QUALITY FOR AFRICA





SPS Stocktaking Document – 2019 –

The PAQI initiative is supported by





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FOREWORD

As part of its efforts to contribute to the development of quality infrastructure (QI) on the continent, the Pan African Quality Infrastructure institutions have instituted programmes to continuously assess developments in the area of QI in Africa with a view to identifying where critical gaps exist and facilitating capacity building as necessary. Two cycles of assessment of the QI elements including Standardization, Metrology and Accreditation have already been carried out and a third round of assessment is being carried out with the report being published in 2020.

Noting the close relationship between QI and Sanitary and Phytosanitary (SPS) issues, the project to carry out stocktaking in the thematic areas of SPS (Food Safety, Plant Health and Animal Health) has also been initiated and this report provides the results of the SPS survey of 43 African countries who were able to submit their information. Stocktaking information in QI and SPS is important in the facilitation of trade and achievement of industrial and agricultural development goals. Information gathered during stocktaking will assist policy makers to identify where there are weaknesses and to take corrective measures as necessary. Benchmarking against global trends is also made possible.

This report will as well help Member States to grasp a number of good practices that exist to improve the implementation of SPS measures in a way that facilitates safe trade.

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CONTENT

ΑC	CKNOWLEDGEMENTS	III
LIS	ST OF ACRONYMS	VI
1.	Introduction	1
	1.1 Notification authorities	
	1.2. Food safety	4
	1.3. Animal health	6
	1.4. Plant health	8
2.	Summary of the SPS status in Africa	10
	2.1 Methodology	. 10
	2.2 Summary	11

LIST OF ACRONYMS

AfCFTA African Continental Free Trade Area
ARSO African Organization for Standardization

AU African Union

AUC African Union Commission

AUC-DREA AUC Department of Rural Economy and Agriculture

AUC-DTI AUC Department of Trade and Industry

AU-IAPSC African Union Inter-African Phytosanitary Council
AU-IBAR African Union Inter-African Bureau for Animal Resources
CABI Centre for Agriculture and Bioscience International

CAC Codex Alimentarius Commission FAO Food and Agriculture Organisation

IITA International Institute of Tropical Agriculture IPPC International Plant Protection Convention

NGO Non Governmental Organisation
NPPO National Plant Protection Organisation

NTBs Non-tariff barriers to trade

OIE World Organisaton for Animal Health
PACA Partnership for Aflatoxin Control in Africa

PAQI Pan-African Quality Infrastructure

QI Quality Infrastructure

REC Regional Economic Community
SPS Sanitary and Phytosanitary Measures

TBT Technical Barriers to Trade
WHO World Health Organisation
WTO World Trade Organisation

WTO/STDF WTO Standards and Trade Development Facility

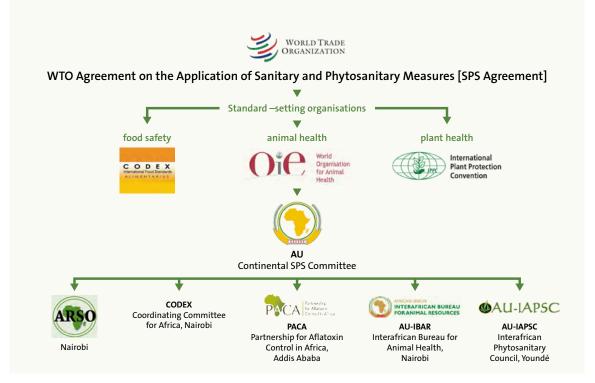


Figure 1

1. INTRODUCTION

Central to the success of Africa's agricultural development strategies is the ability of Member States to meet Sanitary and Phytosanitary (SPS) standards for both the assurance of food safety, plant and animal life or health, as well as market access. With this in mind, African Ministers of Trade at their meeting in December 2014 called upon the African Union Commission (AUC) and Pan African Quality Infrastructure (PAQI) institutions to assess the status of Quality Infrastructure in Africa. The purpose was to give a summarized and easy framework to understand the picture of where African countries stand in terms of their capacity to implement standards/measures for safety, agricultural and industrial development and trade. This was re-emphasized at the start of the AfCFTA negotiations where cooperation in the area of standards and addressing nontariff barriers to trade (NTBs) was identified as important for the successful implementation of the historic free trade agreement.

