

Reflecting National Circumstances and Development Priorities in National Codes on Good Agricultural Practices That Can be benchmarked to EUREPGAP – The Case Of Uganda

**Draft background note for the FAO-UNCTAD Regional Workshop on
Good Agriculture Practices in Eastern and Southern Africa:
Practices and Policies
5-9 March, Nairobi, Kenya¹**

¹ For further information, please see the meeting website at www.unctad.org/trade_env/meeting.asp?MeetingID=217

Note

This paper was commissioned by UNCTAD under its Consultative Task Force on Environmental Requirements and Market Access for Developing Countries.

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ABBREVIATIONS & ACRONYMS

UEPB	Uganda Export Promotion Board
COMESA	Common Market for Eastern and Southern Africa
IDEA	Investment in Developing Export Agriculture
CAA	Civil Aviation Authority
EU	European Union
PIP	Pesticide Initiative Programme
IPM	Integrated Pest Management
MAAIF	Ministry of Agriculture Animal Industry and Fisheries
NOGAMU	National Organic Agricultural Movement of Uganda
IMO	Institute for Marketecology
PMO	Produce Marketing Organization
UNBS	Uganda National Beruea of Standards
USAID	United States Agency for International Development
HORTEXA	Horticultural Exporters Association
AMA	Agribusiness Management Associates
FAUEX	Federation of Association of Uganda Exporters
MTTI	Ministry of Trade Tourism and Industry
UNAFFE	Uganda National Farmers Federation
KARI	Kawanda Agricultural Research Institute
HPOU	Horticultural Promotion Organization of Uganda
MFPED	Ministry of Finance, Planning and Economic Development
PMA	Plan for Modernization of Agriculture
NAADS	National Agricultural Advisory Services
NEMA	National Environment Management Authority
ILO	International Labour Organization
MoH	Ministry of Health
NARO	National Agricultural Research Organization
SIDA	Swedish International Development Agency
EPOPA	Export Promotion of Organic Products from Africa
FAO	Food and Agricultural Organization
UNCTAD	United Nations Conference on Trade and Development.

Acknowledgements

I would like to extend my appreciation to all those contributed to this study by sharing with me the information and expertise without which the production of this document would have been difficult. Special thanks go to the staff of the ministry of Agriculture, Agribusiness Management Associates, Uganda Export Promotions Board, Uganda National Bureau of Standards and the individual exporters associations and all those who provided crucial data needed to finalize this assignment on behalf of UNCTAD.

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Overview of production and trade patterns of Horticultural products in Uganda and the role of EUREPGAP.

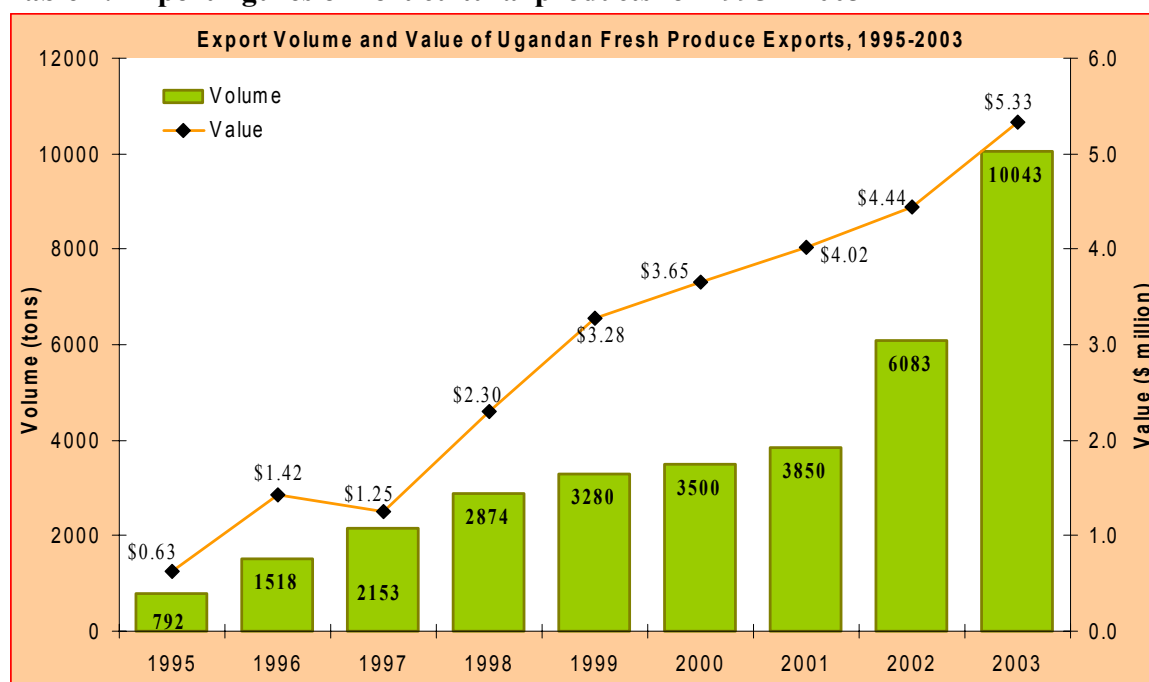
Introduction

Uganda is largely an agricultural country with 85% of its population living in rural areas and over 80% engaged in Agriculture. Currently, Agriculture contributes about 40% to the Gross Domestic Products (GDP). The country has a tropical climate, which allows the production of a variety of horticultural products all year around.

