

Liberalising Intra Africa Trade in Wild Meat

Report of Research Findings and Recommendations

Dr Biandri Joubert
Research Fellow
African Wildlife Economy Institute
Stellenbosch University

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0. Overview

This research paper is the result of three distinct phases of research. The first was a combination of desktop research and scoping interviews with persons practically involved in different stages of the wild meat industry. This stage identified broad barriers faced by the industry in the export or import of wild meat in the three countries, Namibia, South Africa, and Zambia. The second phase was the evaluation of the data collected within the context of the appropriateness of the AfCFTA NTB reporting, monitoring and elimination mechanism in the resolution of the barriers identified. At this stage online consultations were conducted and the outcomes of the research and draft of recommendations were presented to stakeholders for further engagement and discussion. The third phase of the research is the development of policy recommendations based on the outcomes of the first two phases and broader, related, needs identified in the wild meat industry. Although three countries were used in the scoping phase, the recommendations are generalised across AfCFTA Members and this report and recommendations do not address country specific matters. The following document forms the basis for the policy recommendations presented to stakeholders in December 2022.

This research considered the AfCFTA NTB mechanism as an appropriate forum of dispute resolution for the barriers identified as within the scope of this research. This research aimed to develop policy recommendations that have the potential to effect actual change in the industry. It was initially assumed that the recommendations made would be limited to technical improvements of the mechanism itself. However, through the course of the research and in particular during the consultations phase, it became apparent that there is a limited engagement with the NTB mechanism in the wild meat industry. The policy recommendations below at section 0 reflect the critical need for technical co-operation and open information available to stakeholders as well as specific capacity building in the wild meat industry. The recommendations related to the NTB mechanism are largely capacity related and on account of the limited engagement on the matter from stakeholders there are limited technical recommendations in terms of improvement of the mechanism itself. Given the importance of recurring themes and barriers in the research, recommendations are made regarding the broader barriers identified in the research that are not directly related to the purpose and scope of the AfCFTA NTB mechanism.

1. Introduction

Taking advantage of the opportunities offered by the AfCFTA to grow trade in wild meat will be greatly facilitated by identifying and addressing non-tariff barriers (NTBs) that restrict the intra-African wild meat trade. This report evaluates aspects of the AfCFTA NTB Reporting, Monitoring and Elimination Mechanism and in particular and considers its appropriateness as a forum of dispute resolution for the barriers identified within the scope of this research. The AfCFTA NTB mechanism is currently in its infancy and is similar in form to the NTB mechanism in place in the SADC region. This report considers the accessibility and effectiveness of the mechanism, its suitability as a forum for the resolution of a variety of NTBs and makes recommendations for how it can be improved. The core objective of this report is to assess the ability of the AfCFTA's NTB mechanism as a tool through which to address the identified challenges and NTBs in the wildlife meat industry. Where relevant, specific differences between South Africa, Namibia and Zambia are highlighted, however given the focus of the report on the AfCFTA mechanism, where possible focus remains and the broader NTBs that are relevant in an intra-AfCFTA trade context and are capable of generalization.

The African Continental Free Trade Area (AfCFTA) is an agreement between African countries that creates a continental free trade area. A free trade area typically requires the reduction of tariffs and facilitates the removal of non-tariff barriers within the area concerned. It can also be expected to be a driver of economic growth and development. The AfCFTA is one of the flagship projects of the African Union's Agenda 2063: The Africa We Want.¹ It is ambitious and the African Continental Free Trade Area (AfCFTA) is the world's largest free trade area with 55 member states from the African continent in one market.² By eliminating barriers to trade in Africa, the objectives of the AfCFTA include significantly boosting intra-Africa trade, particularly trade in value-added production and trade across all sectors of Africa's economy.³ The African Union estimates that there are around 1.3 billion people within the AfCFTA area which amounts to a potential \$3.4 trillion market.⁴ A number of international organisations, such as the World Bank and IMF have published research data that expresses the potential benefit of the AfCFTA to the continent.⁵ Outcomes such as economic integration, increased investment, a boost in trade, better jobs, a reduction in poverty, and increased shared prosperity in Africa are ones that the continent welcomes. Estimates indicate that intra African trade could be boosted by as much as 52.3 percent. Significant to this research is that this will possibly double if non-tariff barriers are also significantly reduced. What's important to note in the reports relating to the potential of the AfCFTA is that the benefits would not only

¹ <https://au.int/en/agenda2063/flagship-projects>.

² <https://au-afcfta.org/about/>.

³ <https://au-afcfta.org/about/>.

⁴ <https://au-afcfta.org/about/>.

⁵ <https://www.worldbank.org/en/topic/trade/publication/the-african-continental-free-trade-area>;
<https://www.imf.org/en/Publications/Staff-Discussion-Notes/Issues/2020/05/13/The-African-Continental-Free-Trade-Area-Potential-Economic-Impact-and-Challenges-46235>.

extend to intra-African trade, but the increased investment etc. is also expected to lead to increases in export to the rest of the world by about 32 percent by 2035 according to the World Bank.

This research report applies a paraphrased adaptation of the definition of wildlife trade in the OIE's A Rapid Review of Evidence on Managing The Risk of Disease Emergence in the Wildlife Trade to define wildlife meat trade in this research report as: Wildlife meat trade includes the legal (regulated) harvesting, transportation, trade and end use of wildlife meat across jurisdictions along a supply chain involving harvesters, intermediaries, and consumers.⁶ Wild meat, in this research report, is therefore the product of legally harvested and regulated trade in the wild meat industry.

This research report is the result of three distinct phases of research. The first was a combination of desktop research and scoping interviews with persons practically involved in different stages of the wild meat industry. This stage identified broad barriers faced by the industry in the export or import of wild meat in the three countries, Namibia, South Africa, and Zambia. It assisted in setting the scope of the potential barriers against which the AfCFTA mechanism's appropriateness as an NTB resolution forum in the wild meat trade at this stage was analysed. The second phase was the evaluation of the data collected within the context of the appropriateness of the AfCFTA NTB reporting, monitoring and elimination mechanism in the resolution of the barriers identified. At this point online stakeholder consultations were conducted, and the outcomes of the research and draft of recommendations were presented to stakeholders for further engagement and discussion. The third phase of the research is the development of policy recommendations based on the outcomes of the first two phases and broader, related, needs identified in the wild meat industry. Although three countries were used in the scoping phase, the recommendations are generalised across AfCFTA Members and this report and recommendations do not address country specific matters.

