



▶ **WCO ESA Region - Regional  
Private Sector Group**

▶ *Progress Report  
September 2019*

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## About this report

This report provides an overview of the progress made by the WCO ESA Region - Regional Private Sector Group (RPSG) since its formation at the end of 2018. From the perspective of the ESA-RPSG, key aspects concerning Customs Administration and Trade related issues being addressed within the region include Customs-to-Customs collaboration, AEO programs, Bond guarantees, Ease of doing business and the mandate of the region.

This report is the second of its kind. Future reports on the progress of the region will be published and made available on the [WCO ESA ROCB Website](#).

## A note on the ESA-RPSG

The ESA-RPSG was formed for the purpose of verifying the implementation, monitoring and assistance of various instruments in the WCO Toolkit that will make trade easier without comprising or imposing a higher risk profile. This will also allow Private Sector to better articulate their challenges in regional integration and possible solutions for addressing the known obstacles effectively and create a safe, fair and compliant environment for all. (Special note: Country specific issues are outside the scope of the ESA-RPSG).

## Progress update

	Description	Status
1	Terms of Reference	Delivered
2	Database for Participants	In Progress
3	Progress Report	Delivered
4	Webinars	In Progress
5	Events	Delivered
6	Customs and Trade related matters in the ESA Region	In Progress

### 1. Terms of Reference (TOR)

The TOR was circulated to all prospective participants before each Webinar. So far, no comments/suggestions and/or amendments have been recommended or made to the TOR. Consequently, the participants from the member countries consider the TOR as the agreement going forward. Progress on the TOR is therefore considered as concluded.

### 2. Contacts database for participants

A database has been created and continually updated throughout proceedings. Currently, the database contains around 140 contacts from the 24 member countries within the region. Some countries are particularly well represented, while others are not yet represented at all. The aim of the ESA-RPSG would be to obtain contacts from all of the respective countries. Progress on the database is therefore considered as ongoing (and will be going forward as more participants indicating a willingness to

engage are added). The ESA-RPSG therefore urges participants to independently engage with interested parties able to provide valuable input for the ESA-RPSG.

### 3. Progress Report

The quarterly Progress Report serves as one of the key deliverables of the ESA-RPSG. The reports highlight the most pertinent matters currently experienced by Private Sector throughout the ESA region. By engaging with various stakeholders throughout the region, the ESA-RPSG can collective voice and articulate pertinent issues to a broader audience who may be experiencing similar Customs Administration and Trade related matters in other parts of the region.

### 4. Webinar

It was agreed that the communication platform of the ESA-RPSG will be handled via webinar conferences (internet based dial-in conferences). So far, three (3) official ESA-RPSG webinars have been held, with participants from Eswatini, Kenya, Lesotho, Mauritius, Mozambique, Rwanda, South Africa, Uganda and Zambia. These have included stakeholders from supply chain owners, role players in the extended supply chain such as, Freight Forwarders Associations, Customs Brokers, Truckers and Consolidators. Poor participation in the attempted second webinar resulted in an informal discussion. Therefore, the ESA-RPSG does not consider this webinar as an official communication between participants. Consequently, a second official webinar was hosted a week thereafter. Although the technical approach of the webinars will change somewhat, the webinar platform will be used going forward. The minutes of each Webinar meeting is available on [WCO ESA ROCB Website](#). Below is a consolidated list of the engagements to date.

### 5. Events (engagements to date)

A number of important events themed around Customs Administration and Trade related matters have recently taken place in the region, notably the following:

	Event	Date	Venue
1	SADC Business Council <i>under</i> NEPAD	3 June	Gaborone, Botswana
2	Transit Management Systems Workshop	6 - 8 Aug	Pretoria, South Africa
3	Golden Business Forum	9 Aug	Kigali, Rwanda
4	Third Official Webinar	15 Aug	Online
5	AfCFTA Trade in Services	2 & 3 Sept	Cape Town, South Africa
6	African Union Sub-Committee visit	19, 20 Sept	Kampala, Uganda

#### ***SADC Business Council under NEPAD Business Foundation***

The SADC Business Council, led under the NEPAD Business Foundation (NBF) which acts an interim Secretariat of the SADC Business Council, met at the SADC Secretariat Headquarters in Gaborone, Botswana on the 2nd and 3rd of June. The SADC Business Council is expected to be an umbrella body for the Private Sector, to be composed of national apex bodies of the Private Sectors of each of the 16 SADC Member States.