Horticultural production (flowers, fruits and vegetables) has intensified in the last 20 years, with farmers targeting both the local and export markets. To date, Horticultural product export contribute greatly to Uganda's foreign exchange earning. In 2000, horticultural exports contributed US\$ 3.6M (Fruits and Vegetables) and US\$ 15M (flowers) to the National Foreign exchange earnings [2]. By end of 2004, Horticultural export earnings had increased to US \$ 8.6M (for fruits and vegetables) and US \$ 32 M (Flowers), representing an average annual growth in export value of 33% [1,2,7]

The main horticultural products exported from Uganda in terms of volume include; Bananas (Matooke), hot peppers (scotch bonnet), fine and runner beans, apple bananas, green chillies (cayenne), okra, pineapples and passion fruits. Others include; sugarcanes, aubergines, mangoes (raw and ripe) and papaya.

Europe remained the main export market for all Uganda's products accounting for 28% of all exports, closely followed by the Common Market for Eastern and Southern Africa - COMESA (27%) [7]. In terms of horticultural exports, Europe accounts for over 70% of export market for Uganda's products representing an important market for Uganda as a country and the thousands of smallholder farmers who earn their living for horticultural production. Other markets for Fresh produce included the COMESA It is important to note that almost all fresh and vegetable exports from Uganda to Europe mainly go to wholesale, especially Spitalfields and western international markets in the UK, as well as other wholesale markets in other European countries [3,5,6]. There have been little attempts to supply supermarkets, because the level of infrastructural development for quality and hygiene is still so low among the Uganda exporters and hence are not acceptable to most supermarkets.

Table 1: Export figures of horticultural products for 1995 – 2003

Source: IDEA Project data

Exports by type from Entebbe International Airport (Tonnes)

Table 2: Year 2004

MONTH	FLOWERS	PAPAIN	FRESH PRODUCE	VANILLA	OTHERS	TOTAL
JAN	449	13	439	7	91	2450
FEB	538	15	406	1	84	2452
MAR	562	14	440	3	140	2577
APR	485	8	425	0	105	2704
MAY	555	25	439	0	113	2776
JUN	472	20	454	1	205	2566
JUL	523	8	365	0	301	2598
AUG	407	23	317	14	442	2774
SEPT	518	17	315	8	255	2913
OCT	561	11	359	13	162	3212
NOV	524	2	384	9	108	3117
DEC	556	8	491	10	129	3309
TOTAL	6,152	164	4,834	68	2,135	33,449

Source: CAA export statistics

Table 3: Year 2005

MONTH	FLOWERS	PAPAIN	FRESH PRODUCE	VANILLA	OTHERS	TOTAL
JAN	425	12	439	1	58	3156
FEB	614	5	324	1	31	2846
MAR	573	4	436	19	66	3407
APR	560	11	476	10	49	3331
MAY	488	8	525	10	104	3172
JUN	574	2	397	5	126	3301
JUL	565	13	376	3	168	2969
AUG	560	52	382	3	185	2967
SEPT	582	11	323	41	213	3274
OCT	586	17	366	22	175	3255
NOV	673	15	388	41	135	3211
DEC	612	14	445	30	337	3343
TOTAL	6,813	164	4,877	185	1,647	38,231

Source: CAA export statistics

Most of the horticultural production (fruits and vegetables) for export is managed by small holders located in different parts of the country but mainly the central region. On the side of flowers, all the farms are located around the shores of Lake Victoria and close to the airport with access to abundant volumes of water. Majority of the smallholders are not organized in groups, are scattered, and sell their produce individually to exporters. There are a few quite organized out-grower schemes in the country, where exporters organize smallholder farmers and enter into contractual arrangements. The most successful arrangements of out-grower production have been in Mubuku irrigation scheme (Kasese, Western Uganda) where thousands of small farmers are organized into a scheme and produce vegetables for export all year round. These farmers have been involved in commercial agriculture for the last thirty years and this success is basically due to presence of irrigation water all the year around. The other successful arrangements have been with the organically certified company projects in which the export companies mobilize small farmers, train them and arrange for their certification. Other wise in the majority of cases the smallholder farmers have been individually selling directly to the export companies. It is important to note that there are only three companies that have their own production for about 40% of their exports, the rest of the companies rely on smallholder farmers for their horticultural exports [5,6].

Most small holders involved in flower production are targeting the local market and there is almost no out-grower arrangement as most florists have village and peri-urban gardens where they produce a variety of flowers supplemented by flower export companies.

Food safety and quality issues have become very pronounced since the coming into force of the EU General Food Law (EC 178/2002). There has been a lot of sensitisation of export companies on the increasing requirements in the EU market to comply with the food safety requirements. Companies that entirely rely on the small outgrowers for their produce have been trying to establish systems that will ensure food safety. Most fruit and vegetable export companies have received support from the Pesticide Initiative Program (PIP) in form of trainings to the staff and their outgrowers in most of the important areas that contribute to food safety and traceability. The companies have also been assisted to establish traceability systems to allow for tracking and

