



THE LONDON SCHOOL
OF ECONOMICS AND
POLITICAL SCIENCE ■

Sustainability Impact Assessment in Support of Negotiations with Partner Countries in Eastern and Southern Africa in view of Deepening the Existing Interim Economic Partnership Agreement

Phase III: Stakeholder Consultations Summary • May 2021



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Abbreviations

AfCFTA	African Continental Free Trade Area
AU	African Union
BDI	Federation of German Industries
CETA	Comprehensive Economic and Trade Agreement
CBT	Community-Based Tourism
CSD	Civil Society Dialogue
CSO	Civil Society Organisation
COMESA	Common Market for Eastern and Southern African Countries
CwA	Compact with Africa
DG	Directorate General
ECSA	European Community Shipowners' Associations
EBA	Everything but Arms
EPA	Economic Partnership Agreement
ESA	Eastern and Southern Africa
EPZ	Export processing zone
EU	European Union
FECC	European Association of Chemical Distributors
FDI	Foreign Direct Investment
FTA	Free Trade Agreement
GSP	Generalised Scheme of Preferences
ICT	Information and Communication Technology
ILO	International Labour Organisation
IPR	Intellectual Property Rights
ISDS	Investor-State Dispute Settlement
MCS	Monitoring, Control and Surveillance
MDAs	Ministries, Departments and Agencies
MS	Member States
MSMEs	Micro, Small and Medium Enterprises
NECF	National Economic Consultative Forum
NGOs	Non-governmental organisations
REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals
RoO	Rules of Origin
SEATINI	Southern and Eastern Africa Trade Information and Negotiations Institute
SADC	Southern African Development Community

SIA	Sustainability Impact Assessment
SMEs	Small and medium-sized enterprises
SPS	Sanitary and phytosanitary
TBT	Technical Barriers to Trade
TSA	Tourism Satellite Accounts
TSD	Trade and Sustainable Development
UK	United Kingdom
VAT	Value Added Tax
WTO	World Trade Organization

Phase III: Stakeholder consultations summary

During Phase II and Phase III of the contract, the team implemented the following components of the stakeholder consultation.

- 1) Setting up a website and a Twitter account
- 2) Interviews in ESA4 and Comoros
- 3) Interviews with EU stakeholders
- 4) Online questionnaire

1.1 Overview: website and Twitter account

A dedicated project website (http://research-sia-esa.eu/en/#pll_switcher) in English and French was set up to provide information on the progress of the impact assessment, publish completed reports and as a platform for interaction with civil society and all other relevant stakeholders. It also served as a platform to raise awareness and provide easy access to the reports and feedback mechanism. In raising awareness, the website also served as a medium of communication through announcing upcoming European Union Eastern and Southern Africa Economic Partnership Agreement (EU ESA5 EPA) meetings with civil society and upcoming consultations. The website was used to encourage participation in the survey by sending out a press release about the survey to African and Eastern and Southern African (ESA) news agencies. There was a technical problem with obtaining the stats for the website, but that problem has been rectified, and future stats on the use of the website will be available going forward.

The following reports have been published on the website:

- The draft inception report before the first Civil Society Dialogue (CSD), with a direct link to Directorate General (DG) Trade's web page for the CSD meeting.
- The final inception report.
- The draft evaluation report and first draft Sustainability Impact Assessment (SIA) reports, ahead of the second CSD meeting in March 2021.

The website continues to serve this purpose and will be used throughout the project to publish the final versions of the first three SIA reports upon approval, including the drafts for the third CSD meeting in June 2021. The website was used in conjunction with social media account on Twitter. The Twitter account - https://twitter.com/esa_sia was also used to post announcements and updates on the project, including the survey. The stats with the Twitter account indicate low interaction rates from stakeholders. An analysis of the website and the social media account indicates that even though the two platforms did not yield many responses, it indicates that stakeholder participation was already low despite our efforts.

1.2 Interviews

The key consultation tool were one-on-one interviews, in person, via phone and online tools. To ensure that information and evidence was gathered from relevant stakeholders, the team prioritised interviews conducted by in-country partners with vast networks and familiar with local communities. Each team in the five partner countries set a target to conduct approximately 20 interviews per country. For EU stakeholders, the team identified 30 key stakeholders to interview. The selection criteria were based on the focus areas of the EU-ESA EPA negotiation and key case studies.

Interview responses have been integrated throughout the whole text, and within each of the deliverables, so this Appendix serves to report the number of interviews conducted, the stakeholders consulted, and the key findings for easy reference. The interview questionnaire can be found in our Inception Report.¹

1.2.1 Summary of the feedback from the ESA States

As a means of undertaking an informed SIA of the EU ESA5 EPA to inform the deep EPA negotiations, the Southern and Eastern Africa Trade Information and Negotiations Institute (SEATINI)-Uganda, Dahari Comoros, in partnership with the London School of Economics Trade Hub Policy (LSE) undertook interviews with representatives of ministries, departments and agencies (MDAs); civil society organisations (CSOs); national Chambers of Commerce, business associations; private sector economic operators and small and medium-sized enterprises (SMEs) from Madagascar, Seychelles, Zimbabwe and Madagascar and Comoros. Due to the novel COVID-19, interviews were conducted digitally, using Zoom, WhatsApp and emails, and, where possible face-to-face using protective measures. Due to the different extent of implementation in ESA4 and Comoros, we report the summary of the key findings separately. As of 31 May 2021, 123 respondents were interviewed. These key findings were integrated into all the reports produced.

Table 1: Interviews conducted by May 2021

Country	Category	No. Respondents
Zimbabwe (SEATINI)	CSOs	10
	Government MDAs	4
	National Chambers of Commerce, Business Associations	1
	Private Sector Economic Operators	13
	Small Medium Enterprises	2
Mauritius (SEATINI)	CSOs	4
	Government MDAs	8
	National Chambers of Commerce, Business Associations	1
	Private Sector Economic Operators	15
	Small Medium Enterprises	6
Seychelles (SEATINI)	CSOs	4
	Government MDAs	9
	National Chambers of Commerce, Business Associations	1
	Private Sector Economic Operators	5
	Small Medium Enterprises	5
Madagascar (SEATINI)	CSOs	2
	Government MDAs	5
	National Chambers of Commerce, Business Associations	6
	Private Sector Economic Operators	2
	Small Medium Enterprises	3
Comoros (Dahari)	CSOs	4
	Government MDAs and International Organisations	8

¹ Inception Report. Available at <http://research-sia-esa.eu/en/about/>

	Private Sector Economic Operators	5
Total No. of Respondents		123

Source: Authors own creation

1.2.2 Key findings: ESA4 responses

1. CSO organisations

a. Role of CSOs organisation concerning trade policy and agreements

CSOs interviewed indicated that they play a critical role in influencing trade policy and agreements. The key tenets of the role of CSOs include:

- Monitoring developments in trade and related policies to ensure they generate a favourable environment that can be utilised to achieve equitable and sustainable development at national, regional and global levels.
- Provide a platform for stakeholders to deliberate on global, regional and national issues with a view of developing a consensus.
- Raise awareness, build long-term capacity, and discourse the concerns of key stakeholders in trade, fiscal and related policies and processes at national, regional, and global levels.
- Contribute to the fight for social justice, human rights, democracy and good governance, without partisan, sectarian, gender, racist or sexist biases.
- Network with academics, policy makers, non-governmental organisations (NGOs) and civil society movements concerned about the forces and effects of globalisation on Africa and the Third World in general.
- Undertaking research and other knowledge products on trade policies and negotiations to inform the pro-development outcomes of the policies and negotiations.

b. Knowledge of the EPAs

The majority of the interviewed CSOs exhibited a low level of awareness of the interim EPA. High levels of awareness were recorded from CSOs in Mauritius and Zimbabwe, and low levels of awareness recorded from CSO from Madagascar and Seychelles. According to respondents, high levels of awareness of the interim EPA resulted from organisational strategic outlook, networking with relevant government MDAs. Some of the CSOs like the Zimbabwe Council of Churches are often part of the government negotiating team and are periodically consulted on issues like interim EPA implementation. Media articles and opinions on the interim EPA and Africa- European Union (EU) relations and post-Cotonou negotiations have also increased on CSOs awareness of the existence of the interim EPA. On the other hand, other reasons for low levels of CSO awareness of the existing interim EPA range from

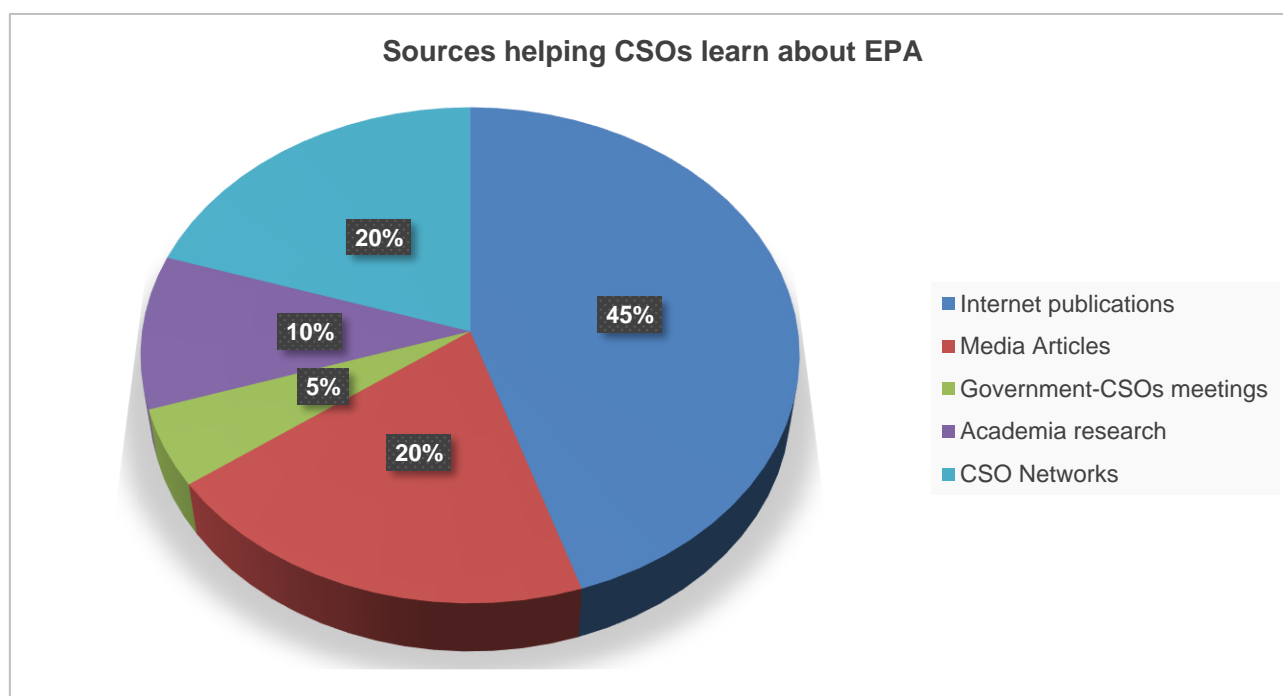
- Limited availability and publication of information on the interim EPA;
- An organisational focus on other core issues that do not prioritise trade;
- Lack of inclusion of CSOs in the interim EPA negotiations by their respective governments (limited appreciation by governments of the role of CSOs in Trade negotiations)

- Limited resources from development partners who do not prioritise funding of trade advocacy.
- Limited CSOs awareness of the negotiations was also visible because there was no single CSO from the ESA5 group that registered to participate in the recently concluded EPA Civil Society Dialogue on the negotiations to deepen the EU-ESA5 EPA.

c. Channels and sources helping CSOs to learn more about the EPA

According to the respondent's submission, several channels and sources, both print and digital, have helped them learn more about the EPA, both the interim EPA and deep EPA negotiations. See Figure below.

Figure 1: Pie chart showing the different sources of EPA information to CSOs



Source: Field data

d. Organisation's interest in the EU ESA5 EPA

The respondents noted that their interest in EU-ESA5 deep EPA negotiations is because they are:

- charged with standing for the promotion of people's socio-economic rights, and thus it is critical to ensure that the negotiations promote, rather than erode, these rights.
- ensuring that trade and fiscal policies and negotiations promote access to jobs, viable markets, and access to health, medicine, and education services.
- an increasing interest in EPA negotiations by CSOs in Zimbabwe, Madagascar, Mauritius and Seychelles. This has led to their increased interest in following, taking track, and monitoring trade and investment issues between the EU and the ESA5, including the Post Cotonou Negotiations, the Compact with Africa (CwA), and the Marshall Plan for Africa.
- fundamental social, human rights and gender aspects of interest in the EPA include their likely implications to (viable) jobs/employment; food security (which is largely a gender issue); access to viable markets; environmental protection; mutual recognition agreements, among others.

e. Key challenges for public authorities, business, and other relevant stakeholders, in the implementation of the EPA

From the respondents, some of the documented challenges in the implementation of the EPA include:

Infrastructure challenges among ESA5: Except for Seychelles, Madagascar, Comoros and Mauritius, which have access to a sea coastline, Zimbabwe is the only landlocked country and faces infrastructure challenges ranging from poor roads, railway and Information and Communication Technology (ICT).

- The majority of the ESA5 private sector and SMEs are deeply constrained to take opportunities presented in the EPA due to their product quality and quantity constraints. With the businesses capacity utilisation projected to drop to 27 per cent in 2020 due to COVID-19, the business sector in the ESA5 is not strategically positioned to export to the EU market significantly.
- Primary commodity dependence: ESA5 countries are exporting primary commodities to the EU. The private sector and civil society believe that unless this is tackled, the comprehensive EPA will cement colonial relationships between the EU and ESA5, where the latter will be a producer of primary commodities, hence will not unlock transformation of the industries.
- Information dissemination: Lack of awareness of the EU ESA5 EPA negotiations by CSOs and the private sector. Often, governments negotiate with little information/inputs of the industry and engage CSOs on an ad hoc basis. The private sector and several civil society actors are also detached from negotiations because of their technical nature and deep mistrust and fatigue, given the tendency of their respective governments to ignore the positions of the private sector and civil society.

f. Perceptions on the overall effect of the comprehensive EU ESA5 EPA

Respondents indicated that there is hope that the EPA will bring positive/favourable impacts to the ESA5 economies, especially in trade in goods.

- Agricultural goods, forest products and marine resources are some of the ESA5 exports which are expected to define this market access.
- Concerns relating to trade in services and new issues like government procurement, intellectual property, digital trade and investment, in that the EU stands to benefit more than the ESA5. Reasons include limited levels of competitiveness of ESA5 in these areas, a small and weak ESA5 private sector, and concentration of ESA5 exports in agricultural and marine resources.
- Stressed that these negative implications can be mitigated through inclusive negotiations, tied to content rather than timelines and taking a multi-stakeholder approach; and organising the production and productivity aspects of the ESA5 private sector and micro, small and medium enterprises (MSMEs) to take advantage of the expected market access opportunities therein the deep EPA.