Matters discussed related to the progress made in the formulation of the SADC Business Council, which directed the Secretariat to establish a Private Sector

engagement mechanism. This was done to enable the involvement of the Private Sector in the implementation of the SADC regional integration agenda and the Industrialisation Strategy and Roadmap (2015-2063).

### ***The Transit Management Systems Workshop***

The AUC-WCO ESA ROCB regional workshop on Transit Management Systems took place from 6<sup>th</sup> to 8<sup>th</sup> August 2019 in Pretoria, South Africa. The workshop was hosted by the South Africa Revenue Service (SARS) in cooperation with the African Union Commission and the WCO ESA ROCB. The meeting brought together 20 ESA member countries, with some delegates from West and Southern Africa (Cameroon, Guinea), Regional Economic Communities including EAC, COMESA, SADC, ECCAS, ECOWAS, UMA and other stakeholders including GIZ, TKCS, and UNCTAD totalling 54 delegates.

The workshop aimed to raise awareness and set a roadmap on harmonizing the legal frameworks in Africa; share transit experiences, improve economic competitiveness; further support the implementation of African Continental Free Trade Area (AfCFTA), set up the ESA working group for a single Bond Guarantee and the Electronic Cargo tracking in line with the ESA - DG's directive.

At the culmination of proceedings, a number of important recommendations were made on Customs Administration and Trade related matters in the region. These were notably:

- regional customs transit guarantees
- risk management and tracking
- legal framework

Additional information on the recommendations can be found in Annex 2 of the proceedings.

### ***Golden Business Forum***

The Golden Business Forum (GBF) was held at Kigali Convention Centre on the 9<sup>th</sup> of August was organised and hosted by Rwanda's Private Sector Federation under the theme 'Unlocking Africa Trade with Itself and the World'. The event brought together more than 1000 participants from Africa, Asia, Europe and America. Participants included industry leaders, investors, policymakers, opinion leaders, development partners and like-minded business leaders discussed how the Private Sector could increase its contribution to the socio-economic development of the continent.

The forum also served as a Business-to-Business marketplace where investors from all over the world pitched for equity, grants, as well as forging for potential future business partnership with their counterparts from all over the world.

### ***Third Official Webinar***

The third official webinar was hosted on 15 August 2019. Agenda items discussed included The World Bank Ease of Doing Business, AEO programmes, Customs IT-Connectivity, The WTO-TFA, Transit Bond Guarantees and the WCO Toolkit. (More on the third official webinar below under *Consolidated list of actionable items from the Webinars*).

### *AfCFTA Trade in Services*

The African Continental Free Trade Area (AfCFTA) Trade in Services Signalling Conference was held at the Westin Hotel in Cape Town, South Africa on 2 - 3 September 2019. The Conference, which was supported by GIZ, brought together representatives from several AU member States, some regional economic communities (RECs) and Private Sector to discuss priorities for services sector commitments under the AfCFTA Agreement. The main objective of the conference was to enable exchange among service providers and negotiators on non-binding indications of market openings, existing or future.

A number of key matters were discussed over the course of the conference, notably:

- the importance and complexity of the services sectors in trade
- the role of services trade in economic development and growth
- the need to underpin infrastructure, especially communications connectivity
- the importance of the movement of people to services trade

In general, Private Sector participants voiced their support in favour of the AfCFTA. Notably, participants were advocating for freer movement of business people and urging officials to involve the Private Sector in negotiations.

### *African Union Sub-Committee visit*

The 11<sup>th</sup> Ordinary Meeting of the AU Sub-Committee of Directors General of Customs in Kampala, Uganda was held under the theme “The Entry into Force of the Agreement Establishing the African Continental Free Trade Area (AfCFTA) – Implications to African Customs Administrations.” and served as a platform for Heads of Customs to discuss the operationalization of the AfCFTA.