Under the leadership of the AUC Department of Trade and Industry (DTI) and the Pan African Quality Infrastructure (PAQI) Secretariat, an assessment of the standardization, metrology and accreditation capacities of African countries was carried out in 2014 and updated in 2017. The findings are captured in a report named PAQI Stocktaking Document for Technical Barriers to Trade (TBT) which was a useful reference for the TBT situational analysis in Africa at the start of AfCFTA negotiations.

A similar exercise has been undertaken for SPS measures largely based on the requirements of the AfCFTA Protocol on Trade in Goods Annex on SPS measures. AU Member States capacity to meet the SPS Measures annex requirements was assessed and scored against a set of pre-determined indicators. This will enable policy makers to see at a glance where SPS capacity gaps exist and to accurately direct investments to achieve the necessary corrective capacity developmental measures.

After one year of data collection, a total of 43 countries submitted their responses, 38 countries among them submitted fully completed questionnaires equivalent to 69% which enabled the PAQI Secretariat to draw a total picture of the SPS capacity status in Africa. Currently the SPS architecture of Africa at continental level comprises organisations working in the thematic areas as follows:

Food Safety: African Organization for Standardization (ARSO), Department of Rural Economy and Agriculture (DREA), Partnership for Aflatoxin Control in Africa (PACA), CODEX. Africa Plant Health: African Union Inter-Africa Phytosanitary Council (AU-IAPSC) Animal Health: African Union Inter-Africa Bureau for Animal Resources (AU – IBAR).

It should be noted that through collaboration and ensure that food safety issues are addressed across the entire food chain, the animal health and plant health institutions also carry out activities related to food safety.

1.1 Notification authorities

Under the World Trade Organization Agreement on the Application of Sanitary and Phytosanitary (SPS) Measures agreement, each Member of the WTO has obligations relating to "transparency". Under this obligation, Members are required to provide prior "notification" of proposed SPS measures. The notification

system facilitates trade by allowing some lead time before new measures must be complied with (a "no surprises" approach).

For example, countries are required to publish all sanitary and phytosanitary measures (SPS measures) and "notify" changes to SPS measures. In implementing the agreement, coun-

CATEGORY	CRITERIA					
1 Well developed	 Guiding principles established (i.e. SPS legislative framework, national SPS committee, Participation in the WTO SPS Committee) Capacity to implement the concept of regionalization (Presence of disease or pest free areas, Zoning and compartmentalization based on scientific evidence, sufficient technical and human resource capacity to carry out disease or pest surveillance) Equivalence developed based on those developed by the WTO SPS committee Audit and verification procedures in place based on principles and guidelines established by international standards bodies Availability of risk based inspection based on international standards, guidelines or recommendations Availability of National SPS Focal point and Notification Authority and documented notifications Emergency procedure in place 					
2 Reasonably developed	 Guiding principles established Reasonable capacity to implement the concept of regionalization Equivalence developed based on those developed by the WTO SPS committee Audit and verification procedures in place based on principles and guidelines established by international standards bodies Adequate availability of risk-based inspection based on international standards, guidelines or recommendations Availability of National SPS Focal point and Notification Authority and documented notifications Emergency procedure in place or under development 					
3 Limited to partially developed	 Not all guiding principles established Limited capacity to implement the concept of regionalization Equivalence partially developed based on those developed by the WTO SPS committee Audit and verification procedures in place based on principles and guidelines established by international standards bodies only partially Limited availability of risk-based inspection based on international standards, guidelines or recommendations Limited availability of National SPS Focal point and Notification Authority and documented notifications Emergency procedure not in place or under development 					
4 Not or very limited developed	 Not all guiding principles established No or very limited capacity to implement the concept of regionalization Equivalence not or only partially developed based on those developed by the WTO SPS committee No audit and verification procedures in place based on principles and guidelines established by international standards bodies No or very limited availability of risk-based inspection based on international standards, guidelines or recommendations No or very limited availability of National SPS Focal point and Notification Authority and documented notifications Emergency procedure not in place 					

