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**PROPOSAL ON INSTITUTIONALIZING A RISK BASED
APPROACH IN APPLICATION OF SANITARY AND
PHYTOSANITARY MEASURES**

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Acronyms

ALOP	Appropriate level of protection
ASYCUDA	Automated System for Customs Data
CA	Competent authority
CAADP	Comprehensive Africa Agriculture Development Programme
EAC	East African Community
EATIH	East Africa Trade and Investment Hub
EAPIC	East Africa Pest Information Committee
EPPO	European Plant Protection Organization
GDP	Gross domestic product
GRP	Good regulatory practice
HACCP	Hazard analysis and critical control points
IT	Information Technology
MS	Member State
NTM	Non-tariff measure
OECD	Organization for Economic Co-operation and Development
OIE	World Organization for Animal Health
PIMS	Pest information management system
PVS	Performance of Veterinary Services
RBA	Risk-based approach
SPS	Sanitary and phytosanitary
SOP	Standard Operating Procedure
STDF	Standards and Trade Development Facility
TBT	Technical Barriers to Trade
TFA	Trade Facilitation Agreement
USAID	United States Agency for International Development
US	United States
WTO	World Trade Organization

I. Background

I.1 US support to EAC

The US government's Trade Africa initiative includes running the East Africa Trade and Investment Hub (EATIH), which aims to deepen regional integration, increase the competitiveness of specific agricultural value chains and promote trade between East Africa and US, thus contributing to the East African Community's (EAC) goals of food security and economic development. While trade may not be the panacea for all the region's development needs, it is widely recognized that both intraregional and international trade can drive economic growth, the rationale for the global emphasis on "Aid for Trade".

In this context, and within a broad framework agreement, in 2015 the US government signed a cooperation agreement with EAC on trade facilitation, sanitary and phytosanitary measures and technical barriers to trade. Article 2 of the agreement concerns sanitary and phytosanitary measures, and lists a number of areas in which the signatories agreed to work together. These include enhancing the technical capacity of EAC states to implement science-based SPS measures, such as through the use of international standards guidelines and recommendations, as well as good regulatory practices. Also included is support to EAC capacity for risk analysis, mitigation and monitoring of risk, in accordance with international standards, guidelines and recommendations.

Within the scope of the US-EAC cooperation agreement, EATIH has commissioned CABI to provide specific SPS capacity development services, including in the area of SPS risk management. These services include training in risk analysis for plant health, animal health and food safety personnel, a review of the organization and implementation of SPS official controls, and the development of a proposal on institutionalizing a risk-based approach in the application of SPS measures.

I.2 The proposal

This document presents the proposal. Section 2 goes into some detail of what a risk-based approach entails, and how it addresses the requirements and principles of both international and regional trade agreements. Section 3 describes the proposed intervention, based on a logical framework. Sections 4 and 5 present proposed implementation arrangements and a budget for the intervention respectively.

"Institutionalize" means to establish something (typically a practice or activity) as a convention or norm in an organization or culture (Oxford Dictionary). In this case the practice is a risk-based approach to the application of SPS measures, and key organizations in this respect are the Competent Authorities (CA) in each member state with the responsibility for plant health, animal health and food safety. However, SPS risks are not only managed by the CAs; many other actors particularly in the private sector also play a significant role. So institutionalizing the risk-based approach needs to include all those that make up the "SPS system", while acknowledging the central role played by the CAs.

2. Risk Based Approach

2.1 Risk

Risk is the probability of something happening multiplied by the magnitude of the negative consequences if it does. An example in the SPS context is the potential introduction of an animal disease to a country through imports of animals. In this case the probability is the likelihood of introducing the disease, which will be a function of many factors including the volume of trade, the origin of the animals, what treatments they may have had etc. The consequence is the economic damage the disease would cause to the importing country, including environmental damage such as disease in wild animals.

A risk is thus different from a hazard. A hazard is the causal agent (biological, chemical or physical) which has the potential to cause negative consequences, but only a specific situation.

Risk can be reduced either by reducing the probability of the unwanted event, or by reducing the consequences of the event should it occur. Reducing risk through specific measures or activities is called risk management, which is the aim in applying sanitary and phytosanitary (SPS) measures.

2.2 What is a risk-based approach?

A risk-based approach is one that views SPS measures and activities through the lens of risk analysis, comprising risk assessment, risk management and risk communication. SPS competent authorities exist in order to manage SPS risks, and therefore in the broad sense, the entire work of competent authorities is risk-based. The fact that the phrase has arisen illustrates that this is not always the case. So a renewed emphasis or stronger focus on the underlying SPS risks is seen as a route to improving the efficiency and effectiveness of SPS systems (including competent authorities and the other actors). A risk-based approach or a risk-focused way of thinking can therefore be applied across many different activities (see below).

A risk-based approach is closely linked to the question of resource use or allocation. The overall goal of SPS systems is to manage risk, and clearly that should be done as effectively and efficiently as possible. This requires decisions to be made concerning resource allocation, so in the SPS context, resources should be allocated to maximize the reduction of risk. This in turn requires an understanding of what the risks are, the costs of risk management measures, and the capacity to assess the benefits (the extent of risk reduction) of the risk management options. Thus a risk-based approach is closely linked to the areas of cost benefit analysis and optimal or rational resource allocation. Resource allocation decisions are made at different levels, and these correspond to different applications of the risk based approach discussed below. A risk-based approach can therefore be seen as ensuring the best return on investment in SPS measures for risk management.

Risk management is a part of managing any organization or enterprise, and ISO 31000:2009 provides an integrated approach (Figure 1). Organizational risks are outside the scope of this proposal, but Figure 1 can be read and applied from an SPS viewpoint.

