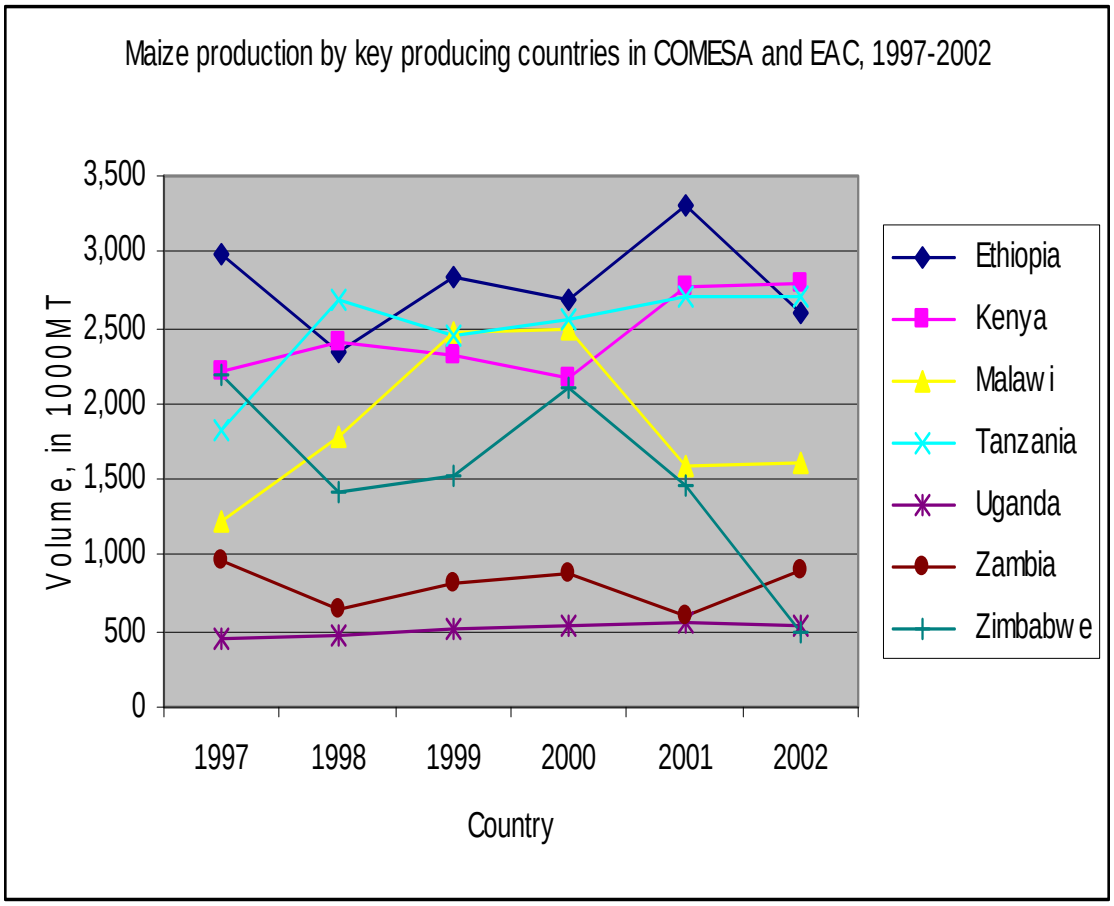
Source: FAO Data Base (for all countries, except Uganda where the data was obtained from IDEA Project[4]).

As illustrated in graph 1, production trends have been erratic across the seven countries. This reflects numerous production problems that farmers have been facing. They include crop failures because of unreliable rainfall, post harvest waste caused by pests and lack of a ready market, soil infertility, poor quality maize seeds, poor marketing systems, etc.

Zimbabwe's case has been more acute, mainly because of the effects of the land reform program which adversely affected commercial farming. For this country maize production has declined dramatically from 2.1million metric tons in 2000 to 499,000 metric tons in 2002. In Uganda production has been more or less static oscillating between 456,000 metric tons and 535,000 metric tons over the review period.

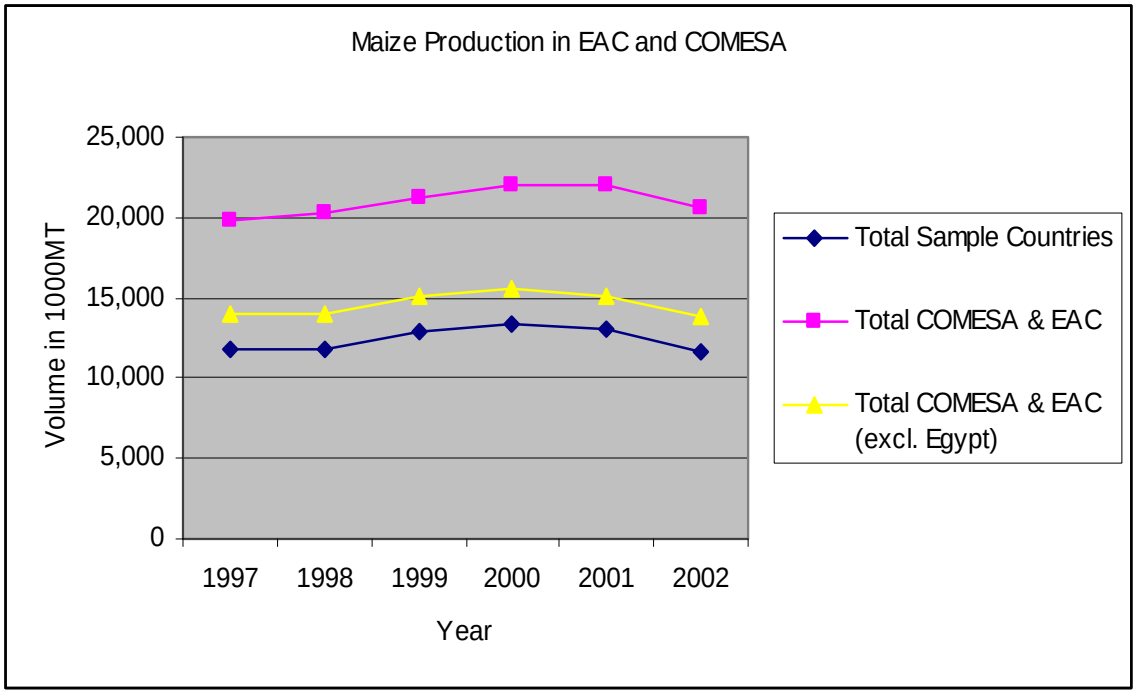
[4] For all countries FAO data which is reported on calendar year basis was compared with data from Ministries of Agriculture and Central Statistics offices and was found to be representative of these countries' actual production. The differences between the two series were attributed to overlapping nature of the crop year data. For Uganda, data was obtained from IDEA Project.

Graph 1



Overall, as illustrated in the graph below, maize production in the region has increased from 20million metric tons in 1997 to 22million metric tons in 2000. In the subsequent years, the region experienced gradual decline in maize production, with the overall production recorded at 20million metric tons in 2002. The sample countries had a significant influence in the regional maize production trend, as can be seen from the graph below.

Graph 2



2.2 Maize Consumption

The region's maize consumption (as food) is estimated at an annual average of just over 14million MT. As illustrated by table 2, 90% of maize consumption is used as food, while the rest is used as livestock feed (7%), seed (2%) and processing (1%).

Table 2: Maize consumption in COMESA and EAC: Food, Livestock Feed, Seed, Processing (1997-2000) – Figures in 1000MT

	Eth	Ke	Mal	TZ	Ug	Zam	Zim	Total	% share
Food	**12035**	**10361**	**5817**	**9229**	**1707**	**5300**	**6019**	**50468**	90
Livestock Feed	470	350	711	490	425	140	1285	3871	7
Seed	162	184	190	141	75	66	154	972	2
Processing	0	31	46	40	490	132	13	752	1
Total	**12667**	**10926**	**6764**	**9900**	**2697**	**5638**	**7471**	**56063**	**100**

Source: FAO Data base

Table 3 shows country level details of the volume of maize consumed as food over the period 1997-2001. The seven sample countries account for 88% of the region's total maize consumption.

Table 3: Maize Consumption as food in COMESA and EAC, 1997 – 2001
Figures in 1000MT

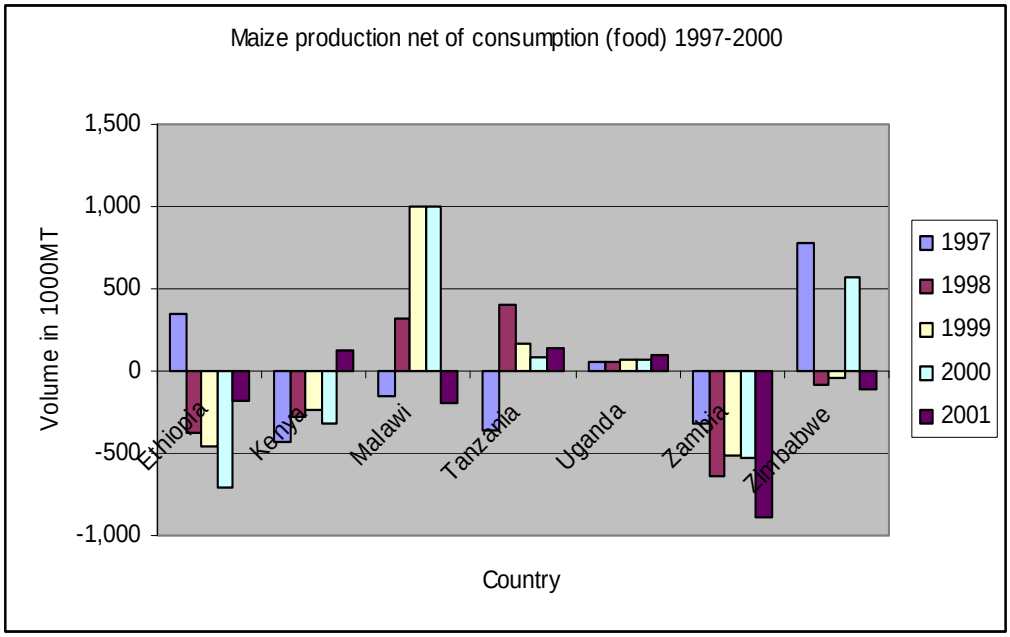
	1997	1998	1999	2000	2001	Period average	% share
Ethiopia	2,641	2,720	3,289	3,385	3,482	15,517	21.21
Kenya	2,644	2,679	2,554	2,484	2,656	13,017	17.79
Malawi	1,377	1,450	1,486	1504	1,781	7,598	10.38
Tanzania	2,188	2,284	2,289	2,468	2,562	11,791	16.11
Uganda	405	419	430	453	467	2,174	2.97
Zambia	1,274	1,281	1,334	1,411	1,488	6,788	9.28
Zimbabwe	1,419	1,503	1,564	1,533	1,571	7,590	10.37
Total Sample countries	**11,948**	**12,336**	**12,946**	**13,238**	**14,007**	**64,475**	**88.12**
COMESA & EAC Total	**13,524**	**14,569**	**14,388**	**15,034**	**15,656**	**73,171**	**100.00**

Source: FAO Data Base (for all countries, except Uganda where the data was obtained from IDEA Project[5] and Ethiopia where the data was obtained from Central Statistics Authority).

2.3 Production vs. Consumption

As shown in graph 3, countries such as Ethiopia, Kenya, Malawi, Tanzania, Uganda and Zimbabwe had some surplus to dispose of in the regional market at different years over the review period. Kenya and Zambia emerge as major regional maize markets.

Graph 3



[5] For all countries where FAO data was used, consumption data in the country studies was reported on crop year basis. To allow comparability across the years, FAO data was preferred. The two series of data compared quite well, with the difference being explained by overlap in the crop year.

2.4 Maize exports

2.4.1 COMESA and EAC maize exports

Performance of the region's maize exports, as shown in graph 4, has been very poor, tending towards stagnation by the end of the year 2001. Ethiopia, which has a potential for producing maize for the regional market was only significant in 1997. Thereafter, draught, marketing constraints and other challenges facing maize production, hampered the country's export performance. For Zimbabwe, the poor export performance is linked to the decline in production.