tracing of their exports. Emphasis in the trainings has been placed on safe use of pesticides, Integrated Pest Management (IPM), and food safety and hygiene. Two years ago, the Uganda government under the Strategic Intervention for Export, introduced a fund that was geared towards training of stakeholders in the industry. The government through Ministry of Agriculture, Animal Industry and Fisheries (MAAIF) have identified and organized export villages to receive training in GAP using the present private service providers. This was an additional activity on the awareness program about food safety and quality issues. At the moment, there is only one large farm growing both fruits and vegetables plus flowers, that has been certified EurepGAP compliant. However, this certification is on the side of flowers only, but has played a big role in the development of the fruits and vegetable sector on the same farm. At the moment, most exporters are kin on EurepGAP with two farms moving towards certification of their out-grower schemes but this is in early stages. It is important to note that in the area of Organic production, the National Organic Agricultural Movement Of Uganda (NOGAMU) together with other stakeholders in the country have established a local Organic certification body, UGOCERT which does certification of organically producing farms especially the out-growers schemes according to EU, US and Japanese market requirements. This is currently being done in collaboration with other internationally accredited certification bodies such as IMO and CERES. Currently there are about 22 companies with outgrower schemes that are organically certified to international standards, representing over 45,000 smallholder farmers. Its important to note that some of the organically certified companies have also started working towards EurepGAP certification as away of increasing their competitiveness and also because by being organically certified, they already comply to over 70% of the EUREPGAP and 100% of the traceability requirements and therefore will find it easier to comply with the remaining requirements to be EurepGAP certified as well.

There are some issues that are important in EurepGAP and other food safety/quality requirements for marketing products e.g.

- **Traceability:** Which is mentioned in the EU General Food Law (EC178/2002) requires that at least the operator is able to track and trace his products on a one - up- one down basis, i.e. the importer needs to know the supplier from the third country from whom the products are sourced and also the operator to whom he immediately sells to. EUREPGAP also emphasizes traceability and requires that a traceability system that allows a EUREPGAP registered product to be traced back to the farm or group of farmers, and tracked forward to the immediate customer, be put in place.

Its important to recognize that meeting EurepGAP requirements will contribute to improvement in other factors required up the chain such as hygiene and reduction of hazards (especially chemical hazards) in the horticultural products

Most exports from Uganda especially fruits and vegetables go to wholesale markets in the UK e.g. New Spitalfields and Western International, and small supermarkets in Rotterdam. To date it is only the flower companies that have been involved in MPS scheme, which targets flowers to The Netherlands. Although there has been no pressure from the wholesale markets for exporters to comply with EurepGAP, indications are such that in the very near future it would be difficult for exporters without EUREP Gap to survive even in the wholesale market as competition and the need to demonstrate due diligence intensifies among the wholesalers [6]. EurepGAP is important in the main export market since it emphasize the work or role by the producers in supplying safe food. Therefore the buyers in importing countries will have knowledge of how

the imported products are produced and this will increase their confidence. EurepGAP also demonstrates a framework for GAP, it adopts IPM/ICM practices, supports HACCP and helps to analyse the food production chain.

There are expected implications of EurepGAP to horticultural exports from Uganda, especially given the fact that production is almost entirely carried out by smallholders, who have almost no appropriate infrastructure at the farms and in most cases have little access to appropriate extension services. While the import markets are moving fast to implement EurepGAP requirements (including wholesale markets), the speed of infrastructural development at the farms (packing sheds and distribution centres) and other services (training and extension) to the smallholders are not at the same pace and hence unless quick interventions to help smallholders in this direction are carried out, the majority of the smallholders will be left out [5,6].

Looking at the different options in EurepGAP certification, most producers in Uganda will be interested in option II of Produce Marketing Organizations (PMO), this is because the production arrangement in Uganda is such that many smallholders will be working with an exporter as outgrowers. The immediate limitation will be the high certification costs which range between US\$ 4000 and US\$ 10,000 depending on the size and organization of a given PMO, and which many exporters find prohibitive [6].

In Uganda the only internationally accredited certifiers are mainly in the organic sector i.e. IMO from Switzerland, CERES, ECOCERT, SOIL ASSOCIATION (all of which are foreign based) and UgoCert, which is a local Ugandan company which was established by the organic stakeholders with support from the SIDA funded EPOPA (Export Promotion of Organic Products from Africa) program. Fortunately some of the organic certifiers are also accredited EUREPGAP certifiers (e.g. IMO and CERES). In addition, the country has had EurepGAP internal auditors trained through support from the PIP programme but no local certification body has been accredited yet.

2. National experiences with the development of “quality systems for Exported horticultural products”

Uganda has no third country arrangement with any foreign quality assurance scheme. Some flower farms have been certified as MPS and EurepGAP compliant [5] but this is a business-to-business arrangement.

At the moment, Uganda horticultural industry through financial and technical support from the USAID funded IDEA project, had developed a National code of Practice but this process was mainly exporter driven and with little involvement of smallholder producers. There is need for a national GAP scheme since it will improve output from smallholders, in addition to enhanced acceptance into the international markets. Small holders would then be assisted to embrace the National GAP in order to remain in business. Presence of a national GAP would also improve the image of the country regarding quality assurance for products [5,6]

The government through the Uganda National Bureau of Standards (UNBS) manages the national quality assurance system. UNBS is responsible for monitoring quality of products delivered on the Uganda market, as well as issuing licenses for using the Uganda Standards

Certification Mark. The mark indicates that the processor /manufacturer is capable of consistently manufacturing a safe and quality product in accordance with either Ugandan or internationally accepted standards. To date most of UNBS's activities are mainly in manufacturing and processed products and not in fresh agriculture/horticulture products. With the commissioning of a National task Force on EurepGAP in June 2003, on which UNBS is a member, the latter is identifying key areas that may need their expertise to conform to EurepGAP requirements. The task force was expected to assist the horticultural export industry to comply with EUREPGAP and other international market requirements [8]

From the private sector perspective, there has been a slow movement towards a national quality assurance system, mainly because of lack of unity among the horticultural exporters and lack of clear collaborative channels with the public sector.