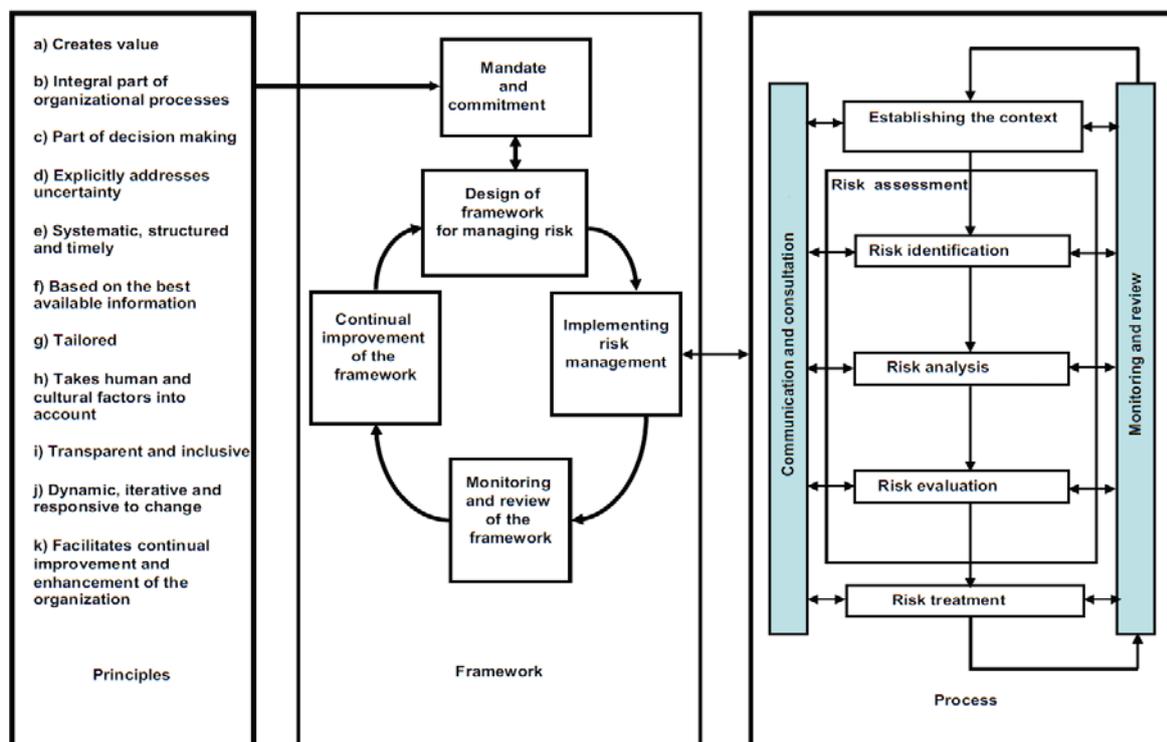


Figure 1. Generalized risk management principles, framework and process. (Source: ISO Standard 31000:2009 risk management principles and guidelines).

2.3 Hazard-based and risk-based approaches

The contrast between hazard-based and risk-based approaches is most commonly articulated in the context of food safety, although the underlying principles can also be applied to animal and plant health. As noted above, a hazard is the causal agent (whether biological, chemical or physical) which has the potential to cause negative consequences. In food safety, the presence of a hazard can be taken as cause for regulation or the application of a measure, and the well-established HACCP (Hazard analysis and critical control points) approach aims to identify and eliminate hazards. However, eliminating a hazard effectively reduces the risk to, yet in practice this is often impossible. Thus OECD defines food safety as “a reasonable certainty that no harm will result from intended uses and the anticipated conditions of consumption”. Implicit in this definition is that food safety is a function of the context, and not simply the hazard. There may be some advantages in using a hazard-based rather than a risk-based approach, but the value of risk-based approaches is becoming increasingly recognized. While this contrast is most marked in the food safety area, observation in East Africa suggests that even in the plant and animal health arenas, there is sometimes an unstated assumption that the goal of risk management is to eliminate risk (i.e. more of a hazard-based approach), whereas usually risk management is about reducing risk rather than totally eliminating it. This is central to the risk-based approach expanded on elsewhere in this document.

2.4 Risk-based approach in international and regional agreements

2.4.1 WTO Agreement on the Application of Sanitary and Phytosanitary Measures

The WTO SPS Agreement provides a set of rules for the application of SPS measures (Box 1) to reduce SPS risks. The rules are designed to allow countries to apply legitimate, justifiable measures, but to prevent them from using SPS measures as disguised trade barriers.

Box 1. WTO SPS Agreement’s Definition of an SPS Measure

Any measure applied:

- (a) to protect animal or plant life or health within the territory of the Member from risks arising from the entry, establishment or spread of pests, diseases, disease-carrying organisms or disease-causing organisms;
- (b) to protect human or animal life or health within the territory of the Member from risks arising from additives, contaminants, toxins or disease-causing organisms in foods, beverages or feedstuffs;
- (c) to protect human life or health within the territory of the Member from risks arising from diseases carried by animals, plants or products thereof, or from the entry, establishment or spread of pests;
- (d) to prevent or limit other damage within the territory of the Member from the entry, establishment or spread of pests.

Sanitary or phytosanitary measures include all relevant laws, decrees, regulations, requirements and procedures including, inter alia, end product criteria; processes and production methods; testing, inspection, certification and approval procedures; quarantine treatments including relevant requirements associated with the transport of animals or plants, or with the materials necessary for their survival during transport; provisions on relevant statistical methods, sampling procedures and methods of risk assessment; and packaging and labelling requirements directly related to food safety.

Article 5 of the SPS agreement requires countries to base their SPS measures on an assessment of the risks involved, using the available information. Countries have the right to define their own “appropriate level of protection” (ALOP), but are not allowed to require stricter measures than necessary to achieve that level. As noted in Annex C of the agreement, the ALOP is sometimes referred to as the acceptable level of risk. SPS measures are designed to reduce risk, but at the same time eliminating risk is likely to be too costly or impossible if trade is to continue.

The SPS Agreement includes a number of principles that can be seen as aspects of a risk-based approach. The principle of minimizing disruption to trade involves assessing and comparing alternative SPS measures (with varying degrees of restrictiveness), and the comparison must include assessing the level of

protection the measures provide, or the level of residual risk after their application. The SPS agreement also includes the principle of equivalence, under which countries should accept trading partners' measures or procedures that demonstrably achieve their own objectives – in terms of risk reduction - even if the measures are different from what they might request. The principle of non-discrimination is also risk based, in that the same measures must be applied to all trading partners with similar conditions (ie similar risks), as well as domestically.

A risk-based approach is thus at the core of, and fully consistent with the SPS Agreement.

2.4.2 WTO Trade Facilitation Agreement

The trade facilitation agreement concerns “expediting the movement, release and clearance of goods, including goods in transit” and covers a wide range of trade procedures beyond SPS. However, a number of its provisions and requirements are applicable to SPS measures. Article 7 on release and clearance of goods includes a section on risk management (Box 2), which although primarily applicable to customs, also applies to other border controls such as SPS.

Box 2. Risk Management in the Trade Facilitation Agreement

(from Article 7, Release and Clearance of Goods)

- 4.1 Each Member shall, to the extent possible, adopt or maintain a risk management system for customs control.
- 4.2 Each Member shall design and apply risk management in a manner as to avoid arbitrary or unjustifiable discrimination, or a disguised restriction on international trade.
- 4.3 Each Member shall concentrate customs control and, to the extent possible other relevant border controls, on high-risk consignments and expedite the release of low-risk consignments. A Member also may select, on a random basis, consignments for such controls as part of its risk management.
- 4.4 Each Member shall base risk management on an assessment of risk through appropriate selectivity criteria. Such selectivity criteria may include, inter alia, the Harmonized System code, nature and description of the goods, country of origin, country from which the goods were shipped, value of the goods, compliance record of traders, and type of means of transport.

Clause 4.3, requiring border controls to be focused on high risk consignments, is effectively saying that a risk-based approach should be adopted. Thus a risk-based approach is also consistent with the TFA, and contributes to the objectives of the TFA.

2.4.3 EAC SPS Protocol

Article 108 of the EAC Treaty requires countries to harmonize SPS measures for pest and disease control, and Article 45(3) of the EAC Common Market Protocol calls for an effective regime of Sanitary and Phytosanitary (SPS) measures, standards and technical regulations in the region. The objectives of the protocol (Box 3) include promoting implementation of the WTO SPS Agreement including risk assessment, so RBA is also aligned with the protocol. Detailed SPS measures have been drafted for implementing the protocol.