Graph 4

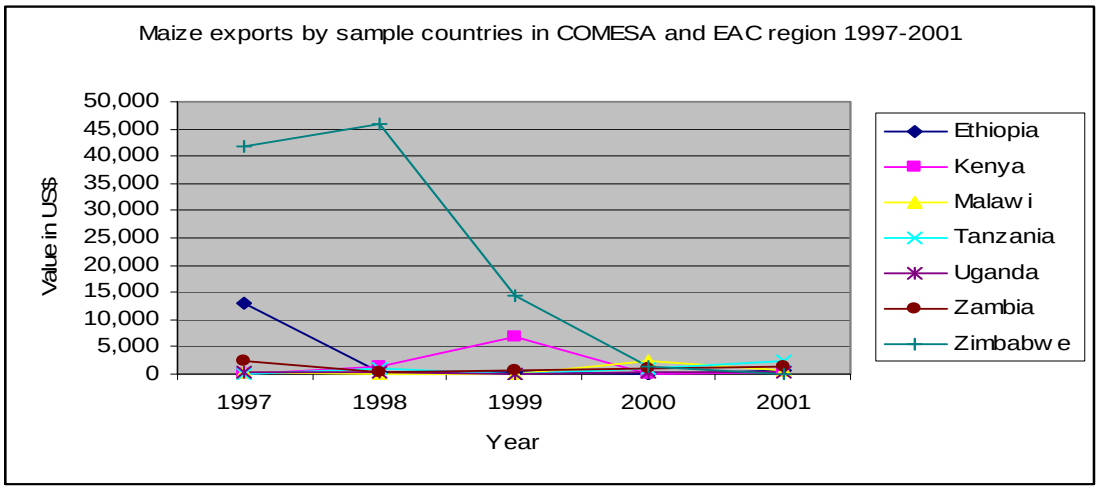


Table 4 details each country's export performance and the share of the exports in the region's total exports. Exports destined for the regional market accounted for 74% of total exports, while those destined outside the COMESA and EAC region accounted for a mere 26%. Annex 2 gives the details of destination countries for the maize exports.

Table 4: Exports of maize by Key EAC & COMESA maize exporting countries (figures in US$)

Exporter country	1997	1998	1999	2000	2001	Period total	%share
Ethiopia	13,179,402	331,667	235,559	83,286	638,045	14,467,959	9
Kenya	118,887	1,278,997	6,948,010	894	381,798	8,728,586	6
Malawi	234,465	6,478	51,721	4,439,042	607,323	5,339,029	3
Tanzania	63,494	1,178,177	1,568	1,118,308	2,550,546	6,710,147	4
Uganda	413,706	474,897	28,811	388,264	279,817	1,585,495	1
Zambia	2,458,817	508,896	594,542	1,027,405	1,344,017	5,933,677	4
Zimbabwe	41,905,114	46,028,412	14,435,806	1,229,614	36,599	103,635,545	68
Total	58,373,885	49,807,524	22,296,017	8,286,813	7,636,199	146,400,438	96
COMESA and EAC Total	61,480,705	50,376,549	23,094,672	9,323,249	8,737,414	153,012,589	100

Source: COMESA Database[6]

[6] For Tanzania, the data for 2001 was computed from the value data in the country report using an exchange rate of TShs876.41

2.4.2 Maize availability calendar and cross border trade flows

Maize availability calendar shows existence of opportunity for regional trading throughout the year. Malawi can for instance sell maize to Kenya between May and September. During these months, chances for Kenya requiring maize imports are high. Prices also tend to sore during these months. In August 2003, for instance prices hit a high level of US$250 per metric ton (or KShs1,700 per 90kg bag in Kenya, while in Malawi, where there was an export ban[7] maize price was quoted at US$100 per metric ton.

Table 5: Maize marketing calendar

	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept.	Oct.	Nov	Dec.
Ethiopia												
Kenya												
Malawi												
Uganda												
Tanzania												
Zambia												
Zimbabwe												

Source: RATES Country study reports

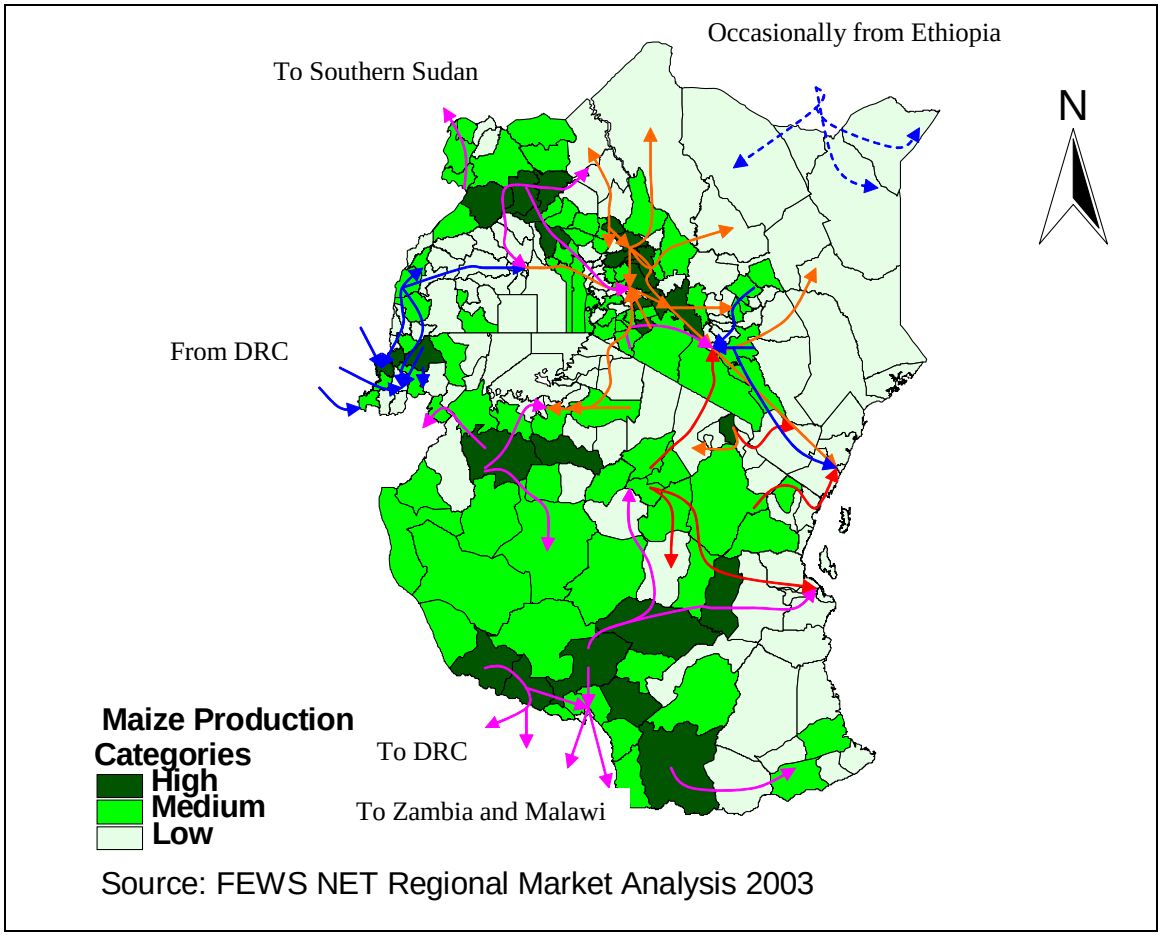
Marketing period seems to coincide for a majority of countries, with all countries having maize to trade between October and February. Zimbabwe's year round marketing calendar is based on the 1990s experiences, when the country had surplus to export. It is thus illustrative of the country's capability of marketing maize year round should production be increased to the levels of 1998/99.

The effect of coinciding marketing period in the region has been tendency for farmers to pressure for restrictions of maize imports in an effort to safeguard against price decline (*see for instance the call for higher tariffs by Kenyan farmers in the East African Standard, 7th August 2003, in anticipation of maize trading period that starts in September*). This interventionist policy is however not sustainable and evidence shows that it has not been able to stabilize prices.

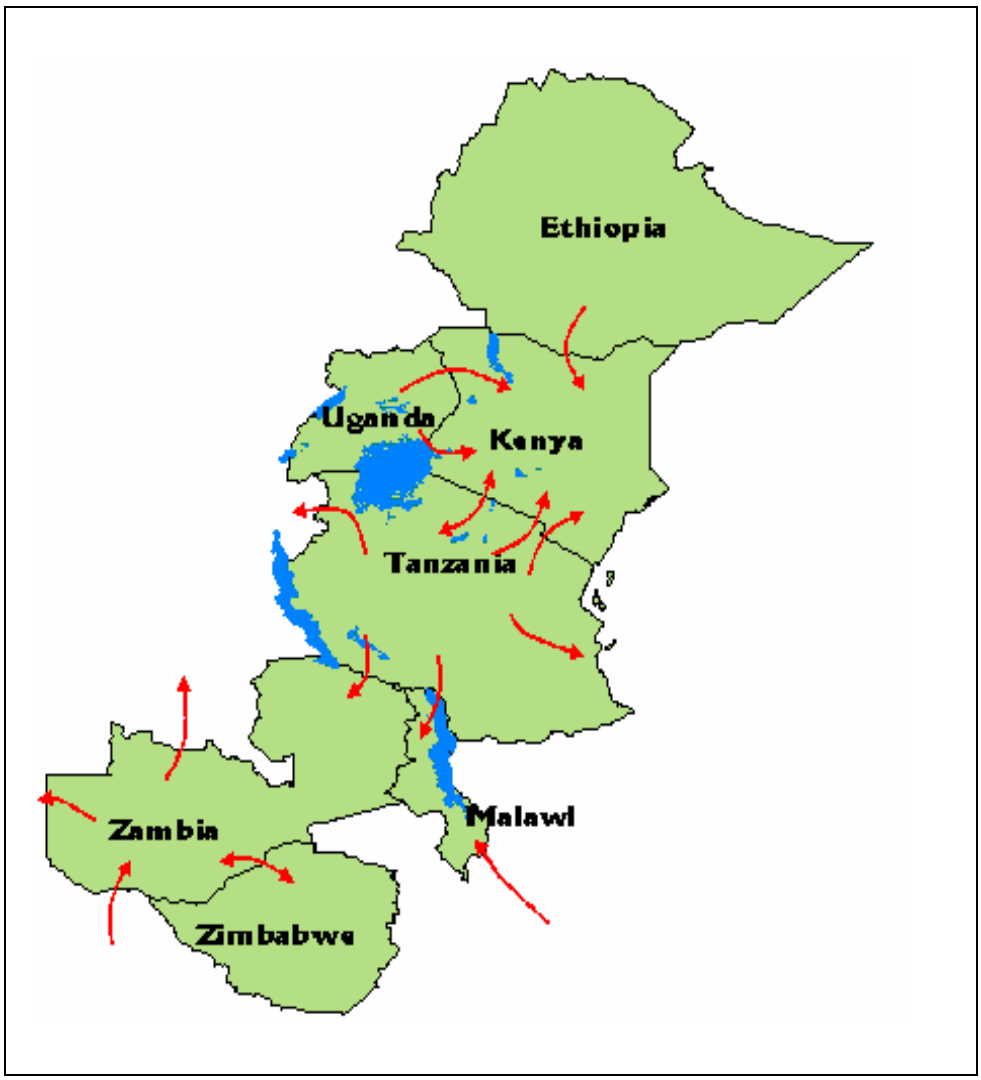
Regional trade, supported by national level post harvest stock management systems – such as warehouse receipt system, may be the way out. The two maps below, show movement of maize in the EAC and COMESA regions, which if allowed to move freely may contribute to price stabilisation and increased maize availability.

[7] Despite there being maize surplus maize – as a result of last season's harvested and imported stock that was yet to be disposed off.

Map 1: Maize trade flow in EAC region



Map 2: Maize trade flow from selected key producing/exporting countries in COMESA and EAC



2.4.3 Category of maize traders

Maize traders in the region fall into three broad categories. Small scale trades, Medium scale traders and larger traders/millers. Small and medium traders play a key role in assembling of maize either within the country or across the borders. They account for over 60% of intra-regional maize trade. They deliver their maize to the millers or large scale traders for processing or speculative storage.

Large scale traders and millers also get their supplies directly from commercial farmers or importation from outside the region.

2.5 Regional maize market potential

As illustrated in table 5, there is a huge regional market that is currently being serviced from extra regional imports. In the period 1997-2001, extra regional maize imports amounted to US$3.2billion.with Egypt accounting for US$2.5billion of that figure. The balance US$700million balance went to the rest of the COMESA and EAC countries. Regionally sourced imports stood at US$107million. Regional maize trade potential can be estimated at just over US$500million or 2.3million metric tons, excluding the Egyptian market whose maize is mainly destined for livestock feed.

Table 5: COMESA and EAC Extra Regional imports of maize. Figures in US$

Importer country	**1997**	**1998**	**1999**	**2000**	**2001**	**Period Total**	**%Share**
Egypt	385,010	388,629	651,213	558,819	552,711	2,536,382	78.14
Ethiopia	0	434	783	1	2,142	3,360	0.10
Kenya	152,363	73,872	10,808	56,910	33,633	327,586	10.09
Malawi	1,431	29,519	1,717	823	893	34,383	1.06
Tanzania	2624	4911	44105	44105	11447	107192	3.30
Uganda	9,775	8,739	3,674	1,155	1,355	24,698	0.76
Zambia	482	15,582	3,557	292	2,224	22,137	0.68
Zimbabwe	5,655	24,116	44,976	691	303	75,740	2.33
Total	557,340	545,803	760,832	662,796	604,707	3,131,478	96.47
COMESA & EAC Total	**576,629**	**568,286**	**785,603**	**681,209**	**634,197**	**3,245,924**	**100.00**

Source: COMESA Data base

Maize import from outside the region is a mixture of food aid and commercial maize. Food aid has a potential to disrupt regional maize market because of the subsidy element in the price of such maize. A regional policy on food aid is therefore required in order to mitigate such an eventuality.