Table 2: Perceptions of ESA4

	Very favourable/ very positive	Favourable/ positive	No effect	Adverse/ negative	Very adverse/ very negative	I don't know
For the ESA5						
For the EU						
Overall						

Source: Field data

Specifically, several likely effects of the EPA on ESA5 Countries were documented and include:

- **One Agreement to rule them all:** Respondents pointed out that the EU was the first rich country block to launch reciprocal EPAs) with least developed countries (LDCs) in 2002. It is now the first to launch a deep and comprehensive, new-generation free trade agreement. This deep EPA will likely become the template for all African Caribbean and Pacific-ACP regions.
- **A new mandate that turns the EPAs into Comprehensive Economic and Trade Agreement (CETA):** Respondents pointed out that the deep EPA comes as a revision of the 2002 trade mandate and needs to be checked against the original version to see what is new. The new mandate is much more far-reaching than the 2002 version as it incorporates everything that the EU has been pushing in its free trade agreements (FTAs) since CETA. It includes investor-state dispute settlement (ISDS), digital trade, regulatory disciplines, investment and trade facilitation, far-reaching intellectual property rights (IPRs), technical barriers to trade (TBTs) and Sanitary and phytosanitary (SPS) chapters.
- **The likelihood of erosion of EPA benefits to ESA5:** respondents noted that the EU perceives that the ESA5 will benefit from the current interim EPA and subsequently the deep EPA, as the ESA5 members are currently exporting more to the EU. While respondents do not dispute this, they noted the possibility of this change given the competition from African countries and other regions as EPAs are implemented and standards enforced.
- **Low utilisation of EPA opportunities by ESA5 Countries:** Concerns that countries like Zimbabwe can access opportunities presented by EPAs remain constrained by internal challenges, politics, currency issues, etc. These factors have also derailed the flow of investments into Zimbabwe from the EU, thus undermining the potential positive contribution of any trade agreement.
- **Negative implications on small-holder farmers in ESA5:** Liberalising local food markets in key agricultural products like dairy and beef, poultry, and vegetables face such unequal competition is not a prescription for improving efficiency but a recipe for the destruction of livelihoods on a massive scale. The imbalances in agriculture, for example, pity farmers (including peasants) in ESA5 against those from the EU, who on average receive a hundred times more in agricultural support. ESA5 farmers' ability to sell on the local market can be undercut by rapid trade liberalisation that opens the way to surges of cheap imports.
- **Potential implications on TRIPS Flexibilities:** Respondents noted that the ongoing comprehensive EPA negotiations could profoundly impact areas of health and health services in the ESA5 Economies.

Table 3: Potential implications on TRIPS Flexibilities

	Extremely positive				Moderately Positive				Slightly positive				Slightly negative				Moderately negative				Extremely negative			
	M	ZW	S	MD	M	ZW	S	MD	M	ZW	S	MD	M	ZW	S	MD	M	ZW	S	MD	M	ZW	S	MD
Government																								
Private sector																								
MSMEs																								
Chamber of Commerce																								
CSOs																								

Source: Author's compilation; M = Mauritius, MD = Madagascar, ZW = Zimbabwe, S = Seychelles

- **Potential implications on the environment:** Government and CSOs highlighted a moderately positive impact of the interim EPA on the environment due to: provisions on trade, environment and sustainable development; stringent provisions on SPS of exports to EU; and the European Development Fund (EDF) which has aspects of pro-sustainable development projects.
- **COVID-19 implications on the Tourism sector have resulted in low utilisation of EPA opportunities by ESA5 Countries:** As many economies of ESA5 depend on Tourism, COVID-19 measures to contain the spread of the virus has affected the tourism sector, particularly small actors.

g. CSOs greatest hope about the comprehensive EPA

Reminiscing about the interim EPA and its implications on ESA5 economies and highlighting the state of play and process of the ongoing negotiations for a comprehensive EPA, CSOs stressed several issues they hope will be addressed in the comprehensive EPA. These are highlighted below:

- **Primacy of appropriate EPA implementation strategies:** To fully benefit from the interim EPA, appropriate implementation strategies need to be implemented to improve access and diversify exports to EU individual member states. CSOs also hope to develop a common methodology to finalise a monitoring and evaluation framework for the interim EPA and, subsequently, the deep EPA. This will act as a springboard to defining a common understanding of the progress and remaining challenges to ESA5 implementation of the interim EPA to be able to address them adequately.
- **Comprehensive EPA as a tool for socio-economic development:** The desire for the CSOs is for the EPA to be trade tools that generate socio-economic development by reducing poverty, reducing social and economic inequalities, enhancing living standards and people's quality of life. CSOs envision trade and investment to promote justice and prosperity for holistic salvation. In this regard, the participation of non-state actors in trade agreements and monitoring the impact of trade initiatives are vital in ensuring socio-economic development and advocating for the delivery of benefits across all stakeholders, particularly the most vulnerable groups.
- **Increased involvement by non-state actors in the comprehensive EPA negotiations:** There is little involvement and participation of the industry and other non-state actors in monitoring the implementation of the current EPA, and influencing the ongoing negotiations is very weak.

2. Perceptions from government

a. Role of Government in the EPA Negotiations

Respondents from the different government MDAs indicate their primary mandate is to coordinate and formulate trade negotiating positions in the context of the deepening of the EPA and the implementation of the interim EPA. The government MDAs also are charged with undertaking consultations with all relevant stakeholders before devising a strategy/position on the EPA negotiations. Whereas the EU does not accept the involvement of the private sector, ESA5 Countries continue to maintain that the private sector institutions should be part of the delegation negotiating the EPA, as they are the key beneficiaries of the agreement.

b. Impacts (positive and negative) of the existing interim EPA in ESA5 Countries

- Mauritius government: the EPA has been a game-changer by practically addressing challenges faced in its economic development policies - expanded coverage of products, enjoying duty-free access, improved the rules of origin (RoO) for products of export, e.g. tuna and garments and improved Mauritius' ranking in the Ease of Doing Business.
- Zimbabwe: Increase in EU to the EU, e.g. Tanganda tea, avocados and peas by 12 per cent for the period 2012-2019, the trade surplus with the EU, the EU support programme has facilitated improvements in policy, legislative and regulatory frameworks as well as developing the capacity of trade institutions to manage trade policy and trade agreements; improved trade facilitation by reducing the cost and time of trading across borders; and enhanced the competitiveness and export capacity of MSMEs in selected value chains. Regarding the economic impacts of the existing interim EPA on Tourism and related aspects in ESA5 economies, it was largely acknowledged by both respondents to be moderately positive, with the private sector having varying perceptions.
- ESA5: Largely, SME actors in the tourism sector remain reserved on the implications of EPA on their welfare enhancement. In general, there has been a strong national uptake among the ESA5 in EU trade because of the EPA, as the EU remains the main exporter partner for the ESA5. This primacy is seen from the increased commitment by EAS5 to implement their EPA market access schedules, with countries like Mauritius preparing to effect the last tariff phase down in December 2022.

On the other hand, several challenges have also been documented.

- Mauritius: the continuous decline of exports since the implementation of the EPA from US\$1.4 billion in 2008 to USD 865 million in 2019. This, according to the Mauritian government, shows that the interim EPA is not enough to meet the growing challenges.
- Mauritius and Madagascar: concern over the constant decline in their exports of garments and sugar (for Mauritius) which are intrinsically related to either EU unilateral policies (such as the Generalised Scheme of Preferences (GSP) schemes) or EU FTAs concluded with third countries which have taken our share in the EU's market. In addition, ESA relevant ministries to trade have noted a lack of support to firms in meeting EU standards, inadequate framework in particular for agro-based products, high concentration on few products and inability to diversify to new markets. It was also noted that project-based assistance could be complex and difficult to implement, as is the current model. All four countries noted there has yet to be major diversification of products with the interim EPA, which is a matter of concern. Thus, exploring a comprehensive EPA is thought to be an opportunity for product diversification in other areas like services.

c. Main obstacles for ESA5 to trade under the EPA

In a bid to understand the positive implications of interim EPA to ESA5, the interviewer teased out the major obstacles for ESA5 to trade under the EPA. These include:

- Serious compliance difficulties in meeting EU SPS standards, i.e. the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) regulation, which is costly for SMEs. On the other

hand, private standards create additional barriers to the private sector and SMEs in ESA5 to access the EU Market.

- Lack of promotion activities in EU non-traditional markets, with an increasing tendency to focus on traditional markets like France, Spain, Germany, Netherlands and Belgium. While other potential markets like Poland, Croatia, and Bulgaria exists, the focus on ESA5 remains low.
- The EU market has become more competitive and difficult to access for small island developing countries like Mauritius and Seychelles.
- High cost of production as compared to Asian countries due to economies of scale labour, and logistics
- Limited trading under EPA has also been due to challenges to ESA5 in implementing all tariff commitments under the interim EPA. This is because there are provisions under the interim EPA, particularly the development Chapter, which the EU should implement in consultation with ESA5.
- Difficulties in the application of RoO - stringent RoO prevents local stakeholders to source from the most efficient and accessible regions such as South Africa or low-cost suppliers.
- Chambers of Commerce Seychelles, Mauritius and Madagascar, highlighted an increase in high levels of foreign ownership of hotels. Most, if not all, foreign-owned hotels are high-end and large. These franchises also import their furniture, technologies, and luxury food and drink to cater for their foreign clients. This promotes heavy economic leakages and suppresses local entrepreneurship, and may have profound negative effects on Seychelles' economic sustainability. The implications include wealth transfer, resulting in ESA5 countries not deriving much revenue from the sector.

Additional concerns raised by the Mauritius and Seychelles Customs are as follows:

- The verification of origin at import can be burdensome due to the lack of awareness of exporters on the issuance of invoice declaration in cases without a clear indication of originating products or an incorrect origin declaration wording on the invoices.
- The application of value/weight tolerance, Annex IIA are not indicated in invoice declaration as the same are not prescribed in the Agreement.
- Lack of transparency of registered products for registered exporters. The EU website provides an indicative list of registered products.

Concerning dissemination of information on RoO, it was observed that the ESA5 majorly use the EU's Official Journal or website; custom and websites of respective government/public, public-private, private) trading community associations. Nevertheless, it was also pointed out that there is much scope for improvement and increasing awareness of RoO through increased capacity building of Chambers of Commerce and exporters associations.

Use of cumulation: ESA5 countries like Mauritius and Seychelles noted that they are using Bilateral Cumulation and cannot use the diagonal cumulation due to stringent requirements such as the conclusion of the Administrative Customs Cooperation Agreement. The box below shows several products (HS heading) for which cumulation is cumulation most commonly used.

Table 4: Use of cumulation

HS Heading (2 digits)	
Product Description	HS 1604 -Prepared or preserved fish HS 0905 -Vanilla pods; HS 9503 -Reduced-sized models and similar recreational models

Mauritius, Seychelles and Madagascar also noted that the rules for cumulation are too stringent under the interim EPA. This is because of the two main conditions: the RoO should be similar, and there should be an Administrative Customs Cooperation Agreement in place. Therefore, it is a widely accepted proposal that the EPA should allow a flexible mechanism for cooperation on customs matters. It is also proposed that the RoO need to improve to meet current challenges to ESA5 in trading with the EU. For instance, several products under ANNEX XII of the RoO Protocol (products excluded from cumulation with South Africa) are now duty-free, but ESA cannot cumulate on such products. Furthermore, the RoO are so stringent that the local canneries depend heavily on EU operators (vessels) for the raw tuna. The new Agreement should also consider flexible RoO provided, for instance, under the everything but arms (EBA) scheme or other FTAs on specific products of interest to ESA5.

d. Key issues in the negotiations for the comprehensive EPA

According to the directorate of Trade in Mauritius, all the issues as agreed under the scoping paper, particularly Trade in services, Investment, and RoO, should be atop the agenda of the comprehensive EPA. Whereas the Ministry of Trade shares this same position in Zimbabwe, more importantly, the government of Zimbabwe is negotiating to widen and deepening of interim EPA as they are of the view that addressing issues of trade facilitation, trade in services, and SPS will help Zimbabwe to unlock value in the current interim EPA. It was also pointed out that comprehensive EPA negotiations with the EU are strategic given the continuing political dialogue between the EU and Zimbabwe. Other identified key issues for consideration include the TSD chapter, including agricultural safeguards. The table below shows the choices of the ESA5 in preferences of issues of focus in the comprehensive EPA negotiations.

Table 5: Key Issues in the negotiations

	High priority				Low priority				No need to be negotiated				I don't know			
	M	ZW	S	MD	M	ZW	S	MD	M	ZW	S	MD	M	ZW	S	MD
RoO																
Customs and trade facilitation																
SPS																
Technical Barriers to Trade																
Trade defence mechanisms																
Trade in Services																
Investment liberalisation and investment facilitation (and private sector development)																
Public procurement																
Intellectual Property Rights																
Competition																

Source: Field data; M = Mauritius, MD = Madagascar, ZW = Zimbabwe, S = Seychelles

The majority of the respondents from both civil society, government and private sector noted that in negotiations at the WTO as well as in regional and bilateral trade negotiations like the EPA, ESA5 countries had sought developmental agreements with non-reciprocal arrangements because of the asymmetries in world trade, their lack of economic power concerning their developed counterparts and their serious poverty challenges. It is therefore vital that all the comprehensive EPA negotiations prioritise the development dimension of trade. According to them, the success and failure of comprehensive EPA negotiations have to be measured not mainly against market access of interest to ESA5, and removal of trade distortions in an asymmetrical manner, rather it has to be measured against the ability of the EU, a major trading partner, to commit herself on development.

- The upgrading of national accounting systems to facilitate the introduction of Tourism Satellite Accounts (TSA) at the Regional and local level;
- Capacity building for environmental management in tourism areas at the Regional and local level;
- The development of Internet marketing strategies for small and medium-sized tourism enterprises in the tourism services sector.
- Mechanisms to ensure the effective participation of ESA5 States in international standard-setting bodies focused on sustainable tourism standards development;
- Tourism exchange programs and training, including language training, for tourism services providers.
- Improving the export capacity of service suppliers of the ESA5 States, with particular attention to the marketing of tourism and cultural services, SMEs), franchising and the negotiation of mutual recognition agreements;
- The modalities related to cultural industries and the tourism sector, once negotiated, should be implemented by ESA5.
- Regarding services, the private sector and civil society perceive that ESA countries should not make any services commitments in the EPAs beyond their World Trade Organization (WTO) commitments.