Box 3. Objectives of the EAC Protocol on SPS Measures (Article 2)

The objectives of this Protocol are to

- (a) promote trade in food and agricultural commodities within the Community and between the Community and other trading partners;
- (b) promote within the Community, the implementation of the principles on harmonization, equivalence, regionalization, transparency and risk assessment in the Agreement on the Application of Sanitary and Phytosanitary Measures;
- (c) Strengthen cooperation and coordination of sanitary and phytosanitary measures and activities at national and regional level, based on common understanding and application within the Community; and
- (d) enhance the sanitary and phytosanitary status through science-based approach in the Community.

2.4.4 Revised Kyoto Convention

The Kyoto Convention concerns simplification and harmonization of customs procedures, and includes the principles of RBA (Box 4).

Box 4. Risk Management in the Revised Kyoto Convention

(from General Annex, Chapter 6, Customs Control)

6.3. In the application of Customs control, the Customs shall use risk management.

6.4. The Customs shall use risk analysis to determine which persons and which goods, including means of transport, should be examined and the extent of the examination.

6.5. The Customs shall adopt a compliance measurement strategy to support risk management.

The World Customs Organization (WCO) thus promotes a risk-based compliance management approach, and has developed a customs risk management compendium. Although there are significant differences between SPS and customs authorities, many of the principles and approaches are common to both, and lessons for the application of RBA in the SPS context can be learned from customs. In terms of institutionalizing RBA, the following quote from the compendium is pertinent: “For risk management to be effective, it needs to be embedded as an organizational culture and be part of the way customs runs its business. Anecdotal experience provided by Members indicates that it may take several years, and requires strong ongoing commitment from managers and staff at all levels.” (WCO Customs Risk Management Compendium).

Furthermore, there are significant opportunities for collaboration between SPS and customs authorities in assessing and managing risk, particularly at border points where inspections take place. Computerized customs management systems (such as the widely used ASYCUDA) provide facilities for customs risk assessment and management, such as selecting consignments for inspection. Thus part of institutionalizing RBA for SPS measures should include identifying and taking advantage of such opportunities.

2.5 Risk based approach and good regulatory practice

Good regulatory practices (GRP) are recognized processes, systems, tools and methods to improve the quality of regulations and ensure that regulatory outcomes are effective, transparent, inclusive and sustained. Thus there are clear links to the area of RBA and trade facilitation. The WTO SPS committee has briefly discussed GRP, and it was suggested that the committee could develop guidelines on GRP in implementing the SPS agreement. The STDF working group has recently decided to make GRP in the development and implementation of SPS measures a focus for future work, reflecting the growing appreciation for improving the way in which SPS regulatory agencies function. RBA can be seen as an element of GRP, in that it should influence regulatory reform and the assessment of regulatory impact, and include communication and dialogue with stakeholders in the process.

2.6 Risk-based approach in practice

Here we present what a risk-based approach can look like in practice, ranging from the implementation of specific activities, through to broad strategic decisions. Some of these areas are included in the proposal in Section 3. The different activities are not all mutually exclusive; clearly there is overlap, and the underlying principle in all of them is that decision-making and resource allocation is based on an analysis of risk or a component of risk.

2.6.1 Inspection of incoming consignments

The aim, in an SPS context, of inspections of consignments at border points and ports is to intercept those that are non-compliant. In doing so risk is managed by reducing the probability of the unwanted event taking place. Box 5 shows a worked example of how risk-based inspection operates.

Box 5. Risk based inspections: An example

Scenario: 500 consignments a year of a commodity are imported at a particular border. If 50 of the consignments are non-compliant, (for example they contain a regulated pest), a random sample of 100 consignments will make 10 interceptions. 40 non-compliant consignments will not be detected.

However from previous sampling, it is known the 500 consignments fall into two categories, 100 high risk and 400 low risk. The high risk consignments include 40 of the non-compliant consignments, while the low risk consignments include the other 10 non-compliant consignments.

If the same sampling effort (100 samples) is now directed entirely at the high risk consignments, 40 non-compliant consignments will be intercepted, and only 10 non-compliant consignments will remain undetected.

Thus by adopting a risk-based approach to border inspection the number of undetected non-compliant consignments (ie the risk) has been reduced by 75%, from 40 to 10.

Alternatively, if 40 non-compliant consignments in 500 is considered an acceptable level of risk, only 25 high risk consignments would need to be inspected, so reducing the cost of inspection by 75%.

2.6.2 Inspection of outgoing consignments

Risk analysis is generally conducted in relation to imports. However, regulatory services are frequently required to authorize and/or certify outgoing consignments, which supports compliance with the export destination's SPS requirements. In many countries including East Africa a significant proportion of SPS regulatory authorities' resources are spent in this area, so it is appropriate to ask how RBA can be applied in this context. In this case the consequence element of the risk calculation is the potential loss of markets should consignments fail to comply with the importing countries requirements. As with incoming consignments, the aim of inspecting outgoing consignments is to detect as high a proportion as possible of non-compliant consignments, while minimizing the cost to exporters. Thus similar principles and methods to those described in the previous section can be applied to inspection of outgoing consignments.

2.6.3 Inspection of passengers at airports

Incoming passengers at airports are a pathway for introduction of SPS hazards, and some countries invest in monitoring and enforcing compliance with restrictions on agri-food products carried by passengers. RBA can be used to assess in the first place whether such an investment is worthwhile, and then how the resources can most usefully be deployed. Again similar principles to those for inspections of incoming and outgoing consignments can be applied in determining which passengers should be stopped and checked.

2.6.4 Risk profiling

Risk profiling is the process underlying the risk based inspections of consignments and passengers described above, and generates the criteria or parameters for identifying the high risk consignments/passengers. The process may already occur informally; from experience an inspector may realize that consignments coming from a particular area are more likely to be non-compliant, and so priorities them for inspection. Profiling formalizes this process. Whatever data are available are analyzed to establish parameters that correlate with non-compliance. In some cases there may be a cause and effect relationship between the parameters and the likelihood of compliance, but this is not necessary. Parameters are identified that can be easily assessed, and which provide a good predictor of the likelihood of compliance/non-compliance. Once created, the risk profile allows rapid (even automatic) determination of where/when inspection should be concentrated.

Risk profiles are not static; they need regular review and updating based on the compliance data collected following application of the profile in targeted inspections. Data are needed from both low and high risk categories.

2.6.5 Surveillance

Surveillance is an important part of CAs' work, although other stakeholders may also be involved. Surveillance is used for a range of purposes including detecting incursions of new pests and diseases, detecting and delineating outbreaks, and maintaining and demonstrating pest or disease free areas to support exports. Surveillance can consume large amounts of resource, so using RBA, surveillance operations can be prioritized to those that will give the greatest benefit. This could be done qualitatively or could include a quantitative of cost benefit analysis.