In attendance were 104 participants from 29 Member countries as well as representatives from various international organizations such as the EAC, ITC, UN – OCHA, UNCTAD, WCO and WCO ESA ROCB among others.

During proceedings, the impact of the AfCFTA in shaping the future of the African continent was emphasized. As of 19 September, Eritrea was the only country that had not signed the AfCFTA. The agreement requires 22 deposits of instrument of ratification in order to come into force. The 22<sup>nd</sup> instrument was deposited with the AUC IN April 2019. Therefore, in terms of Article 24, the AfCFTA came into force on 30<sup>th</sup> May 2019. As at the 19<sup>th</sup> September 2019, 27 Countries had deposited their ratification instruments.

The AfCFTA as an operational entity was launched in July 2019 during a Summit in Niamey, Niger. It was decided that the implementation of the AfCFTA will come into effect in July 2020, which will allow for the domestication of laws and stakeholder engagement at National levels. However, at this current juncture, two key issues were outstanding: 1) Rules of Origin; and 2) Tariff offers.

Furthermore, the central role that Customs Administrations would play in effective implementation of AfCFTA was underscored. This was especially emphasized in terms of cross border movement of goods, implementation of trade policy; and safely

securing borders and protecting society while at the same time facilitating trade and collecting revenue. It was also highlighted that the successful implementation of the abovementioned factors can only take place with close cooperation among the 55 Customs Administration in Africa.

A panel discussion was also held around the impact of the AfCFTA on Customs Administrations and the working thereof. Two central themes emerged from this discussion, firstly that Customs needs to include Private Sector in their discussions and the need for widespread sharing of information to find possible solutions. Secondly, Customs should include other Government organizations in their discussions, otherwise trade related bottlenecks will remain problematic.

Other notably presentations at the event included a presentation on the African Union Trade Observatory by International Trade Centre (ITC). The ATO (African Trade Observatory) has been developed for the sharing of trade information - a key theme of the ESA-RPSG. Another important presentation on the Afrexim Bank-African Collaborative Transit Guarantee Scheme was made. The case made for single transit guarantees between Regional Economic Communities and ultimately across African Continent resonated with discussions within the ESA-RPSG.

## Webinars hosted

Date	Comments
22 November 2018	First Webinar for ESA-RPSG
29 March 2019	Short Webinar (non-official)
4 April 2019	Second Webinar
15 August 2019	Third Webinar

The first webinar was hosted on 22 November 2018. The participants present included stakeholders from South Africa, Kenya, Lesotho, Eswatini and Rwanda. The webinar lasted about an hour and was considered a success.

A second webinar was scheduled and hosted on 29 March 2019. However, due to minimal participation (only one participant - Mauritius - present) and poor connectivity issues (other participants - whom indicated their willingness to engage - were unable to connect). Consequently, the discussion was more informal in nature and therefore not considered as an official webinar.

The third (second official) webinar was hosted on 4 April 2019. The participants present included stakeholders from SADC, Mozambique and Uganda. The webinar lasted for around 45 minutes, with some issues mentioned largely echoing those brought up in the first webinar, as well as additional important matters pertaining to the respective countries.

The fourth webinar (third official) was hosted on 15 August 2019. The participants present included stakeholders from Eswatini, Kenya, South Africa and Zambia. Agenda items discussed included The World Bank Ease of Doing Business, AEO programmes, Customs IT-Connectivity, The WTO-TFA, Transit Bond Guarantees and the WCO Toolkit. The webinar concluded with all members agreeing on a consolidated list of actionable items which originated from the various webinars to date.

## Webinars practice

From the experiences gathered so far, certain technical changes to the webinars are proposed. The major reason being a technical one.

The discussions will remain similar, but it is suggested that the platform evolve from a webinar (dial-in) to a full video conference whereby participants will physical see each other. Therefore, both audio and visual will be present.

It is further proposed that webinar should take place on Thursday mornings.

The aim of the initial set of webinars was to include a total of eight countries. Future engagements will rather target four member countries in order to focus and streamline the discussions and obtain a clear picture of trade and customs issues within the respective countries.

Lastly, it was agreed that the matters arising from the webinars will be compiled and circulated within two working days of the webinar.