2. The AfCFTA NTB Mechanism

2.1 Overview

The AfCFTA is a flagship project of the African Union's *Agenda 2063: The Africa we Want* (African Union 2015). The first objective listed in the *Agreement Establishing the African Continental Free Trade Area* is to "create a single market for goods, services, facilitated by movement of persons in order to deepen the economic integration of the African continent and in accordance with the Pan African vision of 'An integrated, prosperous, and peaceful Africa' enshrined in Agenda 2063." The agreement goes on to list specific objectives in Article 4. Of particular relevance to this research are the following provisions:

⁶ Craig Stephen 2021

For the purposes of fulfilling and realising the objectives set out in Article 3, state parties shall:

(a) progressively eliminate tariffs and non-tariff barriers to trade in goods;

Annex 5 of the AfCFTA provides the framework to address non-tariff barriers. It provides the institutional structure, categories of NTBs as well as reporting and monitoring tools and for the facilitation of identified barriers.⁷ According to the agreement NTBs are categorised as follows:

- Government participation in trade and restrictive practices tolerated by Governments;
- Customs and administrative entry procedures;
- Technical Barriers to Trade;
- Sanitary and Phytosanitary Measures;
- Specific limitations; and
- Charges on imports.

A sub-committee of the Committee of Trade in Goods is established for on Non-Tariff Barriers⁸ and it is to be composed of members for AfCFTA State Parties.⁹ State Parties are expected to establish National Monitoring Committees and National Focal Points on NTBs.¹⁰ In addition to this, it is expected that the NMC perform a number of functions, including

- Identifying, resolving, and monitoring NTBs;
- Defining the process of elimination;
- Confirming deadlines for action;
- Agreeing on recourse due to non-action;
- Defining the mandate and responsibilities of NTB institutional structures and
- Providing clear guidelines to the business community for the resolution of identified NTBs; and
- Any other related activities.¹¹

The AfCFTA establishes the "Mechanism for identifying, reporting, resolving, monitoring and elimination of non-tariff barriers" in Article 12 of Annex 5. Article 13 further requires that State Parties "prepare a Time Bound Elimination Matrix, based on the agreed categorisation of NTBs and their level of impact on intra-Africa trade." The article 12 mechanism has translated into a website through which matters can be resolved. The NTB mechanism home page is captured below:

⁷ Article 2(3).

⁸ Article 4(1).

⁹ Article 4(2).

¹⁰ Article 6(2)(a)

¹¹ Article 9.



The website describes the online reporting mechanism as follows:

The African Continental Free Trade Area (AfCFTA)'s Non-Tariff Barriers online reporting, monitoring, and eliminating mechanism is a facility developed to enhance trade through removal of non-tariff barriers to trade (NTBs).¹²

The layout of the mechanism is therefore, at first glance, user friendly. The reporting can be done online, and according to the website there will be a mobile reporting option "soon". The language options currently available are English, French, Arabic and Portuguese.

The website describes seven broad categories of NTBs. These are: Government Participation in Trade and Restrictive Practices Tolerated by Governments; Customs and Administrative Entry Procedures; Technical Barriers to Trade; Sanitary and Phytosanitary Measures; Specific Limitations; Charges on Imports; Other. It is useful to the reader that there is some sort of guideline available. Each category lists a few examples of the type of barrier that it represents.

Under the "complaints" tab it is possible to see what complaints active and what complaints are resolved. The first one on the list is coded AfCFTA-000-015. Presumably that is complaint number 15 since the mechanism has been in use.¹³ The website lists complaints with the ability to filter them according to NTB type; Location, reporting country of region and status:

¹² <https://tradebarriers.africa/>

¹³ As of 15 August 2022, at 15:07.

location: airport; border post; seaport; government institution; non-government institution; roadblock; weighbridge; other. In the description of the affected product the HS code can be recorded or a product name if that is unknown.¹⁴

In the context of what NTBs are or what they might manifest as the AU provides the examples listed below as guidelines. Some of the barriers that the wildlife meat industry faces are import bans (usually related to the animal health status of a country, related to diseases such as foot and mouth disease for example), unjustified sanitary conditions (this is closely linked to import bans but does not necessarily result in a ban, but can be a delay in inspections or permitting related to sanitary conditions etc. that bars the product from being a viable option for commercial production), inadequate customs classification, and the determination of eligibility of an exporting country. The examples provided by the NTB mechanism of typical NTBs that users may experience are:

- Import bans
- General or product-specific quotas
- Complex/discriminatory Rules of Origin
- Unjustified quality requirements imposed by the importing country
- Unjustified Sanitary and Phyto-sanitary conditions
- Unjustified packaging, labelling, product requirements
- Determination of eligibility of an exporting country by the importing country
- Excessive document requirements
- Import licenses and their restrictive application
- State subsidies
- Export subsidies
- Inadequate product classification or customs valuation
- Seasonal import regimes
- Restrictive customs procedures
- Determination of eligibility of an exporting establishment (firm, company) by the importing country

The examples listed above are typically categorized into one of the following categories:

- Government Participation in Trade and Restrictive Practices Tolerated by Governments
- Customs and Administrative Entry Procedures
- Technical Barriers to Trade
- Sanitary and Phytosanitary Measures
- Specific Limitations
- Charges on Imports
- Other

¹⁴ African Union NTB Reporting Mechanism online.

2.2 Criticism of the Mechanism

The mechanism design assumes a number of things. The first and most critical assumption is that people know it exists. The second is that the persons using it are able to identify their challenges as an NTB that is reportable. The third is that there is enough confidence in the mechanism for people to take the time to submit a complaint.

A significant drawback is the fact that it is not possible to export the details for active or resolved case data to excel or csv document for further analysis. To request such data, if it exists and what is likely to be limited to data relevant to that specific contact point, there are contact details provided for the relevant AU members under the "contacts" tab. The confidence of persons submitting reports is potentially influenced by the fact that on the "contacts" page, a large number of contact point e-mail addresses listed are personal "gmail" or "yahoo" accounts. This is an indication of a low level of institutional memory that the mechanism facilitates in the national government departments.

Despite the fact that there are examples of categories of NTBs provided on the website this is likely not enough guidance for a number of exporters and importers. The field of NTBs is a daunting and complicated field even for person's specialised in it. The mechanism misses a significant amount of reliability for the person's it seeks to serve.

A system such as the reporting mechanism described here is one that is reactive as opposed to being a proactive mechanism to prevent barriers form recurring. It also depends on the stability of each focal point or contact point and will be subject to challenges related to staff turnover and general resource limitations. A low level of NTB reporting will not be an indication of a low level of NTBs.

Contrary to the introductory paragraph on the website, the mechanism does not in itself "enhance trade through removal of non-tariff barriers to trade (NTBs)." The removal of trade barriers and the enhancement of trade remains much more complicated than what the mechanism can deliver in its current form. It serves as a collection point for data that is provided by the public or other State Parties.