2.6.6 Inspecting places of production, processing, packaging, sale

Often a more effective approach to managing risk is to inspect the origin of commodities or consignments. If the operations meet a required standard, it can be assumed that the risk of non-compliant products originating at the place is reduced (although some sampling might still be appropriate). This requires an understanding of what the risks are, and how different procedures and processes at the place can reduce or manage the risk, and how their effectiveness can be assessed.

The above approach is taken in regard to exports, but it can also be used to reduce food safety risks in domestic food chains. Rather than trying to inspect large numbers of products, the farm, factory or other place of production, processing, packaging or sale is inspected to see if it meets certain criteria that are known to be effective at managing risk.

2.6.7 Establishing import controls

The usual application of a risk-based approach is in determining the need for and defining controls on specific imports. This is also the usual basis for training in risk analysis. The CA of the importing country conducts a risk analysis, usually to assess the risk associated with imports of a particular commodity from a particular country. On the basis of the analysis and any subsequent negotiation between the exporting and importing country, a set of requirements or conditions will be specified under which import will be allowed. Negotiations might explore the different risk management options, requiring an assessment of the cost and effectiveness of the different options in reducing the assessed risk. As in the WTO SPS agreement the import requirements must be science-based and applied without discrimination.

A risk analysis of this nature can be a lengthy and expensive procedure, or it can be undertaken relatively quickly. EPPO, for example has an "Express Pest Risk Analysis" (EPPO, 2012), which is much more suitable for CAs that are short of resources.

2.6.8 Strategic planning

SPS competent authorities can be expected to develop strategic plans, including *inter alia*, priority areas for investment in the medium to long term, and methods for monitoring organizational performance. Given that CAs exist in order to manage risks, RBA can be used to support strategic planning. While detailed numerical analysis may not always be appropriate, the principles can be applied so that the relative emphasis placed on different activities such as import controls, export certification, surveillance etc can be determined in a more structured, objective way.

2.6.9 Sector biosecurity strategies

In countries where there is a particular crop or sector that is of high importance to the economy, a crop or sector specific biosecurity strategy can be developed. For example, Malaysia, one of the world's largest producers and exporters of palm oil, has recently developed a palm oil biosecurity strategy. Such a strategy includes analyses of the various SPS risks (in this case plant pests), as well as response plans should a hazard appear. Such a strategy clearly needs to use RBA as a way of prioritizing the different risks, allocating resources to their management/reduction, and providing an objective assessment of response options.

2.6.10 Emergency response

In all three SPS areas emergencies sometimes occur, such as the appearance of a new animal or plant disease, or a food poisoning event. To deal with such emergencies contingency plans are required, and these are generally lacking in East Africa. However, one element of an emergency response plan should be a risk analysis to assess the possible costs and benefits of different response options.

2.7 Risk based approach in East Africa

2.7.1 Risk analysis

The current state of risk analysis in East Africa was touched on in the desk reviews of official controls. It was found that although there is some capacity and expertise in risk analysis, its application is often fragmented and inadequate.

In the area of food safety specific changes recommended included using risk assessment to provide a scientific basis for management decisions; monitoring and reviewing the effect of risk management efforts; and including effective risk communication in all food safety activities. It was reported that all countries have a list of priority food safety risks available although it was also noted that the large number of hazards, which is still increasing, presents a significant challenge. All countries were assessed as having risk-based food inspection services in place but in all cases they were adjudged inadequate. Response to food safety events, an area in which RBA can be applied, was also adjudged to be generally inadequate.

In plant health all countries have some capacity in risk analysis although Tanzania's capacity in the detection and management of risks was singled out as needing strengthening. Regional co-operation and harmonization was emphasized as lacking in the area of official controls and management of specific risks.

In animal health the status of risk analysis is captured in the OIE PVS Analysis report but these are rarely made public. However Kenya's report has been made public and shows that the veterinary services were rated as unsatisfactory in areas including quarantine and border control, passive and active surveillance, early detection and rapid response, and application of risk analysis.

Over recent years considerable effort has gone into training technical personnel in East Africa in risk analysis (incorporating risk assessment, risk management and risk communication). This includes the recent training activities by EATIH. Earlier support was given to develop a harmonized regional pest list for rice, maize and beans, the basis for a regional pest risk analysis and harmonized phytosanitary import conditions. It was noted then that the challenge would be to ensure adoption.

2.7.2 Data systems

An effective risk-based approach requires information and data for assessing and monitoring risk. In East Africa there are various activities designed to facilitate trade through the use of IT systems. These include online/single window systems for managing trade across borders (eg ASYCUDA as noted above). Not only are systems being implemented, there are also efforts to harmonise systems and technologies. Such systems are potentially valuable in implementing RBA for SPS measures for two reasons; they provide data which could be used in risk assessment, and they potentially provide a way of capturing SPS compliance data, for monitoring and reassessing risk in the future, as the basis for further improvements in risk management methods. The proposed project will therefore need to investigate options and opportunities for linking SPS RBA to these initiatives. An earlier initiative to digitize some phytosanitary information (East Africa Phytosanitary Information Committee, EAPIC, and the Pest Information Management System, PIMS), did not live up to expectations and provides lessons for the current proposal.

2.7.3 Challenges

Institutionalizing any approach faces the challenges of resistance to change, at an individual and organizational level. Changes to organizational structure, job descriptions, line management arrangements and related areas can all meet with resistance if not managed correctly. Here we mention some specific considerations that could present a challenge to the institutionalization of RBA in East Africa.

In an environment where regulatory agencies may still be establishing their authority, both regulators and regulated stakeholders may view regulatory processes as akin to policing, in order to find and punish non-compliance. While there is inevitably an element of this, the overall aim of regulatory agencies should be to increase compliance (ie reduce risk), which can be most effectively achieved through partnership with those they regulate. This may require a change of attitude amongst all parties, which can take time to occur.

A fundamental principle of RBA is that risk cannot be reduced to zero. While many regulatory staff would acknowledge this, in practice they may be likely to take the approach that any reduction in risk is worthwhile. RBA means accepting that some risk reduction activities may not be justifiable, and this may be difficult to accept.

If the current approach to managing compliance at borders is to inspect 100% of consignments (or as many as possible), using RBA to select high risk consignments might be seen as reducing the need for inspectors and so jeopardizing jobs (although evidence from customs suggests this fear is unfounded).

At an organizational level SPS measures such as the issuing of certificates and licenses generates revenue. However, RBA may show that in some circumstances the certification process does little or nothing to manage risk, and therefore could be reduced or eliminated. This could lead to a loss of revenue. A specific example in East Africa is the issuing of phytosanitary certificates, which are designed to certify freedom from specific pests of quarantine significance. However, if for the particular commodity being traded there are no quarantine pests, issuing the phytosanitary certificate does nothing to manage risk so could therefore be dispensed with.

2.7.4 Benefits of RBA

There are multiple interrelated benefits of RBA, but in institutionalizing the approach it is useful to consider where or to whom the benefits accrue, particularly if there is resistance to the changes involved.