## Consolidated list of actionable items from the Webinars

Various important issues have been raised in the webinars to date. A number of Customs Administration and Trade related matters seemed to be repeated across a number of countries within the ESA Region. However, building on the mandate of the ESA-RPSG, the most importance respective issues are specifically listed below:

1. **AEO Programs, alignment and Mutual Recognition Agreements (MRA) in Africa.**
2. **Time Release Study for cross border transactions and the sharing of data with Private Sector**
3. **Uptake of the WCO Toolkit and membership countries in the maturity of the different WCO instruments (i.e. SAFE, RKC, HS, ISCM, Risk Management)**
4. **WTO-TFA / with a linkage to Readiness and implementation of AfCFTA**
  - a. **Articles that dovetail Customs Administration and Trade**
5. **IT-Connectivity & Enablement of Customs Administrations to interchange data fields effectively in the ESA Region; which will result in a smoother trading environment, reducing red-tape and working towards a more aligned risk management system**

In depth, the key matters were:

### 1. AEO Programs

The uptake of Authorized Economic Operators (AEO) within the region needs to increase. Fortunately for some of the countries within the region a certain degree of uptake has already occurred. However for various stakeholders, the benefits of AEO are not particularly clear, especially for SMEs. These benefits therefore need to be articulated and linked with the WCO SAFE. The Mutual Recognition Agreements (MRA) also need to be communicated and monitored in order to realize their impact. Customs Administrations serve to gain greatly from any MRAs in the Region. Currently, Private Sector is struggling to understand the failure by Customs Administrations in not driving this critical instrument. AEO is a promised program for the future, however AEO needs to be extended to all of the role players in the extended supply chain and



needs to have an impact on border crossings especially. Note Annex B listing the various AEO programs currently within the region, as well as their respective levels of maturity.

## [2. Time Release Study](#)

Webinar discussions have highlighted that various participants agree to the importance of the monitoring and evaluation of Customs Administration and Trade related issues in the ESA region.

This assessment on the ease of operation in the ESA Region should be conducted on the basis of a time release study, which might include more than the measurement of efficiency across borders as in many cases it is not Customs Administration, but the total value chain from geographical border lines, cross border trade, terminals, transports, customs brokers, other law enforcement agencies, which are individually or collectively thwarting the flow of goods.

## [3. WTO-TFA / Readiness and implementation of AfCFTA](#)

Globally, 145 countries (88.4% of the total number of WTO members) have ratified the WTO-TFA. To add to that, nearly 80% of the members in the ESA Region have ratified the WTO-TFA. While most members have implemented Category A, those in the ESA Region have not done so well and have not yet implemented Category B and Category C of the WTO-TFA.

The ratification and overall readiness of the WTO-TFA can serve as a beacon towards the readiness and implementation of the AfCFTA. To date, nine of the 24 countries within the ESA region have ratified the AfCFTA.

## [4. IT-Connectivity & Enablement of Customs Administrations in the ESA Region](#)

Customs-to-Customs connectivity and enablement has been on the forefront of Customs Administrations' focus lately. An initiative emergent from the WCO has been to connect two Customs Authorities through IT enablement. The concept is to continue with the respective inbound and outbound declaration, whereby two Customs Administrations would exchange their respective datasets with each other and established the level of agreement and harmonizing between the two sets of declarations. Within the ESA Region, a successful pilot project was run between South Africa and eSwatini. The level of matching was as close as 99.99% on some of the traders. As a key matter to the success of future engagements, the project highlighted discrepancies between the outbound declaration and the inbound declaration. Future projects will be between South Africa and Lesotho, and South Africa and Botswana, which is currently awaiting roll-out. Subsequently Namibia has also come on board with live implementation expected in the next six months. The aim is to drive this project out to the greater region.

In addition to this initiative, the AU has also spearheaded IT Connectivity. At a customs level, the AU has held six meetings on IT Connectivity. In May this year, the 6th meeting was held in Mauritius, with South Africa and eSwatini sharing their experiences. The AU has subsequently created a Draft Bilateral/Multilateral Utility Blog Guideline for IT Connectivity for all administrations when exchanging information. The key

recommendation was for the Utility Blog to be approved by the Director Generals of Customs. The WCO ROCB did a survey on the customs management systems used in Africa - 63% of members are using ASYCUDA (Note Annex A), with other members using their own system. All members have invested heavily in the system. The important take-away from the survey is the need for the system to interact and share information.