As regards infrastructural support towards a national assurance system, at present there is only one private run Laboratory (Chemiphar) that is internationally accredited. The Government (UNBS) system has only the microbiology laboratory that is internationally accredited.

At the moment, the present status of the national GAP scheme demands a lot to be done. This has of course been detrimental to the establishment of relationships with importing countries especially when it comes to market entry. Most business developments have been very costly because of limited structures and systems in place for quality assurance. The slow development of the national GAP has had an impact on the way importing countries consider our preparedness with the changing laws. Recently the EU introduced tougher laws to care of increasing demands by the consumers. The laws have found Uganda not prepared enough especially in form of structures to handle the increasing consumer demands; this is in addition to slow development of exporting companies.

Uganda as a country is currently very aggressive in establishing national systems but the biggest problem is to differentiate what private and public sector can do on their own or as partners. This is evidenced by the development of the new draft law on Food safety and hygiene. This law should take care of both production (Agronomy) and post harvest handling and processing. The process of putting in place this law should involve both private and public sector stakeholders for it to be useful and practical. This law was at first drafted by MAAIF but it was later taken over by the Ministry of Health, with the explanation that food safety has more to do with people falling sick than agricultural production, hence the transfer of the responsibility of the bill from the ministry of Agriculture to the Ministry of Health. This is a clear sign of the lack of coordination and understanding of roles, which is one of the impediments to the development of a national quality assurance system.

Factors to be reflected in a National Protocol on Good Agricultural Practices.

Standards need to be established through consensus of all stakeholders in any given sector. This will ensure that the developed standards are owned by the concerned parties and this will lead to a smoother implementation and acceptability of the standards. It will also ensure that the developed standards reflect the circumstances and situations, as well as concerns of all the stakeholders.

In the current initiatives and discussion on national standards for the horticultural sector, and specifically on the work of the national taskforce on EUREP Gap which was commissioned by the Ministry of Agriculture in June 2003, a number and variety of stakeholders are involved in this initiative from both the private and public sectors and these include; Government agencies like Uganda National Bureau of Standards (UNBS), Uganda Export Promotions Board (UEPB), Ministry of Tourism, Trade and Industry (MTTI), Ministry of Agriculture, Animal Industry and Fisheries (MAAIF), Kawanda Agricultural Research Institute (KARI), Exporters and Farmers Associations like HORTEXA, FAUEX, NOGAMU, AMA, , UNAFFE, , Individual exporters, etc.

The commissioning of the EUREP GAP Task Force was as a response to the increasing strict requirements on exports from Uganda to comply with the new market demands especially from Europe i.e. the demand from European Retailers that exports from Uganda and other export countries need to be EUREP GAP certified and the new legislations e.g. the EU general good law (EEC 178 / 2002, which requires at least the importer to know the operator in the third country from whom he has sourced the products, this became effective from the 1st January 2005.

There has been some criticism on the approach to the formation of the EUREP GAP Taskforce by government especially coming from the private sector and exporters. While the intention of government (MAAIF) were good in forming the taskforce, there wasn't enough sensitization and consultation of all the stakeholders before appointment of the taskforce. As a result, many stakeholders felt that the ministry of agriculture in effect assumed many roles and responsibilities and the process was too top down (i.e. from the Ministry to the taskforce), and yet their role should have been to facilitate the activities and bringing together the stakeholders in defining the objectives of the task force and exploring the possibilities to be pursued as provided by EUREP GAP. This undermined the confidence of the stakeholders and reduced their active participation.

In another example, while it is understood that inspection and certifications according to the EUREP Gap code is carried out by third party certification bodies, the Ministry of Agriculture has already indicated that its role will among others be to carry out inspections and confirming checks for EUREP GAP and certify and issue certificates to companies that produce according to EUREP GAP.

This highlights a lack of clear understanding on which roles should be implemented by which stakeholders and this subsequently undermines the mandate of the taskforce in providing the necessary guidance towards understanding and complying to international market requirements with regards to standards such as EUREP GAP and other standards.

Whereas EUREP GAP offers both the possibility for a country to submit national interpretation, the way France, Italy and Netherlands have done or create a national standard that is benchmarked against EUREP GAP (the way the Chile Gap was developed or Kenya Gap is being developed), its still unclear which option is being pursued in the case of Uganda due to the circumstances explained in the preceding sections. There has not been any consensus on which possibility should be perused and why, and there is no clear indication that the majority of the key stakeholders are even aware or sensitized of the availability of these options. For now the

Ministry of Agriculture is undertaking trainings to organized groups of farmers to comply with EUREPGAP requirements

Currently all activities of the taskforce and its results (Standards and guidelines) are being implemented and owned by the Ministry of Agriculture, however, it is also important to note that unlike Kenya, there hasn't been a strong United Horticultural Exporters' Association in Uganda. Instead there have been a number of small, sometimes-conflicting associations, representing different horticultural exporters' interests. This has been a key factor in weakening the sector and lack of collective response to quality and safety issues including response to common challenges such as complying with EUREP GAP.

On a positive note, the Ministry of Agriculture has supported the initiative of uniting all stakeholders in the horticultural sector under one umbrella association, this has resulted into the formation of the Horticultural Promotion Organization of Uganda (HPOU), and this has somehow managed to bring together the various associations and groups under one umbrella.