They also perceive that EU partners do not push for extensive liberalisation that does not recognise the absolute need for a carefully managed sequencing of services liberalisation, preceded by the establishment of strong regulatory frameworks.

f. ESA5 greatest hope about the comprehensive EPA

Several government technocrats and politicians expressed much hope in the EPA. While some issues are cross-cutting, e.g. increased assured market access for the private sector, many “nationalistic” tendencies were observed on key asks by the different countries of the comprehensive EPA.

Expectations from the Mauritius Government

For Mauritius, the comprehensive EPA can play a crucial role in developing new sectors such as robotics, artificial intelligence, research, the pharmaceutical sector, etc. It can also enhance the value chain through flexible RoO. In addition, the EPA will strengthen the interim EPA if issues related to TBTs, RoO and SPS are finalised. Further improving the new issues in the deepening process will strengthen opportunities in the EPA; hence Mauritius is leading negotiations on trade-related issues. In the full EPA, the government hopes that specific provisions should be incorporated to support SMEs to export to the EU.

Expectations from the Government of Zimbabwe

The general view from the Zimbabwean government is that Zimbabwe will not lose anything by participating in the ongoing negotiations. While the government acknowledges that Zimbabwe faced challenges in implementing the interim EPA during the early stages, the country has liberalised most of its trade and is now on course to liberalise 80% of its trade by 2022. Thus, Zimbabwe is participating in the negotiations to widen EPAs and is leading negotiations on trade-related issues. Nevertheless, the major challenge and greatest fears are the possible impacts of tariff liberalisation on Zimbabwe’s revenue envelope. However, since liberalisation has already been done under the interim EPAs, the government maintains that the ongoing negotiations will not have a huge bearing on our industry. There are expectations that all the ESA5 countries will benefit if RoO is improved, e.g., cumulation with South Africa will benefit Zimbabwe, Seychelles and Madagascar to boost their capacity to meet the quality and quantity requirements in the EU market.

Concerning the support provided by the EU, it is hoped that under the comprehensive EPA, this special support will be maintained. Indeed, to date, support has been provided to upgrade laboratories in Zimbabwe to improve on health standards of exports, with other resources directed towards helping the National Economic Consultative Forum (NECF) conduct dialogues on EPAs at different platforms. At the dawn of comprehensive EPA negotiations, bolstering support for an EPA awareness campaign in Zimbabwe and other ESA countries is paramount.

Competing interests among ESA5 Countries: The Zimbabwe government stressed that the five countries are expressing different interests under the current comprehensive EPA negotiations. For example, Mauritius has a complete set of products and is moving fast as it sees opportunities in key areas like services and investment, whereas Zimbabwe has to focus on agricultural products like horticulture but need to sort out standards and certification issues. Therefore, it is expected that comprehensive EPA negotiations are conducted on issues/content rather than deadlines while ensuring that all negotiating parties are on board.

Expectations from the Government of Seychelles

Lack of clarity on Development Finance aka EPA Fund: The Ministry of Trade raised concern about the development finance not coming as anticipated, the government hopes for a commitment of the EPA Fund, instead of the hypothesis that the funds will accrue from the increased ESA5 trade with the EU under the comprehensive EPA.

Limited efforts to strengthen key EPA trade facilitating institutions: Whereas some funds support EPA implementation, there is a need for targeted support to key divisions of the public sector that will facilitate the expediting of trade under EPA. The respondents also note that at the request of the ESA5 countries, the EU has agreed to provide financial assistance for the setting up of an EPA coordination mechanism whose aim is to provide appropriate coordination and technical support to the five ESA countries so that they can engage effectively in the negotiation process.

Need to put regional integration at the core of EPA negotiations: The government of Seychelles makes an important observation that whereas the interim EPAs, to some extent, caused disintegration among ESA5 members, it is strategic for ESA5 countries to continue negotiating. This is because it is important to consolidate intra-ESA5 trade and integration, which requires harmonised positions on negotiating free trade agreements (comprehensive EPA) with third parties like the EU.

The Seychelles government has expectations that the comprehensive EPA will provide duty-free quota-free access to ESA5 countries to the EU market based on favourable RoO. Accordingly, it is expected that the EPA will support export diversification, competitiveness, increased export standards and promote the creation of local and regional value chains among ESA5 economies. However, the Seychelles government is also aware that the comprehensive EPA will provide for reciprocal trade, which will have varied impacts on industry, employment and poverty, and food security issues among ESA5 Countries. Thus, it is hoped that critical adaptation mechanisms will be provided under the EPAs as several (sensitive) products will likely be excluded from the agreement.

The comprehensive EPA opens competition for the EU markets within the other ACP countries and non-ACP member countries. Seychelles and other ESA5 countries have to diversify their production and upgrade their standards to benefit in the long run as they will face intense competition from other regions. In the future, many aspects of the trade, including the standards and SPS issues, will have to be adhered to. Thus, support under the EPA to upgrading these aspects is critical.

Revision of current policy on Dock dues: The Seychelles and Mauritius reiterated their concern on the application of dock dues levied by the French Overseas Territories, impacting products from ESA-5. The ESA-5 hope that the EU will not extend the dock dues (Octroi de Mer) after December 2020.

3. General concerns of the private sector and SMEs

In general, documented concerns by respondents from the private sector and SMEs in Zimbabwe, Seychelles, Mauritius and Madagascar vary but are not limited to:

- **Limited preparedness of private sector in utilising Market Access offer under comprehensive EPA:** Private sector and SMEs are concerned that, 1) limited capacity of the industry 2) heavy reliance on primary goods and commodities, and 3) EU development support is not advancing value chain development, and 4) domestic service providers are generally weak and will be decimated by foreign multi-nationals. Consequently, the private sector and SME actors feel limited options to trade with the EU outside the EPA as other preferences may be challenged within the WTO.
- **A lack of understanding of the technical issues** involved in the negotiations, not only by the industry but also the line ministries. This is because most sector players are not participating in the negotiations, which makes it very difficult for them to appreciate, understand and benefit from the final agreements. One hope the private actors hold is that the companies only know of the EPA benefits when exporting products right at the border, so there is no awareness of the agreements.
- **Delay from ESA5 governments making EPA lose meaning:** The private sector and SMEs indicated that there had been no meaningful impact from the interim EPA as the government delayed implementing the agreement provisions due to a lot of structural challenges. Concerning the current negotiations, the

industry thinks that there is not much that will happen in terms of benefiting because Zimbabwean industries are still struggling to take off.

- **EU Assistance not well-targeted:** Both private sector respondents from Zimbabwe and Madagascar indicated that most development assistance from the EU is targeted especially towards SME production level with no significant impact on the EU market. Such development and trade finance has no capacity to transform the Zimbabwean and Madagascar industry; rather, it will cement them as producers of primary commodities for export to the EU market. Thus, the relations do not promote national and regional value chain development.
- **Less likelihood to benefit from trade in services:** Respondents indicated that the EPA is likely to bolster opportunities in tourism, health, education and transport in ESA5 Countries. However, while trade in services is a major thrust in the comprehensive EPA, private sector and SME respondents from Zimbabwe, Seychelles and Madagascar are concerned about the limited benefits of trade services.
- **Continue EPA negotiations linked to Benchmarks and based on the African Union (AU) position:** General position is related to the importance of continuing the EPA negotiations with the EU. However, one key issue that stands out is that liberalisation commitments should be pegged to clear development thresholds or benchmarks and must not be more onerous than the low levels of liberalisation by other countries (e.g. Mexico and Syria) in EU FTAs. Only when these benchmarks have been attained should countries liberalise a certain percentage of their trade with the EU. The EPA negotiations should also consider the common positions on the various contentious issues articulated in the AU template. Also, other clauses must be brought into line with the WTO. Other clauses must be vastly improved upon bilateral safeguards; infant industry clause; modification of tariffs; definition of the parties, to name only a few.
- **Proposed United Kingdom (UK) ESA EPA negotiations and its implications:** It was pointed out that in line with the Trade Bill 2017-19, the UK Government is in the process of delivering continuity in the UK's trade relationship with the ESA countries of Madagascar, Mauritius, Seychelles and Zimbabwe. In the proposed text, there are provisions like bilateral safeguards (especially the "trigger price mechanism" on sugar), RoO and dispute settlement which are likely to circumscribe the likely positions in the EU-ESA5 comprehensive EPA negotiations. The EU-ESA5 comprehensive EPA should therefore consider provisions of negotiating FTAs with third parties by ESA5.
- Despite the success stories of textiles in the free zone in Madagascar, and studies on the conditions for the recovery and development of the textile sector by EDBM, for example; the textile industry in particular and industry, in general, does not interest the public authorities and is declining instead of developing, a deep crisis of confidence sets in and causes mutual misunderstandings, the dialogue is one-sided, as the sector is not listened to.
- **The main challenge is working with local farmers to enhance their improved productivity**, etc. Contract farming that companies utilise in Madagascar – a support programme that needs to be done or designed to help fill the gap between the local farmers and the economic operators.
- **Red tape issues when exporting from Madagascar** - dealing with local customs (long processing time, clearance times) impact their activities. This lengthens their deliveries to the end consumer/customer.
- **Regional barriers are still high.** For Reunion and Mayotte – it is very difficult to export to these countries due to the SPS requirements. An in-depth EPA can improve trade relations with Réunion and Mayotte if the law of the sea is removed (exclusionary economic zones)

- **An in-depth EPA will promote FDI in Madagascar and improve the export of high value-added agricultural products to the EU.** Risks include institutional instability, lack of support from the local population due to a lack of communication on investment projects, lack of production infrastructure and climate change effects.
- **Tourism:** SME tour operators stressed that currently, most hotels and resorts in the ESA5 are owned by foreign transnational hotel chains with a propensity to import personnel, technologies, food and drink. The consequences have been stunted by the growth of local businesses and precarious employment.

4. Other Issues of Concern

- **Intellectual Property negotiations:** CSOs and the private sector noted that the inclusion of intellectual property in the ESA5-EU EPAs was unnecessary to comply with the WTO rules on preferential treatment for goods. The EU's insistence on the inclusion of IPRs continues to place undue pressure on ESA5 countries to negotiate IPR provisions when discussions on IP are ongoing at the WTO and African Continental Free Trade Area (AfCFTA). However, it was appreciated that it does not commit ESA5 to any kinds of obligations, leaving room for "cooperation-based" provisions or "best endeavour" clauses rather than substantive obligations.

5. Global developments

- Respondents noted that the EU-ESA5 deep EPA negotiations should examine the EPAs efficacy and relevancy in the context of global developments which are taking place. These include, inter alia, the backlash against globalisation, BREXIT (and its implications to EU market value), the increasing inequality between and within countries largely as a result of the unfair trade arrangements, a relapse to protectionism, the recognition of the need for industrialisation/structural transformation and the redefinition of the role of the state in ensuring inclusive growth. These developments indicate the urgent need to harness our resources through promoting cross-sectoral synergies. This will require policy space to rethink and redesign our development strategy in light of these emerging challenges.
- **Liberalisation of Investment:** Both private and public stakeholders (Zimbabwe, Seychelles, Madagascar) stressed that the EU proposal on investment liberalisation is a means to introduce the agenda of the Marshall Plan for Africa and Global Compact with Africa in the EPA negotiations. Respondents noted that the EU had been a *demandeur* of binding rules on investment at the multilateral level. It has pursued this position in many fora including the WTO; in bilateral negotiations on FTAs, the EPAs, and the various Bilateral Investment Treaties.
- **Develop and update national EPA implementation strategies:** All the participants, public, private sector and civil society, noted the need for ESA5 countries to develop and update their respective EPA implementation strategies and frameworks.

6. General recommendations

- Appropriate implementation strategies by ESA5 respectively to improve access and diversify their exports to EU individual member states.
- Undertake further steps towards developing a common methodology aimed at finalising a monitoring and evaluation framework for the interim EPA, as this is an important step to define a joint understanding of the progress and remaining challenges to address those adequately.
- Have non-state actors play a critical role in monitoring EPAs as they can negatively affect industrial growth, employment, poverty reduction and industrial transformation. Social partners, including the church and CSOs, have to monitor the implementation of EPAs through continuous engagements with other

stakeholders. The monitoring exercise must entail the systematic collection of data and experiences and processing these experiences to inform policies and negotiations.

- Liberalise all the textile sector in Madagascar and have a Textile Ministry to promote the development of this industry, simplify the laws, apply them and stop challenging them every year. Launch a national campaign to showcase this industry rather than seeing it apart.
- For the Madagascar authorities to simplify procedures like the Bordereau de Suivi des Cargaissos of gasinet and customs procedures that are time-consuming, aggravated by the defective conditions of the infrastructures (roads, electricity, etc.)
- Facilitate resource mobilisation and capital mobilisation for the private sector. Trade support from EU partners supports ensuring that the products are entering the EU receive greater awareness.
- Strengthen technical training centres – Madagascar has a strategy for a technical training centre that needs to be put in place. It needs to be implemented as it forms part of the projects that receive the EU's support. This includes support to put in place of export promotion agency, digitalise customs procedures, and support from the EU to implement the trade facilitation agreement – there is a roadmap on this but need assistance to implement. It will help with competitiveness and getting foreign investors.
- Training relating to NTBs and RoO – no one knows what SPS is in the region. Training is required for all companies alike, big and small.
- Technical assistance from actors in the agricultural sector in terms of negotiation (identification of national priorities, formulation of the national position, understanding of the impacts of the provisions of the EPA on the sector, etc.) The private sector has difficulties bringing agricultural products into conformity with SPS requirements because of the lack of information, lack of resources and lack of mastery of technology.
- Have accompanying measures, especially in the plan to withdraw pesticide molecules banned by the EU. Strengthen the capacity of producers and economic operators to comply with EU requirements in the SPS field (information, technical support, support for certification, etc.).
- The EPA is a framework for economic cooperation, but there is a need for Zimbabwe to utilise this facility. Economic cooperation to be a heightened level compared to what other SADC countries receive.
- Adopt luxury Community-based tourism (CBT) Model: The EPA negotiations should adopt the concept of luxury CBT, which could be used to localise the ownership of hotels, address inequality, and promote social justice.
- Diversification of Tourism: Diversification of tourism products could attract more tourists. Therefore, tourism should not be the only economic sector upon which the major ESA5 countries rely but should complement other sectors and products. Diversification would enable a long-term shift towards CBT as the main product of the economies.
- Reforms in the tourism facilitating infrastructure in ESA5: As tourism is an export product consumed at source, the key to growth is to ensure accessibility by improving air and road connectivity - need to reform the visa regime and rehabilitation of the road network and reduce needless delays on police roadblocks.
- To sustain CBT would require increased funding from the government towards the development and resuscitation of these projects. Accessibility constraints haunt most CBT because of their remote location, there are no roads that connect them to major highways, and in many instances, the roads are in a deplorable state.
- Tourism growth is driven and supported by a coherent system that works to drive the tourism agenda forward. These systems are enabled by the existence of government policy that supports and regulates their operation.