### [Summary from the fourth webinar](#)

To summarise the focus areas of the WCO ESA RPSG Webinars to date, the actionable items can be captured as follows:

First Webinar - 22 November 2018:	Fourth Webinar - 15 August 2019:
1. Look into providing World Bank Performance indicators and how it links with the WCO Time Release Study (TRS)	1. A draft white paper around the WB's Ease of Doing Business Trading Across Borders Methodology to be drawn up
2. Three work streams agreed by all participants: <ul style="list-style-type: none"> <li>• Work on the AEO program</li> <li>• Effective measurement of processes / assessment on ease of operation</li> <li>• ESA – Private Sector – interactive database (24 members)</li> </ul>	2. An update from the Working Group to be distributed amongst the WCO – ESA – RPSG
3. List of particular companies that could be included in the list of participants	3. The summary of the IT Report - as well as the AU Report built on IT Connectivity to be distributed among the WCO - ESA - RPSG
4. Obtain feedback on the Business Council in SADC – this is an important platform for Private Sector. Will get information from BUSA (Business Unity South Africa) with a request to share this information with this group, WCO - ESA - RPSG	4. WCO - ESA - RPSG to promote the utilization of the WCO Click portal
5. Investigation of App for WCO - ESA - RPSG Suggestion of formation of a WhatsApp group Any other tools that Private Sector think that will be meaningful need to be tabled	5. WCO – ESA - RPSG going forward to focus on: <ol style="list-style-type: none"> <li>1. AEO</li> <li>2. Time Release Study</li> <li>3. TFA/AfCFTA</li> </ol> IT Connectivity & Enablement

## Progress update on other matters within the ESA region

In addition to the various matters discussed above, the following section will also provide a summary of other Customs Administration and Trade related matters discussed during the course of the webinars.

### [RKC](#)

A topic of conversation that has been widely discussed by the Private Sector (and indeed the PSCG in their meeting in June) has been the Revised Kyoto Convention (RKC). Some Private Sector members felt that the adoption of the RKC was overdue with no amendments being proposed to either the General or Specific Annexes after the PSCG review of it. The PSCG is still working with the WCO. A Working Group has been established with a TOR to horizontally ensure a better monitoring and uniform application and vertically, to link the RKC better to Free Trade Zones. Private Sector needs to know what is being discussed; however, progress on discussions has been less than ideal for the constructive input from Private Sector at large. Management meetings have taken place but there has been the withdrawal by the USA, the EU being against Appendix III of the RKC, and Russia becoming a permanent observatory member.

Within this scope, PSCG has requested clarity regarding the RKC. Private Sector is not refusing cooperation in this matter, rather requesting that there is a re-enforcement

on the position of the RKC, which has been made to the WCO Policy Committee. The PSCG has therefore agreed to participate in discussion in October 2019.

Feedback has been received from SARS, stating that “We (SARS) are actively participating in the RKC Review Working Group.” The PSCG members have inquired whether they have access to the WG of the RKC revision (next meeting planned from 14th till 18th of October in Brussels).

This is however not the case since the RKC review is at a management committee level. Private Sector is therefore eagerly awaiting an update from the RKC Review Working Group.

### *Bond Guarantee system*

Transit bond guarantees at a regional level continues to be a concern. The recent AU meeting provided some insights on these matters within each region. Moreover, a suggestion was made during the AU meeting that a continental bond guarantee system or a tripartite bond guarantee system should be developed and that acquittals should be based on mutual recognition. It was decided that a comprehensive study on the different transit procedures will be commissioned.

### *World Bank Ease of Doing Business - Trading across borders*

A great disparity between the countries in Africa is currently evident in the World Bank’s Ease of Doing Business rankings (note Annex C & D). The problem universally seems to lie with the Customs processes and the standardising of business processes as reflected by the WB’s findings. It was further noted that there are a lot of discussions at the WCO around whether the way in which the WB’s measures performance actually gives an accurate and a true picture. The general feeling from the ESA region is that the WB’s methodology is not as sound for Customs management processes as reflected in the trading across Borders index. This assumption can be problematic as the WB index and findings are used for commercial realities and the Private Sector views these as important indexes. Therefore more time and effort is called for from Private Sector and Customs Administrations across the region to work collectively to portray an accurate picture.