At a national level RBA should improve risk management, and therefore reduce SPS risks. This benefits the country, and also the organizations and individuals who would suffer costs if the risks were not managed. As many SPS risks relate to agriculture which generates a significant proportion of GDP and employs a high percentage of the population in East Africa, reduced risks benefits many. However, in most cases it is difficult to perceive the benefit of reduced risk; a livestock farmer may not even know of the animal disease whose introduction was prevented.

RBA also contributes to trade facilitation. Trading costs for traders who are generally compliant should be reduced under RBA, promoting trade and the benefits it brings. Producers, traders and others in the value chains involved should all benefit from reduced trading costs.

At an organizational level RBA provides immediate benefits to the CAs. Through improved management processes including allocation of resources, the CAs should be better able to achieve their objectives. This would improve their reputation and standing with stakeholders within the country, but also with trading partners and investors internationally. These organizational benefits should provide an incentive to senior management of CAs to implement RBA, even if not to all employees.

Perceived benefits of RBA to individual staff of a CA will depend to a large extent on the way in which the institutionalization takes place. Possible negative perceptions were highlighted in the previous section, but the changes could also be viewed positively. RBA should assist in defining more realistic and

achievable delivery targets for some posts, such as border inspectors, and provide a more objective and transparent way of coping with resource limitations. This increase in professionalism could improve job satisfaction as well as regard by colleagues and other stakeholders.

Although the primary locus of institutionalization is the national SPS competent authorities, doing so across EAC member states should deliver additional benefits through harmonization of approaches and or the implementation of mutual recognition or equivalence agreements. If all countries are pursuing RBA, regional trade should be facilitated and encouraged as envisaged in the EAC agreement.

3. Project Description

3.1 Scope

As noted above, full institutionalization of RBA is likely to be a long-term endeavor, eventually involving and impacting on almost all aspects of CAs' work, as well as impinging on the activities of agri-food value chain actors. While implementation of particular elements of RBA can be time bound, the overall approach is as much a direction of travel as a destination to be reached. In countries where SPS regulatory agencies are already well established, major restructuring and realignment is feasible, even though time-consuming and expensive. For example, one approach is to combine all SPS agencies within a single organization with an overall strategy. In East Africa where the regulatory agencies are generally younger and still developing, major change of that sort could be difficult to achieve and provide few demonstrable benefits in the short term. It is therefore proposed that an appropriate and pragmatic strategy in EAC member states is to take steps that are practical, but still represent significant changes towards institutionalizing RBA.

The WTO SPS agreement as well as the EAC SPS protocol primarily concern SPS risk management in the context of trade. While that remains the main focus of this proposal, it is also recognized that particularly in the area of food safety, RBA can also deliver benefits in domestic value chains. As many of the actors are similar, application of RBA in domestic value chains is included in the proposal.

Table 1 provides a summary of the proposed intervention in the form of a Logframe using the USAID-preferred format (USAID Technical Note No. 2). Subsequent sections elaborate on the different elements of the Logframe, including the indicators and assumptions at each level. A four year project is envisaged.

3.2 Goal and Purpose

3.2.1 Goal

The goal to which this proposal contributes is **“Increased sale and trade of safe agri-food products by EAC member states (MS)”**. This is in line with national and regional goals which emphasize the importance of agricultural value chains in contributing to economic development. Commercialization of agriculture through production for sale into national, regional and international value chains is a recurring theme in policies and strategies, including the Malabo Declaration renewing commitment to CAADP.

The word “safe” refers not only to safety of food for human consumption, but also safety of other agri-food products which represent risks to agricultural production and productivity, and to the environment. However, safety is a relative term so in this context it implies an acceptable level of residual risk after risk management methods have been implemented. The risks referred to in the context of this proposal are those addressed by the SPS Agreement, but it is noted that there are other risks of trade, for example those covered by the WTO Agreement on Technical Barriers to Trade (TBT).

Thus there are two indicators. The first measures the volume of trade for selected commodities. Some commodities such as staples are regional priorities, for which EATIH aims to double intra-regional trade. Other commodities are more important for some countries than others. Data for this indicator are available from trade databases held by national and international organizations.

The second indicator is SPS compliance rates for those value chains. Compliance rates have to be calculated from inspection and sampling data. Given that RBA focuses on high risk consignments, the overall compliance rate is not linearly related to the level of interceptions of non-compliant consignments. Data for this indicator should become available from the data systems established under the proposed intervention.

Table 1: Logical framework

Narrative	Indicators (Objectively verifiable indicators)	Data Sources (Mean of Verification)	Assumptions
<p>Goal Increased sale and trade of safe agri-food products by EAC member states (MS)</p>	<p>Volume of selected commodities in trade and local markets SPS compliance rates</p>	<p>Trade Databases CA inspection, compliance data</p>	
<p>Purpose Risk-based approach (RBA) to application of SPS measures institutionalized in EAC MS.</p>	<p>CA resources allocated, at different levels, on the basis of risk management objectives</p>	<p>Competent authority annual reports showing specific instances of resource allocation</p>	<ul style="list-style-type: none"> • Agri-food sales and trade not negatively impacted by other hazards such as adverse weather • Cost-effective management methods for priority risks are available
<p>Outputs</p> <ol style="list-style-type: none"> 1. Risk units established in Competent Authorities (CAs) 2. Risk data collection & management systems established 3. Risk based approaches operationalized 	<ol style="list-style-type: none"> 1. Operational units established in all CAs by end of year 2 2. Data systems in all MS by end of year 3 3. All MS using one or more RBAs by year 3 	<ol style="list-style-type: none"> 1. CA organograms; unit terms of reference; job descriptions 2. Data and data analyses 3. Standard operating procedures; CA activity reports 	<ul style="list-style-type: none"> • Other organizational changes in ministries do not reverse or impede established units • Risk management approaches indicated by analyses can be implemented • Operationalization generates support for rather than resistance to RBA
<p>Activities (See budget in Section 5)</p> <p>Output 1. Risk units established in Competent Authorities Activity 1.1 Sensitize policy makers and senior officials. Activity 1.2 Regional training on RBA for senior CA staff. Activity 1.3 CA workshops/meetings to develop ToR for risk units. Activity 1.4 Staffing of risk units. Activity 1.5 Regional training for risk unit staff. Activity 1.6 Stakeholder open days on RBA.</p> <p>Output 2. Risk data systems established Activity 2.1 Needs assessment. Activity 2.2 Design, develop, test and implement systems. Activity 2.3 Training users.</p> <p>Output 3. Risk-based approaches operationalized Activity 3.1 Regional training workshop. Activity 3.2 National training workshops. Activity 3.3 Development of SOPs, guidelines. Activity 3.4 Stakeholder engagement and communication. Activity 3.5 Implement, monitor and review.</p>			<ul style="list-style-type: none"> • Resistance to change can be overcome (in public and private sector organizations) • Trained personnel are able to pass on and act on new knowledge and skills.