While the Government's ownership of the EUREP GAP Task Force activities through the Ministry of Agriculture has been understandable in the absence of a strong private sector Horticultural body, it is important to recognize that a national standard need to be owned by a multi stakeholder association in order to:

- Keep all stakeholders active in the process and hence maintain credibility
- Utilize the broad skills base from the different stakeholders participating.
- Increase the likelihood of meeting the needs and priorities of all players (growers, workers, exporters, government e.t.c)

As a result, all stakeholders will support the standard and act as ambassadors to ensure its implementation and acceptability. In the current situation, the National taskforce on EUREP GAP offers a more balanced forum to own the National standard since it is composed of representatives from both the private and public sectors. However, in order to improve the relevance and acceptability of the current taskforce, there is need to make it more independent and not solely reporting to MAAIF but rather to all stakeholders. There is also a need to clarify on the terms of reference and objectives to be more focused. The foreseeable challenge in such an arrangement where the taskforce would own the standard is the legal basis of the taskforce because by their nature, taskforces are limited by time and accomplishment of the specific task, yet the ownership of the standard is supposed to stand the test of time.

While looking at the development of a National Gap, it is important to realize the following facts;

- Agricultural production in Uganda is dominated by smallholder farmers (over 80%) and when it comes to horticultural production over 95% of farmers are smallholders (ranging from 0.25 – 1 ha)
- Entirely all horticultural exports from Uganda are sourced from smallholders who act as out growers for the export companies (only about 3 companies have their own production averaging about 25 ha, but these still depend on out growers for about 40% - 60% of their exports)
- Majority of these farmers are in rural areas where the basic infrastructure is lacking or in a bad state (roads, post harvest handling facilities e.t.c)

- Majority of smallholders are not organized along specified enterprises, they are scattered and growing a number of different crops for both their domestic consumption and for sale.
- Prevailing low levels of education among majority of smallholder farmers.
- Uganda has probably the lowest usage of agro chemicals in Africa less than 2% or 1 – 2kg/ha, or about 5% of all that used in East Africa [9,10]
- Mainly family and casual labor, and only in very few cases do farmers use permanent workers.

The development priority of the Government of Uganda as hatched in its policy for the modernization of Agriculture (PMA) is to transform Agricultural production from subsistence to production for markets (local or export). This implies that the economy of Uganda, being basically agricultural, will become market led [3]

This necessitates taking market requirements and concerns (Food safety, quality, traceability, environmental protection e.t.c), as compounded in the EUREPGAP standard, and incorporating them into a National Gap.

In addition, serious consideration on the specific national circumstances outlined above need to be borne in mind in order to realize a more realistic GAP, that will be practical and acceptable to both the local stakeholders and the market.

It is therefore important that in the development and implementation of a National GAP, specific attention need to be given to the organization and development of small holder schemes, focusing the schemes around particular enterprises (e.g. the current zoning programme by the Ministry of Agriculture) and building the capacity of the schemes focusing on the key areas of the GAP e.g. record keeping, surveillance of pests and diseases e.t.c. In addition, there is need to focus on improving or developing the infrastructure (Transport, post harvest handling facilities e.t.c) around the schemes, since the absence of the basic infrastructure will make pursuance of the bench making strategy of the National GAP to EUREP GAP difficult to attain.

Given the national development priorities and the practical circumstances of horticulture production and marketing on the ground, there are no specific EUREP GAP requirements that are misplaced in the case of Uganda. However, it is important to point out that the section on workers safety and welfare, in its current form may not be in line with much of the production in Uganda since majority of production is entirely small holder based relying on family labour and occasionally casual labour sourced from neighbors and relatives.

Otherwise many of the EUREP GAP requirements are already covered in various government policies and laws such as the Plant protection ACT 1962, CAP 244 and several ordinances 1937 and 1977, the control of agricultural chemicals statute 1994, The Uganda National Bureau of Standards (UNBS) 2001, the National Environment Management Authority (NEMA) statute 1995, and now the Food Safety Bill which is yet to be presented to Parliament. These policies in one way or the other support the content of EUREP GAP though not in a more coordinated way and despite the general lack of enforcement and implementation.

Specific concern and requirements of smallholder and out-grower Networks

Smallholders are the major producers of exportable fruits and vegetables from Uganda, they cover over 98% of all horticultural (fruits and vegetables) production in the country, thus their involvement in the National Gap development process is crucial for the successful improvement in the quality and volume of products grown and marketed.

The critical factor in involving smallholders in the National Gap development process is the need to have them organized in commercially oriented groups/cooperatives. This is because in Uganda, their production is small, scattered and they produce a multiplicity of crops as a means of reducing their risks and hence ensuring their survival. This makes evaluation of their compliance to GAPs, auditing and follow up activities complicated. Thus to have them successfully involved in the process requires careful planning, sensitisation and training and above all organizing them first, into commercially oriented groups focusing on particular enterprises.

Over the past year, MAAIF organized targeted training for farmers together with the private sector (exporters). The exercise was aimed at sensitisation of organized farmers groups that are involved in or have the potential to participate in outgrower schemes for horticultural export, on the EurepGAP requirements. This resulted in the formation of what has now been termed “export villages” in different parts of the country. This localization of information was aimed at improvement in strategic planning and involvement of stakeholders especially the small-scale farmers. The MAAIF initiative has been targeted to improve exports and therefore focuses on export products. It is still debatable whether the focus should be on exports because the private sector is willing to make investments in infrastructure and systems to take advantage of the these markets, and whether government need to focus on the local market development as well.