3.0 TRADE POLICY AND REGULATORY ENVIRONMENT

3.1 COMESA and EAC Trade Regimes

COMESA and EAC trade regimes have charted out the policy framework under which maize and all other commodities should trade. According to the trade regimes, member countries have committed themselves to charging preferential tariffs on goods originating from the region. The levels of preferential tariff expressed as a percentage of tariff rebates on Most Favored Nations (MFN) tariffs or tariffs charged on all non COMESA or EAC countries is given as follows: -

In COMESA, nine countries, which have already ratified the Free Trade Area (FTA) protocol, are levying zero duty on goods from the region. These countries include: Kenya, Malawi, Zambia, Zimbabwe, Egypt, Djibouti, Madagascar, Mauritius and Sudan. Tariff reduction commitment for Non FTA COMESA countries is as follows: -

- ***Comoros, Eritrea and Uganda*** *80% reduction*
- ***DR Congo*** *70% reduction*
- ***Burundi and Rwanda*** *60% reduction*
- ***Ethiopia*** *10% reduction*

Under the EAC trade regime, Kenya grants market access to commodities imported from Uganda and Tanzania a 90% tax reduction on the MFN rate. Tanzania and Uganda on the other hand grant an 80% tariff reduction on goods originating from Kenya. EAC member countries are poised to sign-up the EAC Customs Union Protocol in November 2003. Envisaged under this protocol is a progressive tariff reduction to zero on goods sourced from within the EAC. A common external tariff on goods from non EAC countries is also envisaged.

Preferential duties are allowed only after proof that commodities meet the Rules of Origin criteria as provided under Article 4(1)(e) of the COMESA Treaty and under the provisions of the EAC Rules of Origin.

The COMESA and EAC Rules of Origin are therefore the basis for according market access to COMESA or EAC originating products. The Rules of Origin thus serve as a determinant of where a product is made and the minimum percentage of inputs contained therein from member states.

There are five Rules of Origin and at least one of them must be complied with for any goods to qualify for COMESA tariff treatment.

The Rules are:

1. Goods wholly produced or obtained in a member state (that is no material outside the common market has been used).
2. Goods produced in the member states and the C.I.F value of any foreign materials used (that is non-COMESA/EAC) does not exceed 60% of the total cost of all materials used in their production.

3. Goods produced in member states whose value added resulting from the process of production accounts for at least 35% of the factory cost of the goods.
4. Goods produced in member states and are classified or become classified under a tariff heading under which they were imported.
5. Goods of particular importance to the economic development of the member states and containing not less than 25% value added not withstanding the provision in 3

Maize, a commodity that is among the most frequently traded agricultural commodities in COMESA and EAC[8] conforms to the first rule since it is wholly produced the region.

Imposition of arbitrary measures, such as import restrictions to prevent market access, is prohibited under the COMESA trade regime, unless such an action is approved by the council of ministers under the safeguard clause of the Treaty. In EAC a similar provision is contained in the EAC Customs Union Protocol which is due for enforcement after November 2003.

The above trade regimes have mainly addressed tariff applicable on regionally sourced products. This leaves out a host of other trade policies and regulations that are equally important in ensuring free movement of maize across COMESA and EAC such as export and import restrictions through mandatory permits, standards, phytosanitary requirements, and quality and safety standards and customs clearance regulations. In the following section each of these regulations are discussed in detail; the section also gives proposed recommendations obtained through national consultative processes.

3.2 Maize Trade policies and regulations in EAC and COMESA countries

A review of the trade policy and regulatory environment that governs maize trade in the COMESA and EAC region includes the following policies/regulations as the most important based on their implication on intra/extra exports of this commodity.

- Export/Import regulations through issuance of permits
- Tariff and non tariff charges
- Quality and Safety Standards
- Phytosantiary requirements
- Customs clearance procedures

3.2.1 Export regulations

Export policy on maize varies across the seven sample countries. It is driven by concerns about food security. In countries where maize is a predominant staple food or prone to draught, like Ethiopia, it is a requirement that an export permit be obtained from the Ministry of Agriculture. Countries that require export permits include Zambia, Tanzania, Malawi, Ethiopia and Zimbabwe. Enforcement of this regulation at times leads to export bans if the government projects food deficit. During the 2002/03-crop season, Tanzania, Zambia and Malawi imposed an export ban.

[8] Other most frequently traded agricultural produce includes sugar, rice, wheat flour and livestock and livestock products

Export bans are said to distort market prices and discourage private sector investment in maize trading, especially because bans are introduced without sufficient notice. Traders viewed this as a commercial risk, especially if it happens after contractual commitment to supply foreign buyers.

Import permits are issued at central location or select provincial or regional capitals, which are in most cases out of the way for traders, especially small and medium traders who operate along the borders. The effect of this is to deter formal trade, even during surplus seasons.

Box 1
Maize Export Permits in Tanzania

An exporter is required to obtain an export permit from either the Food Security Department (FSD) in Dar es Salaam (for the northern regions) or from the Regional Agriculture Department (for the southern regions). The export permit is in form of a letter, which is copied to the customs department. The letter shows the quantity the exporter is allowed to export and duration upon which it shall expire. If the exporter wishes to extend the period, he has to apply for an extension. Validity of the export permit is one month.

Export restriction, while not prohibited under either EAC or COMESA Treaties tends to undermine development of a regional export capacity. This mainly occurs where a maize trader, caught in between a commercial transaction by the export ban, is forced to dishonor a trade contract at his cost. The policy also discourages cross border trading in situations where border proximity justifies trade. It increases the price of maize to consumers through high transaction costs as maize in the surplus region has to be moved to the deficit regions often over long distances.

Box 2
Effects of export Bans in Zambia

Currently (May 2003), an export ban applies to maize, millet, sorghum, and related brans. This has major policy implications on the current and future market structures affecting maize as a cross border tradable commodity. The main complainants of export bans are milling companies who have a traditional maize meal market share, especially in the Congo DR's Lubumbashi Province. The millers feel that they should always be always considered for some minimum exports even during the ban so that they raise minimum amounts of foreign currency for spare parts and servicing of plant and equipment.

Commercial farmers, especially those growing early maize under irrigation, have equally expressed concern over export restrictions in that the local market producer prices fall far below their unit costs of production per ton. As such they feel the government should be considering them for exports to DRC where the producer prices tend to be much higher than in Zambia.

3.2.2 Import regulations

Maize import permits are issued in Malawi, Zambia, Zimbabwe and Tanzania as a means of monitoring the food situation in the country as well as a devise of keeping the commodity price within the reach of the consumers. The box below illustrates the practice of maize import regulation and its impact in Zambia, a situation that is representative of similar cases in the region.

Box 3

Effects of import regulations in Zambia on regional maize trade

The process of directing maize imports tends to be heavily influenced by the Government, either as direct purchasers or intermediaries for commercial transactions involving the private sector or the Food Reserve Agency (FRA). This is largely due to the Government's interest in protecting consumer prices for maize meal. The private sector considers this as being destructive to the operations of a liberalized market. The actions of Government's decisions are seen as being based more on short-term social and political considerations rather than long term market development considerations.

An example given relates to the 2001/2002 marketing season, when the Government through FRA arranged for the importation of about 150,000 metric tons of maize, which was later sold to milling companies at a subsidized price on condition that they sell their milled maize at set prices. Clearly the Government was worried about the rising prices of maize meal, which if left unchecked, could cause social and political instability. Unfortunately, not all the millers benefited from this arrangement. This exposed millers outside these arrangements to unfair competition due to the subsidy enjoyed by their competitors.

This policy intervention limited the private sector ability to source maize from the region, because domestic market pricing was unfair. The severity of this policy on regional maize trade is even magnified by budgetary limitation which governments in the region face, implying that they cannot sustain the subsidy program. In a free trading environment, movement of maize by the private sector from the surplus regions, may they be within or without the region (COMESA or EAC) may have ensured that maize prices and maize meal prices remained low, without any budgetary cost to the Government.

Maize traders in the region view import permits as a devise for protecting domestic maize producers during surplus seasons. In the event of bumper harvest, import permits are not readily issued. Lack of a clear cut policy makes it hard for the private sector to project government's behavior during such periods.

Administration of import permits is centralized in capitals and thus quite cumbersome and out of reach for border traders. Desperate cross border traders have resorted to using informal routes to import maize, often at very high cost because traders resort to bulk breaking and carting the maize across the border using bicycles and other 'invisible' modes of transport.

In addition to import permits, suspended duty has been applied in the past on maize imports as a protective devise to the domestic maize producers. According to the findings of country studies, this practice has somewhat died. Kenya's case of protecting the maize sector through suspended duty in 1998 is illustrious of this past practice.

Box 4
Past practise for protection of the maize sector through suspended duty

Date	Placement	Normal Duty	Suspended duty	Total duty applicable
6th Nov.1998	Kenya Gazette Supplement No.62	25%	50%	75%

Source: Kenya Gazette Supplements & Legal Notices

Application of suspended duty has now been phased out. According to the Ministry of Finance and Ministry of Agriculture, other than import tariff, no any other non tariff charges will be applied as a tool for regulating maize imports. This policy stance is validated by the non-application of suspended duty in the year 2001/02 season when a surplus of 68000 MT was recorded.

Recommendations

i. *Export permits that are used as a means of generating export data for use in monitoring food situation should be* ***abolished*** *because they encourage informal cross border trade, which worsens food forecasting prospects. Instead a customs database should be used as the basis for tracking maize export.*

ii. *Introduce regionally acceptable parameters that will be used as a guide in the invocation of maize export bans or import restriction, within the framework of ‚Safeguards Clause' of the EAC and COMESA Treaties. A regional food security information clearing system could form the source for statistics to be applied in computing the parameters.*

iii. *In support of proposed recommendation for regional policy on export and import regulations, a regional crop forecasting system is required to provide reliable information on maize availability, which COMESA and EAC countries could in turn use in their projections of maize availability.*

iv. *Harmonize COMESA and EAC member countries maize imports regulatory policies. Central to these negotiations will be a call for abolishing maize import permit requirement.*

A regional program linking various national warehouse receipt systems regionally should be explored, as a means of addressing the reason behind import regulations.

v. *Abolish import permit regulation and instead develop a private sector marketing system throughout the region, such as warehouse receipt system tied to a regional commodity exchange program. This arrangement will attract funding into the maize trading from commercial banks and other lending institutions, which are now shying away from this sector because of the market risks associated with unforeseen government regulations and roles in the market.*

3.2.3 Tariff and non tariff charges

Imported maize grain attracts varied import tariffs across the seven countries. The level of tariff is determined by each country's commitment to the regional tariff reduction program and the prevailing most favored nations (MFN) tariffs. In addition to import duties, there are some countries which charge non tariff charges, such as VAT and import declaration fees or import commission on maize. The table below summarizes these tariff and non tariff charges.

Table 6: Import duties and non tariff charges on maize imports

	Import Duty (Tariff) for maize grain from: -			**Non Tariff charges paid at when clearing imports**	
	COMESA	EAC	all other countries (MFN rate)	VAT	Import Declaration fees/Import Commission
Ethiopia	4.5%	na	5%	15%	na
Kenya	3%	3%	25%	na	2.75%
Uganda	4%	4%	7%	na	2%
Tanzania	na	5%	25%	na	na
Malawi	0%	na	0%	na	na
Zambia	0%	na	5%	na	na
Zimbabwe	0%	na	0%	na	na

In Ethiopia, Kenya and Uganda, maize imports from COMESA attract an import duty of 4.5%, 3% and 4% respectively. Additional charges levied on imported maize by the three countries are VAT charges of 15% by Ethiopia and import declaration fees or commission of 2.75% and 2% in Kenya and Uganda, respectively, for maize imports whose value is US$5,000 and above. Tanzania's export of maize into the COMESA region is subjected to the MFN rate of 5% in Ethiopia and Zambia. Tanzania levies an import duty of 25% on all COMESA sourced maize (with exception of Kenya and Uganda where EAC tariff regime applies).

In EAC, maize imports attract a tariff of 3%, 4% and 5% in Kenya, Uganda and Tanzania respectively. As observed above, Kenya and Uganda levy import declaration fees or commission on maize imports exceeding US$5,000.

Tariff on maize was viewed as high by cross border traders. An assessment of duty paid revealed that cross border traders are no able to access preferential regional tariffs, that are much lower or even zero for COMESA FTA countries, because they often do not have certificates of origin. The process of acquiring certificates of origin is painstaking and costly, with issuance agents located in capital cities and in some countries in limited regional and provincial towns.