Table 1: Classification criteria for notification authorities

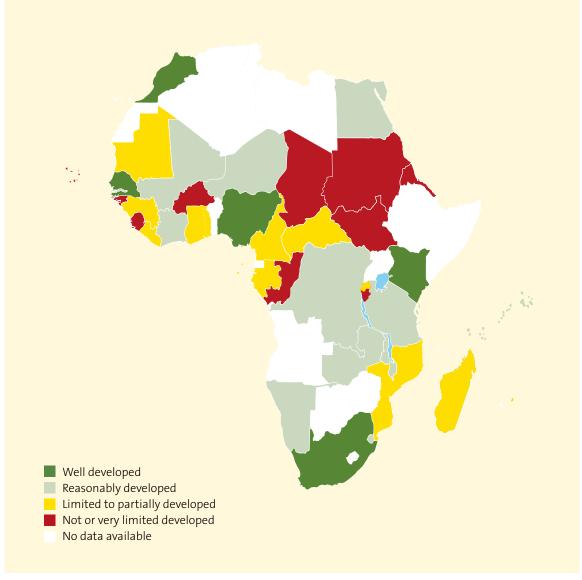


Figure 2: Notification autorities stocktaking

tries are required to identify a single central government authority to be responsible for the notification requirements of the SPS Agreement (the notification authority). An important advantage of the notification system is allowing other countries to comment on proposed measures being planned by other Members. Transparency creates a predictable trading environment.

To fulfil transparency obligations, countries are also required to establish an "enquiry point" responsible for answering questions from other countries about SPS measures and related issues.

Most African countries have established their SPS Notification authorities within the Ministries dealing with agricultural issues.

CATEGORY	COUNTRY
1	Kenya, Morocco, Nigeria, Senegal, South Africa
2	Cote d'Ivoire, Dem. Republic of Congo, Eswatini, Egypt, Gambia, Malawi, Mali, Namibia, Niger, Seychelles, Tanzania, Zambia
3	Cameroon, Central Republic of Africa, Gabon, Ghana, Guinea, Liberia, Madagascar, Mauritania, Mauritius, Mozambique, Rwanda, Sao Tome and Principe, Togo
4	Burkina Faso, Burundi, Cape Verde, Chad, Congo Brazzaville, Eritrea, Guinea-Bissau, Sierra Leone, South Sudan, Sudan

Table 2: Classification of capabilities

1.2. Food safety

Unsafe food is a threat to human health and contributes to food insecurity, poverty and a range of health related problems making national development and lasting peace more challenging. Whilst governments have focused mostly on food production and sufficiency to ensure availability of food to their populations, food safety, food quality and nutrition have, overall, been given lesser priority until recent years.

The burden of unsafe foods is most felt in Africa where, according to the WHO, 91 million people fall ill each year due to food-borne diseases and 137,000 die of the same cause, representing one-third of the global death toll although

Africa accounts for only 16% of the global population. Moreover, food safety has become an important precondition for access to global food markets and increasingly, for high-value domestic markets in developing countries. Cognizant of the impact food safety has in Africa; the African Union Commission, through DREA, has placed high-level political commitments to ensure that the issues of food safety are adequately addressed in order to meet development targets in the Malabo Declaration, Agenda 2063 and Sustainable Development Goals. Organisations like the Partnership for Aflatoxin Control in Africa (PACA), CODEX Africa, and ARSO, with linkages to national