- Lack of Institutional Coordination: The tourism sector is affected by policies originating from the ministries that govern the sector. Lack of effective inter-ministerial and intergovernmental policy coordination has hampered the growth of the sector.

Key Findings: Comoros

1. Public Sector

Knowledge of the EPAs

- Strong knowledge, key departments are part of the negotiating team.
- Negotiating team from an l'Agriculture, la Pêche et l'environnement group with sectoral input from e.g. l'Institut National de Recherche pour l'Agriculture, la Pêche et l'environnement. The private sector is represented by the Chamber of Commerce and the Economics Faculty at the University.
- EU pays for two participants, one based in Brussels and one coming from Comoros. The government cannot afford to finance other places, so the country is always under-represented in negotiations.
- EU still the biggest trading partner, with over half of imports coming from the EU.
- The EPA negotiations are linked to others involving the EU, notably post-Cotonou and the continental free trade area.
- In the beginning, the EU asked not to integrate fishing agreements, but this is happening within the new round.

Concerns

- Comoros is one of the least attractive countries for investment in Africa, so how will the country benefit from these agreements?
- Need to introduce value-added tax (VAT) to replace customs duties, but there is fear around this switch. A study financed by the IMF is underway, and it could be done in three years – it is possible, but politicians are worried they lack the capacity to collect taxes internally rather than at the frontier.
- The government was worried about the Common Market for Eastern and Southern African Countries (COMESA), but it has worked out well, and more impact as more trade happens.
 - Complex for customs, can not manage between the different regimes for different trading blocs and agreements. Only one customs agent is properly trained, and the right equipment and software are not in place. The two ports in Anjouan and Grande Comore also brings complexity. Customs needs support from the EU to manage the different tariffs.
- The problem of theory versus reality, with a heavy difference in the capacity to adapt between EU and Comoros
- Also, the negotiators will change role frequently within the civil service, so lose the expertise
- Comoros can gain economic benefits but must have the capacity to profit and benefit from preferential access.
- Risk of imported products competing with locally produced products.

- Key that public procurement laws and rules are adopted as part of the agreements so that the correct procedures are followed, which is not happening in the main.
- Need to support Comoros towards industrial production and quality service that meets the standards and requirements required on the European market.
- Support the agricultural sector towards a whole value chain in terms of production, transformation and marketing.
- The risk is the failure to master trade defence measures to protect against unfair competition or easy-to-apply safeguard measures in the event of massive imports, which risks damaging national production.

Priorities for negotiations

- Fisheries and agriculture, including processing cash crops in-country for export, are the two key sectors. Increasing exports in line with the emergency plan of the government will lead to increased employment. Another priority is tourism.
- Local production must be prioritised and safeguarded.
- Need support to enable them to respect the norms of EU markets; otherwise, there will not be able to benefit from the opportunities (e.g. testing laboratory). There is also the risk that custom receipts go down without benefits leading to a negative impact.
- The deepened EPA will improve economic competitiveness by improving phytosanitary conditions, competition provisions and trade in services.
- Progressive application is positive and must be maintained.
- Need to improve capacity to apply preferential rates at customs and apply rules of RoO through the substantial improvement of agricultural production in quality and quantity and diversification, marketing, and easy access to the international market.
- Comoros could ask for more support from the EU to improve their negotiating expertise.

2. Private sector

Knowledge of the EPAs

- Weak understanding in general – would like to have more information and be able to study the texts. The sector does not understand what opportunities there are because the information is not available.
- The public sector does not seem to know a lot either; civil society nothing at all – to their knowledge, has civil society been involved in these discussions only once.
- The government does not fully understand the agreements it has signed and then ignores clauses not related to the public sector when it comes to implementation, e.g. business cannot profit from reduced import taxes.
- Since 2007, accords have become an affair of a few civil servants at the ministry; other actors have been gently moved aside.

- Notices that in other countries, the private sector operators accompany the ministry to meetings and negotiations, not the case in Comoros.
- In meetings private sector is always in the minority; contradictory views are not welcome.

Trade issues

- The three major bottlenecks for imports are taxes, logistical problems and transport costs.
- Three major bottlenecks for export: export taxes, technical barriers, transport costs, plus administrative formalities and financing for trade.
- Goods are imported from the EU for quality reasons; otherwise, importers source from elsewhere.

Concerns

- Suggests that as soon as speak about EU, only a few operators are targeted for invitations – should invite other sectors like export crops. People should be invited because they have an interest, not just inviting people for inviting people.
- Concerns about the capacity of Comoros to negotiate faced with the EU teams. If they do not position themselves well, the EU might have too much leverage (e.g. fisheries).
- Negotiations must be equal – this requires Comoros' negotiators and economic operators to go up a level; the EU could support this.
- Need to negotiate better based on the companies' needs. There is also the need to reinforce capacity through training and developing an institute capable of delivering this training (e.g. negotiations unit at the chamber).
- Negotiators should be in fixed positions, not changing with political regimes. This needs a department in charge of negotiations with a fixed team.
- Does not feel that the private sector is properly represented at the moment, need a mechanism to mobilise the inputs and views of the sector better.
- Customs should be able to manage the complexities of the different import tax regimes.
- The potential for reducing import taxes worries the government because of the state's dependency on import taxes. Taxes can be charged using VAT.
- The problem of EU phytosanitary rules and the lab in Comoros not being accredited so, e.g. cash crops, have to be tested in Réunion which is not possible for all exporters – a centre for testing and transformation airport would help.
- Fisheries accords discussed as part of APE (this confusion was generalised across several interviewees) are seen as unequal without monitoring.
- Comoros is a small and disorganised market with a lack of outlets – how will they profit from the agreement?
- Given the Comoros rating, no investors will come to the country.

- Will local businesses benefit through partnerships and easier export, or will there be more competition? What can local businesses benefit from these agreements?
- Will there be employment creation, or will things reinforce the wealth of import exporters?
- Currently, the EU is happy to import unprocessed materials, but if Comoros looks to export processed goods, it will become complicated.
- At import, people do not understand RoO to apply the appropriate rate, but customs should have the capacity to do this.
- There are no phytosanitary rules in Comoros but very high to export to the EU, so it is difficult for products to be competitive.

Priorities for negotiations

- Three priorities for negotiations: fisheries agreements (including a regional fishing monitoring centre); non-tax blockages to exportation; a mechanism for evaluating the agreement's impact.
- EU should ensure access to information, ensure private sector representatives are in the negotiations, and that reports and other evidence are published online.
- Want to focus on the agricultural sector and services to export. A focus on technological services could also be important.
- Needs to be equality in the negotiations; there is a pretence that the negotiations are inclusive when they are not. Ideas against the mainstream are avoided and ignored. There should be one set of interactions with the government and one with the private sector. Make the negotiations clear, clean and inclusive. Once this is achieved, it is worth giving an opinion on priorities for the accords and investment.
- Fisheries agreements are completely unequal. This should be a priority within the current negotiations.
- A second priority should be to support producers to improve production capacity.
- VAT should replace import taxes and the agreement.

3. Civil Society

Knowledge of the EPAs

- None of the civil society actors had ever heard of the EPAs; a couple mentioned the fishery agreements as the only EU-Comoros agreements that they were aware of.
- Some actors felt that the government did not make an effort to inform and involve civil society in negotiations and that more transparency was important.

Concerns

- Poorer people at the bottom of agricultural value chains would be unlikely to benefit from the agreements unless targeted measures were included within the agreements. Similarly, poorer people would not be using the EU products that would potentially benefit from reduced import taxes under the agreement.

- The Comorian market is disorganised and weak, and local producers and sellers would not be able to compete with imports.
- Environmentally, given the lack of waste management systems in Comoros, there was concern that increasing imports, particularly foodstuffs, could lead to increased rubbish.
- Questions were raised about the potential for reduced import taxes to impact the country significantly, given the treasury's high dependency level.

Priorities for negotiations

- The priority focal area proposed by several actors was the agriculture sector, including increasing production and developing industries to support processing and export.
- Questions were also raised about the fisheries agreements, which are seen as unbalanced, and whether these could be integrated into negotiations.
- The potential to involve opening market access to Mayotte was also raised.

4. General Findings

- **Only civil servants directly involved in negotiations have a high understanding of the EPA:** other public sectors interviewees had limited knowledge, the private sector said, in general, they had very weak knowledge, and civil society respondents had none. Non-state actors suggested that there was not much sharing of information.
- **The private sector would like to be more involved in negotiations:** several businesses representatives felt that the sector was largely excluded from the processes and negotiations to the detriment of Comoros negotiating power and potential to benefit from the agreements.
- **Interviewees from all sectors expressed concern about unequal negotiating capacity:** 'Comoros brings a general practitioner to the table whilst the EU has a full suite of medical specialists' best sums up the widely-held view that Comoros is unable to compete with the EU at the negotiating table. Non-state actors suggested that, in addition, the Comorian authorities did not maximise their capabilities by failing to be inclusive regarding their negotiating teams.
- **Fisheries and agricultural export were the two most frequently prioritised for negotiation:** the existing fisheries agreements were widely described as unequal with Comoros, which was seen as gaining little benefit compared to the EU; hence a need for these to be renegotiated is a priority. Support to agricultural production, processing and export was also seen as key whilst ensuring that value went down the chain to the poorest people.
- **The reduction of revenues from customs taxes is seen as a key potential impact, with a possible upside:** A high percentage of Comoros' treasury receipts comes from taxes on imports, so a potential reduction in these concerns several interviewees. Others, however, suggested that the agreements could progressively push taxation away from imports towards other forms such as VAT, which would be an important fiscal step.
- **Several interviewees highlighted the potential for opening up trade with Mayotte:** some interviewees expressed frustration that whilst Mayotte is off the negotiating table, normalising trade with Mayotte, particularly agricultural export, could have more of an impact and help more of the poorest people than other elements of the EPA.

1.2.3 EU stakeholder interviews

The team identified a priority list consisting of 20 associations, NGOs and other social partners for targeted interviews. The criteria for prioritisation were based on identifying stakeholders that would have meaningful input to the SIA and the key areas of importance in the ongoing study. The team sent out the first round of emails, to which it received minimal responses. The team then sent a second round of emails for stakeholders that had not responded, and the response rate was very low. In response to the low response rate from EU stakeholders, the team expanded the list and added 23 more stakeholders. Overall, the team managed to conduct 11 interviews with EU stakeholders across the different sectors. The key findings of the interviews were integrated into the different reports. The list of stakeholders interviewed is outlined in the Annex.

Table 6: EU stakeholder interviews

Total number of requests sent	Accepted Interview	Turned down Interview Request	No Response	Scheduled interviews
43	11	11	18	3

Source: Author's compilation

1. Private Sector

Key Findings

- Many stakeholders indicated that the EU ESA5 EPA had no real impact in their sectors, particularly agriculture, textiles,
- Welcome agreements that improve market access and reduce trade barriers.
- Trade agreements were important for the investment climate.
- There are no e-commerce competition barriers on the EU side, but there are barriers on the ESA side that make it difficult to enter the EU market. This is because they have basic digital data services.

Knowledge of the EPAs

The majority of the EU stakeholders approached or interviewed were not aware of the agreement and declined the opportunity to participate in the interviews. Many reasons were cited for lack of awareness and unwillingness to participate in the interviews:

- They were not directly working on the issue; hence they could not make any substantial contribution.
- They do not operate in nor have business relations with the ESA countries.
- Too small markets and as a result Africa has not played a major role in their sectors.
- Limited interest in the ESA region; hence, they could not contribute to the assessment.
- Geographically, the ESA countries were too far for the EU market and businesses.

Concerns

- **Market barriers:** There is a need to incentivise trade between the EU and the ESA region. In practice – this requires trade liberalisation, bringing down tariffs, trade facilitation, and RoO to be made investor-friendly. Some of these barriers include coping with waiting times, infrastructure; landlocked countries (such as Zimbabwe) have poor trade facilitation infrastructure in place, which are detrimental for companies in the EU who would like to do business in these areas of the world. For textiles, sourcing in the ESA countries was not cheap; hence, there is no first option. The ESA markets are too small and far away, and it all boils down to what is practical.
- **Environment and sustainability:** Fair and sustainable trade need to take place alongside the deepening of trade – support free and fair trade. The challenge lies in actual enforcement and organisation. This can provide good incentives for targeted liberalisation – linking trade and sustainable development intelligently. The economic pillar of sustainability is important and needs to be linked to trade.
- **RoO** must be simpler to use and easier to understand for EU companies if they invest in the ESA region; red tape needs to be reduced. This is an issue with ESA countries – the more this is addressed, the more the EPA creates an incentive to focus on Mauritius and Madagascar.
- **Collaboration:** There are also operational realities, such as cases where companies would predominantly be focused on bigger trade partners. There is a need to focus on intensifying cooperation and to look for new markets, which is what the ESA 5 countries can offer. This involves having the private sector working together and collaborate between the two sectors. The result will be mutually beneficial in the medium and long term. Both sectors have very good reasons to collaborate, and they are willing to promote and help boost collaboration.
- **Quality:** Stakeholders in the textiles raised concerns about the quality of certain products from the region and indicated that it would have no real market in the EU.
- **Services:** Concerns about facilitating the movement of staff and obtaining visas.
- **Competitiveness:** ESA countries lack the competitive edge, especially in textiles- they are a small geographical disadvantage, improve marketing. The entire package has to be conducive for EU textile businesses.

Recommendations

- Organise focus groups to get information on smaller markets such as Mauritius for the textile sector. In addition, better marketing and promotion of what can be achieved in the ESA countries.
- Simplify and **harmonise RoO** for EU companies to import from the ESA countries – focusing on imports; the textile industry outsourced much of its production decades ago, and the industry is extremely globalised, and this creates a need for members to find RoO that link various supplier countries to provide for smooth flow of inputs into the final product.
- Chapters HS 50 to 63 – levels of detail are much higher than in our chapters of harmonisation, and this complexity is an inherent feature of protectionism. Small companies cannot rely only on employing someone to deal with RoO and compliance in this regard.
- The simplification aspect plays a major role in trying and getting EU private sector interest in the Madagascan and Mauritian textile industries.

- Important for EU businesses to have better access to public procurement as it would be attractive for them.
- Important to have investment facilitation.
- The agreement is currently limited – need to expand it to cover other areas and not just trade in goods.
- Improve market access and transparency in the ESA region.
- Initiate capacity building activities that will have spillover effects on the overall investment climate.
- Need to provide assurances to companies that their investment would be protected and legal certainty over the long term.