Recommendations

i. *Reduce tariff on intra regional maize imports to zero. Impact on government revenue would be negligible, as tariffs on intra-regionally sourced maize are already low. For instance using year 2001 imports statistics, the revenue loss for the countries who are reported in the COMESA database as having sourced maize from the region would be negligible, as shown in table 7.*

Table 7: Estimate of revenue loss arising from regionally sourced maize

	Year 2001 maize imports from the region, cif value, in US$	Revenue Loss[9] (US$)
Kenya	3,668,074	21,659
Uganda	21,531	1,077
Tanzania	0	0
Malawi	31,046	0
Zambia	112,331	0
Zimbabwe	0	0
Ethiopia	0	0

Source: Own computation

ii. *Import Declaration Fees or commission be can eliminated, following the traders strong recommendation (as revisited further on in the report) that Pre-Shipment Inspection on regionally sourced maize be abolished.*

iii. *Ethiopia should also review its policy to levy VAT on maize imports, with a view to exempting regionally sourced maize from this tax.*

3.2.4 Quality and Safety Standards

Quality standards

As evidenced in the able below, maize quality standards vary from one country to the other. With the exception of Zambia where compliance with the standards is optional, it is a mandatory requirement that all maize imports meet these standards. For Uganda, it is compulsory that maize exports meet Uganda standards as well.

The standards act as a technical barrier to maize trade, especially where traders are unaware of the destination country's standards and only learn of them at the port of entry or border posts. The consequences of this regulation are devastating for traders who fail to meet the standards. The course of action is usually return of the consignment to the country of origin, quarantine or destruction of the consignment at the trader's expense. At the Kenya/Uganda Busia Border, there were cases of maize imports rejected on accounted of moisture content, where Kenyan Authorities insisted on 13.5 while Uganda maize was at 14% moisture content.

[9] The revenue loss is computed by applying the applicable regional tariff on cif value of maize imports. For Kenya it is worth noting that imports from Malawi which amount to US$2.9million came in duty free because Malawi is implementing COMESA FTA.

Table 8: Specifications of quality standards

Specification	Kenya	Uganda	Tanzania	Malawi	Zambia	Zimbabwe	Ethiopia
Moisture Content (maximum)	13.5%	14%	13%	14%	12.5%	14%	13%
Foreign Matter	1.0%	0.5%	1%	2.6%	1.5%	2%	0.5%%
Broken Grains	2.0%	2.0%	2%	11.5%	6.0%	6%	2%
Insect Damaged Grains	3.0%	1.0%	2%	-	5%	-	3%
Rotten, Diseased and Discolored Grains	4.0%	3.5%	1%	-	2%	0.5%	-
Other Colored Grains	2.0%	3.0%		-	3%	-	0.5
Live Insect Infestation	Nil	Nil	Nil	Nil		--	Nil
Aflatoxin (maximum)	(10ppb)	10ppb	10ppb	3ug/kg		-	-
Total defective grains	-	6.5%	-	-		-	8.0%
Immature/shriveled grain	-	-	1%	-	1%	-	1%
Fungal damaged grain	-	-	-	-	1%	-	-
Germinated grain	-	-	-	-	1%	-	-
Contracting classes	-	-	-	-	-	-	1.9
Number of Grades	4	2	2	-	-	-	4
Packaging	90kg gunny bags	Not specific	90kg gunny bag	100kg bag	100kg bag	90kg gunny bags	100kg gunny bag

Centralized quality standards testing services or provision of these services in just a few borders or entry points impedes exports of maize, especially by the small and medium traders, who may find it expensive to go for these services at the centralized locations. In Malawi, for instance, maize traders have to pick the inspectors, at their cost, to have their maize inspected before release. It can take up to 3 days. Testing facilities are available only in Blantyre.

Box 5
Draft EAC Quality Standards

For EAC, there already exist harmonized standards, which are yet to be implemented. It is therefore recommended that EAC harmonized maize standards be adopted by the member states and they start to be applied. EAC standards are as follows: -

	Grade 1	Grade 2
Moisture Content (maximum)	13%	13.5%
Foreign Matter	1.0%	2%
Broken Grains	2.0%	5%
Insect Damaged Grains	0.5%	2%
Rotten, Diseased and Discolored Grains	2%	5%
Filth	0.1%	0.2%
Immature/shriveled grain	1%	2%
Packaging	gunny bags (maize not handled in bulk) and containers for bulk maize handling	gunny bags (maize not handled in bulk) and containers for bulk maize handling

Safety standards on maize imports are only applicable in Kenya, Uganda and Tanzania. The standards are issued and enforced by the Port Health Office (in Kenya) and National Food Control Commission (NFCC) in Tanzania. In Uganda the standards are enforced by Uganda Bureau of Standards. With exception of Kenya, the specification of safety standards in Uganda and Tanzania is the same as that of Bureau of Standards. In Kenya the main difference is in the moisture content, where the safety standards specification is 12.5, while Kenya Bureau of Standards specification is 13.5.

In addition to safety specifications, Kenya and Tanzania require maize imports to be tested for radioactive active material. In Kenya, radioactive tests cost KShs3000 and are done for each consignment. Traders were of the view that this regulation be subjected to maize originating in areas where radioactive materials are known to be in existence, rather than being generally employed on all maize imports.

The procedures for enforcing the safety standards in Tanzania require an importer to be registered with NFCC. For each import consignment, the trader is required to apply for an import permit (in Dar es Salaam) by accompanying such application with sample of the maize to be imported. The import permit is issued citing port of entry where the entire consignment will be inspected to ascertain that maize is in deed fit for human consumption. The centralization of the issuance of the import permit is a key constraint to traders who are far away from the capital. Restriction of the port of entry also presents a problem because after sourcing maize from a neighboring country, it may be more economical to use an alternative port of entry to the one specified in the permit. According to the maize traders, compliance with the specification of the import permit may therefore lead to additional transport and handling costs, as one diverts maize from a more economical route to the route leading to the port of entry that is specified in the import permit.

In Kenya, the key concern among traders is lack of knowledge of the safety standards requirements until maize gets to the port of entry, where the health officials subject the commodity to safety inspections. This amounts to ambushing traders and the consequences may be costly if the standards are not met. Dual moisture content specification (KEBS and PHO) poses a potential conflict among the regulatory authorities and a risk to the traders in case one agency opts to stick to its specification.

Recommendations

i. *It is recommended that COMESA and EAC spearhead negotiations leading to harmonization of maize quality standards and testing methods.*

ii. *Enhance accessibility to standards inspection services. As a rule, COMESA and EAC countries should ensure presence of quality standards inspectors, backed with standards testing equipments at main borders or ports of entry, through which maize is exported/imported.*

iii. *Safety standards for maize should be merged with quality standards and Bureaus of Standards assigned the responsibility of their enforcement. Requirement for sample testing for regionally sourced maize should be abolished, especially because even after issuing import permit against the results of the sample test, the imported consignment still has to be tested at the border or port of entry. Issuance of an import permit should also*

be abolished. Instead, maize traders should be educated on regional safety specifications, and be made aware that such specifications are enforced whenever maize is imported in to the country.

3.2.5 Phytosanitary requirements

Phytosanitary regulations are enforced on all plant and plant materials being imported into a country. The purpose of phytosanitary regulations is to check against introduction of plant diseases and pests which may wreck havoc to crops and vegetation in a country. Maize imports in both the COMESA and EAC regions are therefore subjected to phytosanitary regulations. With the exception of Ethiopia, maize importers in all the sample countries are required to obtain phytosanitary import permits before importation. The permit stipulates declaration conditions that a Phytosanitary Agency in the exporting country is required to certify as having been complied with before exportation of the consignment. This is done through a Phytosanitary Certificate which is part of the documents that an importer is supposed to produce to customs and phytosanitary authorities at the border or port of entry.

As evidenced in the table below, Phytosanitary standards and requirements for maize imports differ across the across the region. The impact of this has been to interfere with maize trade between EAC and COMESA countries, despite their having similar agro-ecological conditions with regard to pests and diseases.

Table 9: Phytosanitary Declaration Conditions

Declaration conditions	Ke	Ug	Tz	Mal	Zam	Zim	Eth
Sclerospora graminicola (sace) Schroet and *Sclerospora sacchard miy* are not known to occur in the country of origin	✓						
Xanthomonas stewatii (EF Smith) Dawnson is not known to occur in the place of production	✓						
The maize was fumigated before dispatch (details to be stated in the Phytosanitary certificate)	✓	✓		✓			
The material is not genetically modified	✓						
Maize is free from Erwinia Stewartii a bacterial wilt of maize			✓				
Maize is free from Large Grain Borer				✓	✓		✓
Open pollination of seed variety has been avoided						✓	

Worse still, as documented in ASERECA (2002) there are instances where phytosanitary regulations are not based on scientific data, thus making them trade barriers.

Issuance of phytosanitary import permits was centralized at the capitals or regional or provincial headquarters. This acted as a deterrent factor to maize traders who would have to travel long distances to get the phytosanitary certificates or import permits. Take the case of Uganda where phytosanitary certificates are issued in Kampala or Entebbe, yet maize growing and exporting regions are some 200 to 250KM to the east of the country, bordering Kenya.

In Malawi, Tanzania and Zambia, where maize imports run into thousands of tons during deficit seasons, issuance of maize import permits is also centralized at the capital (in Tanzania and Zambia; and in Malawi at Blantyre).

Recommendations

i. *Harmonization of the phytosanitary regulations and requirements for maize imports is recommended. This will involve: -*
   - *Pest Risk Analysis of individual pests*
   - *Development of standard protocols for diagnostic and inspection procedures*
   - *Establishment of standard protocol for pest risk analysis for EAC and COMESA regions based on FAO guidelines*
   - *Establishment of a regionally and internationally acceptable format of a phytosanitary certificate*
   - *Establishment of a pest information system and network and public awareness procedures.*

ii. *Introduce phytosanitary import permits and certification offices at border posts or port of entry. Currently only phytosanitary inspection offices are at these points.*

iii. *Through ASERECA, assist in the implementation of the EAC harmonized phytosanitary program on aspects that touch on maize grain.*

In EAC, under the ASERECA project, work on harmonization of phytosanitary regulations on seeds has been on going and achievements and areas of further work is documented in the box below. Our enquiry on the relevance of this work on maize grain revealed that phytosanitary regulations for maize seed and maize grain are basically the same, only that seeds regulatory requirements and enforcement procedures are more rigorous.

Box 6
Harmonization of Phytosanitary Regulations in EAC – Status and areas of further work

Status

EAC is in the process of harmonizing sanitary and phytosanitary regulations. Milestones that have been realized include: -

- *Revised FAO pest risk analysis (PRA) be used in all the three countries*
- *Membership of International Plant Protection Convention (IPPC)*
- *Quarantine pests have been reduced from 33 to 3 for 10 crops (which included maize)*
- *A common list of mid-to-high quarantine pests in East Africa has already been established*
- *Proposal for establishment of minimum phytosanitary facilities at high risk entry points*

Further work

Implementation of the above agreed positions constitutes the only further work in the process of the harmonisation of EAC Phytosanitary regulations. This should be backed up by targeted awareness creating seminars/workshops.

3.2.6 Customs clearance procedures

a) Customs entry documents

In all the seven countries, customs clearance procedures have been greatly eased by the introduction of a single entry document (SED) which replaced numerous customs forms that were cumbersome and difficult for traders (especially cross border traders) to complete accurately. Although adopted from the COMESA Customs Document (COMESA CD) format, their details vary across the countries.

While the single entry documents were lauded by maize traders for easing customs clearance burden, the following concerns were raised.

- In some countries details called for in the SED put off cross border traders, who may not have these details or may shy from giving the details. The specific case was cited in the EAC region where the requirement for PIN discourages small and medium traders from using the forms.

- Lack of knowledge among traders and enforcement customs officers on how to complete the form and its use, which resulted in rejection of the documents and consequent delays in customs clearance.

b) Other requirements before clearance of maize at customs

Other requirements before customs clearance for either exports or imports are summarized in the table below. These requirements are applied on maize imports, except requirement number 9 which is only applicable for exports. Requirement number 7 (quality standards certificate) is applicable for both export and import in Uganda.

These requirements impede regional maize trade. For instance, inaccessibility to the following certificates due to the problem already explained disadvantages the trades: Phytosanitary, quality standards, safety standards inspection services. These services are centralized in capitals or a few district or regional administrative capitals. Although there is some effort throughout the COMESA and EAC region to have officers from the relevant government departments at the border to carry out spot inspection, there are some border posts that are not covered. A case in point is the Kenya/Uganda Lwakhakha border, where due to lack of standards, health and phytosanitary agents maize clearance is delayed as these officials have to be called in from other stations (such as Malaba or Busia).

Table 10: Customs Clearance requirements

No	Requirements	Ke	Ug	Tz	Mal	Zam	Zim	Eth
1	Original invoice	✓	✓	✓	✓	✓	✓	✓
2	Contract with importer and Letter of Credit (irrevocable)							✓
3	Import Declaration Form	✓	✓					
4	Pre-Shipment Inspection (Clean Report of Finding – CRF)	✓		✓				
5	Certificate of origin (for maize originating from EAC or COMESA region)	✓	✓	✓	✓	✓	✓	✓
6	Phytosanitary Certificate	✓	✓	✓	✓	✓	✓	
7	Quality standards certificate (issued by Standard Bureau)	✓	✓	✓	✓		✓	✓
8	Safety standards certificate (issued by Health Authorities)	✓	✓	✓				
9	Export permit Ministry of Agriculture			✓	✓	✓	✓	✓
10	Import permit from Ministry of Agriculture			✓	✓	✓	✓	✓
11	Lodgment of customs documents by licensed clearing agents (if maize is for commercial use)	✓		✓				

Small and medium traders who source maize for regional trade at the farm gates find original invoice requirement a problem, because the sellers do not normally issue this document. This disadvantages the traders when they present their case to the customs officials.