CATEGORY	CRITERIA
1 Well developed	 Full Capacity to conduct Risk Assessment on human health for setting or updating SPS measures (Availability of institution undertaking risk assessment, availability of human, financial and material capacity to undertake risk assessment and risk assessment reports Full capacity regarding harmonization (i.e. Participation in the work of Codex Alimentarius Commission (CAC), available national coordination mechanism for participation in CAC work) National measures are based on international standards, guidelines or recommendations and other national measures supported by scientific justification
2 Reasonably developed	 Reasonable capacity to conduct Risk Assessment on human health for setting or updating SPS measures (Availability of institution undertaking risk assessment, availability of human, financial and material capacity to undertake risk assessment and risk assessment reports Reasonable capacity regarding harmonization (i.e. Participation in the work of CAC, available national coordination mechanism for participation in CAC work) National measures are based on international standards, guidelines or recommendations and other national measures supported by scientific justification
3 Limited to partially developed	 Limited capacity to conduct Risk Assessment on human health for setting or updating SPS measures (Availability of institution undertaking risk assessment, limited availability of human, financial and material capacity to undertake risk assessment and risk assessment reports Limited capacity regarding harmonization (i.e. limited participation in the work of CAC, national coordination mechanism for participation in CAC work under development) National measures are based on international standards, guidelines or recommendations and other national measures supported by scientific justification
4 Not or very limited developed	 No or very limited capacity to conduct Risk Assessment on human health for setting or updating SPS measures (no institution undertaking risk assessment, limited or no availability of human, financial and material capacity to undertake risk assessment and risk assessment reports No or very limited capacity regarding harmonization (i.e. limited participation in the work of CAC, no national coordination mechanism for participation in CAC work under development) National measures are based on international standards, guidelines or recommendations, other national measures not supported by scientific justification

Table 3: Classification criteria for Food safety

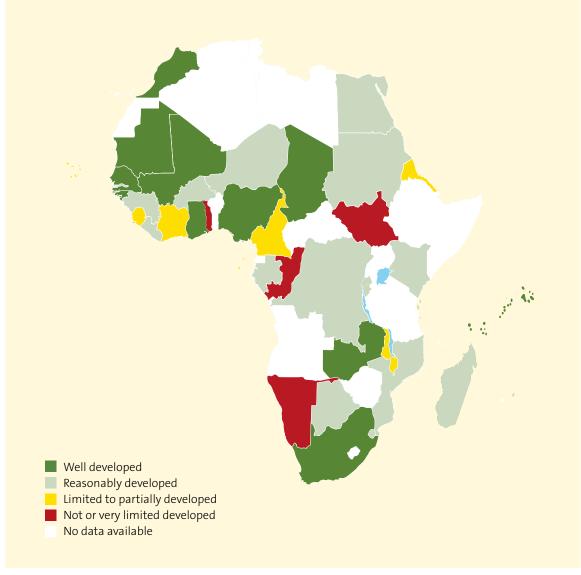


Figure 3: Food safety stocktaking

CODEX committees and national standards bodies are working to ensure the availability and implementation of food standards on the continent. To ensure that the entire food chain is addressed, the concept of "farm to fork" is normally adopted. This implies that in order to ensure the safety of food, it is necessary to consider all aspects of the food production chain as a continuum from and including primary production and the production of animal feed up

to and including sale or supply of food to the consumer. This is because each element may have a potential impact on food safety. Consequently organisations dealing with plant health (AU-IAPSC), and animal health (AU-IBAR) in Africa, also contribute to food safety. Food safety is very important in intra-Africa trade, enabling food business operators to provide safe food, access to market and increase consumer confidence.