ESA Customs Authorities recently met in Botswana and concurrently felt that the WB’s parameters and indices do not favour Customs practices and members in the region. It was noted that a contributing factor is that many Customs Administrations within the region felt that a lot of their work is intertwined with other government agencies (such as Port Health, Police, Bureau of Standards and Port Authorities). Nonetheless, the general view of the Private Sector was however in agreement with the WB’s findings; whereas the general view of government was not in agreement with the WB. Furthermore, the Commissioners from the ESA feel that the WB needs to meet up with them to discuss both additional or other parameters and indices, since it seems to be a cross-cutting theme. The ESA Customs Administrations therefore feel there is a case for better involvement of Customs Administration in the WB’s parameters.

It was therefore suggested that the group produce a white paper around the WB’s methodology. It was agreed that a first draft will be drawn up and circulated for inputs on the matter for reviewing at the next webinar. The importance of input by Trade was stressed by the group. Moreover, it was noted that the WB’s methodology was a

controversial topic presently and that it is important for the ESA- RPSG to add their voices to the discussion.

## Feedback from the WCO-PSCG

The WCO Private Sector Consultative Group meeting was held at the WCO Headquarters in Brussels, Belgium on the 24<sup>th</sup> and 25<sup>th</sup> of June. During the two-day meeting, the PSCG discussed its recurring work on the Comprehensive Review of the Revised Kyoto Convention (RKC), Performance Measurement, the WCO Study Report on Disruptive Technologies – Exploring possibilities for PSCG contribution and Non-Negotiated Tariffs and Retaliatory Tariffs.

In addition, the PSCG reviewed the status of the WCO Cross-Border E-Commerce Framework of Standards and expressed its support for the Framework and its commitment to participate in any additional WCO work on e-commerce. PSCG members further contributed to a paper on Non-Negotiated Tariffs and Retaliatory Tariffs and their impact on business in which the PSCG identified a number of areas of relevance and possible actions by Customs. This report therefore summarizes the main points discussed during this two-day meeting with a prescient view of future work connecting Customs Administrations with the Private Sector.

## Assistance for the WCO-PSCG

The following five items will greatly aid in assisting with C-2-B relationship with specific focus on monitoring and evaluation in the ESA Region. Efforts can be initiated to help developing strong partnerships, however the guidance is needed from the WCO-PSCG as this body was instrumental in the successful development and maintenance of the WCO-SAFE Instrument. This WCO Instrument found its value in the three pillars of engagement, C-2-C, C-2-B. C-2-other Government law enforcement agencies around the world:
















1. Innovative thinking – for exploring and identifying the pertinent issues in the ESA Region
2. Guidance – on the ESA Region's approach in solutions around the pertinent issues in the region
3. Best Practice Examples – the work that has been done in other regions can be replicated in the ESA Region, therefore best practices should be identified
4. Knowledge sharing – taking the best practices from around the world and sharing them throughout the region
5. Training – increase the capacity building and awareness in the Private Sector



## ANNEXURE A

### EAST AND SOUTHERN AFRICA

#### CUSTOMS INTERFACE PLATFORM (2019)

Country	Platform
 Angola	ASYCUDA
 Botswana	BURS Customs Management System (CMS) - Crimson Logic
 Burundi	ASYCUDA
 Comoros	ASYCUDA
 Djibouti	ASYCUDA
 Eritrea	ASYCUDA
 Eswatini	ASYCUDA
 Ethiopia	ERCA Electronic Customs Management System (eCMS)
 Kenya	KRA Integrated Customs Management System (iCMS)
 Lesotho	ASYCUDA
 Madagascar	ASYCUDA
 Malawi	ASYCUDA
 Mauritius	MRA Customs Management System (CMS)
 Mozambique	Mozambique Customs Management System (MCMS)
 Namibia	ASYCUDA
 Rwanda	ASYCUDA
 Seychelles	ASYCUDA
 Somalia	-
 South Africa	SARS Interfront Customs and Border Management Solution (iCBS)
 South Sudan	-
 Tanzania	Tanzania Customs Integrated System (TANCIS)
 Uganda	ASYCUDA
 Zambia	ASYCUDA
 Zimbabwe	ASYCUDA