Customs officials are also unable to apply preferential regional (COMESA or EAC tariffs) for maize which is not accompanied by certificate of origin. Certificates of origin are not readily available, because of the limited places where they are issued.

The requirement for pre-shipment inspection on regionally sourced maize is also seen as a handicap, especially because the revenue rationale for using PSI services is not valid in COMESA and EAC where duty on agricultural commodities is already too low or zero. The cost of complying with PSI requirements (in Kenya this cost is 2.75% of the c.i.f value of a maize consignment that equals to or is more than US$5000) may already be much higher than the duty that is due (like in Kenya where duty is zero on maize)

Recommendations

i) The Single Entry Document should be reviewed to ensure that the required details do not discourage small and medium traders from using formal customs clearance procedures. For instance the call for PIN number should be made optional and introduction of details such as ID number and other forms of identification should be explored, to cater for individual traders and small businesses that may be operating under sole proprietor mode of business registration.

ii) Requirements for customs documents to be lodged by licensed clearing agents should be reviewed, with the aim of making the requirement optional for agricultural

consignments that are less than US$5000. This policy change should however be backed by extensive education of customs entry documents and procedures.

iii) *Requirements for original invoices on maize imports should be limited to consignments that exceed US$5000. This will encourage cross border traders who currently shy away from using customs entry documents just because they may not have invoices. It is worth noting that even where original invoices are lodged, customs officials have the liberty to revise the figures should they suspect under-invoicing. Pre-shipment inspection should be eliminated for regionally sourced maize. Along with this policy measure, the requirement for IDF and IDF fees should also be phased out for regionally sourced maize, especially because IDF is merely a record of intention to import. Actual imports are captured through customs statistics.*

iv) *All trade regulatory institutions, which have to inspect maize (as indeed all other commodities) before release, should carry out inspections at the same time to avoid delays.*

v) *For the few countries which are still enforcing foreign exchange controls, mandatory requirement of irrevocable LC before issuance of an export permit for regionally destined maize exports should be dropped. Other less punitive trade finance instruments, such as Cash Against Documents (CAD) should be applied.*

vi) *Issuance of the certificates of origin for agricultural produce need to be decentralized and made more accessible to traders. Efforts should be made to have these certificates issued close to the ports of exit. In case the issuing authorities may not have office at these localities, this responsibility should be assigned to customs offices.*

4.0 IMPACT OF TRADE POLICIES AND REGULATIONS

4.1 Informal Cross Border trade

The main effect of the trade regulations and policies has been to encourage informal cross border trade. According to various sources, this trade is substantial.

In Malawi, for instance, informal trade from Southern Tanzania to Northern Malawi flourishes during periods of deficit in Malawi. In the year 2002, respondents who were interviewed in the course of the Malawi RATES baseline study field work indicated that a total of 20,000 MT of maize was imported into the country through informal channels from Tanzania and 80,000 MT from Mozambique. A collaboration of these figures with the Malawi Revenue Authorities showed possibility of informal cross border trade being even much higher. The MRA border officials indicated that up to 10 bicycles pass every minute with a minimum of two bags of maize (50kg) at the relatively small border post of Milange during the harvesting season in Mozambique (April-June). This amounts to 5,000 bags or 250 metric tons daily. Even during periods of shortages in Malawi (December-February), 3 to 5 bicycles pass every minute amounting to about 144MT daily. Taking the average of those and calculating on annual basis, results in a figure for informal cross border trade as high as 73,000 MT a year, just for this relatively small border post.

A study carried out in 2001[10] came up with a figure of 100,000 MT in marketing years of 1997, 40,000 MT in 2000 and 40,000 MT in 2001, for informal cross-border trade between Malawi and Mozambique. In Zambia, Informal cross border exports of maize were estimated by the Zambia RATES baseline study at about 100,000 MT. These exports took place at the height of an export ban imposed because of the perceived food crisis.

In Uganda, the difference between official statistics and IDEA project estimates give the magnitude of maize leaving the country through informal channels. For the period 1997-2001, these exports averaged 55,000MT.

Table 11: Evidence of informal cross border trade: The Case of Uganda. Figures in US$

		1997	1998	1999	2000	2001
IDEA Project estimate		11,024,000	10,660,000	14,800,000	11,835,000	10,731,000
COMESA/CSO Data Base		413,706	474,897	28,811	388,264	279,817
Informal Cross Border Trade	**US$**	10,610,294	10,185,103	14,771,189	11,446,736	10,451,183
	MT (estimates)[11]	53,051	50,926	73,856	57,234	52,256

Source: Uganda RATES Maize Market Assessment and Baseline Study. Estimates of the informal cross border trade are derived from these figures.

[10] Whiteside, Martin: Neighbours in Development: Livelihood Interactions between Northern Mozambique and Southern Malawi, 2002.

[11] Estimates based on an assumed price of US$200 per metric ton

These estimates compare with that by an USAID/REDSO study[12], which recorded Kenya's informal maize imports from Uganda as 84,000MT between the period August 1994 and July 1995.

4.2 High transaction costs associated with informal cross border trading

Informal cross border trading is characterized by breaking of bulk in order to disguise maize imports for commercial purposes from the regulatory authorities. Taking the case of the Uganda and Kenya Busia Border, as an example, the cost of breaking the bulk was found to be enormous. It includes labor charges by loaders who are paid to empty a truck of maize from hinterland of Uganda on the Uganda side of the border (usually KShs5 to 10 per 90KG bag). It also includes cyclists who are paid between KShs10 to 20 to ferry maize across the border to a waiting lorry on the Kenya side.

Additional cost is incurred in paying the loaders on the Kenyan side who are paid to load the maize on to the Lorries for onward transportation to destination markets such as Nakuru, Kisumu etc.

This operation may take a whole day for 10 tones of maize to be cleared across the border informally.

If trade regulations and policy environment were conducive, all this hassle would be avoided by a trader merely hiring a truck in Uganda and ferrying maize right across the border at minimal cost (mainly the low EAC or COMESA tariff) and time (usually less than 2 hours when the border is not busy).

The two following pictures, taken on 20th April 2000 at the Busia border, illustrate this process. The first photo is that of a cyclist ferrying maize from Uganda through the Kenyan customs border post. Duty on this maize was collected through the direct assessment method that is applied for non-commercial maize.The second photo is that of a track on the Kenyan side, where the cyclist deposits the maize. The loaders are busy loading the maize before the maize is transported to the hinterland market.

[12] Chris Ackello-Ogutu, and Protase Echessah, 1997 'Unrecorded cross border trade between Kenya and Uganda, Implications for Food Security' A Joint Publication of AFR/SD and REDSO/ESA

First picture

Second picture

4.3 Discouraging private sector investment in the maize value chain (storage, handling and marketing)

Risks associated with restrictive trade practices in Zambia, Tanzania, Malawi and Zimbabwe were said to be discouraging private sector investments in the maize value chain, especially in the storage and marketing infrastructure. This in turn poses as a formidable challenge to the region's ability to exploit the regional maize market potential.

5.0 SUMMARY OF RECOMMENDATIONS

This study has shown trade policies and regulations on maize trade to be very different from one country to the other. Enforcement of these regulations has deterred regional maize trade and in extreme cases forced traders to resort to informal trading in an effort to avoid the regulations.

Existence of the regional maize market potential, which is currently being serviced by maize imported from outside the region spells the need for the COMESA and EAC member states to create a more enabling regional trade policy and regulatory environment, in order to encourage freer movement of maize.

The following recommendations are proposed for consideration by the member states in their endeavour to creating an enabling environment for regional maize trade.

5.1 Relax import and export restriction

a) Export permits that are used as a means of generating export data for use in monitoring food situations should be **abolished** because they encourage informal cross border trade, which worsens food forecasting prospects. Instead a customs database should be used as the basis for tracking maize export.

b) Introduce regionally acceptable parameters that will be used as a guide in the invocation of maize export bans or import restriction, within the framework of ‚Safeguards Clause' of the EAC and COMESA Treaties. A regional food security information clearing system could form the source for statistics to be applied in computing the parameters.

c) In support of proposed recommendation for regional policy on export and import regulations, a regional crop forecasting system is required to provide reliable information on maize availability, which COMESA and EAC countries could in turn use in their projections of maize availability.

d) Develop a regional policy on the basis and modalities for introduction of export bans. The overriding fundamental being the ability of such a move to be predictable and supported by regionally acceptable statistics.

e) In support of proposed recommendation for regional policy on export and import regulations, a regional crop forecasting system is required to provide reliable information on maize availability, which COMESA and EAC countries could in turn use in their projections of maize availability.

f) Harmonize COMESA and EAC member countries maize imports regulatory policies. Central to these negotiations will be a call for abolishing maize import permit requirement.

g) A regional program linking various national warehouse receipt system regionally should be explored, as a means of addressing the reason behind import regulations.

h) Abolish import permit regulations and instead develop private sector marketing systems throughout the region, such as warehouse receipt system tied to a regional commodity exchange program. This arrangement will attract funding into the maize trading from commercial banks and other lending institutions, which are now shying away from this sector because of the market risks associated with unforeseen government regulations and roles in the market.

5.2 Harmonize or eliminate regional tariff and non tariff charges on regionally sourced maize

a) Harmonize the internal tariff on maize by reducing it to zero, in line with the tariff rates of some countries in the COMESA and EAC region. Impact on government revenue would be negligible, as already tariffs on intra-regionally sourced maize are low. For instance using year 2001 imports statistics, the revenue loss for the countries that are reported in the COMESA data base as having sourced maize from the region would be negligible, as shown in section 3.2 of this report.

b) Import Declaration Fees or commission be can eliminated, following the traders strong recommendation (as revisited further on in the report) that Pre-Shipment Inspection on regionally sourced maize be abolished.

c) Ethiopia should also review its policy for levying VAT on maize imports, with a view to exempting regionally sourced maize from this tax.

5.3 Harmonize Quality and Safety Standards

a) It is recommended that COMESA and EAC spearhead negotiations leading to harmonization of maize quality standards and testing methods.

b) Enhance accessibility to standards inspection services. As a rule, COMESA and EAC countries should ensure presence of quality standards inspectors, backed with standards testing equipments at the borders or ports of entry.

c) Safety standards for maize should be merged with quality standards and Bureaus of Standards assigned the enforcement responsibility. Requirement for sample testing for regionally sourced maize should be abolished, especially because even after issuing import permits against the results of the sample test, the imported consignment still has to be tested at the border or port of entry. Issuance of import permit should also be abolished. Instead, maize traders should be educated on regional safety specifications, and be made aware that such specifications are enforced whenever maize is imported into the country.

5.4 Harmonize Phytosanitary requirements and procedures

a) Harmonization of the phytosanitary regulations and requirements for maize imports is recommended. This will involve: -
   - Pest Risk Analysis of individual pests
   - Development of standard protocols for diagnostic and inspection procedures

- Establishment of standard protocol for pest risk analysis for EAC and COMESA regions based on FAO guidelines
- Establishment of a regionally and internationally acceptable format of a phytosanitary certificate
- Establishment of a pest information system and network and public awareness procedures.

d) Introduce phytosanitary import permit and certification offices at border posts or ports of entry. Currently only phytosanitary inspection offices are at some of these points.

e) Through ASERECA, assist in the implementation of the EAC harmonized phytosanitary program on aspects that touch on maize grain.

5.5 Customs clearance procedures

a) The Single Entry Document should be reviewed to ensure that the required details do not discourage small and medium traders from using formal customs clearance procedures. For instance the call for PIN number should be made optional and introduction of details such as ID number and other forms of identification should be explored, to cater for individual traders and small businesses that may be operating under sole proprietor mode of business registration.

b) Requirements for customs documents to be lodged by licensed clearing agents should be reviewed, with the aim of making the requirement optional for agricultural consignments that are less than US$5000. This policy change should however be backed by extensive education of customs entry documents and procedures.

c) Requirement for original invoice on maize imports should be limited to consignments that exceed US$5000. This will encourage cross border traders who currently shy away from using customs entry documents just because they may not have invoices. It is worth noting that even where original invoices are lodged, customs officials have the liberty to revise the figures should they suspect under-invoicing.

d) Pre-shipment inspection should be eliminated for regionally sourced maize. Along with this policy measure, the requirement for IDF and IDF fees should also be phased out, for regionally sourced maize, especially because IDF is merely a record of intention to import. Actual imports are captured through customs statistics.

e) All trade regulatory institutions, which have to inspect maize (as indeed all other commodities) before release, should carry out inspections at the same time to avoid delays.

f) For the few countries, which are still enforcing foreign exchange controls, mandatory requirement of irrevocable LC before issuance of an export permit for regionally destined maize exports should be dropped. Other less punitive trade finance instruments, such as Cash Against Documents (CAD) should be applied.

g) Issuance of the certificates of origin for agricultural produce need to be decentralized and made more accessible to traders. Efforts should be made to have these certificates issued

close to the ports of exit. In case the issuing authorities may not have offices at these localities, this responsibility should be assigned to customs offices.