CATEGORY	COUNTRY
1	Chad, Ghana, Guinea-Bissau, Mali, Mauritania, Morocco, Nigeria, Senegal, Seychelles , South Africa, Zambia
2	Botswana, Burkina Faso, Burundi, Dem. Republic of Congo, Egypt, Eswatini, Gabon Republic, Gambia, Guinea, Kenya, Liberia, Madagascar, Mauritius, Mozambique, Niger, Rwanda, Sudan
3	Cameroon, Cape Verde, Cote d'Ivoire, Eritrea, Malawi, Sao Tome and Principe, Sierra Leone
4	Congo Brazzaville, Namibia, South Sudan, Togo

Table 4: Classification of capabilities in Food safety

1.3. Animal health

Established in 1951, the African Union Interafrican Bureau for Animal Resources (AU-IBAR), is a specialized technical office of the African Union. It was originally known as the Inter-African Bureau of Epizootic Diseases and was mainly concerned with rinderpest control. Its mandate was later expanded to other major animal diseases and finally to all aspects of animal resource development. AU-IBAR programmes are focused on Animal Health and production as well as trade and markets.

AU-IBAR offices are located in Nairobi, Kenya. AU-IBAR works closely with RECs Secretariat

units dealing with Animal Health matters and also represents African interests at the World Organisation of Animal Health, the OIE. Currently, with no dedicated continental authority for Food Safety, AU-IBAR also contributes to the management of Food Safety issues in Africa in close collaboration with the African Union Department of Rural Economy and Agriculture (AU-DREA), the African Union Interafrican Phytosanitary Council (AU-IAPSC), the African Organisation for Standardisation, (ARSO), CODEX Africa and the RECs.

CATEGORY	CRITERIA
1 Well developed	 Full capacity to conduct Risk Assessment on animal health for setting or updating SPS measures (Availability of institution undertaking risk assessment, availability of human, financial and material capacity to undertake risk assessment and risk assessment reports Full capacity regarding harmonization (i.e. Participation in the work of OIE, available national coordination mechanism for participation in OIE work) National measures are based on international standards, guidelines or recommendations and other national measures supported by scientific justification
2 Reasonably developed	 Reasonable capacity to conduct Risk Assessment on animal health for setting or updating SPS measures (Availability of institution undertaking risk assessment, availability of human, financial and material capacity to undertake risk assessment and risk assessment reports Reasonable capacity regarding harmonization (i.e. Participation in the work of OIE, available national coordination mechanism for participation in OIE work) National measures are based on international standards, guidelines or recommendations and other national measures supported by scientific justification
3 Limited to partially developed	 Limited capacity to conduct Risk Assessment on animal health for setting or updating SPS measures (Availability of institution undertaking risk assessment, limited availability of human, financial and material capacity to undertake risk assessment and risk assessment reports Limited capacity regarding harmonization (i.e. limited participation in the work of OIE, national coordination mechanism for participation in OIE work under development) National measures are based on international standards, guidelines or recommendations and other national measures supported by scientific justification
4 Not or very limited developed	 No or very limited capacity to conduct Risk Assessment on animal health for setting or updating SPS measures (no institution undertaking risk assessment, limited or no availability of human, financial and material capacity to undertake risk assessment and risk assessment reports No or very limited capacity regarding harmonization (i.e. limited participation in the work of OIE, no national coordination mechanism for participation in OIE work under development) National measures are based on international standards, guidelines or recommendations, other national measures not supported by scientific justification