There are clearly barriers that the mechanism cannot solve. The mechanism relies on the willingness and ability of State parties to act on the information passed on to them. It presupposes that the State Parties receiving the complaint have both the technical and financial capacity to address the barrier and to act upon the information provided to them. It is not a mechanism well suited to a barrier that is technically complicated or requires swift action to resolve.

3. Summary of findings

3.1 Desktop research and scoping interviews

Scoping interviews were conducted with parties involved in the wildlife meat value chain. The purpose of this exercise was to ensure the presentation of a research report that remains focused on barriers that are broadly experienced within the industry allowing for policy recommendations that have the potential to effect actual change in the industry. This research paper identifies and limits its scope to some of the challenges identified during scoping interviews that pose a barrier to freeing intra- African trade in wildlife products, specifically wild meat. Scoping interviews were conducted with a small group of representatives or persons engaged within the wildlife trade and the information gathered from these has provided the framework for this report. The interviews were not intended to be a representative sample of the industry as a whole, but to act as delimiters on the scope of the report. The broad themes that arose in the scoping interviews were as follows:

- There is not enough certainty about what “wildlife meat” is;
- The HS codes up to 6 digits do not provide enough granularity to accurately determine the size of the wildlife industry and the species being traded through trade statistics;
- There are persistent concerns about administrative capacity (veterinary and animal health related, especially in the harvesting phase);
- There are recurring animal health diseases that inhibit the ability to export certain categories of meat (e.g., the inability to export cloven hoofed animals on account of FMD); and
- There is a vacuum in the legal framework as far as it relates to the clear, concise, and specific regulation of wildlife meat.

In this report the role that these themes play in terms of their nature as barriers to trade is described at section 0 below. After further consultations during the stakeholder engagement phase, they were elaborated on or refined and therefore section 0 below contains further barriers identified.

3.2 Consultations with stakeholders – Oct 2022

During October 2022 a round of online consultations were done to stakeholders from each of the three countries used to scope the broader barriers faced in the wild meat trade: Namibia, South Africa and Zambia. In this round of online consultations, I presented the current draft of my research related to the barriers to freeing intra- African

trade in wildlife products, specifically wild meat. I provided a technical and practical overview of the AfCFTA Non-Tariff Barrier Reporting, Monitoring and Elimination Mechanism, and an overview of its intended purpose. Thereafter, discussion turned towards participants views of the findings and potential recommendations that I propose as well as identification of gaps in information or scope that might arise. The expected outcome of the session was that I gather further insight into the challenges of exporting wildlife meat between trading partners within the continent and that participants have the opportunity to further contribute to the discussion. Ultimately, the purpose of these workshops was to lead the project towards a final set of policy recommendations. During the stakeholder consultations the following additional matters arose as important to the trade in wild meat in the Africa continent:

- There is a lack of awareness of the existence of the AfCFTA NTB Mechanism;
- There is a lack of awareness of the potential and purpose of the AfCFTA NTB Mechanism, and it may be that smaller industries such as the wildlife meat industry are not being reached by AU level capacity building and stakeholder engagement;
- Industry organisations play a vital role in the facilitation of communication and information in the wild meat trade and the development of guidelines and recommendations;
- The wild meat industry is primarily focused on exporting wild meat the European Countries. The barriers faced in this regard are beyond the scope of this research. However, general capacity building and technical assistance in the AfCFTA context can be expected to benefit export into any region and facilitating exports in either direction should not generally be seen as mutually exclusive endeavours;
- The resolution of barriers, especially barriers that are beyond what the design of the AfCFTA mechanism can facilitate, requires insights and technical expertise from a variety of academic backgrounds across trade law, economics, science (animal health), social science and conservation sciences;
- Commodity specific guidelines and technical guidelines do to exist to varying degrees, however not in all three countries;
- There is a need for simplified and practically implementable permitting procedures;
- The harvesting phase is a critical point in the wild meat chain where the resolution of barriers is core to the success of the wild meat industry in terms of both export and local supply;
- There are different answers from industry as to (in the commercial sense) what species of animals and meat are included in the meaning of wild meat and what

not – including clarity on categorization of wild meat in terms of harvesting practices, ownership, veterinary intervention, and production systems etc.;

- Animal health matters beyond FMD, such as rabies, contribute to the barriers related to export;
- There appears to be limited specific co-operation and co-ordination of addressing overlapping barriers between the wild meat and livestock industries;
- When exporting wild meat to territories where the specific species being exported is unknown to the authority issuing the import permit, there is a need for technical information to accompany the application so as to facilitate faster access to the market and the removal of uncertainty surrounding the veterinary (or SPS) specifics of the species;
- There is a need for traceability to ensure that illegally harvested meat is not introduced into the wild meat chain;
- There needs to be a stable supply of wild meat and may other factors need to align for that to be ensured;
- There are existing schemes and plans to facilitate exports that already exist that have not been implemented;
- There is no certainty in terms of the exact size of the wildlife industry in all three countries; and
- The industry needs enabling legislation and guidelines that practically facilitate the trade in wild meat and a legal framework that does not in itself contribute to further barriers in the trade in wild meat.

The additional matters identified and discussed during consultations were added to the policy recommendations.

3.3 Presentation of findings and recommendations– Dec 2022

During the presentations to stakeholders the policy recommendations were presented. Limited new information was introduced in this phase and the findings and recommendations presented in the following section 4 were not disputed by participants.

4. Potential sources of barriers identified during scoping interviews

4.1 A lack of consensus about what “wildlife meat” is in international trade terms

During scoping interviews, it became apparent that there is a lack of consensus of what constitutes “wildlife meat.” The description “wildlife meat” is sometimes used interchangeably with “game meat.” The lack of further definition provided by HS codes at the 6-digit level or 8-digit level adds to the uncertainty. There also does not appear to be a harmonized standard even amongst stakeholders within the three individual countries that defines this or includes detail, for example, when a ranching system crosses from hosting “wild” animals to one considered to be hosted to domesticated wild animals and whether or not that distinction is of relevance in a discussion of the wildlife meat industry. The opportunity exists to develop a harmonized standard for wildlife meat applicable to the AfCFTA Member’s in addition to the recommendations provided in terms of HS codes below.

4.2 Barriers during the harvesting phase of the value chain

Harvesting of wildlife meat is a point in the value chain that differs the most significantly from meat production in domestic livestock. The harvesting stage carries risks with both animal health and food safety consequences. For this reason, there is legitimate concern about what protocols should or could be in place to ensure that the end product is safe for human consumption while still be a financially sustainable process. These are not typically barriers for which the AfCFTA NTB mechanism is a suitable forum through which to engage and solve the challenges experienced.