6.0 PROPOSED IMPLEMENTATION PLAN MATRIX

To move the process of expanding regional maize trade beyond just the identification of the policy and regulatory constraints, the following implementation plan details proposed activities for consideration at the regional conference. Existing regional policy design and implementation mechanism at the EAC and COMESA will be applied. The plan identifies the relevant working groups which constitutes these mechanisms.

POLICY AREA	PROPOSED ACTIVITY	REGIONAL IMPLEMENTATION MECHANISM
Export/Import Restrictions and Regulation	**Export Regulations** Negotiations to explore possibilities for abolishing export permits that are issued as a means of generating export data to monitor food security situation. A regional position requiring that customs statistics be the source for such data should be pursued.	Working groups comprising members of the trade and customs committee (in the case of EAC) and trade and industry committee in the case of COMESA. In each case the working groups will co-opt interested maize traders drawn from the regional network of maize traders.
	Export bans Negotiations to come up with a regional policy on the basis and modalities for introduction of export bans. The overriding fundamental being ability of such a move to be predictable and supported by regionally acceptable statistics.	Working groups comprising members of the trade and customs committee (in the case of EAC) and trade and industry committee in the case of COMESA. In each case the working groups will co-opt maize traders drawn from the regional network of maize traders.
	Regional crop forecasting Consultations leading to introductions of regional crop forecasting system to support data requirements as a means of enhancing member countries ability to estimate maize	Working Groups under committees of Agriculture and Food Security

POLICY AREA	PROPOSED ACTIVITY	REGIONAL IMPLEMENTATION MECHANISM
	availability with precision	
contd….Export/Import Restrictions or Regulation	**<u>Import Regulations</u>** Negotiations to harmonize member countries maize imports regulatory policies. Central to these negotiations will be a call for abolishing maize import permit requirement. A regional program linking various national warehouse receipt system regionally should be explored, as a means of addressing the reason behind import regulations.	
Harmonize or Eliminate regional tariff and non tariff charges on regionally sourced maize	Negotiations to harmonize internal tariff on maize by reducing it to zero, in line with the tariff rates of some countries in the COMESA and EAC region.	Working groups comprising members of the trade and customs committee (in the case of EAC) and trade and industry committee in the case of COMESA. In each case the working groups will co-opt maize traders drawn from the regional network of maize traders
	Negotiations leading to elimination of Import Declaration Fees or commission on maize imports.	Working groups comprising members of the trade and customs committee (in the case of EAC) and trade and industry committee in the case of COMESA. In each case the working groups will co-opt maize traders drawn from the regional network of maize traders

POLICY AREA	PROPOSED ACTIVITY	REGIONAL IMPLEMENTATION MECHANISM
	Negotiations leading to abolishing of VAT and other charges of equivalent effect to tariffs	
Harmonize Quality and Safety Standards	Negotiations to harmonize maize quality standards and testing methods in the COMESA region	Working Group of the Bureaus of Standards and maize traders drawn from the regional network
	A regional consultative meeting of EAC Bureau of Standards and lead maize traders to consider private sector inputs to EAC Maize quality standards and finalization of EAC standards, ready for publishing.	Working Group of the Bureaus of Standards and maize traders drawn from the EAC regional maize traders network
	Adoption of EAC maize standards at national level and publishing of the same ready for application	Working Group of the Bureaus of Standards and maize traders drawn from the EAC regional maize traders network
	Negotiations leading to identification of border posts or port of entry where quality standards testing and issuance of standards certificates should be mandatory for all countries to observe as a means of facilitating regional maize trade.	Working Group of the Bureaus of Standards and maize traders drawn from the regional network
	Negotiations to explore possibility of merging safety standards for maize imports with quality standards and Bureaus of Standards assigned the enforcement responsibility.	Working Group of the Bureaus of Standards and maize traders drawn from the regional network

POLICY AREA	PROPOSED ACTIVITY	REGIONAL IMPLEMENTATION MECHANISM
Harmonize Phytosanitary requirements and procedures	For COMESA, negotiations among Phytosanitary Agencies on phytosanitary regulations on maize grain, leading to harmonized regulations and testing methods and procedures. Specific areas of coverage could include: - • Pest Risk Analysis of individual pests • Development of standard protocols for diagnostic and inspection procedures • Establishment of standard protocol for pest risk analysis for EAC and COMESA regions based on FAO guidelines • Establishment of a regionally and internationally acceptable format of a phytosanitary certificate • Establishment of a pest information system and network and public awareness procedures.	Working Group of the Phytosanitary Agencies in COMESA
	Through ASERECA, facilitate implementation of the EAC harmonized phytosanitary program on aspects that touch on maize grain.	Working Group of the Phytosanitary Agencies in EAC
	Negotiations leading to identification of border posts or port of entry where phytosanitary import permits should be issued and testing done. A regional program for ensuring that all these centers	Working Group of the Phytosanitary Agencies

POLICY AREA	PROPOSED ACTIVITY	REGIONAL IMPLEMENTATION MECHANISM
	are operational should be considered in the process of these negotiations.	
	Negotiations leading to a regional policy on GMO maize.	Working Group of the Phytosanitary Agencies
Customs clearance procedures	Consultative meeting of the customs officials and private sector to review Single Entry Document with the aim of ensuring that the required details do not discourage small and medium traders from using formal customs clearance procedures.	Working groups comprising members of the trade and customs committee (in the case of EAC) and trade and industry committee in the case of COMESA. In each case the working groups will co-opt maize traders drawn from the regional network of maize traders.
	• Consultative meeting of the customs officials and private sector to review the requirements for customs documents to be lodged by licensed clearing agents, with the aim of making the requirement optional for agricultural consignments that are less than US$5000. • Extensive education of customs entry documents and procedures small and medium cross border traders.	Working groups comprising members of the trade and customs committee (in the case of EAC) and trade and industry committee in the case of COMESA. In each case the working groups will co-opt maize traders drawn from the regional network of maize traders.
	Consultative meeting of the customs officials and private sector to limit the requirement for original invoice on maize	Working groups comprising members of the trade and customs committee (in the case of EAC) and trade and industry

POLICY AREA	PROPOSED ACTIVITY	REGIONAL IMPLEMENTATION MECHANISM
	imports to consignments that exceed US$5000.	committee in the case of COMESA. In each case the working groups will co-opt maize traders drawn from the regional network of maize traders.
	• Negotiations leading to abolishment of Pre-shipment inspection for regionally sourced maize. • Negotiations leading to abolishment of the IDF requirement and IDF fees or import commission.	Working groups comprising members of the trade and customs committee (in the case of EAC) and trade and industry committee in the case of COMESA. In each case the working groups will co-opt maize traders drawn from the regional network of maize traders.
	Consultative meeting of the customs officials and private sector to introduce customs clearance best practice as a regional *modus operandi*, where all trade regulatory institutions which have to inspect maize before release carry out inspection same time to avoid delays.	Working groups comprising members of the trade and customs committee (in the case of EAC) and trade and industry committee in the case of COMESA. In each case the working groups will co-opt maize traders drawn from the regional network of maize traders.
	Negotiations leading to the relaxation of the mandatory requirement for irrevocable LC for all countries which are still enforcing foreign exchange controls. Other less punitive trade finance instruments, such as Cash Against Documents (CAD) should be applied.	Working groups comprising members of the trade and customs committee (in the case of EAC) and trade and industry committee in the case of COMESA. In each case the working groups will co-opt maize traders drawn from the regional network of maize traders.
	Consultative meeting for all agencies responsible for issuance of certificates leading to decentralized of the issuance of	Working groups comprising members of the trade and customs committee (in the case of EAC) and trade and industry

POLICY AREA	PROPOSED ACTIVITY	REGIONAL IMPLEMENTATION MECHANISM
	the certificates of origin. The consultative process should focus on having these certificates issued close to the ports of exit. In case the issuing authorities may not have office at these localities, this responsibility should be assigned to customs offices.	committee in the case of COMESA. In each case the working groups will co-opt maize traders drawn from the regional network of maize traders.
Food Aid	Negotiations leading to a regional policy on food Aid, providing that the primary source of such food be the regional market and overseas sources is secondary, upon the region lacking sufficient supplies. The EU food policy in Ethiopia[13] could be a lesson for the negotiating teams to consider.	Working groups comprising members of the trade and customs committee (in the case of EAC) and trade and industry committee in the case of COMESA. In each case the working groups will co-opt maize traders drawn from the regional network of maize traders.

[13] In Ethiopia, EU food aid program is tied to the development of agricultural sector, where instead of importing food for relieve purposes, Funds are availed to the Disaster Prevention and Preparedness Commission for use in purchasing of the foods locally. External supplies are resorted only when local supplies are not sufficient

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Annex 1: COMESA and EAC Maize Production in Metric Tonnes (1997-2002)

	1997	1998	1999	2000	2001	2002	Period Total	%share
Angola	370	505	428	395	429	430	2,556	2.03
Burundi	145	132	129	118	124	124	772	0.61
Comoros	4	4	4	4	4	4	23	0.02
Congo, DR	1,167	1,215	1,199	1,184	1,169	1,154	7,089	5.62
Djibouti	0	0	0	0	0	0	0	0.00
Egypt	5,806	6,337	6,143	6,474	6,842	6,800	38,403	30.47
Eritrea	6	29	16	14	9	0	74	0.06
Ethiopia	2,987	2,344	2,832	2,683	3,298	2,600	16,744	13.29
Kenya	2,214	2,400	2,322	2,160	2,776	2,800	14,672	11.64
Madagascar	178	152	175	170	180	181	1,035	0.82
Malawi	1,226	1,772	2,479	2,501	1,589	1,603	11,172	8.86
Mauritius	0	0	0	1	1	0	2	0.00
Namibia	49	18	19	32	28	28	173	0.14
Rwanda	83	59	55	63	81	92	432	0.34
Sudan	52	42	37	53	53	53	290	0.23
Swaziland	108	125	113	85	85	85	600	0.48
Tanzania	1,831	2,685	2,452	2,551	2,698	2,701	14,917	11.84
Uganda	456	480	505	526	564	535	3,067	2.43
Zambia	960	638	822	882	602	900	4,804	3.81
Zimbabwe	2,192	1,418	1,520	2,108	1,467	499	9,203	7.30
Grand Total	19,836	20,355	21,250	22,002	21,998	20,589	126,029	100.00

Source: FAO Data, Central Statistics Office of the respective countries and IDEA Project Data (in the case of Uganda)

Annex 1: Cont'd

Maize Consumption in COMESA and EAC, 1'000MT

Year	1997	1998	1999	2000	Period Total	% Share in period total
Angola	130	477	110	424	1141	1.94
Burundi	137	133	136	129	535	0.91
Congo DR	1057	1114	1064	1064	4299	7.30
Comoros	3	96	3	3	105	0.18
Djibouti	4	4	4	1	13	0.02
Kenya	2,644	2,679	2,554	2,484	10361	17.60
Eriteria	17	17	24	13	71	0.12
Ethiopia	2,641	2,720	3,289	3,385	12035	20.44
Malawi	1,377	1,450	1,486	1504	5817	9.88
Madagascar	147	130	138	150	565	0.96
Mauritius	3	3	3	1	10	0.02
Namibia	126	131	100	109	466	0.79
Rwanda	154	154	187	160	655	1.11
Seychelles	1	0	1	1	3	0.01
Sudan	58	33	104	66	261	0.44
Swaziland	74	80	62	64	280	0.48
Tanzania	2,188	2,284	2,289	2,468	9229	15.68
Uganda	405	419	430	453	1707	2.90
Zimbabwe	1,419	1,503	1,564	1,533	6019	10.22
Zambia	1,274	1,281	1,334	1,411	5300	9.00
Total	13,859	14,708	14,882	15,423	58,872	100.00

Source: FAO Data for all countries, except Uganda and Ethiopia, where the data was obtained from IDEA project and Central Statistics Authority, respectively).