Table 5: Classification criteria for Animal health

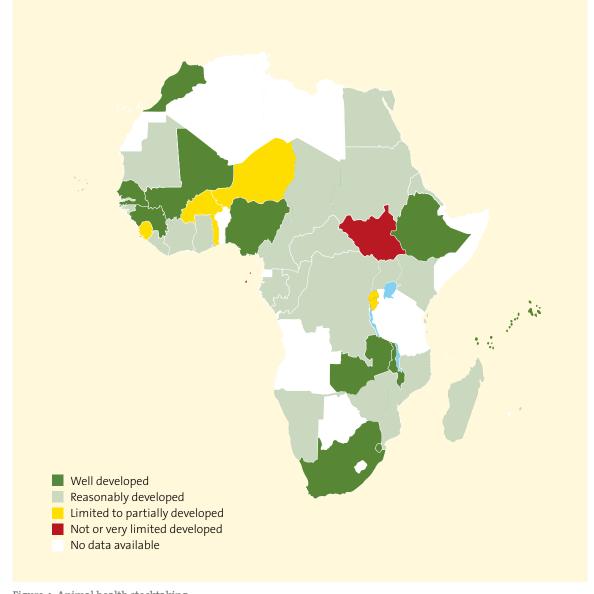


Figure 4: Animal health stocktaking

CATEGORY	COUNTRY			
1	Eswatini, Ethiopia, Guinea, Malawi, Mali, Morocco, Nigeria, Senegal, Seychelles, South Africa, Zambia			
2	Cameroon, Cape Verde, Chad, Central Republic of Africa, Congo Brazzaville, Cote d'Ivoire, Dem. Republic of Congo, Egypt, Eritrea, Gabon, Gambia, Ghana, Guinea-Bissau, Kenya, Liberia, Madagascar, Mauritania, Mauritius, Mozambique, Namibia, Sudan, Uganda, Zimbabwe			
3	Burkina Faso, Burundi, Niger, Rwanda, Sierra Leone, Togo			
4	Sao Tome and Principe, South Sudan			

Table 6: Classification of Animal health

1.4. Plant health

The African Union Inter-African Phytosanitary Council (AU-IAPSC), is the Regional Plant Protection Organization of the International Plant Protection Convention (IPPC) in charge of Africa (55 countries). It is also a Specialized Technical Office of the Department of Rural Economy and Agriculture (DREA) of the African Union Commission (AUC) in charge of plant protection. AU-IAPSC plays an important role in the cooperative endeavor to implement, at continental level, the IPPC's functions and promote good agricultural and pesticides management practices. It promotes the increase of agricultural production and market access. AU-IAPSC's mission is to develop, promote and coordinate sustainable plant health systems among continental, regional and national actors for increased agricultural production and market access. In addition of its roles as described in article IX of the IPPC Convention, IAPSC also does the following:

- Facilitation and support in the process of elaboration of harmonized policies, standards procedures and guidelines;
- facilitation and articulation of common African positions on aspects of phytosanitary matters in international fora;
- promotion of technical leadership and advisory services to member states;
- sensitization and advocacy on issues relevant for continental plant protection; and
- data collection, management and exchange of information on pests

CATEGORY	CRITERIA				
1 Well developed	 Full Capacity to conduct Risk Assessment on plant health for setting or updating SPS measures (Availability of institution undertaking risk assessment, availability of human, financial and material capacity to undertake risk assessment and risk assessment reports Full capacity regarding harmonization (i.e. Participation in the work of IPCC, available national coordination mechanism for participation in IPCC work) National measures are based on international standards, guidelines or recommendations and other national measures supported by scientific justification 				
2 Reasonably developed	 Reasonable capacity to conduct Risk Assessment on plant health for setting or updating SPS measures (Availability of institution undertaking risk assessment, availability of human, financial and material capacity to undertake risk assessment and risk assessment reports Reasonable capacity regarding harmonization (i.e. Participation in the work of IPCC, available national coordination mechanism for participation in IPCC work) National measures are based on international standards, guidelines or recommendations and other national measures supported by scientific justification 				
3 Limited to partially developed	 Limited capacity to conduct Risk Assessment on plant health for setting or updating SPS measures (Availability of institution undertaking risk assessment, limited availability of human, financial and material capacity to undertake risk assessment and risk assessment reports Limited capacity regarding harmonization (i.e. limited participation in the work of IPCC, national coordination mechanism for participation in IPCC work under development) National measures are based on international standards, guidelines or recommendations and other national measures supported by scientific justification 				
4 Not or very limited developed	 No or very limited capacity to conduct Risk Assessment on plant health for setting or updating SPS measures (no institution undertaking risk assessment, limited or no availability of human, financial and material capacity to undertake risk assessment and risk assessment reports No or very limited capacity regarding harmonization (i.e. limited participation in the work of IPCC, no national coordination mechanism for participation in IPCC work under development) National measures are based on international standards, guidelines or recommendations, other national measures not supported by scientific justification 				