4.3 HS codes up to 6 digits do not provide enough granularity to accurately determine wildlife industry size and species traded

From the onset of this research report, it is important to emphasise that “wildlife” meat is the collective term used in this report for a meat product harvested from a wild animal for purposes of cross border trade and ultimately for human consumption. It does however not suggest that wildlife meat is a homogenous product. The different species of wild animals can be seen as separate products and when considering products in a more technical sense, the different cuts are further definable separate products. An international trade focused view on wildlife meat and the use of the “language” that HS codes provide in terms of clarity and categorization of wildlife meat is useful in establishing clarity of what wildlife meat is and identifying the nuances within the industry that require individualized attention and that may not benefit from broad generalization as to what “the industry” requires to thrive.

By introducing difference into the dialogue of developing an inter-continental trade in these products it is possible to both manage animal health concerns and legitimate trade

bans while allowing for simultaneous and ideally unrestricted movement of unaffected wildlife products. A challenge with developing policy, regulations, and standards with broad generalisations about a meat products nature (wild versus domestic) is that nuance is lost in the language and the existence of one barrier (such as FMD) that cannot be timeously overcome can cause harm to the rest of the industry potential to develop. The "wild meat" sector needs to be clear on what wild meat is in outward messaging for specific international trade concerns to gain traction in negotiations. Wild meat, as an export commodity or product, is subject to the same rules and regulations as any other product being traded across a border. This includes rules and regulations as well as rights and obligations related to sanitary and phytosanitary measures, technical measures, tariffs, trade remedies, pre-shipment inspection, and/or other internationally set standards or requirements.

What further distinguished products from one another and to a greater extent groups wildlife meat into one of two broad product categories is the split between cloven hoofed and non-cloven-hoofed animals. From a trade perspective this split may be the most significant in as far as the ongoing problem of FMD in the Southern part of Africa is concerned, particularly in South Africa. When devising recommendations for the removal of a barrier such as FMD is concerned only cloven-hoofed animals are impacted by the ban itself. In order to specify on an HS level what the other products are that are not subject to this ban and to record the impact (from a trade perspective) that such a ban has had on the industry, the lack of specificity in HS code detail add to the grey area of understanding. This is in itself a barrier to the industry and to the ability to make disease specific policy.

The non-specificity of HS codes is a barrier to the wildlife industry in itself. The complexity of the matter and the effect of losing the quantifiability of the wildlife industry is a recurring cause for concern in the scoping interviews as well as literature related to the topic. The language of international trade is simplified across countries and languages by the use of HS codes that identify products. 184 Members have agreed under the World Customs Organization to use these codes in customs declarations. Although intended to identify a product and the duties payable upon import of the product, HS codes are a powerful quantifier of other insights into international trade as well. Any agricultural or wildlife product imported or exported is being recorded at the border as belonging to a specific HS code upon presentation. This means that there is a way to identify or link a specific import and specific HS code to a broader set of documents such as a sanitary or veterinary certificate and any supporting documentation or permits.

The lack of detail provided by the trade statistics at a 6-digit level is one that not only has an impact on the ability to define what wildlife meat is in broad terms, but it also results in the inability to truly report on the exact size of the wildlife meat industry worldwide or to accurately compare countries with each other. This is particularly true in of the vague categories of wildlife meat that are recorded within the same HS code as domesticated meat. For example, meat of bovines classified as carcasses. The quantification of the wildlife meat industry therefore relies on the internal collection of

data from parties engaged in the import or export of wildlife meat products. This is an inefficient system and one that is not subject to specific reporting requirements.

The quantification of the wildlife economy is important and serves a specific purpose. However, in the context of NTBs and removing barriers to trade, caution should be applied in equating the size of the industry or its potential size to the importance of removing the barriers within the industry. If the prioritization of the removal of barriers is dependent on the size of the industry a cycle of stagnation is likely to develop where the industry is not growing because barriers are not removed, the barriers are not removed because the industry is not large enough to inflict enough pressure on those with the ability to change the situation, and so on.

The process of arriving at the correct classification of wildlife meat is complicated. The World Customs Organisation (WCO) provides a “Harmonized Commodity Description and Coding System” also referred to as the “Harmonized System” by which products or categories of products are classified for the facilitation of trade and the collection of trade statistics. It is essentially a language facilitated by codes that introduces specificity and certainty to trade statistics primarily for the purpose of assigning import duties during international trade. The importance of the correct and accurate classification of products through the use of the harmonised system is important beyond the quantification of trade statistics. It provides an avenue to be precise in classifying or categorising further measures that also required compliance at the point of entry or exit at a border. In addition to this, the harmonised system, and the flow of products across borders is a tool that can be used to visualise the reach of the industry, its comparability to other countries and the effects of, for example, disease related movement bans.

Tariff classification has the potential to get very complicated and given the importance of getting it right, in tariff classification there are 6 principles that apply in the classification of goods. The rules are extensive and complicated classifications are typically done by someone with advanced knowledge of the field of customs. For the most part, well known or, for example single composition products, are classifiable by the person engaged in their import or export.

It is not a simple process to classify wildlife meat and the selection of HS codes to analyse in the wildlife meat context is challenging. Authors Andersson *et al* present a detailed discussion of their methodological approach to classifying wildlife in the HS codes (Andersson et al. 2021). The authors identify similar challenges experienced in this research when classifying wildlife (or in the case of this particular research report, wildlife meat) on account of the fact that HS codes do not adequately distinguish between wild and farmed sources of meat and some HS codes include both domestic and wild sources of meat in the same HS code. Their classification¹⁵ of wildlife meat includes the following HS codes:

¹⁵ See their supplementary text available for a detailed description of the methodological choices made in their study Andersson et al. 2021.

- 20820 – processed
- 20830 – processed
- 20840 – processed
- 20850 - broad category – processed
- 20860 – processed
- 20890 - broad category – processed
- 21090 - broad category – processed
- 21091- processed
- 21092- processed
- 21093 - broad category – processed
- 21099 - broad category - processed

Andersson et al also exclude tariff codes that would strongly relate to domesticated animals or livestock (Andersson et al. 2021). This is mostly relevant when researching live animals but is relevant as far as bovine carcasses are concerned in this research.

The South African Game Meat Strategy presents a similar list of HS codes as the representative list for game meat:

- 020850 – Fresh, chilled or frozen meat and edible offal of reptiles e.g., snakes, turtles, crocodiles; 020890 – Fresh, chilled or frozen meat and edible offal of pigeons, game, reindeer and other animals
- 021093 – Meat and edible offal, salted, in brine, dried or smoked, and edible flours and meals of meat ... of reptiles
- 021099 – Meat and edible offal, salted, in brine, dried or smoked, and edible flours and meals of meat ... of other animals
- 160290 – Prepared or preserved meat, offal or blood excluding meat or offal of poultry, swine, and bovine.