2. Civil society organisations

Key Findings

- **Impact of ESA exports on EU farmers:** Not a strong EU impact, but flowers, sugar, coffee may affect the market balance: the biggest impact is on sugar (e.g. in Mauritius). However, it is marginal and not significant.
- **Implementation challenges of the EPA:** For Europe, there are no major challenges. If something had to be selected, it would be linked to the actual development agenda, as increased trade would truly help rural farmers striving for better livelihoods. Value sharing within the value chain can generate more income out of the consumer than the actual primary producers. There is a need for a balanced value chain taken into farmers interests.
- **SPS impacts** No SPS concerns because of the systematic control mechanisms in place, and the product categories imported are considered reasonably low risk when it comes to sanitary conditions. One of the elements they are closely following is plant disease and animal disease. However, thus far, no major problems as the EU controls are sufficient to tackle these issues.
- **Opportunities presented by EPA in the agricultural sector for Europe:** This is all linked to the general benefits of international trade, prosperity and growth. Imports and exports are very much in favour of ESA from an agricultural perspective (latest stats from 2019), but it favours the EU for total trade. Europe has much potential in terms of processed foodstuffs, value-added products have potential in terms of export to ESA, but such brands are sky-high in, e.g. Mauritius, thereby targeting affluent tourists. The EU is not competitive in terms of raw materials, but they are an advantage when it comes to added products. However, this is all linked to development. Therefore, the market potential is simply not yet there.
- Agreement acted as encouragement for a wider trade opportunity in terms of opening the economy.

Knowledge of the EPAs

The general level of awareness from most organisations approached indicated a low level of awareness. Some of the reasons cited included:

- The EPAs were not their area of focus.
- Lack of sufficient experience and involvement in the EU ESA EPA as the focus was on other EU trade agreements.

- Limited resources in following all EU trade agreements.
- Not working on the EPAs
- EPAs of minor importance as very members are sourcing from the ESA region

Concerns

- **Increased Trade:** The stakeholder indicated that EU farmers want increased trade in farmers' community parallel to trade itself have the benefits of trade going to the farmers. Trade volumes/value have not been substantial. It has been more of a development agenda at this stage. For EU farmers, developing trade and open trade opportunities are benefiting rural communities and the farmers themselves. Emphasis on this from the EU farmers. Creating cooperatives to organise farmers in the market is important.
- **Unfair competition:** The first principle is that the EU EPAs should never expose EU agriculture practice to unfair competition in terms of working conditions, wages, etc., in the partner countries. This is important not only from the EU perspective but also from the ESA side; these conditions need to be respected.
- The EU must come to a policy coherence between EU commitments and the trade agreements. For example, the green deal, farm to fork strategy that affect EU farmers and producers needs to match the trade agreements.
- Some organisations are pushing on an EU level to get rid of certain pesticides that develop cancer but continue to be used elsewhere in the world – pesticides that cannot be used in the EU should not be exported to other regions in the world.
- The stakeholders indicated that their main demand on the EPAs was to have a sustainable development chapter in every trade agreement, specifically on labour rights – as they are not subject to the same dispute settlement as other chapters having enforceable labour chapters is important. The stakeholders indicated that TSD chapters should be enforceable – with no sanctions, there is no enforceability. Hence, there should be a mechanism that leads to redress and sanction in the event of labour violations.
- Some stakeholders expressed dissatisfaction with the agreement, particularly with Zimbabwe's involvement because of its human rights records. They indicated that workers in Zimbabwe had been jailed – and this is an area of concern.
- General concerns around environmental governance and governance in labour standards around mining and expansion of mining projects. Disposal of mining waste and the global problem of dealing with waste is a big environmental concern. The agreement must promote the expansion of economic activities and create a dependence of ESA dependence to export to the EU. Rather the EU should promote the strengthening of governance and their environmental standards. This is where the EU and EU businesses can lead and help that happen. The EU and EU businesses investing should have a duty to help the region generate more income through exports and use more trade to work on the standards and implement them. Hence strengthening due diligence, institutions, legislation in sustainable corporate governance need to be incorporated in trade.
- Transparency in how licenses are allocated is a major problem (Fisheries sector). The deepening of the EPA could contribute to building positive political will to police waters and to include local

stakeholders in decision-making processes. In this area, sanctions should be considered, as with the previous GSP+ where preferences could be withdrawn.

- Impact: Generally, the agreement with the EU has had a positive impact here; the EU is stricter on reporting and uses onboard observers and documentations checks. It is still not enough, but better. The EPA also provides support for control capabilities. The stakeholder considers the reported catch on vessels under the EU agreement to be a minimum basis for estimating the real catch volume. All the SFPAs are tuna agreements – EU vessels pay for the right to access waters, giving financial compensation to the treasury which uses it for sectoral support – used for research, inspection, local infrastructure – in this area, monitoring, control and surveillance (MCS) capabilities exist more and more. However, the overall amount of money is very little. Access is organised at the IOTC level. More money is needed to strengthen MCS capabilities.
- Underreporting is a large problem. Illegal overfishing is sometimes effectively legalised by the state, as with Madagascar. Madagascar signs private tuna fishing protocols with foreign companies, including European ones. Vessels covered by these protocols underreport their catches in Madagascar waters on a massive scale. It does not have the capacity or will to monitor its waters, and the vessels do not land in Madagascar, which makes it very difficult to verify how accurate their catch declarations are. Reported catches through these private agreements are roughly half that of those under the EU agreement, despite the vessels being the same size and needing a similar catch rate to be economically viable.

Recommendations and priorities for negotiations

- Crucially important to ensure that EU farmers have a fair role in the value chain – farmers' voice is relatively weak globally, and it needs to be enhanced. It is farmers' interest to invest in implementing high-quality standards, become more organised, set up cooperatives and focus on their purchasing and selling powers. This would be beneficial in the long run. It is also necessary to highlight the difference between farmers and consumers.
- Respect for fundamental rights and International Labour Organisation (ILO) conventions: The agreement needs to consider and respect a broad range of human rights: right to adequate nutrition-safe food, right to livelihood protection, food sovereignty, safe working environment and rights of workers and trade union rights. Including setting preconditions for the ratification and implementation of 8 ILO labour standards in the core conventions. If the partner countries have not yet ratified or properly implemented these conventions, they should demonstrate and provide a roadmap of how this will be achieved on time. More broadly – workers' rights cannot be brought into question – labour rights are a fundamental right in all trade and investment agreements. The stakeholder recommends possible suspension in the case of failure to adhere to international conventions and violations of human rights. For example, in the flower sector in Zimbabwe – highly profitable workers are not paid living wages. It is the lowest wages amongst farmworkers living below the poverty line. Focused on health, housing and safety - these are the issues our international section is working on. Relating to child labour flagged under vanilla production, stakeholders indicated that the EU should use its power leverage to change this change. Perhaps this can be resolved through a roadmap with some mechanism that flags child labour as a problem and designs measures to tackle it.
- The key priority should be on cooperation on human rights protection, conflict resolution, strengthening democracy and the rule of law and food sovereignty and security and the right to a healthy environment. Here, the EU has a role to play in terms of how a healthy environment is perceived and implemented. Also, it should be about the exchange of values and frameworks that need to be the priority in conducting trade that does not have a negative impact. It should be creating mutual agreements that strengthen values.

- The problem mainly lies with the enforcement and implementation of the agreement. The EU can assist with best practices of law enforcement procedures.
- Transparency in the labour and supply chain: Stakeholders indicated that they would like to see transparency in the labour and supply chain. To ensure that the products imported into the EU are not made from child labour. If this happens after the trade agreement is finalised, the EU loses leverage to enforce ratification.
- Need for regional cooperation: A mechanism for civil society consultation would be useful for consulting stakeholders, including small-scale fisheries.
- Development cooperation for women in fisheries: It would be good to organise exchange and contact to have a voice for women in small-scale fisheries.
- It is difficult finding a new generation of fishers; making the sector attractive for young fishers is a challenge. One way is to improve working conditions onboard vessels. There is already experience at the EU level about how to improve working conditions. Improving safety at sea could be a focus in terms of social sustainability.
- Proposal for priority access for those fishing most responsibly – this would be a recognition of provision of social and economic benefits to local coastal economies and make more visible the contribution of small-scale fisheries to the region.

1.3 Online questionnaire

After mapping EU and member states (MS) stakeholders, due to their extensive number, the team distributed a short survey (less than 10 minutes to complete), where it invited stakeholders to self-identify their interest in the negotiations and a discussion with us. We circulated the survey twice with a deadline of 1 December and an extension to 10 December. The survey will remain open throughout the projects, but the specific deadlines allow us to consolidate findings for each report submission. The online questionnaire can be located here (in English and French): https://lse.eu.qualtrics.com/jfe/form/SV_db76MEAHQHNVYUd.

The survey was circulated to 295 stakeholders, but response rates remained low despite the specific actions taken.

1.3.1 Respondents

We received 19 survey responses via Qualtrics and three responses by email via our dedicated mailbox. Out of these responses, the composition was the following:

- **The majority of respondents were business associations.** Ten business association, one company, four non-governmental organisations/civil society, one social partner and one self-defined as other responded to the survey.
- **The majority of respondents (seven responses) identifies as belonging to the Agricultural and Food and Drink Industry;** two – Aeronautics industries; two – Tourism; two – Electrical and electronic engineering industries; two – International development; one – chemical distribution; one – Maritime industries; one – Automotive industry and one in Textiles, fashion and creative industries.
- **The headquarters of respondents varied across the EU and ESA5,** across Belgium (2), Bulgaria (1), Denmark (1), France (4), Germany (2), Italy (2), Mauritius (2), Slovenia (1), and Sweden (1).

- Among the respondents, seven organisations chose to remain anonymous, and ten organisations opted for their comments to be made public. Based on that, we note a few of the responses below.

1.3.2 Key findings across the survey questions

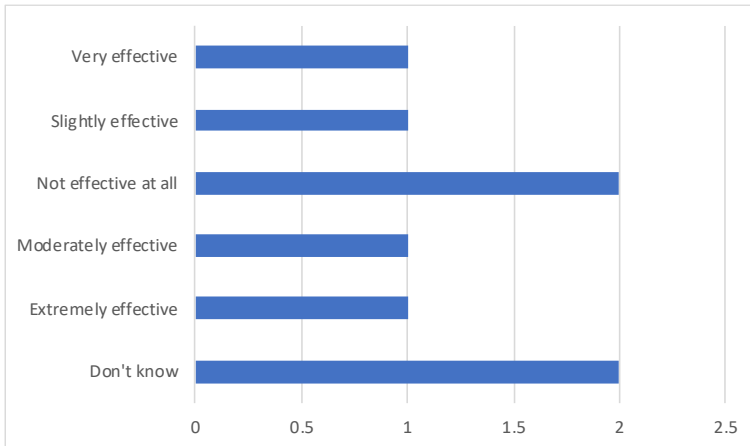
1. What advantages and positive developments have you seen under the interim EPA between the EU and the ESA5?

- An EU respondent noted that the main development is the improvement in trade patterns with some of the ESA5 countries.
- An ESA5 respondent highlighted that they have continued benefiting from duty-free and quota-free access for sugars, hence assuring the sustainability of supplies.
- Danish Agriculture & Food Council noted a slight increase in exports from Denmark.
- Federation of German Industries (BDI) included the following benefits:
 - The BDI considers the EPAs as facilitators for the investment and trade of German companies with the ESA countries.
 - Most African nations are currently still too small to offer an attractive market for German companies. The EPAs promote free trade within African regions, and with the EU, they increase the attractiveness of African markets for European and German companies and thus create incentives to create urgently needed jobs on the African continent.
 - Thus, the BDI advocates fast ratification of the EPAs. These create WTO-compatible and long-term access to markets for African exporters and European companies.
- European Association of Chemical Distributors (FECC):
 - An even level playing field is paramount for improving the EU's resilience and building the model of an open strategic autonomy. The EU expects high-quality products from its local manufacturers, regardless of whether this refers to the single market or for export to third countries.
 - FECC supports the EU proposal on identifying, preventing and eliminating technical barriers to facilitate trade in goods between the two regions. Article 10.5 ([link](#)) of the EU note states that although harmonizing standards between regions should be implemented whenever possible, considering the climatic, geographical and/or technological factors is also needed as this may pose a challenge for some of the African stakeholders and regulators. By identifying the bureaucratic and technological barriers, trade between the EU and ESA5 through the proposed interim agreement could further be optimised.
 - Lastly, another positive impact of the EPA is the decrease in import prices due to the continued trade liberalisation. Consumers from both the EU and ESA5 would be subject to wider choices for both products and services under the agreement.

2. What problems and obstacles are you aware of under the interim EPA between the EU and ESA5?

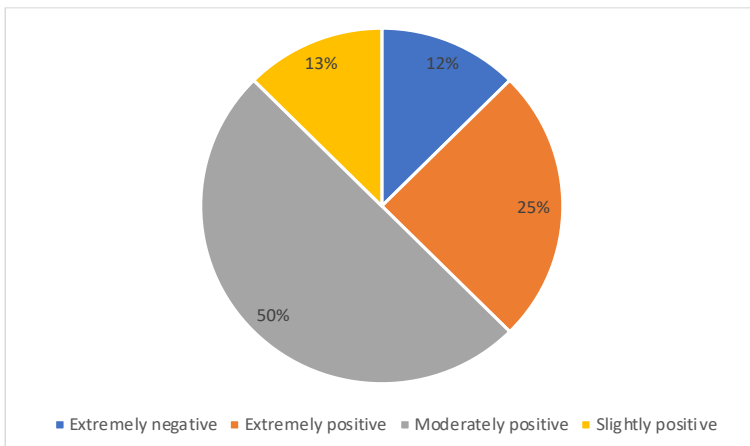
- EU respondents noted that no substantial problems exist as far as their business in the Textiles industry is concerned.
- An ESA5 respondent highlighted that "preferential market access is being eroded by the free trade agreement finalised by the EU with non-ACP sugar producers, namely from Central and Latin America, and Asia. Insufficient flexibility under certain clauses such as the 'value tolerance rule' under RoO."
- Danish Agriculture & Food Council noted little awareness and attention about the existence of the EPA.
- Syndicat du Sucre de la Reunion: "Globally, the EU sugar sector does not consider that ESA country's market holds significant growth potential for exports of sugar from the EU. This situation concerns white sugar and the ready-to-use brown sugars (called speciality sugars) produced in the EU OR (La Reunion, Guadeloupe, and Martinique). The EU speciality sugars market is a very small niche market of only 250,000 to 300,000 tonnes, representing 1.5 % of the total EU sugar market. As some ESA countries already produce speciality sugars and develop economies of scale, producers of speciality sugars originating in the EU OR will never compete on equal terms with ESA producers on their market. Whereas reciprocity in trade relations was one of the main objectives of the Cotonou Agreement, the Interim Agreement created access inequities by giving to ESA sugars full duty-free and quota-free access to the EU continental market while keeping most of the ESA market closed to EU sugars."
- BDI notes:
 - I) Negative effects on sensitive product groups of individual African countries: The BDI recommends that the EU shows flexibility regarding the time frame and product scope of EPAs. So-called sensitive product groups should be examined for the individual African countries. A case-by-case decision as to which product groups should be excluded from EPAs for the time being for individual African countries is needed.
 - II) Lost customs revenues for the five African countries: The BDI advocates that the EU provides adjustment assistance for lost customs revenues. This should include programmes to increase the competitiveness of the African private sector and infrastructure measures.
- FECC:
 - The planned impact assessments in 2021 should consider the short, medium and long-term effects of the EPA. An analysis of the socio-economic effects of its implementation should be considered not just between the ESA5 member state but also within the region of a specific country. Through a region-specific assessment, the EPA evaluation would facilitate identifying whether the economic activity could also be stimulated in underperforming regions of the ESA5.
 - Additionally, as with all other partnership agreements, confirming the EPA without the corresponding implementation would result in an uneven playing field for both the EU and African stakeholders. Regulators should ensure that businesses taking part in the scheme comply with the proper requirements for importing and exporting.