3.2.2 Purpose

The purpose of this proposal is **“Risk-based approach (RBA) to application of SPS measures institutionalized in EAC MS”**. As already noted, “Institutionalize” means to establish a practice or activity as a convention or norm in an organization or culture, in this case RBA in the application of SPS measures. Earlier sections have demonstrated the importance of this approach and how it corresponds to the objectives of international and regional agreements, and how it can deliver benefits regionally and nationally, as well as to public and private stakeholders.

The proposed indicator for the purpose is the allocation of resources by CAs in each country, on the basis of risk management objectives. This is not an either/or situation; rather as RBA is increasingly institutionalized, we might see more resource allocation decisions taken on the basis of risk analysis.

Evidence for this can be gathered from CA reports, but the envisaged external evaluator will need to visit a sample of CAs and interview staff and review financial and technical operations.

Two assumptions are identified which need to be met if the delivery of this purpose is to contribute to the goal. Firstly if other hazards such as adverse weather negatively impact production and trade, the positive impact of RBA could be obscured. Secondly, there must be cost effective risk management methods available for the highest priority risks. In some instances it may be possible to assess the risk and identify appropriate management methods but the necessary technology may not be cost-effective in local conditions. The first of these possibilities has to be accepted, and could be taken account of in impact evaluation. For the second assumption, improved engagement with local research institutions should help to ensure the assumption is valid in the long term.

3.3 Outputs

Three outputs are envisaged, described below.

Output 1. Risk units established in Competent Authorities (CAs)

Promoting institutionalization of a process or approach is more easily managed if there is an organizational unit and/or personnel who have direct responsibility. The proposal therefore envisages establishment of risk “units” within each CA. The exact nature of the unit will need to be determined by each CA according to its resources, personnel and existing structure. Many CAs are departments within a ministry and have little independence, so to deliver this output will require not only the management of CAs to be convinced of the value of RBA, but also their superiors.

The indicator for this output is the establishment of risk units (or their equivalent) in all CAs by the end of Year 2. Evidence for this will come from CA organograms, Terms of Reference for the units, and job descriptions of the posts within the units. For the stronger CAs that already have staff with the responsibility for risk analysis (even if there is no organizational unit), this target is realistic. For the CAs where there are insufficient technical staff to perform all the duties of a CA, this will be more challenging.

For this output to contribute to the purpose we assume that other organizational changes such as restructuring of ministries do not reverse or detract from the establishment of risk units. Should this happen it is possible that all CAs in a country would be affected at the same time. However with five countries involved over a four-year period there should be sufficient opportunity to achieve impact.

Output 2. Risk data collection & management systems established

Analysis of risk requires access to data and information. A large amount of useful information is publicly available, and/or can be obtained from trading partners (particularly the wealthier countries). However, RBA also requires the collection of local data on the SPS status of agri-food products for sale and trade. This data can then be used for various aspects of risk management including risk assessment, risk profiling and compliance monitoring. IT systems are not a prerequisite for RBA but they do greatly extend its potential scope and value. Given the ongoing development and implementation of IT systems to support trade in East Africa, it is appropriate to include RBA, either as elements of larger systems, or in specific cases as stand-alone systems. Activities under this output will assess and determine opportunities for RBA data systems, and then implement the appropriate solutions.

The indicator proposed for this output is the existence of functional systems in all MS by the end of year 3. For some CAs this may not be an ambitious target whereas for others it could be difficult to achieve. The inception workshop may therefore need to set country/CA specific targets, given the baseline at the time. Evidence that the systems are functional will be the presence of data in the systems, and more importantly the results of the analyses that are made with the data, to guide risk management decision-making. Of course for data systems to have an impact, the decisions based on the analyses they facilitate must be implemented.

Output 3. Risk based approaches operationalized

In section 2.6 above a number of instances were described illustrating the main ways in which RBA manifests in practice. In this output a number of these will be selected and put into practice in the different countries. At this stage it is not appropriate to determine which activities should be given top priority in which country and in which SPS sector. This will be decided during the course of the project by national teams and the project steering committee. However, we do identify some specific activities which should be implemented as they should provide a good basis for operationalizing at least some aspects of RBA.

Thus the indicator concerns the number of countries in which specific RBA procedures/tools that have been deployed. This will be discussed further at the inception meeting, and again at subsequent meetings once some of the initial training and sensitization activities have taken place. Once implemented, evidence should be available from the associated standard operating procedures (SOPs) and CA reports of activities, in some cases including data from the systems established under Output 2. If such approaches are to be sustained and contribute to institutionalization, it is assumed that the trials conducted will be well received and create support rather than generate resistance. Effective management and stakeholder engagement should support this assumption.

3.4 Activities

3.4.1 Output 1. Risk units established in Competent Authorities

Activity 1.1. Sensitise policy makers and senior officials. An important first step in institutionalising RBA is securing high-level understanding and support. In each country a one day seminar will be held for senior management in the three competent authorities, together with senior staff within the ministries to whom the competent authorities report. A regional consultant will devise and lead the seminar, which will cover all three SPS areas. Potential topics to be covered include:

- What is a risk-based approach?
- Value and advantages of a risk based approach
- Contribution of RBA to national and regional policy

Activity 1.2. Regional training on RBA for senior CA staff. Senior managers in the competent authorities will be trained on RBA by a regional consultant. A separate training will be undertaken for the three different SPS areas, and will equip the managers to lead the establishment of risk units in their respective organizations (activity 1.3). Training will last three days and include the following topics:

- Organizational change management (OCM)
- Elements of RBA
- RBA and strategic planning
- Example applications (including those prioritized for the operationalizing under output 3)
- Expertise required
- Data systems

Activity 1.3. CA workshops/meetings to develop ToR for risk units. Each CA will hold its own internal workshops/meetings (several may be required) to plan for a risk unit or section, where one does not already exist. Where it does, structure and operations will be reviewed. The planning/review may include the creation of new positions, and/or the revision of job descriptions for existing positions. The size of the unit will be determined by each CA. The output of this activity will be terms of reference for the unit, its structure, and job descriptions of the defined positions/roles.

Activity 1.4 Staffing of risk units. Following the determination of the structure and staff complement of the risk units, they will be staffed. This may include hiring of new staff, reassigning existing staff, or incorporating existing staff roles within the new unit. This will be a process for each CA to undertake, and no budget provision is made as this can be considered part of normal operations.

Activity 1.5 Regional training for risk unit staff. Once the staff of the “risk units” have been assigned/appointed, they will need training in risk-based approaches. Three separate courses will be held for the 3 SPS areas, each lasting a week, led by a regional consultant. The topics to be covered would include the following, with an emphasis on practical application of the task that the participants would be expecting to undertake in their new/revised roles:

- Refresher on risk, risk assessment, risk management, risk communication, import controls
- Elements of RBA
- Risk data; collection, analysis uses
- Risk based border inspections (consignments, passengers)
- Risk-based export certification
- Risk based surveillance

Activity 1.6. Stakeholder open days on RBA. Each CA will hold an “open day” for their key stakeholders, comprising presentations, panel discussion and Q&A. The aim will be to introduce RBA and the new risk unit, and build stakeholders’ awareness and understanding of what RBA might mean for them in practice, including the changes they will see and the benefits. Mass media will be invited to promote wider awareness.