The South African game meat strategy includes considerably fewer HS codes as the “sum of the game meat market” than Andersson et al and this research report. A discussion of what the tariff codes include and exclude follows below before an analysis of the intra African trade of these products. Namibia’s *Growth Strategy for Namibia’s Game Meat Industry and Associated Value Chain* bases their definition of game meat on the *International Standard Industrial Classification of All Economic Activities (ISIC), Revision 4*.¹⁶ The Namibian strategy refers to HS codes 0208, specifically 020890 and 160290.

This research used the UN Comtrade data as the data analysed for the same reasons that *Andersson et al* do. UN Comtrade is the most reliable source of trade data available, and it is the primary database recording and making trade data available to the public. It records both volume and value whereas CITES’s data which uses non-standardized measurement unit’s data is not suited to this type of research. The CITES data also has

¹⁶ 7.

other inconsistencies related to reporting practices and value declarations are not a requirement of the data (Andersson et al. 2021). UN Comtrade only records legal wildlife trade, which is also suitable in the context of this research as illegal trade is entirely excluded.

It is necessary that much more detail be introduced into the trade data that can currently be derived from the structure of the HS codes. This is not an uncommon recommendation and other authors have repeatedly emphasised this matter. A broader reason that other authors have raised is that of the inability to monitor biodiversity and the effect that trade has on it with a lack in granularity of HS codes to taxonomic or genus level (Andersson et al. 2021). This supports the views shared in this research that granularity will provide a more useful and appropriate tool for understanding the legal market for wildlife meat and provide a “language” with which to pursue broader goals of creating intra-African export markets.

The practical reasons provided by Andersson *et al* for the exclusion of HS codes that have a strong likelihood of predominantly representing domesticated animals which are indistinguishable in the statistics from wildlife meat is supported by this research. What this research emphasizes further is the effect that the indistinguishability at a 6-digit level has on resolving barriers that apply specifically to trade in wildlife meat.

For purposes of analysis of UN Comtrade data, this research report included the following HS codes in the analysis:

- 020850
- 020890
- 021093
- 021099
- 160290
- 020810
- 020840
- 020840
- 020860

Descriptions of the exports done to various Africa countries under these HS codes from Namibia, South Africa and Zambia are provided below:

- 020850 - Meat and edible meat offal; of reptiles (including snakes and turtles), fresh, chilled, or frozen

During the period 2017 to 2021, Namibia did not report any exports of products classified under this HS code. South Africa and Zambia, however, did. Zambia only exported to the DR Congo and South Africa exported to Namibia. There were also other country's recorded, however the quantities were very low and volumes of less than 30 kg's per country were reported.

- 020890 - Meat and edible meat offal; n.e.c. in chapter 2, fresh, chilled, or frozen

South Africa is by far the country that exported products classifiable under 020890 to the most African countries during 2017-2021. The main export destinations in terms of volume during this period were Namibia, Lesotho, Somalia, Mozambique and Eswatini. Namibia exported to fewer countries, with South Africa being the main country of destination by far. Zambia primarily exported to the DR Congo with lesser volumes to South Africa during this period as well.

- 021099 - Meat and edible meat offal; salted, in brine, dried or smoked, and edible flours and meals of meat or meat offal, other than of primates, whales, dolphins, porpoises, manatees, dugongs, seals, sea lions, walruses, reptiles (including snakes and turtles)

South Africa reported exports to the largest number of countries under this HS code. Most notable volumes were to Namibia and the DR Congo. Namibia primarily exported to Zambia, but also reported exports to South Africa in low total volume. Zambia's primary market for this is indicated as Angola based on the available statistics.

- 021093 - Meat and edible meat offal; salted, in brine, dried or smoked, and edible flours and meals of meat or meat offal, of reptiles (including snakes and turtles)

During the period 2017-2021, South Africa only exported 32kg of product under this tariff code to Zimbabwe. Neither Namibia nor Zambia reported having exported any products into Africa under this HS code.

- 160290 - Meat preparations; of meat, meat offal or the blood of any animal, n.e.c. in heading no. 1602

South Africa primarily exported this product to Lesotho, Eswatini and Namibia, with smaller volumes to Botswana and Namibia. Namibia's main export destination was South Africa with very limited volumes to other countries, including Zambia, Angola, and Botswana. During this period, Zambia only reported exporting 50kg in total volume to the DR Congo.

- 020810 - Meat and edible meat offal; of rabbits or hares, fresh, chilled, or frozen

Only South Africa recorded exporting product under this HS code during the period. These were to Botswana, Angola and to a lesser extent Mozambique. Zambia and Namibia did not report any exports.

- 020840 - Meat and edible meat offal; of whales, dolphins, and porpoises (mammals of the order Cetacea); of manatees and dugongs (mammals of the order Sirenia);

of seals, sea lions and walruses (mammals of the suborder Pinnipedia), fresh, chilled, or frozen

South Africa was the only one of the three countries to report exports of this product into Africa during the 2017-2021 period. Primarily to Lesotho and Eswatini.

- 020860 - Meat and edible meat offal; of camels and other camelids (Camelidae), fresh, chilled, or frozen

South Africa was the only one of the three countries to report exports of this product into Africa and only to Mozambique. Despite the potential overlaps of wild and domestic meat the exclusion of certain broader tariff codes, such as those listed above, means that some of the context of what the industry is as an export industry, is lost. All three countries appear to be important wildlife meat trade partners to each other, at least in an African context and on very specific products.

4.4 Concerns about administrative capacity of the competent authorities

The entire value chain of wildlife meat is reliant on the actions of a variety of representatives from multiple competent authorities (departments within government). These activities range from the issuing of permits to the inspection of carcasses and the certification procedures related to the approval of abattoirs etc. Meat destined for export is also subject to further inspection and approval procedures and in many instances outside audit by the destination country or through private standards. From desktop research, wildlife meat appears to largely be free of the politicization of trade as far as wildlife meat as a product is concerned. However, Wildlife meat does not originate in a vacuum from other industries and the events that take place in industries processing meat from domestic livestock have a bearing on the possibility to access certain markets with wildlife meat as well.

4.5 Recurring animal health diseases that inhibit the ability to export certain categories of meat

There is a particular concern for the future of the export of wildlife meat harvested from cloven hoofed animals in South Africa in particular. Foot and mouth disease is one of the main diseases of concern. Namibia is focused on preventing entry of the disease in particular to protect the domestic red-meat export market and ensure continued export of meat from Namibia. Animal health issues is a good example of a point at which there is considerable intersection with the interests of domestic livestock and the red-meat industries of the various countries.