## ANNEXURE B

### EAST AND SOUTHERN AFRICA

























#### AEO/PT PROGRAMS

Country	Program Title	Maturity Level	Program Launched	# of Operators
 Angola	Angola AEO Program	-	2019 (estimate)	20
 Botswana	Trans Kalahari Accreditation Scheme	Low	2010	-
 Burundi	AEO	Medium	2014	13
 Comoros	-	-	-	-
 Djibouti	AEO	-	-	-
 Eritrea	-	-	-	-
 Eswatini	-	-	-	-
 Ethiopia	-	-	-	-
 Kenya	AEO	High	2010	64
 Lesotho	Preferred Trader Programme pilot	Low	2014	-
 Madagascar	Accelerated Clearance Program	High	2011	108
 Malawi	-	-	-	-
 Mauritius	AEO	High	2007	33
 Mozambique	AEO	Low	2012	6
 Namibia	-	-	-	-
 Rwanda	Compliant Trader schemes	Medium	2008	22
 Seychelles	AEO	-	2019 (estimate)	-
 Somalia	-	-	-	-
 South Africa	Preferred Trader Program	Medium	2017	101
 South Sudan	-	-	-	-
 Tanzania	Compliant Traders' Scheme	High	2007	52
 Uganda	AEO	Medium	2013	36
 Zambia	Customs Accredited Clients Program	Medium	2012	59
 Zimbabwe	-	-	-	-

## ANNEXURE C

### EAST AND SOUTHERN AFRICA

#### WORLD BANK: Ease of Doing Business (2019) - Trading across borders

























Country	Rank (out of 190)	Score (out of 100)	Score Change (2018)
 Angola	174	36.15	10.87
 Botswana	55	86.65	-
 Burundi	169	47.34	0.32
 Comoros	118	66.87	-
 Djibouti	145	59.37	7.50
 Eritrea	189	0.00	-
 Eswatini	32	92.92	-
 Ethiopia	154	56.00	10.66
 Kenya	112	68.06	0.43
 Lesotho	38	91.86	0.26
 Madagascar	138	60.95	-
 Malawi	126	65.29	-
 Mauritius	69	81.00	1.10
 Mozambique	91	73.84	6.59
 Namibia	136	61.47	-
 Rwanda	88	74.98	2.54
 Seychelles	95	71.79	-
 Somalia	164	51.60	-
 South Africa	143	59.64	1.63
 South Sudan	180	26.19	-
 Tanzania	183	20.21	-
 Uganda	119	66.73	4.65
 Zambia	156	56.88	-
 Zimbabwe	157	54.34	-1.13



## ANNEXURE D

### EAST AND SOUTHERN AFRICA

#### WORLD BANK: Documentary Compliance (2019)

Country	Cost to Export (US\$)	Time to Export (Hours)	Cost to Import (US\$)	Time to Import (Hours)
 Angola	240	96	460	96
 Botswana	179	18	67	3
 Burundi	150	120	1025	180
 Comoros	124	50	93	26
 Djibouti	95	60	100	50
 Eritrea	..	..	..	..
 Eswatini	76	2	76	4
 Ethiopia	175	76	750	194
 Kenya	191	19	115	60
 Lesotho	90	1	90	1
 Madagascar	117	49	150	58
 Malawi	342	75	162	55
 Mauritius	128	9	166	9
 Mozambique	160	36	60	16
 Namibia	348	90	63	3
 Rwanda	110	30	121	48
 Seychelles	115	44	93	33
 Somalia	350	73	300	76
 South Africa	55	68	73	36
 South Sudan	194	192	350	360
 Tanzania	275	96	375	240
 Uganda	102	24	296	96
 Zambia	200	96	175	72
 Zimbabwe	170	99	150	81
<b>Average</b>	<b>173</b>	<b>62</b>	<b>231</b>	<b>78</b>