Annex 2: Intra-COMESA Export of Maize, 1997

Exporter Country	HS Code	HS96 Product Description	Value USD ***FOB***	Importer Country
Angola	100590	Maize (excl. seed)	53	Namibia
Ethiopia	100590	Maize (excl. seed)	11,477,199	Kenya
Ethiopia	100590	Maize (excl. seed)	1,497,551	Uganda
Ethiopia	100590	Maize (excl. seed)	173,173	Djibouti
			13,147,923	
Kenya	100590	Maize (excl. seed)	104,531	Uganda
Kenya	100590	Maize (excl. seed)	67	Sudan
			104,598	
Madagascar	100590	Maize (excl. seed)	104,320	Seychelles
Madagascar	100590	Maize (excl. seed)	2,229	Comoros
			106,549	
Malawi	100590	Maize (excl. seed)	38,223	Ethiopia
Malawi	100590	Maize (excl. seed)	12,871	Kenya
Malawi	100590	Maize (excl. seed)	4,778	Zimbabwe
			55,872	
Namibia	100590	Maize (excl. seed)	**24,206**	Angola
Rwanda	100590	Maize (excl. seed)	**6,557**	Uganda
Uganda	100590	Maize (excl. seed)	274,990	Rwanda
Uganda	100590	Maize (excl. seed)	83,026	Burundi
Uganda	100590	Maize (excl. seed)	49,744	Congo DR
Uganda	100590	Maize (excl. seed)	5,946	Kenya
			413,706	
Zambia	100590	Maize (excl. seed)	757,168	Namibia
Zambia	100590	Maize (excl. seed)	687,992	Congo DR
Zambia	100590	Maize (excl. seed)	556,499	Zimbabwe
Zambia	100590	Maize (excl. seed)	35,181	Malawi
			2,036,840	
Congo DR	100590	Maize (excl. seed)	1,033,296	Kenya
Congo DR	100590	Maize (excl. seed)	2,728	Burundi
			1,036,024	
Zimbabwe	100590	Maize (excl. seed)	12,429,251	Kenya
Zimbabwe	100590	Maize (excl. seed)	6,707,751	Zambia
Zimbabwe	100590	Maize (excl. seed)	647,845	Congo DR
Zimbabwe	100590	Maize (excl. seed)	599,952	Malawi
Zimbabwe	100590	Maize (excl. seed)	4,909	Seychelles
			20,389,708	
Intra-COMESA Export of Maize, 1998				
Exporter Country	HS Code	HS96 Product Description	Value USD ***FOB***	Importer Country
Eritrea	100590	Maize (excl. seed)	**258**	Ethiopia
Ethiopia	100590	Maize (excl. seed)	**331,667**	Djibouti

Exporter Country	HS Code	HS96 Product Description	Value USD ***FOB***	Importer Country
Kenya	100590	Maize (excl. seed)	1,079,014	Sudan
Kenya	100590	Maize (excl. seed)	3,270	Rwanda
			1,082,284	
Mauritius	100590	Maize (excl. seed)	**291**	Comoros
Namibia	100590	Maize (excl. seed)	**26,162**	Angola
Uganda	100590	Maize (excl. seed)	157,153	Burundi
Uganda	100590	Maize (excl. seed)	98,632	Rwanda
Uganda	100590	Maize (excl. seed)	87,304	Congo DR
Uganda	100590	Maize (excl. seed)	66,853	Kenya
Uganda	100590	Maize (excl. seed)	41,756	Sudan
			451,698	
Zambia	100590	Maize (excl. seed)	163,690	Congo DR
Zambia	100590	Maize (excl. seed)	35,014	Malawi
			198,704	
Congo DR	100590	Maize (excl. seed)	**20,419**	Uganda
Zimbabwe	100590	Maize (excl. seed)	31,288,692	Zambia
Zimbabwe	100590	Maize (excl. seed)	11,638,371	Malawi
Zimbabwe	100590	Maize (excl. seed)	118,047	Congo DR
Zimbabwe	100590	Maize (excl. seed)	2,152	Namibia
Zimbabwe	100590	Maize (excl. seed)	1,211	Kenya
			43,048,473	
Intra-COMESA Export of Maize, 1999				
Exporter Country	HS Code	HS96 Product Description	Value USD ***FOB***	Importer Country
Angola	100590	Maize (excl. seed)	**5**	Namibia
Ethiopia	100590	Maize (excl. seed)	**215,893**	Djibouti
Kenya	100590	Maize (excl. seed)	4,423,408	Uganda
Kenya	100590	Maize (excl. seed)	23,996	Sudan
Kenya	100590	Maize (excl. seed)	195	Comoros
			4,447,599	
Madagascar	100590	Maize (excl. seed)	1,643	Mauritius
Madagascar	100590	Maize (excl. seed)	61	Comoros
			1,704	
Namibia	100590	Maize (excl. seed)	**24,985**	Angola
Exporter Country	HS Code	HS96 Product Description	Value USD ***FOB***	Importer Country
Uganda	100590	Maize (excl. seed)	**4,406**	Kenya
Zambia	100590	Maize (excl. seed)	436,062	Congo DR
Zambia	100590	Maize (excl. seed)	32,314	Zimbabwe
			468,376	
Zimbabwe	100590	Maize (excl. seed)	13,074,323	Malawi
Zimbabwe	100590	Maize (excl. seed)	266,953	Zambia

Exporter Country	HS Code	HS96 Product Description	Value USD ***FOB***	Importer Country
Zimbabwe	100590	Maize (excl. seed)	816	Kenya
Zimbabwe	100590	Maize (excl. seed)	796	Mauritius
			13,342,888	
Intra-COMESA Export of Maize, 2000				
Exporter Country	HS Code	HS96 Product Description	Value USD ***FOB***	Importer Country
Angola	100590	Maize (excl. seed)	**18**	Namibia
Ethiopia	100590	Maize (excl. seed)	**70,617**	Djibouti
Kenya	100590	Maize (excl. seed)	776	Sudan
Kenya	100590	Maize (excl. seed)	118	Comoros
			894	
Madagascar	100590	Maize (excl. seed)	74,939	Seychelles
Madagascar	100590	Maize (excl. seed)	21	Comoros
			74,960	
Mauritius	100590	Maize (excl. seed)	**152**	Seychelles
Malawi	100590	Maize (excl. seed)	3,301,720	Kenya
Malawi	100590	Maize (excl. seed)	3,518	Zimbabwe
Malawi	100590	Maize (excl. seed)	2,907	Zambia
			3,308,145	
Namibia	100590	Maize (excl. seed)	**45,897**	Angola
Uganda	100590	Maize (excl. seed)	385,671	Kenya
Uganda	100590	Maize (excl. seed)	2,593	Ethiopia
			388,264	
Zambia	100590	Maize (excl. seed)	898,858	Congo DR
Zambia	100590	Maize (excl. seed)	18,116	Burundi
Zambia	100590	Maize (excl. seed)	2,666	Zimbabwe
			919,640	
Congo DR	100590	Maize (excl. seed)	**86**	Zambia
Zimbabwe	100590	Maize (excl. seed)	27	Mauritius
Zimbabwe	100590	Maize (excl. seed)	10	Malawi
			37	
Intra-COMESA Export of Maize, 2001				
Exporter Country	HS Code	HS96 Product Description	Value USD ***FOB***	Importer Country
Djibouti	100590	Maize (excl. seed)	**126,122**	Ethiopia
Egypt	100590	Maize (excl. seed)	**15,183**	Sudan
Ethiopia	100590	Maize (excl. seed)	**95,917**	Djibouti
Kenya	100590	Maize (excl. seed)	117,266	Rwanda
Kenya	100590	Maize (excl. seed)	21,922	Burundi

Exporter Country	HS Code	HS96 Product Description	Value USD ***FOB***	Importer Country
Kenya	100590	Maize (excl. seed)	19,378	Uganda
Kenya	100590	Maize (excl. seed)	50	Comoros
			158,616	
Malawi	100590	Maize (excl. seed)	17,735	Zimbabwe
Malawi	100590	Maize (excl. seed)	6,332	Zambia
			24,067	
Namibia	100590	Maize (excl. seed)	**11,990**	Angola
Uganda	100590	Maize (excl. seed)	131,171	Rwanda
Uganda	100590	Maize (excl. seed)	69,095	Kenya
Uganda	100590	Maize (excl. seed)	38,935	Sudan
Uganda	100590	Maize (excl. seed)	37,632	Burundi
			276,833	
Zambia	100590	Maize (excl. seed)	1,265,467	Congo DR
Zambia	100590	Maize (excl. seed)	12,166	Malawi
Zambia	100590	Maize (excl. seed)	10,629	Zimbabwe
Zimbabwe	100590	Maize (excl. seed)	19	Malawi
			1,288,281	

b) Extra-COMESA Export of Maize, 1997

Exporter Country	HS Code	HS96 Product Description	Value USD ***FOB***	Importer Country
Egypt	100590	Maize (excl. seed)	152,740	Netherlands
Egypt	100590	Maize (excl. seed)	123,653	Saudi Arabia
Egypt	100590	Maize (excl. seed)	83,879	Belgium
Egypt	100590	Maize (excl. seed)	56,310	United Kingdom
Egypt	100590	Maize (excl. seed)	53,519	Turkey
Egypt	100590	Maize (excl. seed)	31,290	PALESTINIAN TERRITORIES
Egypt	100590	Maize (excl. seed)	20,054	Lebanon
Egypt	100590	Maize (excl. seed)	19,877	Antigua and barbuda
Egypt	100590	Maize (excl. seed)	13,765	Greece
Egypt	100590	Maize (excl. seed)	12,649	Portugal
Egypt	100590	Maize (excl. seed)	10,031	Jordan
Egypt	100590	Maize (excl. seed)	9,678	Germany
Egypt	100590	Maize (excl. seed)	7,762	Israel
Egypt	100590	Maize (excl. seed)	2,925	Cyprus
Egypt	100590	Maize (excl. seed)	1,504	Libya
Egypt	100590	Maize (excl. seed)	1,179	France
Egypt	100590	Maize (excl. seed)	508	Kuwait
			601,323	
Ethiopia	100590	Maize (excl. seed)	**31,479**	Saudi Arabia
Kenya	100590	Maize (excl. seed)	10,637	Somalia
Kenya	100590	Maize (excl. seed)	1,615	United Kingdom
Kenya	100590	Maize (excl. seed)	730	Netherlands
Kenya	100590	Maize (excl. seed)	610	United Arab Emirates
Kenya	100590	Maize (excl. seed)	593	Switzerland
Kenya	100590	Maize (excl. seed)	101	Belgium
Kenya	100590	Maize (excl. seed)	3	France
			14,289	
Madagascar	100590	Maize (excl. seed)	**1,125,600**	Reunion
Mauritius	100590	Maize (excl. seed)	**361**	Unknown
Malawi	100590	Maize (excl. seed)	**178,593**	Tanzania
Namibia	100590	Maize (excl. seed)	82,054	South Africa
Namibia	100590	Maize (excl. seed)	1,295	Botswana
			83,349	
Swaziland	100590	Maize (excl. seed)	121,430	South Africa
Swaziland	100590	Maize (excl. seed)	892	France
Swaziland	100590	Maize (excl. seed)	318	Botswana
Swaziland	100590	Maize (excl. seed)	158	Lesotho
			122,798	
Zambia	100590	Maize (excl. seed)	358,834	Congo
Zambia	100590	Maize (excl. seed)	33,434	South Africa
Zambia	100590	Maize (excl. seed)	23,187	Tanzania
Zambia	100590	Maize (excl. seed)	6,522	United Kingdom
			421,977	

Zimbabwe	100590	Maize (excl. seed)	11,116,992	Mozambique
Zimbabwe	100590	Maize (excl. seed)	4,757,739	South Africa
Zimbabwe	100590	Maize (excl. seed)	1,891,444	United Kingdom
Zimbabwe	100590	Maize (excl. seed)	1,762,698	Botswana
Zimbabwe	100590	Maize (excl. seed)	1,158,763	Malaysia
Zimbabwe	100590	Maize (excl. seed)	539,044	Benin
Zimbabwe	100590	Maize (excl. seed)	152,518	Netherlands
Zimbabwe	100590	Maize (excl. seed)	77,933	Congo
Zimbabwe	100590	Maize (excl. seed)	32,465	Spain
Zimbabwe	100590	Maize (excl. seed)	8,483	Australia
Zimbabwe	100590	Maize (excl. seed)	7,423	Germany
Zimbabwe	100590	Maize (excl. seed)	3,200	France
Zimbabwe	100590	Maize (excl. seed)	2,818	Belgium
Zimbabwe	100590	Maize (excl. seed)	1,768	Switzerland
Zimbabwe	100590	Maize (excl. seed)	1,587	Unknown
Zimbabwe	100590	Maize (excl. seed)	210	Portugal
Zimbabwe	100590	Maize (excl. seed)	125	Sweden
Zimbabwe	100590	Maize (excl. seed)	119	Italy
Zimbabwe	100590	Maize (excl. seed)	77	Ireland
			21,515,406	

Extra-COMESA Export of Maize, 1998

Exporter Country	HS Code	HS96 Product Description	Value USD ***FOB***	Importer Country
Egypt	100590	Maize (excl. seed)	62,592	Saudi Arabia
Egypt	100590	Maize (excl. seed)	60,128	Lebanon
Egypt	100590	Maize (excl. seed)	51,158	Libya
Egypt	100590	Maize (excl. seed)	13,820	Israel
Egypt	100590	Maize (excl. seed)	12,819	Portugal
Egypt	100590	Maize (excl. seed)	9,564	Belgium
Egypt	100590	Maize (excl. seed)	8,412	United Kingdom
Egypt	100590	Maize (excl. seed)	7,044	Denmark
Egypt	100590	Maize (excl. seed)	4,972	Kuwait
Egypt	100590	Maize (excl. seed)	4,306	Netherlands
Egypt	100590	Maize (excl. seed)	2,404	Tunisia
Egypt	100590	Maize (excl. seed)	513	United Arab Emirates
Egypt	100590	Maize (excl. seed)	495	Greece
Egypt	100590	Maize (excl. seed)	381	Cyprus
			238,608	
Kenya	100590	Maize (excl. seed)	195,265	Tanzania
Kenya	100590	Maize (excl. seed)	994	Netherlands
Kenya	100590	Maize (excl. seed)	452	United Kingdom
Kenya	100590	Maize (excl. seed)	2	South Africa
			196,713	
Madagascar	100590	Maize (excl. seed)	105,439	Reunion
Madagascar	100590	Maize (excl. seed)	110	France
			105,549	
Malawi	100590	Maize (excl. seed)	**6,478**	South Africa
Namibia	100590	Maize (excl. seed)	**45,346**	South Africa
Sudan	100590	Maize (excl. seed)	49,667	Saudi Arabia
Sudan	100590	Maize (excl. seed)	19	United Arab