Figure 2: How would you assess the effectiveness of the agreement for the issues that are relevant to you?



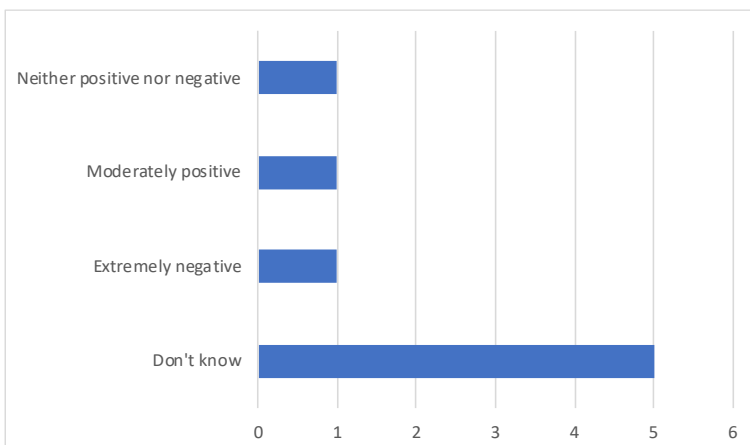
Source: Qualtrics Survey

Figure 3: How would you rate some of the economic impacts of the existing interim EPA in your sector/in the overall economy?



Source: Qualtrics Survey

Figure 4: How would you rate some of the environmental impacts of the existing interim EPA in your sector/in the overall economy?



Source: Qualtrics Survey

Figure 5: How would you assess some of the social and human rights effects of the existing interim EPA agreement between the EU and ESA5 in your sector/in the overall economy?



Source: Qualtrics Survey

3. Please elaborate briefly on your response on any type of impact above?

- Danish Agriculture & Food Council: "Increase in trade flows would generate increased production, profits, commercial relationships, diversification of income sources, a wider product range of high-quality products."
- Syndicat du Sucre de la Reunion:
 - "Since both the EU or EU trade partners are located in tropical regions, they produce the same types of agricultural products, unlike EU continental producers. The cane-sugar sector of La Réunion is the leader in the segment of speciality sugars, which only accounts for 1,5 % of the EU sugar market. However, EU OR products are in direct competition with ESA States products. As ESA States do not comply with the EU high social, environmental and regulatory standards, producers from the EU OR will never compete on an equal footing with the ESA producers. The reform of the CMO, combined with the total opening of the EU market to sugars originating in the ESA States, led the latter to redirect their production towards the manufacturing of speciality sugars. The objective is to conquer a segment of the EU market where competition is already intense due to the entrance of new Latin American stakeholders in 2013. In 2020, Mauritius closed one of the last two refineries of the country, stating that it will now focus on speciality sugars production. Deprived of the outlets for their white and raw sugars, the ESA sugar industries attack the speciality sugars market. They are destabilising the market of speciality sugars, thus threatening the cane-sugar sector of the EU OR, for whose the EU market is a vital outlet and where it is the leader.
 - The EU white sugar market is no more attractive for the ESA States. Thus, they are increasing their speciality sugars production and exports to the EU, which damages the EU OR."
- A Mauritian stakeholder reported that: "The fact that the EU sugar market remains protected from the world market through high tariffs of EUR 419 / ton, it is somewhat protected from the global price volatility. The social and environmental standards, on the other hand, safeguard the market from unfair competition.
- Olof Palme International Center "Since it calls for adherence to international labour laws and ILO conventions, it is a good incentive for partners. It also debunks the alternate narrative on punitive sanctions."

4. What are priority issues that need to be addressed in the deepening negotiations from the perspective of your sector/field of expertise?

- DAFC: Trade facilitation, TBTs, services, digital trade.
- European Community Shipowners' Associations (ECSA):
 - From the perspective of ECSA (representing the European shipping industry), maritime transport services must form part of any trade-related discussion the EU has with third parties, including, in this case, economic partnership arrangements. This is because shipping transports around 90% of the global trade in goods, making it the backbone of world trade. In Africa, shipping is even more important due, in some cases, to less advanced land transport. Therefore, efficient maritime transport is critical to the region's trade and economic growth, but shipping and ports in this region sometimes lag behind global trends and standards, resulting in high trading costs.
 - Looking at the African continent more broadly, European shipping companies have traditionally held a strong position. They are important partners to African governments and business and ensure they are connected to the world and intra-African trade. They are heavily investing in the continent and support local employment. Africa is also one of the main growth markets for EU businesses, with an anticipated doubling in the size of the population by 2050.
 - However, at the same time, EU shipowners are more and more confronted with market access barriers (in Africa and around the world) targeting foreign logistics and maritime services. These include, i.e. cargo reservations or preferences for national carriers, licensing requirements or rules on vessel flag, crew or construction to carry cargo or call at ports in their territory, all to the detriment of foreign operators.
 - For ECSA, partnership agreements offer an excellent platform for the EU to draw the attention of its trading partners to the importance of free access to maritime services and safe and secure frameworks for operation. We, therefore, encourage the EU to seek to include maritime services in future EPAs or revisions of existing EPAs.
- Syndicat du Sucre de la Reunion:
 - "The priority is to extend, under the current EPA, the period during which the local market of the French overseas departments is protected from ESA sugar exports, as provided by the provision currently in force, and under the EPA to come, replicating the provision currently in force which protects the local market of the French overseas departments from ESA sugar exports.
 - If applicable to the EU outer regions, the general suppression of custom duties provided by the EPAs would offer a disproportionate competitive advantage to products originating in countries where social, environmental and productive standards are way lower than the EU ones. It would deny the sugar industry of the EU outer regions access to their local market.
 - Under the Cotonou agreement, this safeguard has been replicated in every EPAs and interim agreements, which have been concluded. Thus, the interim EPA acknowledged the necessity to protect the local market of the French overseas departments from sugar imports originating in the ESA States. Thus, the ESA EPA provides that duties remain due on sugar originating in the ESA States and released for free circulation in the French overseas departments (on tariff lines of chapter 1701 of the combined nomenclature). This provision is applicable for ten years, extended for a further period of 10 years unless the EU and the ESA States agree otherwise.

- Since the EPA with ESA came into force on 14 May 2012, the first deadline will be 14 May 2022, with a potential extension until 14 May 2032. Hence the necessity to extend, under the current EPA, the period during which the local market of the French overseas departments is protected from ESA sugar exports, as provided by the provision currently in force, and under the EPA to come, replicating the provision currently in force which protects the local market of the French overseas departments from ESA sugar exports.
- The second priority is to define an annual duty-free quota on speciality sugars imports from ESA states to continental Europe and maintain imports duties on volumes, which would enter the EU market in excess of the annual duty-free quota conceded to ESA states. The tariff lines of speciality sugars are lines 1701 1390, 1701 1490, 1701 9100 and 1701 9990 of the combined nomenclature.
- Since the reform of the CMO, the market environment has changed: the EU must take notice of the metamorphosis of its sugar market – a metamorphosis that the EU encouraged itself – and take all needed measures to protect its territories and industries. In the framework of the negotiations on the deepening of the EPA with the ESA States, the principles and terms, which previously led to the complete opening of the EU market, must not be maintained.
- The EU speciality sugars market is saturated, as non-EU competitors detain more than 60% of its shares. It is now imperative and urgent to define a market exposure volume, i.e. a maximum volume of concessions that can be granted to speciality sugars originating in foreign countries, by considering the currently imported quantities. This will minimize the windfall effect and secure the stability of the EU speciality sugars market.
- This rule is all the more needed and legitimate, as the French overseas departments still can increase their production of speciality sugars and supply more than 45% of the EU market. This objective will not be met if the EU maintains duty-free and quota-free access to its speciality sugar market.
- A Mauritian stakeholder reported the need for more flexibility concerning RoO, namely cumulation with other ACP producers and the value tolerance rule.
- Fecc calls for an enhanced monitoring effort when it comes to EU requirements under the EU Africa strategy. Without comprehensive surveillance of products being exported to Africa, this may result in (1) the undermining of EU and African producers and service providers, (2) the decrease of the EU market share and (3) unnecessary regulatory roadblocks due to internal bureaucratic delays.
 - The EU and other national governments are currently offering various regulatory and financial incentives for green initiatives, particularly for public stakeholders and start-ups. These include so-called emissions allowances under the EU Emissions Trading System (EU ETS) scheme. With both the EU Green Deal and the EU African Strategy being game-changers, support from the community must include a wider part of the industry to ensure that integrating a circular economy on trade also includes socio-economic benefits. We believe that such incentivization is a more pragmatic approach that encourages companies to innovate, rather than the overlapping regulations in the European chemical wholesale sector that result in an uneven level playing field, most especially for SMEs.

5. What obstacles and challenges to doing business, trading or investing in your sector/ the overall economy would you like to see addressed in the ongoing negotiations?

- Danish Agriculture & Food Council: Administrative costs associated with cumbersome export procedures.

- An Italian stakeholder: “Stabilisation politique, sociale et économique. Amélioration des systèmes bancaires”
- Syndicat du Sucre de la Reunion: "Even if the ESA States accept to open their market to EU sugars, their social, environmental and productive standards are way lower than the EU ones. There is a clear absence of a level playing field between the EU and the ESA States concerning the cane sugar sector. The sugar industries of the ESA States are thus extremely competitive on their market, which will therefore remain closed to EU outer regions products in any case.
 - The EU speciality sugars market was already wide open to non-EU countries (over 60%). Nevertheless, in 2013, the EU concluded new trade agreements with Central America and the Andean Community and allowed their cane sugar producers to enter the EU speciality sugars market. Consequently, competition has considerably increased in this market, thus accentuating pressure on the EU outer regions.
 - The EU must acknowledge that part of its agricultural production is in direct competition with agricultural products produced in neighbouring tropical countries. Thus, it is crucial to involve the main economic actors of the outer regions in every step of the negotiation process.
- A Mauritian stakeholder reported the lack of visibility on the market as it is not sufficiently protected, namely through too many trade agreements covering sugar and even domestic support provided to EU producers.
- ECSA:
 - Trade in services with African countries will undoubtedly thrive in the forthcoming decades. However, EU trade policy should step up to seize these opportunities and ensure European businesses, such as the shipping industry, can play their role in ensuring sustainable development, mobility and connectivity – and avoid the market mentioned above access barriers.
 - We highlight that the non-discriminatory treatment of maritime transport services has been formally recognised by EU and ACP partners as of 1995 (Lomé IV, art. 126 and following) and reconfirmed in 2000 (Cotonou Agreement, art. 42). EU shipowners stress that in the renewed Partnership Agreement and any other legal and policy instruments with African partners, these principles must be anchored, even re-enforced. Fair and free competition, without local protectionist measures, is of key importance to secure continued growth. For maritime transport, free access to transport markets should go hand in hand with the right of establishment of local agents to provide the best possible service to our customers. Shipowners' rights to invest in local services and infrastructure should also be secured.
 - By anchoring clear commitments on maritime transport in legally binding instruments, the EU creates the certainty EU businesses need to invest and operate sustainably. Such trade agreements should at a minimum ensure that third countries provide reciprocal market access to EU operators as third-country operators face in the EU and include provisions on maritime transport services to the fullest extent possible, including:
 - Commitments towards unrestricted access to the international maritime markets and trades on a commercial and non-discriminatory basis;
 - Commitments to abolish and abstain from cargo-sharing agreements or reservations;

- The ability for EU operators to be granted reciprocal national market access, at minimum feeder services, and all forms of transshipment and movement of empty containers;
- Ability to perform multimodal operations and the ability for EU operators to establish local representations in third countries.
- These are in addition to all other supporting measures to ensure smooth and fair trade

Three of the remaining questions have six valid responses and do not carry information relevant to the ex-post report.²

1.4 Minutes of the Civil Society Dialogue

CIVIL SOCIETY DIALOGUE

MEETING ON

SUSTAINABILITY IMPACT ASSESSMENT IN SUPPORT OF THE NEGOTIATIONS TO DEEPEN THE EU- EASTERN AND SOUTHERN AFRICA (ESA) ECONOMIC PARTNERSHIP AGREEMENT

Date: 23/03/2021

Time: 11:00 -13:00

Location: WebEx

Lead speakers

- Ewa Synowiec, Director, Directorate-General for Trade (DG Trade), Chief Negotiator for the negotiations to deepen the EU-ESA EPA
- Andreas Freytag, Study Coordinator/Team Leader of the consortium led by LSE Consulting **Moderator**

Deputy Head of Unit, Transparency, Civil Society and Communication Unit, DG Trade, European Commission

Agenda

- 1) Presentation of the state of play of the negotiations;
- 2) Presentation of the draft thematic reports of the Sustainability Impact Assessment on (1) trade in goods, (2) trade in services and investment and (3) trade and sustainable development; and draft ex-post evaluation of the existing interim EPA.

² These forward looking questions were: What are the possible economic impacts of the chapters for negotiation in the deepening of the EPA in your sector/ in the overall economy? What are your expectations on the possible environmental impacts of the chapters for negotiation in the deepening of the EPA in your sector/in the overall economy? What are your expectations on the possible social and human rights impacts of the chapters for negotiation in the deepening of the EPA in your sector/in the overall economy?

3) Open discussion with stakeholders.