The animal health status of the country has a bearing on whether or not meat originating from certain species of animal can or cannot be export or imported and in what form the

product is allowed to enter or exit a country. The World Animal Health Organisation (formerly the OIE) and the Codex Alimentarius Commission are the international standard setting bodies of most relevance to the import and export of wildlife meat. Both bodies provide detailed guidelines and recommendations which can be applied to mitigate the risks of trading in wildlife meat. They can also be applied in a manner that facilitates trade. In this regard they are a useful source of guidance in the establishment of the necessary protocols and distinctions between the various species of wildlife and wildlife meat.

Once lost, recognition of disease-free status under the OIE is difficult to regain and often results in a ban in the movement of relevant products to trading partners during this period. In some cases, different standards may apply, and trade can pick up again, but there is a need for considerable bilateral negotiation during these periods.

4.6 Barrier in the import-export phase of the value chain: permit requirements

The table below shows that, in wildlife, only South Africa has recorded infection in wildlife in the period for which data is available online from the OIE. The table below summarises the countries (South Africa, Namibia, and Zambia) in which the OIE records infection with FMD in wildlife.¹⁷ During the period reported, only South Africa shows infection in wildlife specifically.

Table 1: Countries where Infection with FMD in Wild Species has been Reported

Country	Disease	Species of Animal Infected
South Africa	Foot and mouth disease virus (Inf. with)	Syncerus caffer
South Africa	Foot and mouth disease virus (Inf. with)	Aepyceros melampus

Source: World Organisation for Animal Health (up to date as of 2022-09-09)

The following table shows the different species, both domestic and wild in the three countries in which FMD has been reported to the OIE. In domestic animals, both Namibia and Zambia also make the list. However, South Africa remains the dominant reporter. It is possible to deduce that as far as an application of specific policy towards protecting disease free status South Africa faces challenges in both wild and domestic meat. The reality is, as stated earlier, that disease free status affects both industries, usually regardless of the species in which the outbreak is recorded.

¹⁷ A distinction in data has not always been made between wild and domestic and these tables reflect the data as of when the distinction was introduced.

Table 2: Countries where Infection with FMD is reported in Both Wild and Domestic Species

Country	Disease	Species of Animal Infected
Namibia	Foot and mouth disease virus (Inf. with)	Cattle
South Africa	Foot and mouth disease virus (Inf. with)	Aepyceros melampus
South Africa	Foot and mouth disease virus (Inf. with)	Buffaloes
South Africa	Foot and mouth disease virus (Inf. with)	Cattle
South Africa	Foot and mouth disease virus (Inf. with)	Goats
South Africa	Foot and mouth disease virus (Inf. with)	Sheep
South Africa	Foot and mouth disease virus (Inf. with)	Swine
South Africa	Foot and mouth disease virus (Inf. with)	Syncerus caffer
Zambia	Foot and mouth disease virus (Inf. with)	Cattle

Source: World Organisation for Animal Health (up to date as of 2022-09-09)

4.7 The legal framework

In order to provide an overview of the available legislation that may apply to the wildlife meat trade in each of the three countries, the FAOLEX database¹⁸ was consulted. This is a frequently updated database that contains a list of national legislation, policies and bilateral agreements on food, agriculture, and natural resources management for over 200 countries, including South Africa, Zambia and Namibia.¹⁹ This report and research did not intend to provide a doctrinal analysis of the legislation available for each country. It considered the potentially applicable legislation that would be relevant in the resolution of any barriers through national legislation at a high level. It does not focus on specific regulations in any of the countries as this was beyond the scope of the research.

The legal framework as far as it relates to the absence of clear, concise, and specific regulation of wild meat is largely of concern to person's engaged on the wildlife meat trade. In general, the legal frameworks of all three countries will benefit from further

¹⁸ <https://www.fao.org/faolex/background/en/>

¹⁹ Last access September 2022.

refinement of legislation and from less dependency on multiple departments within the value chain with concurrent or overlapping jurisdictions. It should however be noted that given the overlap on matters such as SPS and animal health, the development of the legal framework should be done for the reasons and in the same project as that suggested in the context of SPS measures as barriers in the red meat industry as I have recommended during PDH research conducted in the red meat industry.²⁰

4.8 Barrier in the import-export phase of the value chain: Border requirements and broader NTBs during transit

The barriers that persons engaged in the import or export of wildlife meat experience at the border are typically, although not all, barriers that the AfCFTA mechanism is possibly the appropriate forum at which to address. It is necessary that at the border there is an awareness amongst individuals engaged in trade that this mechanism exists. Its usefulness depends entirely on the actions taken by Member governments once the barrier or incident at the border has been recorded.

5. Conclusion: The suitability of the AfCFTA mechanism as a tool to resolve the main categories of barriers in the intra-African wildlife meat trade

This research considered the AfCFTA NTB mechanism as an appropriate forum of dispute resolution for the barriers identified as within the scope of this research. This research aimed to develop policy recommendations that have the potential to effect actual change in the industry. It was initially assumed that the recommendations made would be limited to technical improvements of the mechanism itself. However, through the course of the research and in particular during the consultations phase, it became apparent that there is a limited engagement with the NTB mechanism in the wild meat industry. The policy recommendations below at section 0 reflect the critical need for technical co-operation and open information available to stakeholders as well as specific capacity building in the wild meat industry. The recommendations related to the NTB mechanism are largely capacity related and on account of the limited engagement on the matter from stakeholders there are limited technical recommendations in terms of improvement of the mechanism itself.

The scoping interviews indicated that in the context of barriers to trade and understanding the wildlife meta industry, there is not enough certainty about what “wild meat” is. This is supported by the interchanging use of the words “game” meat and “wildlife” meat as well as the definition of the HS codes up to 6 digits that do not provide enough description or enough granularity to accurately determine the size of the wildlife

²⁰ Joubert 2022 *Sanitary and Phytosanitary Measures as Barriers to Trade: A South African Perspective*.

industry and the species being traded through trade statistics. The scoping interviews also indicated that there are persistent concerns about administrative capacity (veterinary and animal health related, especially in the harvesting phase) and the ability to trade in the context of recurring animal health diseases that inhibit the ability to export certain categories of meat (e.g., the inability to export cloven hoofed animals on account of FMD). There was also some suggestion that in some cases (be it a specific product or country) that there is a vacuum in the legal framework as far as it relates to the clear, concise and specific regulation of wildlife meat. The part of the value chain that appears to be the source of most concern is the point of harvesting of wildlife meat. The harvesting phase is critical in terms of maintaining the supply of wild meat and the reliability of wild meat availability in the market.