3.4.2 Output 2. Risk data systems established

Activity 2.1 Needs assessment. A detailed assessment is required at the point of implementing this project. First it will review what systems are currently available by that time, and what options there are for using or enhancing those systems for SPS risk data. Second it will assess what data systems would be appropriate in each country, including what data should be collected and how, and what human, technical and financial resources would be required to run, use and maintain the system. And third it will make recommendations on the way forward, including details of what needs to be undertaken under activity 2.2 below. The assessment will be conducted by an international consultant, and will include 1-day validation meetings in each country.

Activity 2.2 Design, develop, test and implement systems. This is a composite activity, incorporating several different activities for which the details cannot be specified at this point. Based on the outcome of Activity 2.1, consultants will be commissioned to undertake the design and development of appropriate systems, as well as testing and implementing them. As noted, this may include enhancements to IT systems that will already be operational by the time of the needs assessment, and/or development of stand-alone systems. It is possible that for countries where IT systems are less advanced, simple stand-alone systems may be appropriate until such time as customs, single window and border management IT systems are installed. Testing and implementing the systems will be done in collaboration with IT staff from the CA and/or parent ministry.

Activity 2.3 Training users. Primary users of the risk data systems will be CA staff. Training will be required in each country, for staff from each CA, including members of the risk unit as well as inspectors at ports and border points.

3.4.3 Output 3. Risk-based approaches operationalised

As noted above, which approaches will be operationalized in each country will be determined when the project is implemented. However, it is suggested that the following areas should each be addressed in at least one country, and the results and lessons learned shared with other countries. These areas have been selected as those likely to be the most relevant and practical for the EAC countries to implement. This

project will thus support selected pilots or trials of the new approaches, on the basis of which countries could scale up the approaches according to their needs and priorities.

- **Risk analysis and import conditions for selected staples traded regionally.** This builds on earlier work by EATIH, so may consist of revising and updating the analyses and conclusions for those commodities, or be undertaken for new commodities. A critical step will be ensuring that the import conditions (i.e. risk management) follow from the results of the risk analysis. As noted elsewhere, some SPS requirements for intra-regional trade are currently not risk-based and may not be necessary.
- **Risk profiling.** This approach can be deployed in several situations so is an important one in which to build capability. It can be initiated before data systems have been developed, although more sophisticated profiling can be undertaken once the data are available.
- **Risk-based border inspections.** Current inspection regimes appear to be somewhat ad hoc in several cases, so could benefit from a risk-based approach. SPS risks are likely to be less than for internationally traded commodities, but benefits from trade facilitation, particularly for small-scale traders, could be significant.
- **Risk-based inspections for export certification.** Trials of this approach would be most suitable where countries have significant international exports of agri-food products that are prone to hazards such as pesticide or veterinary drug residues, and contaminant organisms. Losing access to a high value market would have large economic consequences, making this a high risk situation where RBA would be expected to yield good returns.
- **Risk-based inspections of airport passengers.** As well as leading to more effective management of the SPS risks presented by airport passengers, trials of this approach would build awareness of SPS risks and the need for controls.
- **Prioritization of surveillance operations.** Surveillance is an important activity but for which resources are always inadequate. Using a RBA to priorities surveillance would therefore be beneficial. Included here would be surveillance of food safety in domestic supply chains. Prioritization could occur at different levels. At one level the question is what hazards should surveillance focus on. At another level RBA could determine where, for a particular hazard, the surveillance should be undertaken to maximize the value of information obtained.

For planning and budgeting purposes it is assumed that each of the above approaches would entail five activities. It is assumed that there would be one regional workshop for each topic, but not all countries would be supported to implement all topics. For the purposes of planning and budgeting at this stage we assume 2 countries would be supported to address each topic, so activities 3.4.2 to 3.4.5 would be repeated in 12 different contexts.

Activity 3.1 Regional training workshop. A regional consultant would lead a regional training workshop which would serve as a training of national trainers. The trainer would also develop a manual for the particular approach being trained. There would be one training for each of the above 6 areas. The courses might cover all 3 SPS areas, or focus on one.

Activity 3.2 National training workshops. Personnel trained regionally would then serve as trainers in national workshops, utilizing the manual prepared under activity 3.4.1.

Activity 3.3 Development of SOPs, guidelines. To support consistency of application, national SOPs and/or guidelines would be prepared based on templates included in the manual.

Activity 3.4 Stakeholder engagement and communication. For all of the approaches communication and stakeholder engagement will be required, although the nature of that will vary. For activities involving traders of a particular commodity, engagement with the main traders and their umbrella organizations

would be appropriate. For activities such as risk profiling and surveillance, engagement with research organizations would be appropriate.

Activity 3.5 Implement, monitor and review. In the selected context (such as a particular border, a particular commodity, a particular hazard), the approach will be implemented for a trial period. During this period the process would be monitored, data would be collected, and subsequently the outcome would be reviewed by the appropriate risk unit. This would include data analysis as well as consultation with stakeholders where appropriate.

4. Implementation

4.1 Project management

The exact modalities of project management will be determined by EATIH or whoever will have supervisory responsibility. Project management could therefore reside within EATIH, or it could be contracted out.

4.1.1 Project manager

A full-time project manager will undertake the following roles, supported by a project administrator/finance manager.

- **Budget management.** Ensuring that funds are appropriately disbursed, utilized and accounted for in line with the project document and any modifications agreed by the steering committee. A letter of agreement will be required with each of the national coordinators' organizations specifying responsibilities, accountabilities and budgets.
- **Sub-contracting.** Developing terms of reference for approval by the SC; contracting and supervision of consultants.
- **Monitoring and reporting.** See section 4.2.
- **Organizing Steering Committee meetings.** Preparing papers ahead of the meetings and minutes following the meetings.
- **Organizing regional activities and meetings.** For regional activities, funds would be held centrally rather than disbursed to each country, and the activities would therefore be organized centrally by the project manager and administrator.
- **Backstopping national coordinators.** Considerable time would be required providing backstopping to the 15 national coordinators. For nationally organized activities, funds would be disbursed to the countries, but technical support would be provided by the project manager. The project manager would take part in some but not all national activities.
- **Dissemination and publicity.** Overseeing and organizing the development and implementation of a project communication and dissemination plan, in collaboration with EATIH and CA communication departments.
- **Liaison with other related initiatives/organizations.** National coordinators would be responsible for liaising with other national initiatives, but the project manager would fulfil that role at the regional and international level.

4.1.2 Country coordinators

As there will be three CAs involved in each country, it is proposed that rather than having a single national coordinator, each country has a national coordinator in each CA. This would need to be a senior officer, preferably someone who would be either in, or closely associated with, the risk management unit.

The national coordinators would be responsible for leading and coordinating activities in their country. It would be up to them to decide how best to perform that role, but it is envisaged that a small working group would be formed comprising key members of the CA, representatives of private sector stakeholders, and representatives from other ministries or departments as appropriate. The working groups would meet regularly.