National GAP structures should be established with resources to be operationalised and government need to prioritize and show commitment to avail resources if the GAP has to be implemented with focus on the local market as well

Currently, smallholders are represented at the national level industry meetings through their membership with national associations for example Horticulture Promotion Organization of Uganda (HPOU) and Uganda National Farmers Federation (UNFFE), that has membership of farmers in all the districts countrywide, and therefore are able to contribute towards a proper course of action during the development of the national GAP.

Limits of private sector promotion of small agricultural producers

- Most small holders are small, therefore they do not have great commitment to deliver outputs as per requirement of the exporters
- There is low level of organization in the small holder camps, therefore information flow and analysis is very difficult
- There is an issue of specialization, most private sector promotion is biased towards a particular product but small holders grow a variety of products thus losing the focus on quality as required by exporters

Usually there are some risks involved when smallholders become dependant on powerful buyers in order to access markets. These may include;

- Exporters tend to limit the small holders on which products to grow, this reduces diversification and distribution of risk in case prices of one product goes down
- There is a risk of exporters “owning” the growers in a particular area or group, especially where the farmers are not well organized or do not have a strong leadership that can bargain with the exporter, this reduces chances of these growers being exposed to other chances of improving their income levels through more attractive market opportunities.
- The large buyers have already established market channels, and have the necessary infrastructure and logistics to penetrate and meet the export market requirements. Due to the fact that the smallholders, in most cases cannot afford such logistical investments, they are left with no option but to rely on the large buyer in order to keep their presence in the market.
- Therefore small growers have finally to transform, develop their own management systems and act as business entities. However, in circumstances where most strategic activities like training are done by exporters, chances are that small holders will targeted interventions in-group dynamics to facilitate their transformation into a marketing group, so as to improve their incomes and negotiation skills.

It is therefore important that specific requirements of small holders should be addressed in order to ensure that they are able to comply, these may include:

- Development of information channels through which growers are equipped with useful and up-to-date information to make meaningful decisions
- Development of infrastructure that is required to keep them competitive in the export market. Field handling facilities (Pack house), small irrigation and transport system should be gradually improved with levels of sustainability incorporated into the program
- Management skills which include planning, organization, coordination and control, these systems should be put in place to make sure that small holders can, even without exporters, continue with their business. The key to achieving this largely depends on the establishment of internal quality management systems/Internal control system with procedures and measures to control quality and ensure that products from one group are uniform and meet the market requirements.

Cooperative arrangements among smallholders to benefit from National GAP

As highlighted earlier, the key to integrating the small holders into marketing channels and make them more competitive, lies in the ability to have them organized into commercially oriented groups with clear leadership. Once organized and with specific enterprise focus, the needs of that enterprise in line with the National Gap can then be identified, and an internal control system developed within the group with procedures and internal rules and record system to ensure that the identified GAP activities are implemented. Once the internal control system is established, the group can decide to establish ‘teams’ among themselves that are responsible for implementing particular activities, e.g. Spraying, record keeping etc, on behalf of the rest of the members in the group. The group can therefore clearly specify how they approach purchase of inputs, training, quality control and marketing of their products together. Examples of such arrangements may include:

- Having contract production where by the buyer specifies the details of the production conditions under which a product should be grown and then the group undertakes to grow the product through its internal control system structure.

- Arrangements for smallholder group to have an input supply system which meets the standards of national GAP, supplying and accepting only nationally registered products that also meets their internal procedures. The approved supplier also training the smallholder group “spray team” into the proper application and use of these products.
- Small holders through their groups should go ahead and organize the members to attend crop protection programs that give chance to proper identification of pests through scouting and proper or safe use of pesticides. This system will have to maintain a proper record of all activities which will be useful for traceability purposes
- Cooperative training initiative where farmers benefit from access to updated information regarding the National GAP

Specific EurepGAP requirements difficult for small holders

- Water analysis in villages where most growers use communal sources has remained a challenge but taking samples from different wells/natural springs in the area and analyzing them twice or thrice a year with shared results can be recommended. This is because most production in rural areas is rain fed, and water is used only in very few cases where particular products may require pre-washing at the farm before transporting to the pack house.
- Varieties and rootstocks: most small holders use seed generated from their own farms through selection which may not easily be recorded. In this case we could suggest identifying one good farmer who will be responsible for the process of identifying health plants from which to pick the fruits for the new seed.
- Record keeping: most farmers are illiterate they cannot therefore read and write. It becomes difficult for such farmers to take care of such important information which is used for auditing. It is therefore advisable for them to use a depot system where all records are kept (marketing and collection centre) with individual files for each farmer in the group thus accessing the required information at once. This therefore calls for a centralized management information system for all activities that would be very much taken care of by the internal control system for the group
- Workers health, Safety and Welfare: It is difficult to describe who is a worker in the smallholder perspective. Most small holders use family labour to work on their farms, yet the description of the worker in the code follow the ILO Conventions, but still the smallholders are expected to comply with the entire chapter 12 of EUREPGAP. This calls for development of interpretative guidelines that take care of smallholder perspectives in defining who a worker is, and therefore describing what has to be complied with as far as this chapter is concerned.