The reporting mechanism was investigated and found to be one that relies on reactive as opposed to proactive actions and in that sense incapable in its current form of preventing barriers from recurring. A significant barrier to the success of the NTB mechanism is its dependence on the stability of each focal point or contact point and challenges related to staff turnover and general resource limitations. It can be assumed that a low level of NTB reporting will not be an indication of a low level of NTBs.

The mechanism does not in itself "enhance trade through removal of non-tariff barriers to trade (NTBs)." The removal of trade barriers and the enhancement of trade remains much more complicated than what the mechanism can deliver in its current form. It serves as a collection point for data that is provided by the public or other State Parties. There are also clearly barriers that the mechanism cannot solve and should not be expected to solve. A significant barrier to the resolution of barriers that it is well suited to solving, however, is that the mechanism relies on the willingness and ability of State parties to act on the information passed on to them and that it presupposes that the State Parties receiving the complaint have both the technical and financial capacity to address the barrier and to act upon the information provided to them. It is not a mechanism well suited to a barrier that is technically complicated or requires swift action to resolve, for example one related to SPS measures or in the case of fresh or perishable produce that cannot afford a delay in action.

The mechanism is potentially valuable as a central record of the nature of existing and resolved NTBs within the AfCFTA area. It is a potentially valuable forum for the recording and monitoring of NTBs that are relatively straight forward in nature and easy to identify. The mechanism is not a suitable forum through which to solve any of the broad challenges that the intra-African trade of wild meat faces. In its current form the mechanism's existence and subsequent purpose and potential is largely unknown within the wild meat industry. It is in particular not suitable as a forum to address matters that are of considerable technical complication in nature. It will not be of assistance in further defining what "wild meat" is, nor does it provide further insight or granularity to accurately determine the size of the wild meat industry and the specific species being traded through the continent. The concerns of a lack of administrative capacity are also not a category of barrier that the mechanism is able to address, for example. Another

example is that there are recurring animal health diseases that inhibit the ability to export certain categories of meat (e.g., the inability to export cloven hoofed animals on account of FMD) and the AfCFTA mechanism is not the correct forum through which to report such barriers.

6. Policy recommendations

The outcome of the research was that the barriers faced by the wild meat industry are not all barriers that the AfCFTA mechanism can reasonably be expected to resolve. The recommendations are split into two categories. The first is technical recommendations related to the mechanism itself and the second is broader recommendations.

6.1 Technical policy recommendations: The AfCFTA NTB Mechanism

6.1.1 Build broad industry awareness and capacity related to international trade

As far as the AfCFTA mechanism is concerned there is a lack of awareness of the potential and purpose of the AfCFTA NTB Mechanism, and it may be that smaller industries such as the wildlife meat industry are not being reached by AU level capacity building and stakeholder engagement. It is recommended that training material be developed to guide stakeholders through a broad overview of the foundations and core concepts of international trade to facilitate further engagement with and insight into the potential of the AfCFTA. It is also recommended that training material be developed to guide importers or exporters of wild meat through the use and purpose of the NTB mechanism.

Develop training material to:

- Guide stakeholders through the foundations and core concepts of international trade including individual rights, obligations and methods of dispute or barrier resolution
- Guide stakeholders through the role and purpose of international standards, international standard setting bodies, private standards, and national standards

6.1.2 Build specific capacity in the wild meat industry related to the AfCFTA

The AfCFTA provides the opportunity for the wild meat industry to grow intra African trade and to benefit from the free trade area that the agreement creates. In order to benefit from the opportunities presented by the agreement the wild meat industry will benefit from specific capacity building related to the AfCFTA in general and the disciplines of international trade law that practically affect their ability to engage in trade.

Develop training material to:

- Guide importers or exporters of wild meat through the use and purpose of AfCFTA (including disciplines further than NTBs)
- Guide stakeholders and actors in the value chain of wild meat through the use and purpose of AfCFTA (including disciplines further than NTBs)

6.1.3 Build specific capacity in the wild meat industry related to the AfCFTA NTB Mechanism

The scoping interviews and consultations indicated that in general, stakeholders were not familiar with nor actively engaged in reporting relevant NTBs through the AfCFTA mechanism.

Develop training material to:

- Guide importers or exporters of wild meat through the use and purpose of AfCFTA NTB Reporting, Monitoring and Elimination Mechanism
- Guide stakeholders and actors in the value chain of wild meat through the use and purpose of the AfCFTA NTB Reporting, Monitoring and Elimination Mechanism

6.1.4 Facilitate eased access to NTB data from the AfCFTA NTB Mechanism

There is a lack of access to the data captured by the AfCFTA mechanism. The AfCFTA mechanism is potentially the closest to a single source of quantifiable NTB related data in the continent should the mechanism succeed in attracting reporting and resolution of barriers. Access to this data, the downloading of a record of resolved, recently reported and ongoing NTBs reported will enable both researchers and industry to make targeted suggestions and decisions about what to do in terms of resolving barriers proactively. It is a barrier to the industry and researchers to have to follow a route of requesting data through focal point, especially given the errors identified above at as far as contact details for focal points is concerned. Reliance on filtering options from the website itself for example is not adequate.

- Facilitate free and open access to downloadable versions of the data recording NTBs notified through the AfCFTA mechanism as well as the details and status of the incidents
- Build industry capacity in terms of the interpretation of data and its importance in decision making

6.1.5 Prioritise proactive prevention, removal, or mitigation of NTBs

Proactive prevention, removal, or mitigation of NTBs should be prioritized. If barriers are not proactively addressed industry may find itself in a position where it cannot guarantee supply and encourage investment. The removal of barriers is an exercise that cannot be achieved by one group alone. The proactive reduction or removal of NTBs would benefit from mixed-methodology and intra-disciplinary research as both qualitative and quantitative research across trade law, economics, science (animal health), social science and conservation sciences. Different backgrounds can contribute to proactive action towards NTB removal as opposed to a reliance on the reactive resolution of barriers. Research must be conducted with the practical effect of decisions in mind and with input from industry. It should include the development of wild meat specific guidelines and build technical capacity.

- Implement intra-African research and NTB identification projects
 - mixed-methodology and intra-disciplinary research across trade law, economics, science (animal health), social science and conservation sciences
 - both qualitative and quantitative research
 - foster proactive action as opposed to a reliance on the reactive resolution of barriers
- Equip researchers and postgraduate students from diverse academic backgrounds with the necessary training, methodological tools, and funding to assist in conducting the required research
- Develop commodity specific import and export guidelines and build technical capacity

6.1.6 Increase certainty and transparency: Establish a National Monitoring Committee and National Focal Point

There is a lack of certainty and transparency during the NTB reporting and resolution process once the complaint is passed on to the Member country concerned. It is of little use to have international guidelines or laws if at the national level where in this case the active resolution of the barrier reported is addressed, there is no mandated guideline and responsibility assigned in national legislation. It opens up the opportunity to evade responsibility for inaction or to evade responsibility for a decision made. It could also result in uncertainty about which department has the mandate to act.