Coordination between CAs within a country could be achieved by staggering the working group meetings so that each national coordinator participated in the other two national working groups. Alternatively the three national coordinators in each country could arrange for their own meetings.

Similarly mechanisms to ensure coordination at national level with other initiatives would be required. This should be possible through CAs' usual participation in structures such as national SPS and Trade Facilitation committees, although it is recognized these are not fully functional in all countries. The national coordinators would be expected to use suitable existing mechanisms as far as possible, such as NTM national Monitoring Committees, Joint Border Committees etc.

4.1.3 Steering committee

A steering committee will be constituted to have oversight of the project, comprising EATHH (Chair), the national coordinators from each country and USAID. The project manager would be secretary to the committee which would meet physically for 2 days every six months, with the option for virtual meetings in between. The committee would co-opt or invite others to join the committee or attend specific meetings as required. The committee would develop its own terms of reference which would be expected to include the following.

- Monitor project progress and implementation
- Monitor expenditure
- Ensure timely intervention in the event of any problems
- Approve work plans and budgets
- Approve Terms of Reference for consultancies
- Advise on opportunities for dissemination
- Promote linkages with other regional activities

The steering committee meetings are a significant part of the total budget (see below). However, the national coordinators will be key people “championing” the institutionalization of RBA, so as well as conducting business, the committee meetings will be an opportunity for the coordinators to share ideas, and learn lessons from each other. Selection of appropriate national coordinators will therefore be important.

4.2 Reporting, M&E, Communication

4.2.1 Reporting

The project manager will produce six monthly progress reports to be presented to and reviewed by the steering committee. An inception report will also be prepared following the inception meeting. Progress reports will cover technical progress, a financial report, explanations of deviations from plan and any revisions proposed. A final technical and financial report would also be prepared. National coordinators will be required to make inputs to the progress reports using an agreed template for both technical and financial information.

The project manager will also be responsible for preparing reports of regional meetings including the steering committee. National coordinators will be responsible for providing reports of activities they organize, again using an agreed reporting template.

4.2.2 Monitoring and evaluation

Monitoring and evaluation covers a range of activities from monitoring of inputs and activities through to impact evaluation at the goal level. The logical framework, work plan and budget presented here provide the basis for monitoring and evaluation but they will need revision and updating. The project manager will be responsible for ensuring activities take place as scheduled, within budget, and to the required quality. They will be supported in this role by the steering committee and the national coordinators.

At the project inception meeting work plans and budgets for the first year will be prepared. These will provide the basis for M&E by the Steering Committee. As noted above the Steering Committee will monitor progress against activity plans and budgets, and make adjustments as necessary. Each year the work plan and budget for the next year will be tabled and reviewed by the steering committee. In between steering committee meetings the project manager will be responsible for monitoring progress and expenditure.

The logical framework shows the indicators that will be monitored at the output, purpose and goal level. At the moment the indicators do not have either baseline or realistic target values, so the inception meeting will also revisit the Logframe indicators, and as far as possible set baselines and targets. However, it is expected that details of some activities will only be defined during the project, so regular review and update of indicators will also be part of the steering committees role.

National coordinators will be responsible for monitoring activities and expenditure under their control, and reporting to the Project manager.

The budget provides a lump sum for an independent mid-term and final evaluation. Terms of reference for the mid-term evaluation will include an assessment of the potential sustainability of changes effected through the first half of project, and recommendations for enhancing sustainability during the second half of the project. Sustainability will also be discussed at the project inception meeting.

4.2.3 Communication and dissemination

Communication will be an important part of the project, both to support achievement of its objectives, and to disseminate and promote achievements for application or replication elsewhere. The project manager will be responsible for drafting a communication and dissemination plan tabled and revised/adopted at the inception meeting. The plan will include consideration of target audiences, key messages for each audience, pathways to be used (website, mass media, print, digital etc), materials (including leaflets advertising the project and its aims; a PowerPoint deck for use by national coordinators; website content). Provision is made in the budget for communication and dissemination costs.

4.3 Work plan

Table 3 below shows the proposed schedule of activities over the four-year period of project.

Table 3. Project work plan

Activity	Year 1				Year 2				Year 3				Year 4			
	Q1	Q2	Q3	Q4												
Output 1. Risk units established in Competent Authorities																
Activity 1.1 Sensitise policy makers and senior officials.		■														
Activity 1.2 Regional training on RBA for senior CA staff.			■													
Activity 1.3 CA workshops/meetings to develop ToR for risk units.				■												
Activity 1.4 Staffing of risk units.					■											
Activity 1.5 Regional training for risk unit staff.						■										
Activity 1.6 Stakeholder open days on RBA.						■	■									
Output 2. Risk data systems established																
Activity 2.1 Needs assessment.							■									
Activity 2.2 Design, develop, test and implement systems.								■	■	■						
Activity 2.3 Training users.										■	■					
Output 3. Risk-based approaches operationalised																
Activity 3.1 Regional training workshops.							■	■								
Activity 3.2 National training workshops.								■	■							
Activity 3.3 Development of SOPs, guidelines.								■	■							
Activity 3.4 Stakeholder engagement and communication.									■	■	■	■	■	■	■	■
Activity 3.5 Implement, monitor and review											■	■	■	■	■	■
Project management																
Inception workshop (and inception report)	■															
Steering Committee (and progress report)		■		■		■		■		■		■		■		■
National working groups		■		■		■		■		■		■		■		■
Communication and dissemination			■	■		■	■	■		■	■	■		■	■	■
External evaluation								■								■

5. Budget

The budget is presented in Table 4 below and gives an indicative cost for each of the activities described above. A spreadsheet is attached showing details including unit costs, and assumptions on which the costs are calculated.

The total budget excludes any indirect cost/organizational overhead. Inclusion of this and its amount would depend on the management arrangement selected.

Table 4. Summary budget

Activities	Cost US\$
Output 1. Risk units established in Competent Authorities	
Activity 1.1 Sensitise policy makers and senior officials (5)	33100
Activity 1.2 Regional training on RBA for senior CA staff (3)	145980
Activity 1.3 CA workshops to develop ToR for risk units (15)	18000
Activity 1.4 Staffing of risk units	0
Activity 1.5 Regional training for risk unit staff (3)	198900
Activity 1.6 Stakeholder open days on RBA (15)	18000
Output 2. Risk data systems established	
Activity 2.1 Needs assessment.	44500
Activity 2.2 Design, develop, test and implement systems	150000
Activity 2.3 Training users (5)	190300
Output 3. Risk-based approaches operationalized	
Activity 3.1 Regional training workshops (6)	312960
Activity 3.2 National training workshops (12)	277200
Activity 3.3 Development of SOPs, guidelines (12)	14400
Activity 3.4 Stakeholder engagement and communication (12)	14400
Activity 3.5 Implement, monitor, review (12)	89400
Project management, coordination, M&E	
Project management unit	588800
Inception workshop	19470
Steering Committee (8 meetings)	155760
National working groups (quarterly, 15 CAs)	60000
External evaluation (lump sum)	50000
GRAND TOTAL	2381170