				Emirates
Sudan	100590	Maize (excl. seed)	6	Oman
			49,692	
Swaziland	100590	Maize (excl. seed)	79,353	South Africa
Swaziland	100590	Maize (excl. seed)	3,347	Mozambique
			82,700	
Uganda	100590	Maize (excl. seed)	**23,199**	Tanzania
Zambia	100590	Maize (excl. seed)	256,590	Congo
Zambia	100590	Maize (excl. seed)	29,609	United Kingdom
Zambia	100590	Maize (excl. seed)	23,993	South Africa
			310,192	
Zimbabwe	100590	Maize (excl. seed)	1,682,333	Botswana
Zimbabwe	100590	Maize (excl. seed)	932,024	United Kingdom
Zimbabwe	100590	Maize (excl. seed)	147,791	Netherlands
Zimbabwe	100590	Maize (excl. seed)	115,926	South Africa
Zimbabwe	100590	Maize (excl. seed)	78,374	Mozambique
Zimbabwe	100590	Maize (excl. seed)	7,369	Ireland
Zimbabwe	100590	Maize (excl. seed)	4,762	Germany
Zimbabwe	100590	Maize (excl. seed)	2,107	France
Zimbabwe	100590	Maize (excl. seed)	2,084	Switzerland
Zimbabwe	100590	Maize (excl. seed)	1,850	Belgium
Zimbabwe	100590	Maize (excl. seed)	1,642	Malaysia
Zimbabwe	100590	Maize (excl. seed)	1,491	Australia
Zimbabwe	100590	Maize (excl. seed)	753	Sweden
Zimbabwe	100590	Maize (excl. seed)	727	Cape Verde
Zimbabwe	100590	Maize (excl. seed)	689	New Zealand
Zimbabwe	100590	Maize (excl. seed)	17	Saudi Arabia
			2,979,939	

Extra-COMESA Export of Maize, 1999

Exporter Country	HS Code	HS96 Product Description	Value USD ***FOB***	Importer Country
Egypt	100590	Maize (excl. seed)	180,376	Pakistan
Egypt	100590	Maize (excl. seed)	152,306	United Arab Emirates
Egypt	100590	Maize (excl. seed)	17,030	Lebanon
Egypt	100590	Maize (excl. seed)	14,980	Portugal
Egypt	100590	Maize (excl. seed)	14,249	Saudi Arabia
Egypt	100590	Maize (excl. seed)	14,001	Spain
Egypt	100590	Maize (excl. seed)	3,923	Italy
Egypt	100590	Maize (excl. seed)	2,683	Israel
Egypt	100590	Maize (excl. seed)	507	Kuwait
Egypt	100590	Maize (excl. seed)	60	Jordan
			400,115	
Ethiopia	100590	Maize (excl. seed)	**19,666**	Yemen
Kenya	100590	Maize (excl. seed)	2,003,809	Tanzania
Kenya	100590	Maize (excl. seed)	495,863	Somalia
Kenya	100590	Maize (excl. seed)	337	South Africa
Kenya	100590	Maize (excl. seed)	154	Lebanon
Kenya	100590	Maize (excl. seed)	115	France
Kenya	100590	Maize (excl. seed)	83	United Kingdom
Kenya	100590	Maize (excl. seed)	50	United Arab Emirates
			2,500,411	
Madagascar	100590	Maize (excl. seed)	159,261	Switzerland
Madagascar	100590	Maize (excl. seed)	130,717	Reunion
Madagascar	100590	Maize (excl. seed)	662	France
			290,640	
Malawi	100590	Maize (excl. seed)	49,920	Tanzania
Malawi	100590	Maize (excl. seed)	1,801	South Africa
			51,721	
Namibia	100590	Maize (excl. seed)	11,592	South Africa
Namibia	100590	Maize (excl. seed)	430	Botswana
			12,022	
Sudan	100590	Maize (excl. seed)	10	Qatar
Sudan	100590	Maize (excl. seed)	1	Saudi Arabia
			11	
Swaziland	100590	Maize (excl. seed)	65,003	South Africa
Swaziland	100590	Maize (excl. seed)	2,900	Ghana
Swaziland	100590	Maize (excl. seed)	1,270	Mozambique
			69,173	
Uganda	100590	Maize (excl. seed)	12,560	Tanzania
Uganda	100590	Maize (excl. seed)	11,845	Unknown
			24,405	
Zambia	100590	Maize (excl. seed)	60,484	South Africa
Zambia	100590	Maize (excl. seed)	27,509	United Kingdom
Zambia	100590	Maize (excl. seed)	19,737	Brazil
Zambia	100590	Maize (excl. seed)	14,718	Tanzania
Zambia	100590	Maize (excl. seed)	3,718	Mozambique
			126,166	

Zimbabwe	100590	Maize (excl. seed)	689,954	United Kingdom
Zimbabwe	100590	Maize (excl. seed)	202,476	Mozambique
Zimbabwe	100590	Maize (excl. seed)	100,505	Netherlands
Zimbabwe	100590	Maize (excl. seed)	54,155	South Africa
Zimbabwe	100590	Maize (excl. seed)	28,337	Congo
Zimbabwe	100590	Maize (excl. seed)	10,278	Ireland
Zimbabwe	100590	Maize (excl. seed)	2,760	Australia
Zimbabwe	100590	Maize (excl. seed)	1,898	Germany
Zimbabwe	100590	Maize (excl. seed)	573	France
Zimbabwe	100590	Maize (excl. seed)	562	Belgium
Zimbabwe	100590	Maize (excl. seed)	488	New Zealand
Zimbabwe	100590	Maize (excl. seed)	433	Switzerland
Zimbabwe	100590	Maize (excl. seed)	367	Sweden
Zimbabwe	100590	Maize (excl. seed)	132	Botswana
			1,092,918	

Extra-COMESA Export of Maize, 2000

Exporter Country	HS Code	HS96 Product Description	Value USD ***FOB***	Importer Country
Egypt	100590	Maize (excl. seed)	116,048	United Arab Emirates
Egypt	100590	Maize (excl. seed)	82,709	Italy
Egypt	100590	Maize (excl. seed)	68,816	Saudi Arabia
Egypt	100590	Maize (excl. seed)	59,482	Tunisia
Egypt	100590	Maize (excl. seed)	39,577	Israel
Egypt	100590	Maize (excl. seed)	25,850	Lebanon
Egypt	100590	Maize (excl. seed)	21,190	Spain
Egypt	100590	Maize (excl. seed)	8,365	Libya
Egypt	100590	Maize (excl. seed)	4,569	Netherlands
Egypt	100590	Maize (excl. seed)	3,974	Portugal
Egypt	100590	Maize (excl. seed)	3,389	Kuwait
Egypt	100590	Maize (excl. seed)	915	PALESTINIAN TERRITORIES
Egypt	100590	Maize (excl. seed)	436	Guinea
Egypt	100590	Maize (excl. seed)	145	Qatar
			435,465	
Ethiopia	100590	Maize (excl. seed)	**12,618**	Yemen
Ethiopia	100590	Maize (excl. seed)	**51**	Israel
			12,669	
Madagascar	100590	Maize (excl. seed)	138,429	Reunion
Madagascar	100590	Maize (excl. seed)	48,394	Switzerland
Madagascar	100590	Maize (excl. seed)	2,145	Unknown
Madagascar	100590	Maize (excl. seed)	1,698	France
			190,666	
Malawi	100590	Maize (excl. seed)	573,626	Mozambique
Malawi	100590	Maize (excl. seed)	533,971	Switzerland
Malawi	100590	Maize (excl. seed)	18,698	South Africa
Malawi	100590	Maize (excl. seed)	2,974	Tanzania
Malawi	100590	Maize (excl. seed)	1,628	Congo
			1,130,897	
Namibia	100590	Maize (excl. seed)	**23,673**	Congo
Sudan	100590	Maize (excl. seed)	**42**	Oman

Swaziland	100590	Maize (excl. seed)	77,487	South Africa
Swaziland	100590	Maize (excl. seed)	71,942	Mozambique
			149,429	
Zambia	100590	Maize (excl. seed)	72,134	South Africa
Zambia	100590	Maize (excl. seed)	24,059	Botswana
Zambia	100590	Maize (excl. seed)	10,073	Congo
Zambia	100590	Maize (excl. seed)	1,498	Tanzania
Zambia	100590	Maize (excl. seed)	1	United States of America
			107,765	
Zimbabwe	100590	Maize (excl. seed)	922,279	United Kingdom
Zimbabwe	100590	Maize (excl. seed)	161,233	Netherlands
Zimbabwe	100590	Maize (excl. seed)	97,178	South Africa
Zimbabwe	100590	Maize (excl. seed)	14,648	Germany
Zimbabwe	100590	Maize (excl. seed)	12,529	Sweden
Zimbabwe	100590	Maize (excl. seed)	6,052	France
Zimbabwe	100590	Maize (excl. seed)	5,584	Australia
Zimbabwe	100590	Maize (excl. seed)	4,812	Ireland
Zimbabwe	100590	Maize (excl. seed)	4,160	Belgium
Zimbabwe	100590	Maize (excl. seed)	580	Switzerland
Zimbabwe	100590	Maize (excl. seed)	308	New Zealand
Zimbabwe	100590	Maize (excl. seed)	206	Saudi Arabia
Zimbabwe	100590	Maize (excl. seed)	8	Mozambique
			1,229,577	

Extra-COMESA Export of Maize, 2001

Exporter Country	HS Code	HS96 Product Description	Value USD ***FOB***	Importer Country
Egypt	100590	Maize (excl. seed)	732,287	Pakistan
Egypt	100590	Maize (excl. seed)	26,045	Saudi Arabia
Egypt	100590	Maize (excl. seed)	22,575	Portugal
Egypt	100590	Maize (excl. seed)	19,479	United Arab Emirates
Egypt	100590	Maize (excl. seed)	18,073	Cyprus
Egypt	100590	Maize (excl. seed)	9,513	Belgium
Egypt	100590	Maize (excl. seed)	4,658	Romania
Egypt	100590	Maize (excl. seed)	2,292	Libya
Egypt	100590	Maize (excl. seed)	1,771	Kuwait
Egypt	100590	Maize (excl. seed)	790	Israel
			837,483	
Ethiopia	100590	Maize (excl. seed)	381,602	Yemen
Ethiopia	100590	Maize (excl. seed)	151,372	Netherlands
Ethiopia	100590	Maize (excl. seed)	6,052	Turkey
Ethiopia	100590	Maize (excl. seed)	2,497	Saudi Arabia
Ethiopia	100590	Maize (excl. seed)	363	Iceland
Ethiopia	100590	Maize (excl. seed)	242	Israel
			542,128	
Kenya	100590	Maize (excl. seed)	109,868	Somalia
Kenya	100590	Maize (excl. seed)	108,231	United States of America
Kenya	100590	Maize (excl. seed)	4,435	United Kingdom
Kenya	100590	Maize (excl. seed)	419	Unknown
Kenya	100590	Maize (excl. seed)	156	Netherlands
Kenya	100590	Maize (excl. seed)	57	France
Kenya	100590	Maize (excl. seed)	16	Tanzania

			223,182	
Malawi	100590	Maize (excl. seed)	579,709	Ireland
Malawi	100590	Maize (excl. seed)	2,921	South Africa
Malawi	100590	Maize (excl. seed)	626	Mozambique
			583,256	
Namibia	100590	Maize (excl. seed)	53,286	South Africa
Namibia	100590	Maize (excl. seed)	3,645	Congo
Namibia	100590	Maize (excl. seed)	6	Botswana
			56,937	
Swaziland	100590	Maize (excl. seed)	30,233	Mozambique
Swaziland	100590	Maize (excl. seed)	23,267	South Africa
			53,500	
Uganda	100590	Maize (excl. seed)	**2,984**	Tanzania
Zambia	100590	Maize (excl. seed)	27,073	Tanzania
Zambia	100590	Maize (excl. seed)	22,186	South Africa
Zambia	100590	Maize (excl. seed)	6,496	Botswana
			55,755	
Zimbabwe	100590	Maize (excl. seed)	31,475	United Kingdom
Zimbabwe	100590	Maize (excl. seed)	5,105	South Africa
			36,580	