Whereas switching to alternative markets, in case of the small holders losing access to export markets by not meeting National GAP requirements is a viable option in the short run, indications and trends are such that the so called alternative markets including the local and regional markets are slowly beginning to demand the same standards with regards to food safety issues. It is therefore important that resources are put in developing a national Gap as soon as possible such that it acts as a foundation for smallholder farmers to access all markets.

In Uganda, the current Food Safety bill (soon to be presented to Parliament) under the Ministry of Health (MoH) concerning food safety and Hygiene emphasizes safe food for both Uganda and importer clients. There have been complaints from most stakeholders especially from the agricultural sector that they were not consulted when developing the food safety bill, and this

already undermines the ownership of the Act when it is finally passed by Parliament. Therefore with the present movement to instill a culture of following proper GAP, small holders can maintain a great foundation for the future market access, and therefore what is needed is to design a comprehensive programme of interventions (including improvements in handling facilities and infrastructure), to develop their capacity and understanding to ensure compliance to the National GAP.

In addition to the above, there is an increased flow of information among the people of Uganda and this has been as a result of improved telecommunication system up to the villages, and there are many NGOs working with communities at the grassroots that would compliment capacity building efforts for the smallholders in line with the National GAP.

In Uganda the majority of small holders produce under traditional conditions where there is very limited use of agrochemicals (less than 5% of that used in the whole of East Africa), often referred to as “organic by default” because it is not audited to be certified organic. It is therefore important to realise how easy it will be for small holders to adopt such production technologies, which conform to the required national GAP.

In addition, the East African member countries are in the process of forming The East African Horticultural Task Force on EurepGAP which will be a regional approach to sharing information on how each country has devised ways to conform to GAP [8]

Importance of Extension Services for Meeting the Requirements of high Precision Agriculture.

With the establishment of a National Gap, smallholders would require technical and organizational support in all the key areas that constitute the code and in a way that is coordinated along the product chain. Such areas would include agronomy (seed and site selection, fertility management, pest and disease prevention and control, soil management, harvesting and post harvest handling as well as over all Food safety and hygiene and quality issues.

More important to these requirements, the delivery of these services need to be well coordinated and well targeted to specific out growers preferably those engaged in a specific product enterprise. One would say that one of the biggest obstacle to the delivery of extension services in Uganda is the fact that the smallholder producers who constitute 98%of the horticultural producers are not organized along particular enterprises, nor in some form of groups or cooperatives. It is not unusual to find many producers growing over 10 different crops and selling them to different market channels. Moreover each producer acting independently of the other. This makes the delivery of support services in the areas highlighted at the beginning of this section quite complicated and uncoordinated.

Currently extension services are provided by the Ministry of Agriculture and other agencies like the National Agricultural Advisory Services (NAADS), National Agricultural Research Organization (NARO). Extension service delivery to farmers was privatized with the creation of NAADS as a separate agency. Under NAADS, organized farmers can demand for advisory services in the area of enterprise of their choice, which would in turn be provided by private

service providers and paid for by Government through the scheme. Other support services are mainly coming from the private sector, mainly the individual export companies directly to their out growers and also Non Government organizations (NGOs) operating in particular areas and working with particular communities.

The current support services are not sufficiently being utilized to make optimum use of national expertise. In the first place, most of the support is being implemented in a reactionary manner i.e. in response to a given need such as pest attack, fertility deficiency, and not in a consistent and coordinated way, taking into account all areas of GAP in respect to a given enterprise. In addition, availability of local capacity in mentioned areas of GAP such as Integrated Pest Management (IPM), Integrated Water Management e.t.c both in the government and private sector is also limited to the extent that it is not enough to cover all smallholders especially those in the countryside.

In order to promote effective extension services to the farmers, both government and private sector initiatives need to be coordinated towards building a National Gap, that takes care of National circumstances but also export market requirements. The private sector has a lot of experience regarding market requirements, and often tend to focus on fulfillment of these requirements. However, government can bring the experience of national circumstances and concentrate on building the capacity of service providers that can match the market requirements and national circumstances in line with the established national GAP.

The desired extension service needs to take care of both local situation and trends in the international market requirements, and this can only be created through government working very closely with the private sector pursuing a common strategy in the form of a National GAP.

Certification and Inspections Systems in Uganda.

There is limited capacity in Uganda as far as certification and inspection systems are concerned. Currently, there seem to be a misunderstanding between government (MAAIF) and the private sector on what should constitute an inspection and certification system in the horticultural sector with regard to compliance to GAPs, and who should have the mandate to inspect and certify.

In August 2004, the Ministry of Agriculture formulated a draft manual of standard operating procedures for horticultural commodity inspection and quality assurance [4], the manual highlighted the procedures including documentation (checklists and forms) that would be used by the Ministry to inspect horticultural products for both local and export markets. The manual grossly covers most areas in GAP, but is not well sequenced and coordinated in line with what would be constituted in a National GAP. Moreover the inspection procedures were developed in absence of standards (National Code) that would guide producers and exporters on implementing GAPs, as well as act as a foundation on which the inspection and certification protocol would be built.

In addition, current Ministry of Agriculture inspectors have been trained to undertake Phyto-Sanitary inspections at the ports of entry into the country and with limited capacity to inspect all stages of horticultural production and handling, including food safety and hygiene in line with GAPs.

Therefore, there is need to define inspection training and build capacity in inspection at all levels (farmers, Extensionists and third party level) in line with the GAPS.