Table 7: Classification criteria for Plant health

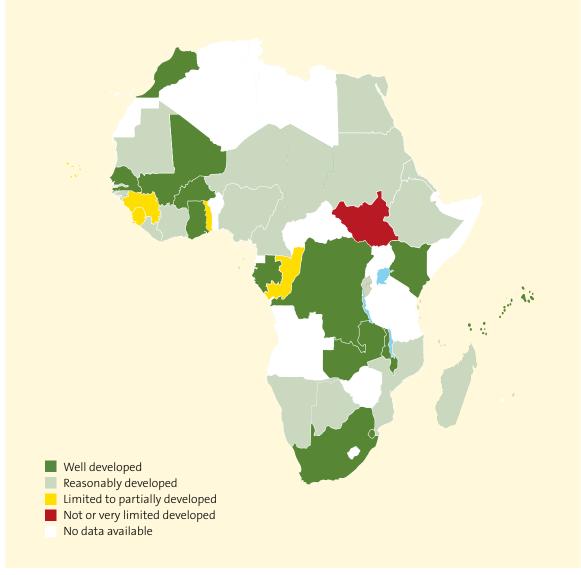


Figure 5: Plant health stocktaking

AU-IAPSC is based in Yaoundé, Cameroon, and its key stakeholders are the 55 AU member states through their National Plant Protection Organizations (NPPOs), the 8 AU recognised Regional Economic Communities (RECs), International Plant Protection Convention Secretariat, the Food and Agriculture Organization (FAO),

International Institute of Tropical Agriculture (IITA), Centre for Agriculture and Bioscience International (CABI), WTO Standards and Trade Development Facility (WTO/STDF), Non Governmental Organisation (NGOs), Agro-industries and trade institutions, farmers organizations and Agricultural institutions of learning.¹

1 https://www.ippc.int/static/.../en/.../AU-IAPSCRPPOTCMemphis_2015_K2k3s7y.pptx

CATEGORY	COUNTRY			
1	Burkina Faso, Dem. Republic of Congo, Eswatini, Gabon, Ghana, Kenya, Malawi, Mali, Morocco, Senegal, Seychelles, South Africa, Zambia			
2	Botswana, Burundi, Cameroon, Chad, Comoros, Cote d'Ivoire, Egypt, Eritrea, Ethiopia, Gambia, Guinea-Bissau, Liberia, Madagascar, Mauritania, Mauritius, Mozambique, Namibia, Niger, Nigeria, Rwanda, Sao Tome and Principe, Sudan,			
3	Cape Verde, Congo Brazzaville, Guinea, Sierra Leone, Togo			
4	South Sudan			

Table 8: Classification of capabilities in Plant health

2. SUMMARY OF THE SPS STATUS IN AFRICA

2.1 Methodology

The classification of the SPS status in the Member states within the four sections Notification Authorities, Food safety, Animal Health and Plant Health is based on a questionnaire. The questionnaire was developed largely based on the requirements arising from the AfCFTA Protocol on Trade in Goods Annex on SPS measures. The questionnaire was validated during a workshop held in Nairobi from 4 – 5 October 2018 with participation from continental organizations dealing with SPS issues as well as representatives from the regional economic communities. AU Member States capacity to meet the SPS Measures annex requirements is assessed and scored against a set of pre-determined indicators.

The questionnaires (available in English, French, Portuguese and Arabic) were sent out to the respective structures in the Member States. The prescribed answers ("yes", "no", "limited", "under development") were transferred into a scoring system.

Four categories for the classification of the status were chosen:

- Well developed capacity
- Reasonably developed capacity
- Limited to partially developed capacity
- Non or very limited capacity

The classification intervals are presented as follows for the different thematic areas:

a) Notification Authorities: (range o to 32 points)

- The score o to 11 reflects a status with no or very limited capacity (red).
- The score 12 to 18 is interpreted with a partially developed capacity but still with the need to develop further (yellow).
- The score 19 to 25 reflects an already reasonably developed capacity (light green)
- The score 26 to 32 indicates that the capacity is considered to be well developed (green).

b) Food Safety, Animal Health and Plant Health: (range o to 14 points).