It is recommended that Member countries develop domestic legislation or regulations that mandate the establishment of a National Monitoring Committee and National Focal Point. They should detail specific time frames and responsibility as well as other necessary institutional responsibility and mandates and they should state consequences for a failure to act as well as applicable remedies. This recommendation is not wild meat

specific as the National Monitoring Committee and National Focal Point are responsible for all relevant matters, not just matters related to wild meat.

Develop domestic legislation or regulations that mandate the establishment of a National Monitoring Committee and National Focal Point

- Detail specific time frames and responsibility as well as other necessary institutional responsibility and mandates
- State consequences for a failure to act as well as applicable remedies should be clearly stated

6.2 Technical policy recommendations: Broader concerns beyond the AfCFTA mechanism

6.2.1 Harmonise and standardise what wildlife meat means

It will be useful to harmonise and standardise at a continental level what wildlife meat is (or is not) in the commercial sense in the wildlife meat industry. The certainty that language and definition provides can ease the further standardization of import and export guidelines or protocols. The standard should be set by consultation within industry and contain details that distinguish the understanding of what wildlife meat is or is not in terms of ranching practices, veterinary intervention etc.

- Develop a harmonised standard at an AfCFTA level defining what is considered “wildlife meat” and what is not for purposes of commercial trade in wildlife meat within the continent
- This standard should include clarity on, for example, production and harvesting practices

6.2.2 Define HS codes beyond the 6-digit HS code level in National tariff books

Related to the definition of what wildlife meat is the further definition of wildlife meat in tariff books. One of the barriers highlighted earlier is inadequate product classification or customs related issues. Clarity of HS codes beyond a 6-digit level will not only facilitate eased movement across borders and potentially avoid delays in the movement of perishable products, but it will also start to develop a clearer picture of the more precise economic value of formally traded wildlife meat and valuable data for the industry.

- AfCFTA Members should define their HS codes specific to wildlife meat beyond the 6-digit HS code level

6.2.3 Address specific barriers during the harvesting phase of the value chain

The research indicates a point in the value chain of wildlife meat that faces a particularly high concentration of barriers to trade at the harvesting phase. Where national standards are absent or inadequate develop private standards for the harvesting of wildlife meat in the AfCFTA area. It is important that these be accessible and are accompanied by accessible and up to date import and export guidelines per category of wildlife meat (where necessary) per country in the AfCFTA. Namibia has an example of clear guidelines for harvesting for export to the EU. The following recommendations are made:

- Develop private standards for harvesting wild meat in the AfCFTA area
 - This should include certification of inspectors and other necessary support)
 - Develop training guidelines and material for professional development of those implementing private standards
- Develop harmonised national standards for the harvesting of wild meat in the AfCFTA area
- Develop accessible and up to date import and export guidelines per category of wildlife meat per country in the AfCFTA
- Develop capacity and technical trade literature regarding the importance of a country's animal health status in import and export of wild meat
 - Develop technical (veterinary) and trade literature and training material to create awareness of the importance of and actions to take towards greater animal health and disease prevention

6.2.4 Support the further development of existing recommendations and strategies to facilitate import and export of wild meat trade

There are existing strategies and agreements related to the facilitation of the export of meat, in particular in the event of disease outbreaks that affect country disease free status.

- Facilitate the further development of existing recommendations, for example commodity-based trade from areas in which animal health statuses fluctuate

6.2.5 Co-operate with other industries on the removal of barriers related to the country animal health status

The animal health status of the country has a large bearing on the ability to export or not. Diseases such as foot and mouth disease, African swine fever, rabies and avian

influenza are examples of diseases that both the livestock and wildlife industries are affected by.

To adequately address this barrier there must co-operation with the domestic livestock industry in the reporting, control of and prevention of animal diseases that affect both industries. There must also be co-operation between commercially orientated and hobby focused wildlife producers in the reporting, control of and prevention of animal diseases. It is recommended that technical (veterinary) and trade literature and training material be developed to create awareness of the importance of and actions to take towards greater animal health and disease prevention. There are solutions that already exist and it is recommended that industry further development these existing recommendations, for example commodity-based trade from areas in which animal health statuses fluctuate.

- Co-operation with the domestic livestock industry in the development of simplified procedures for permitting
- Open central database of up to date, accessible scientific information, and trade guidelines per species of wildlife and information related to overlapping disease control and related matters shared with the livestock industry

6.2.6 Create an open AfCFTA database that contains templates of harmonised veterinary certificates

It will be useful to develop an open central database of up to date, accessible scientific information, and trade guidelines per species of wildlife exported for purposes of facilitating the continuation or resumption of trade in the event of the outbreak of a listed animal health disease. The central database should contain templates of harmonised veterinary certificates based on the guidelines by international standard setting bodies for use by the relevant departments responsible for issuing them. The templates available should account for the different scenarios that possibly arise during and after disease outbreaks. Explanatory literature of the technical justification for the specifications should accompany the templates.

- The central database should contain templates of harmonised veterinary certificates based on the guidelines by international standard setting bodies for use by the relevant departments responsible for issuing them. Templates available should account for the different scenarios that possibly arise during and after disease outbreaks.

6.2.7 Develop technical trade literature to accompany requests for permits related to specialised wild meat products or categories of wild meat

Development of technical (veterinary) and trade literature that is science based and user friendly to accompany the request for specific permit requests in countries where the exporter is known to not have comparable wildlife or diseases present

6.2.8 Simplify and streamline permit procedures

It is very important that government departments simplify and streamline permit procedures. This can be done through co-operation with the domestic livestock industry in the development of simplified procedures for permitting, especially as it relates to the control of diseases that affect the trade in both domestic livestock and wildlife meat.

6.2.9 Reform National legal frameworks

Legislation must be enabling, and it must not add to the collection of barriers that already exist. It is not possible to entirely remove barriers related to regulation if the legislation under which the trade is conducted is not purpose specific and is in itself a barrier to trade on account of vagueness, outdated practices or other reasons. Legislation should domesticate international rights, principles and obligations into national law for purposes of certainty, transparency and benefit of the individuals to whom it applies in international trade.

- Write legislation that is enabling, purpose specific and practically implementable in the wildlife meat value chain
- Reform the national SPS related frameworks of AfCFTA members into frameworks that prioritize the design and implementation of a legislative framework designed for the purpose of translating international SPS-related rights, obligations and principles into law and policy at the national level

6.2.10 Address administrative capacity gaps of the competent authorities

Where administrative capacity is lacking or absent during the activities under the competence of various government departments or representatives, the creation of private standards or assignees should be implemented.