1. Presentation by DG TRADE on the state of play of negotiations with ESA Countries

Ewa Synowiec, Director of Directorate TRADE C and Chief Negotiator for the deepening of the EU-ESA EPA, presented the state of play of the negotiations with the five ESA Countries (ESA5) implementing the EPA. Ms Synowiec started by noting that the SIA aims at feeding into the negotiations between the EU and the ESA5. The SIA provides a deep evaluation of the potential economic, social, human rights and environmental effects of the anticipated new and comprehensive EPA, which will result from the deepening in terms of the substance of the current EPA. The SIA will be based on broad consultations of stakeholders and include recommendations to assist the negotiation process. The EU commissioned an independent contractor (LSE Consulting) to undertake the study. The Contractor will present the research's first results, including the Ex-Post Evaluation of the current EU-ESA5 EPA. Ms Synowiec highlighted that the first Civil Society Dialogue concerning this SIA was held on 11 September, where the state of play of negotiations was presented, and the Contractor presented the Draft Inception Report of the Study.

Concerning the state of play of the negotiations, three rounds were held since their launch in October 2019. Ms Synowiec noted this endeavour had started earlier at the request of the ESA partners to deepen the existing agreement by expanding its scope towards a modern comprehensive agreement, which the EU welcome, engaged in the process and agreed on a joint scoping paper before the formal negotiation process. Negotiations will cover all trade-related issues, including trade and sustainable development, institutional provisions for civil society and parliament.

The negotiation rounds resulted in substantial progress on five issues on TBT, customs and trade facilitation, SPS, RoO, agriculture in terms of cooperation and not in terms of market access. The last round permitted negotiators to have the first discussions on trade and sustainable development (which is new), and it will be included in the EPA. There is one in CARIFORUM but no such chapter in the EPA agreements with African countries. The DG noted that the parties further discussed the principles of the EU approach on trade in services, investment liberalisation and digital trade for the first time. The discussion laid the foundation for the next round to discuss TSD based on a joint working document and start substantial discussions on negotiating texts for Trade in Services, Investment and Digital Trade; for the latter, the EU submitted to the ESA side its proposal, which is also published online. In the framework of the transparency policy, the EU publishes all initial negotiating proposal texts, which stakeholders can access.

Ms Synowiec underlined that the ESA partners have been well prepared and well-coordinated despite institutional capacity challenges – particularly for the least developed countries in the group. The willingness and commitment to move forward with the negotiations is encouraging and supports reasonable optimism that it will continue. Relating to the latest results in the negotiations:

- Very good progress on customs and trade facilitation and SPS, with few outstanding issues, including those related to institutional provisions and capacity building which will need to be discussed in due course.
- On TBT, agreed on most of the text of the chapter but few remaining articles mainly on technical regulations, transparency in marking and labelling. Cooperation and technical assistance remain outstanding.
- On SPS, substantial progress had been made on most articles, including regionalisation, technical consultations, animal welfare and emergency measures. Outstanding issues include cooperation and technical assistance. Support to the capacity building, including technical and financial assistance, will be a cross-cutting issue in this process and the ESA side seems to be focused on this support in view of the implementation of the commitments to be included in the deepened EPA. This support will come from DG INTPA (International Partnership Agreements).

- On Agriculture - mostly relates to good cooperation. Based on a joint working document, some articles were agreed upon, and others are under discussion.
- On RoO, a joint working document can be already considered a good achievement as it is one of the most difficult issues in this negotiation process, given the sensitivity of the issues by both parties and several EU red lines based on ESA5 claims.
- On Trade and sustainable development, the first exchange of views on the mutual text proposals in the last round was constructive with much convergence in many areas, including gender. However, the EU proposal is ambitious, and the differences in particular to the effective implementation of international conventions and strong commitments that the EU advocates for in this chapter will need to be tackled. Ms Synowiec highlighted ESA side aims at linking the implementation of such commitments with the EU support, which will be discussed in the framework of the economic development chapter.
- Concerning services, Investment liberalisation and digital trade – productive initial exchange without text based on the EU's presentation of their approach, key features and objectives. Both sides agreed on the importance of the issue and reiterated their commitment to an ambitious outcome while considering the different levels of development among the partners with Mauritius and Seychelles, which are very interested in services chapters. In contrast, the other three partners are less developed, and for them, it is quite a challenge. Ms Synowiec noted that they are aiming at starting a text-based discussion during the next round.

The next negotiation round will take place on 13-16 April. It will discuss six issues, including SPS, customs and trade facilitation, RoO, TSD, services, investment and digital trade and (to be discussed for the first time) economic development cooperation. The EU aims to resolve all remaining issues in SPS and customs and trade facilitation but the elements relating to cooperation provisions. For the others, the EU hopes to make further progress. As for the EDC chapter, the expectations of the ESA side are high. Relating to the link between the negotiation and the SIA, Ms Synowiec noted they had scheduled a sequencing of the reports to be delivered by the contractors and the agenda of the negotiations. Particularly the thematic reports to be presented in today's sessions (on trade in goods, services and investment and trade and sustainable development) means the issues that are already under discussion with the ESA partners while the other three thematic reports to be delivered later on, namely on public procurement, IPR, and competition with the related development economic cooperation plus on dispute settlement, institutional and general provisions will be discussed at later rounds. Ms Synowiec noted they would consider the SIA recommendations, which is the essence and objective of the SIA exercise.

2. Presentation by Andreas Freytag

Mr Andreas Freytag for LSE Consulting summarised the six studies published: Ex-Post Evaluation, SIA of Trade in Goods provisions, SIA of Trade in Services and Investment provisions, and SIA of TSD provisions. LSE Consulting summarized the findings of the Ex-Post Evaluation, including implementation, RoO, trade flows, economic impacts, the TSD chapter, development cooperation and government and business. The LSE noted that participants might send questions later to the contractor. The contact details are listed at the end of the presentation.

All relevant texts can be found here: <https://ec.europa.eu/trade/policy/policy-making/analysis/policy-evaluation/sustainability-impact-assessments/>.

The presentation can be found here: <https://trade.ec.europa.eu/civilsoc/meetdetails.cfm?meet=11586>.

3. Questions and Answers

Ms Synowiec noted that the duty-free and quota-free access to the EU market is already a fact and that market access liberalisation is not subject to discussion in this negotiation process. Further, she asked: What does the LSE Consulting advise to diversify and increase ESA exports into the EU?

Questions from civil society followed.

Both ENDS noted that Ms Synowiec referred to several texts which were the basis of discussion in the negotiations, and the participant wanted to know where they could access those texts. Both ENDS also enquired on the sectors where the EU exports were growing because this will be most likely the areas where effects of the interim EPAs. Relating to Zimbabwe and Madagascar, Both ENDS noted that the presentation referred to only 96 % will be quota-free; they enquired on the other percentages and requested further elaboration.

The European Community Shipowners Association (ECSA) noted that they had provided some input to the survey last year about maritime services transport being included in the future agreement but noted in the presentation that there was no mention of maritime transport in the services chapter. Could the LSE Consulting comment or elaborate further?

In response, the LSE noted that they would consider the question and pass it on to the expert, and the issue of maritime transport services will be considered.

Relating to the sectors, since the growth of the exports of the EU is very limited, the reports do not preview substantial impacts. There are many data in the Annex of Trade and Goods that suggest that it is the usual suspects being exported, e.g. chemistry, machinery, and gas as the main exports. LSE Consulting would investigate it. Concerning preferences depends on whether the RoO allow for this. That could be why Zimbabwe and Madagascar did not fully utilise this and could not export all the goods free of customs and duties.

Concerning diversification, LSE Consulting noted it is probably better if the countries themselves are the main actors responsible for diversification. If the EU keeps open markets without tariff escalation, this will benefit ESA5 since this has been a huge challenge for developing countries over the years. Tariff escalation meaning that tariffs are increasing when products are moving downstream. Hence if the commodities are duty-free and then the processed goods are facing duties, if this is maintained and at the same time capacity building is improving, and then diversification will be a natural result. What is good for diversification is that services are liberalised in the ESA countries, investment is encouraged, and the capacity of businesses and administration is increased. This ensures that the EU has a chance to support the ESA countries. Thus, it is the governments' task in the ESA regions to improve and maintain a high quality of governance. In addition, with more foreign direct investment, the business position in the global value chain also improves.

In response, Ms Synowiec affirmed that the creation of opportunities via reduction of customs duties and other measures on the border is one thing, but not that it was also a policy issue in the countries concerned that will contribute to the diversification. Services linked to trade would be helpful, but this needs great effort and good policymaking in the countries concerned. Relating to the texts, Ms Synowiec noted that a link had been shared to the Commission website with the reports and initial texts on agriculture, customs and trade facilitation, investment liberalisation, trade in services and digital trade, RoO, TBT, SPS and trade and sustainable development. More texts will be added along the way, and participants are welcome to visit the EU website.

CPME enquired on the impact of taxation on the negotiations and whether the future Carbon Border Adjustment Mechanism (CBAM) taxation will apply to ESA countries under EPA?

In response, Ms Synowiec noted that CBAM was one of the unilateral measures related to the European Green Deal. There are other measures in the pipeline on CBAM but do not know the form the measure will take as discussions are ongoing as the impact assessment is being prepared. The countries concerned will be informed in advance on what the measures are. They will have to continue sending goods that respond to the EU technical safety requirements, which will stay in place to protect the EU consumers.

Syndicat du Sucre de la Réunion enquired on the figures regarding the impact on the sugar sector.

LSE Consulting responded that the sugar regime is complex, and the team is still tackling the question.

Both ENDS asked how far the team has planned to look into preference erosion due to other negotiations

(such as the EU-Mercosur agreement). They also enquired how far ESA5 have changed their trade patterns with other African states and to what extent the team tackled the African Continental Free Trade Agreement.

In response, LSE Consulting noted that the two questions were complex and could not be addressed properly in the meeting. However, they noted that what has changed due to other FTAs and preferential agreements have been considered. Also, the LSE noted that it could not measure the effects by looking into other trade agreements that the EU has been conducting, and the same applies to the African Continental Free Trade Area (AfCFTA), which only started trading officially this year. They noted a section of regional integration in Africa in the Inception Report that discussed relevant channels.

LSE Consulting pointed out that the situation in Africa was complex, with many regional economic communities with overlapping RoO and rules in general. As a result, it will depend on the RoO under AfCFTA if they will affect the trade of the ESA countries with the EU. If there are low value-added shares in the RoO, they encourage intra-regional trade, which also benefits the EU.

In response, Ms Synowiec affirmed the support for regional integration in Africa and noted the convergence created between the two projects – EPAs and AfCFTA. The EU would like an increase in intra-African trade as the level of trade is quite low- 17%. Ms Synowiec stated that the EU was aiming for RoO in the negotiations that contribute to regional and continental integration. In this respect, she noted that the rules applied in the AfCFTA are in many respects similar to those of the EU as they follow the EU model. Regarding impact, not all partners are trading in AfCFTA as they are still negotiating other issues, and the African Union have not started phase II and phase III of the negotiations. EU will support politically, technically and financially to assist in the negotiation and implementation.

Conseil Économique Social et Environmental of the Reunion enquired whether there are any figures on the rise in living standards in these countries. In addition, the participant also enquired whether the exploitation of immigrant workers is taken into account and what consideration in the macroeconomic study of the impact of trade agreements with China and India in these countries (Mauritius, Madagascar).

Concerning the data, the LSE noted that it had figures, including several indicators related to the living standards, which was not restricted to the GDP. LSE Consulting highlighted that they were institutional and living standards indicators in the Inception Report.

LSE Consulting added that the report did not consider other regional integration areas except for Africa. However, it can be considered an idea, but it is not the focus of the study. The LSE elaborated on the human social impact and indicated that in the Ex-Post Evaluation, there is an Annex with a description of the evolution of the living standards – GDP, average wages, access to food, electricity, among others. Overall the standards have improved – not at the same pace in all the ESA countries. The study also found instances of exploitation in some economic sectors in some countries. This is highlighted in the analysis included in the Annex in the Ex-Post Evaluation. However, the study did not find a specific link between the agreement per se and those phenomena as there are more linked to the dynamics of the sectors.

Conseil Économique Social et Environmental of the Reunion enquired on whether the studies looked at the impact of the EPA on the Reunion Islands market and what were some of the issues surrounding workers from India and China.

In the response, LSE Consulting noted the study looked into the OR, which is included in the Annex of the Ex-Post Evaluation.

Syndicat du Sucre de la Réunion noted that the European Parliament is planning to amend the CMO regulation by adding an amendment to article 182. This amendment provides that the European Commission could apply additional duties when “the volume of imports in a given year at preferential rates agreed upon between the Union and third countries in the scope of free-trade agreements exceeds a certain level (‘market exposure volume’)” and also in case of “non-compliance with Union standards in terms of plant protection and animal welfare by third countries”. Does this position impact the negotiations of the European Commission with the ESA countries?

In response, Ms Synowiec noted the complexity of the question and asked that experts look at it, but it will be taken under consideration.

The moderator thanked everyone for their participation.