- The score o to 3 reflects a status with no or very limited capacity (red),
- The score 4 to 7 shows a partially developed capacity but still with the need to develop further (yellow),

- The score 8 to 11 reflects an already reasonably developed capacity (light green)
- The score 12 to 14 indicates that the capacity is considered to be well developed (green).

c) Overall SPS status:

The overall status of SPS in a member state is calculated by agglomerating the scores of the four thematic areas. (range o to 74 points).

- The score o to 20 reflects no or limited overall SPS capacity (red),
- The score 21 to 39 reflects limited or partially developed capacity (yellow),
- The score 40 to 58 reflects reasonably developed capacity (light green)
- The score 59 to 74 reflects well-developed SPS capacity in the member state (green).

2.2 Summary

The basic idea of the stocktaking is to enable policy makers to see at a glance where SPS capacity gaps exist and to accurately direct investments to achieve the necessary corrective capacity developmental measures.

Out of the 55 Member States 38 sent back a complete questionnaire.

Having a closer look into the criteria of the different categories it becomes visible that in most cases the guiding principles such as a SPS legislative framework or a national SPS committee are available in the Member States, but for example the availability of documented specific SPS related trade concerns as well as the participation in the WTO SPS Committee activities remains a challenge. Also, the availability of a competent authority to conduct audits or verifications continues to be work in progress. Early warning and emergency procedures are mostly not yet in place or only under development. From the feedback of the questionnaires in the areas of Food safety, Animal Health and Plant Health it becomes evident that even if the respective institution necessary in the country to undertake the risk assessments is established, it remains a challenge to provide human and financial capacities to fulfill the duties and to maintain the status quo.

On the other hand, the feedback of the Member States affirms that in general the national measures in each area are based on the respective international standards, guidelines or recommendations. The stocktaking shows that fulfilling the requirements for a functional system in the area of SPS is a demanding task and to achieve and to maintain a sufficiently working level is closely linked to the availability of human and financial resources.

It is indispensable that Member States strive towards a "dark green" status to not only fulfil the SPS requirements set at international level but also agreed upon in the AfCFTA SPS Annex. Only then, Member States will benefit from an increasing intra-African trade as well as increase their level of participation in international trade.



NO	COUNTRY	Notific. Auth.	Food Safety	Animal Health	Plant Health	overall SPS status
1	Algeria					
2	Angola					
3	Benin					
4	Botswana					
5	Burkina Faso					
6	Burundi					
7	Cameroon					
8	Cape Verde					
9	Central Republic of Africa					
10	Chad					
11	Comoros					
12	Congo Brazzaville					
13	Cote d'Ivoire					
14	Dem. Republic of Congo					
15	Djibouti					
16	Egypt					
17	Equatorial Guinea					
18	Eritrea					
19	Eswatini					
20	Ethiopia					
21	Gabon					
22	Gambia					
23	Ghana					
24	Guinea					
25	Guinea-Bissau					
26	Kenya					
27	Lesotho					
28	Liberia					
29	Libya					

NO	COUNTRY	Notific. Auth.	Food Safety	Animal Health	Plant Health	overall SPS status
30	Madagascar					
31	Malawi					
32	Mali					
33	Mauritania					
34	Mauritius					
35	Morocco					
36	Mozambique					
37	Namibia					
38	Niger					
39	Nigeria					
40	Rwanda					
41	Sahrawi Republic					
42	Sao Tome and Principe					
43	Senegal					
44	Seychelles					
45	Sierra Leone					
46	Somalia Republic					
47	South Africa					
48	South Sudan					
49	Sudan					
50	Tanzania					
51	Togo					
52	Tunisia					
53	Uganda					
54	Zambia					
55	Zimbabwe					