Table 7: List of participants for the stakeholder meeting

CSD Participants
Participant from Association de l'Aviculture, de l'Industrie et du Commerce de Volailles dans les Pays de l'Union Européenne asbl
Participant from Association de l'Aviculture, de l'Industrie et du Commerce de Volailles dans les Pays de l'Union Européenne asbl
Participant from Association de l'Aviculture, de l'Industrie et du Commerce de Volailles dans les Pays de l'Union Européenne asbl
Participant from ASSUC- European Association of Sugar Traders
Participant from Both ENDS
Participant from BUSINESSEUROPE
Participant from COMITE EUROPEEN des FABRICANTS de SUCRE
Participant from Confederation of Danish Industry
Participant from Confederazione Nazionale Coldiretti
Participant from Confédération des Petites et Moyennes Entreprises
Participant from Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH
Participant from Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH
Participant from EURODOM
Participant from European Centre for Development Policy Management
Participant from European Centre for Development Policy Management
Participant from European Cocoa Association
Participant from European Committee for Standardization
Participant from European Community Shipowner's Associations
Participant from European Community Shipowner's Associations
Participant from European farmers
Participant from Friedrich-Ebert-Stiftung
Participant from Heinrich Böll Stiftung e.V.
Participant from iEthanol, the European Industrial Ethanol Association
Participant from iEthanol, the European Industrial Ethanol Association
Participant from International Confederation of European Beet Growers
Participant from International Confederation of European Beet Growers

Participant from Landbrug & Fødevarer - Danish Agriculture and Food Council
Participant from Lithuanian Investors Association
Participant from Maa- ja metsätaloustuottajain Keskusliitto – Central Union of Agricultural Producers and Forest Owners
Participant from Mouvement des Entreprises de France
Participant from Organisation pour un réseau international d'indications géographiques
Participant from PETITA I MITJANA EMPRESA DE CATALUNYA
Participant from PETITA I MITJANA EMPRESA DE CATALUNYA
Participant from PETITA I MITJANA EMPRESA DE CATALUNYA
Participant from Rosa Luxemburg Stiftung Brussels Office
Participant from Syndicat du Sucre de La Réunion
Participant from TUSIAD
Participant from Wirtschaftskammer Österreich

Source: EC website

1.5 Lists the stakeholders contacted in the EU and the Member States

Table 8: EU Stakeholders contacted

Name of stakeholder
ACT Alliance Advocacy to the European Union
Active Pharmaceutical Ingredients Committee
AeroSpace and Defence Industries Association of Europe
Agriculture and Horticulture Development Board (AHDB)
Airlines for Europe
Airports Council International Europe
Amnesty International
ASINCA
Association de l'Aviculture, de l'Industrie et du Commerce de Volailles dans les Pays de l'Union Européenne asbl
Association de producteurs de cinéma et de télévision (EUROKINEMA)
Association des Constructeurs Européens d'Automobiles (ACEA)
Association Européenne Du Commerce De Fruits Et Légumes De L'UE - European Fruit and Vegetables Trade Association
Association of European Automotive and Industrial Battery -EUROBAT
Association of European Heating Industry
Association of European manufacturers of sporting ammunition
Bureau International des Producteurs d'Assurances & de Réassurances (BIPAR)
Business and Industry Advisory Committee (BIAC)(OECD)
BUSINESS EUROPE
Carbon Capture & Storage Association (CCSA)

CEFS - Comité Européen des Fabricants de Sucre
Central Europe Energy Partners (CEEP)
Centre de Documentation, de Recherche et d'Information des Peuples Autochtones
Chambers of Commerce of Ireland (Chambers Ireland)
Coalition for Fair Fisheries Agreements
Cobalt Development Institute (CDI)
Comité du commerce des céréales, aliments du bétail, oléagineux, huile d'olive, huiles et graisses et agrofouritures de l'U.E.
Comité Européen des Entreprises Vins
Committee for European Construction Equipment
Committee of the European Sugar Users
Confederatia Sindicala Nationala MERIDIAN (CSN MERIDIAN)
Confederation of European Community Cigarette Manufacturers
Confederation of European Paper Industries
Confederation of National Associations of Tanners and Dressers of the European Community (COTANCE)Private sector
Confederation of National Hotel and Restaurant Associations(HOTREC)
Confederation of Netherlands Industry and Employers (VNO-NCW)
Confederation of the food and drink industries of the EU(FoodDrinkEurope)
Confederation of the German Textile and Fashion Industry
Conférence des Notariats de l'Union Européenne
Conseil des barreaux de la Communauté Européenne (CCBE)
Council of European Employers of the Metal, Engineering and Technology-Based Industries (CEEMET)
Danish Agriculture & Food Council
DIGITALEUROPE
Direct Selling Europe AISBL
Ecommerce Europe
EU Vegetable Oil and Protein meal Industry
EUROALLIAGES
Eurochambres
EuroCommerce
EURODOM
Eurogroup for Animals
European & International Federation of Natural Stone Industries -EUROROC
European Aggregates Association (UEPG)
European Apparel and Textile Confederation (EURATEX)
European Association of Chemical Distributors (Fecc)
European Association of Craft, Small and Medium-Sized Enterprises (UEAPME)
European Association of Dairy Trade (Eucolait)
European Association of Fruit and Vegetable Processors (PROFEL)
European Association of Internet Services Providers (ISPA)
European Association of Mining Industries, Metal Ores & Industrial Minerals (Euromines)
European Association of Sugar Traders (ASSUC)

European Biodiesel Board
European Branded Clothing Alliance
European Brands Association
European Business Services Round Table
European Cement Association (CEMBUREAU)
European Centre for International Political Economy
European Cocoa Association Private sector
European Committee for Electrotechnical Standardization
European Community Shipowner's Associations
European Competitive Telecommunications Association
European Confederation of Junior Enterprises
European Confederation of Woodworking Industries (CEI-Bois)
European Construction Industry Federation
European Consumer Organisation (BEUC)
European Coordination Committee of the Radiological, Electromedical and Healthcare IT Industry (COCIR)
European Coordination of Independent Producers (CEPI)
European Council for Automotive R&D (EUCAR)
European Council for Motor Trades and Repairs (CECRA)
European Crop Protection Association
European Dairy Association
European Diisocyanate and Polyol Producers Association
European Disposables & Nonwovens Association (EDANA)
European DIY Retail Association
European Ecommerce and Omni-Channel Trade Association
European Electronic Component Manufacturers Association
European Engineering Industries Association (EUnited)
European Environmental Bureau (EEB)
European Express Association
European Family Businesses
European Farmers (COPA COGECA)
European Federation for Construction Chemicals
European Federation for Cosmetic Ingredients
European Federation of Engineering Consultancy Associations
European Federation of Food, Agriculture and Tourism Trade Unions- EFFAT
European Federation of Foundation Contractors
European Federation of National Associations of Water and Waste Water Services
European Federation of Pharmaceutical Industries and Associations(EFPIA)
European Federation of Public Service Unions (EPSU)
European Federation of the Footwear industry
European Fish Processors & Traders Association and European Federation of National Organizations of Importers and Exporters of Fish (AIPCE-CEP)
European Franchise Federation
European Furniture Industries Confederation

European Health Industry Business Communications Council(EHIBCC)
European Lime Association (EULA)
European Livestock and Meat Trade Union
European Man-made Fibres Association (CIRFS)
European Medical Technology Industry Associations (MedTech Europe)
European Milk Board
European Newspaper Publishers' Association (ENPA)
European Organisation for Security
European Organisation of Tomato Industries (OEIT)
European Panel Federation
European Patent Office
European Plaster and Plasterboard Manufacturers Association (EUROGYPSUM)
European Policy Centre
European Potato Processors' Association
European Potato Trade Association
European Property Federation
European Regions Airline Association (ERA)
European Renewable Ethanol Association - EPURE
European Services Forum
European Services Strategy Unit
European Shippers' Council
European Small Business Alliance
European Steel Technology Platform (ESTEP)
European Sugar Refineries Association
European Technology Platform on Sustainable Mineral Resources(ETP SMR)
European Telecommunications Standards Institute (ETSI)
European Textile Collectivities Association
European Trade Union Confederation - ETUC
European Travel Agents' and Tour Operators' Associations
European Tyre & Rubber Manufacturers' Association (ETRMA)
European Whey Processors Association
Europeche
Fair Trade Advocacy Office
Fédération des Experts Comptables Européens (FEE)
Fédération Internationale de l'Automobile (FIA)
Fédération Internationale du Recyclage
Federation of European Rice Millers
Federation of European Employers (FedEE)
Federation of the European Sporting Goods Industry
Female Europeans of Medium and Small Enterprises (FEM)
Fern
Fertilizers Europe
Foreign Trade Association - Amfori

Freshfel Europe - the forum for the European fresh fruits and vegetable chain
Friends of the Earth Europe (FoEE)
FRUCOM (European Federation of the trade in dried fruit, edible nuts, processed fruit & vegetables and processed fishery products)
Gelatine Manufacturers of Europe (GME)
Global Industrial and Social Progress Research Institute(GISPRI)
Global Witness
Greenpeace
Health First Europe
Human Rights Watch
Independent Retail Europe
Industrial Ethanol Association
Industrial Minerals Association – Europe (IMA-Europe)
industriAll European Trade Union (industriAll)
Instituto Cuestiones Agrarias y Medioambientales
International Association of Users of Artificial and Synthetic Filament Yarns and Natural Silk
International Confederation of European Beet Growers
International Confederation of Inspection and Certification Organizations
International Co-operative Alliance
International Labour Organisation (ILO)
International Network for Sustainable Energy – INFORSE-Europe
International Trade Union Confederation (ITUC)
Long-Distance Fisheries Advisory Council
Market Advisory Council
Medicines for Europe
Nanofutures
Organisation pour un réseau international d'indications Géographiques
Plastics Recyclers Europe
Primary Food Processors
European Flour Milling Association
Starch Europe
European Vegetable Protein Foundation
spiritsEUROPE Private sector
Trade Union Advisory Committee (of the OECD) (TUAC)
Transport and Environment (European Federation for Transport and Environment)
UNIFE
Wind Europe

Source: Authors' compilation

Table 9: Member States organisations contacted

French stakeholders
Embassy of France in Antananarivo, Madagascar
Embassy of France in Moroni, Comoros

Embassy of France in Harare, Zimbabwe
 Embassy of France in Victoria, Seychelles
 Ministry of Overseas France
 Direction Générale du Trésor, Service des Affaires Multilatérales et du Développement
 Caritas (International)
 Man and the Environment France
 Impact Madagascar
 GRET
 Collaboration on International ICT Policy for East and Southern Africa (“CIPESA”)
 Association for Progressive Communications
 French Facility for Global Environment

Italian stakeholders

Assocalzaturifici - Italian Footwear Manufacturers' Association
 Association of Italian Textile Machinery Manufacturers
 ASSOCIAZIONE CENTRO AIUTI VOLONTARI
 Cia - Agricoltori italiani
 Civil Society Organisations
 Cocis (coordination of non-governmental organizations for international development cooperation)
 Confederazione Cooperative Italiane
 CONFINDUSTRIA ASSAFRICA & MEDITERRANEO
 COOPI - Cooperazione Internazionale, Foundation
 COSPE
 COSV
 FederlegnoArredo - Federazione Italiana delle Industrie del Legno, del Sughero, del Mobile e dell'Arredamento
 Fondazione Giacomo Brodolini
 Italian committee for food sovereignty (CISA)
 Italian Committee for the right to water (CICMA)
 Italian Development Cooperation Agency
 Italian National Agency for New Technologies, Energy and Sustainable Economic Development (ENEA)
 Italian network for responsible tourism (AITR)
 Italian Trade Agency
 Italian Trade Union Confederation
 L’Africa Chiama ONLUS-ONG
 Ministry of Economic Development, General Directorate for Trade Policy – Division V
 Unioncamere

German stakeholders

Africa Business Network
 Afrika-Verein der deutschen Wirtschaft
 Association of German Chambers of Industry and Commerce (DIHK)
 AUMA – Association of the German Trade Fair Industry
 BDI - Federation of German Industries
 BGA - Federation of German Wholesale, Foreign Trade and Services

Chambers of Industry and Commerce (IHK)
Consulate of Germany in Port Luis, Mauritius
Consulate of Germany in Victoria, Seychelles
Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ)
Embassy of Germany Harare, Zimbabwe
Embassy of Germany in Madagascar
EZ-Scout
Federal Ministry for Economic Affairs and Energy
Federation of the German Export Trade
German Agribusiness Alliance (GAA)
German Chamber of Commerce Abroad (AHK)
German Federal Ministry for Economic Cooperation and Development
German Foundation for World Population
German Trade Union Confederation (DGB)
OroVerde - Tropical Forest Foundation
SPECTARIS - German Hightech Industry Association
VENRO
Swedish stakeholders
Africa Trade and Invest (ATI)
Diakonia
LO-TCO Secretariat of International Trade Union Development Co-operation
Afrikagrupperna (The Africa Groups)
Brussels Office of the Swedish Trade Unions
Business Sweden
Forum Syd
Global Witness
International Development Cooperation
National Board of Trade, Department for WTO Affairs;
Olof Palme International Center
Sweden Africa Chamber
Swedish African Business Cluster Initiative
Swedish Cooperative Centre - We Effect
Swedish East Africa Chamber of Commerce.
Swedish Enterprise
Swedish International Development Agency (SIDA)
Swedish Foundation for Human Rights
Swedish Society for Nature Conservation, SNF

Source: Authors' compilation

1.6 List of stakeholders contacted in the ESA States

Table 10: List of stakeholders in ESA Countries

Institution

Agence Française de Développement (Comoros)
Association Afrique Agro Export (AAFEX)- Madagascar Section
Association des femmes entrepreneurs de Madagascar in ANTANANARIVO, Madagascar
Association des Hôtels de Charme
Association des petites et micro-entreprises de Madagascar (APMEM)
Association of Inbound Operators of Mauritius (AIOM)
Association for the Promotion of Business in Madagascar (APEM)
Autorité Régulation des Marchés Publics (Comoros)
Banque Centrale (Comoros)
Bureau d'Appui à la Coopération Extérieure, Madagascar
Business Mauritius
Cactus Tours Madagascar
Centre des techniques et pratiques du commerce international (CTPCI)
Chambre de commerce, d'industrie et d'agriculture
Confederation of Farmers of Madagascar
Confederation of Zimbabwe Industries
Dahari (Comoros)
Department of Industry – Enterprise Agency Seychelles (ESA)
Department of Tourism - Seychelles
Economic Development Board of Madagascar
Environmental Protection and Conservation Organisation (EPCO)
Entreprendre au Féminin Océan Indien Comores (EFOICOM)
Epsilon (Madagascar)
FEDMINES / EMIR (Mining Federation of Madagascar)
FHORM (Federation of Hoteliers and Restaurateurs of Madagascar)
GEXPROMER (Group of Seafood Exporters)
Green Islands Foundation
Green Resource Company Zimbabwe
Groupement des Entreprises de Madagascar
Independent trade facilitation and customs consultant, Zimbabwe
Initiative Développement (Comoros)
Les Mariannes Wellness Sanctuary
L'Union des Chambres de Commerce, de l'Industrie, et de l'Artisanat (Comoros)
Madagascar Tour Operators Association
Maison de la Société Civile Anjouan (Comoros)
Ministère de l'Economie, du Commerce, de l'Investissement, de l'Energie et du Tourisme (Comoros)
Ministère de l'Agriculture, de l'Elevage et de la Pêche, Comoros
Ministère de l'Energie, de l'Agriculture, de la Pêche et de l'Environnement

Ministère de Finance (Comoros)
Ministry of Foreign Affairs and International Trade
Mauritian Chamber of Commerce and Industry
Mauritian Export Association
Mauritius Tourism Authority
Mauritian Ministry of Foreign Relations, department of international trade
Ministry of Tourism
<i>Mouvement des Entreprises Comoriennes (MODEC)</i>
National Coffee Marketing Committee-Madagascar
NGO'SHAWO (Comoros)
Organisation Patronale des Comores (OPACO)
Professional Association of Banks-(APB)
Seychelles Chamber of Commerce
The Chamber of Mines Zimbabwe
Tourism Business Council of Zimbabwe
Tourism Promotion Association-Mauritius
The Zimbabwe Tour Operators Association (ZTOA)
World Bank
Zimbabwe Cross Border Traders Association
Zimbabwe Farmers Association
Zimbabwe Miners Federation

Source: Authors' compilation