In the area of certification, there is no local certification body that is already accredited to ISO 65. Currently the only local certification body in Uganda (UGOCERT) is offering organic certification services. UGOCERT was initiated by various stakeholders in Uganda lead by the National Organic Agricultural Movement of Uganda (NOGAMU), and with support from the SIDA funded EPOPA Programme, to build local certification capacity and offer affordable services. UGOCERT has already developed its own inspection protocol and trained a pool of inspectors, but initially in organic certification.

The company is now starting to build capacity in other quality systems such as EurepGAP, Utz Kapeh, FairTrade e.t.c, to strengthen its ability to offer certification services and also work towards ISO 65 accreditation. UGOCERT also offers international certification services through partnership with other international certification bodies (mainly IMO and CERES), and collaboration with AFRICERT especially in sharing certification capacities for organic and EurepGAP.

In addition to offering cheaper inspection services, UGOCERT is also seen by stakeholders as a bridge between undertaking international standard requirements and interpreting them in the local perspective, and therefore a means of building local capacity.

In the case of Uganda, group certification (EUREP GAP Option 2) has been found to be a very viable option and a similar arrangement has already been utilized in the organic certification since 1994. Today there are over 50,000 small holder farmers already certified in a similar (option 2) system but for organic production in compliance to international standards. This represents about 22 outgrower schemes, with the biggest one comprising of over 12,000 small holders farmers. This requires efforts to be put in organizing the smallholders into commercially viable and focused groups, provide basic infrastructure and reasonable level of awareness on requirements, and establish an internal quality management system or internal control system (ICS) with documented internal procedures and controls. This would help the group in complying to the standards and provide a basis upon which inspection and certification for the whole group could be made. In an effort to build capacity, the EU – Pesticide Initiative Programme (PIP) has trained a number of local consultants and export staff in the Internal Auditing skills mainly for EUREPGAP and HACCP.

Group certification has been the main channel through which smallholder organic farmers have been able to comply with strict international market standards and be able to access the market. Indeed currently the only two companies that are pursuing EurepGAP certification in Uganda are organic certified companies working with outgrower smallholder farmers. These are finding it easier to comply with option 2 requirements because they already have a similar internal quality management system.

Similar schemes and arrangements could be emulated and scaled up to the benefit of the rest of smallholders in complying with GAP requirements. This will require investment in consolidation of group efforts at the outgrower level, and provision of training and basic infrastructure in line with GAP requirements.

Government's role in National GAP development and implementation

The agro-food sector has a great role in defining and implementing national GAP program. This can be broken down into farmer associations, exporters, retailers and other intermediaries.

The farmers have formed associations which have subscribed to the Uganda National Farmers Federation (UNFFE) as the apex organization in the country. This apex association is involved in identification of key areas where farmers can benefit especially with resource transformation and development of GAP. Farmers have for a long time been advised to look at farming as an investment which translates into good management of the resources like soil, trees, water and animals.

There have been a number of Exporters associations that often did not recognize each other, but recently all came together and have formed an apex association, Horticulture Promotion Organization of Uganda (HPOU), which has seven pillars:

- Market promotion
- Self control and regulatory role
- Training
- Standards and certification
- Research and development
- Lobbying and advocacy
- Private /public partnerships

All the seven pillars emphasize the need to prioritize the development and focus of GAP program in the farming system.

Retailers and intermediaries, who are more of the local and regional levels, have also played a great role in seeing that GAP programs are effectively managed. Associations of input suppliers to the agriculture sector have a partnership with Makerere University to train handlers before renewing their licenses. Local markets especially supermarkets are interested in knowing how products supplied are produced in order to raise confidence of the buyers.

Government has shown interest in developing a National GAP through the following interventions:

- Development of the recent bill on food safety and hygiene, which will soon be tabled in Parliament.
- Uganda government is funding the National EurepGAP task force committee activities though at the moment it looks more of a public sector driven activity than a private sector issue). The national EUREPGAP task force was initiated and constituted by the ministry of Agriculture as a response in assisting Uganda's horticultural exports to comply with the EU market requirements especially the EUREPGAP Standards. Though the approach of constituting this taskforce was seen by the exporters as the usual government initiated programmes, it played a fundamental role of creating awareness on GAP issues, and indications are that it will slowly be transformed into a private driven demand program, with the coming into the limelight of HPOU.
- Government has continued to play an important role in training of farmers in GAP and information dissemination by the agricultural staff, this has been observed through the

various trainings on GAP conducted by the ministry of Agriculture to organized farmer groups countrywide under the ongoing agricultural zoning program.

- There has been criticism that government intervention to assist exporters and smallholder farmers to comply with EurepGAP has been reactionary, and not built on concrete planning and laying a foundation on which a strong national GAP could be established, also it has been criticized for the limited private sector involvement in the design and implementation of the intervention.

Government's role in developing and implementing a national GAP should mainly focus on facilitating the process and mobilizing all the key players in the industry to actively participate in the development and implementation of a National GAP program. This can be in the form of financial support as well as putting in place a conducive regulatory framework. Government also needs to strengthen the inspectorate and entry points, by recruiting enough personell and training them to strengthen their capacity. Currently there are complaints that the manpower at the entry points is not enough, in some incidences exporters have to look for inspectors in order to have their shipment checked and a Phytosanitary certificate issued.

Government can also be responsible for the Promotion and support of National GAP through several activities in the country like radio programs, resource mobilization and national monitoring of progress. In addition, government can carry out conformity assessments to make sure that what is being talked is achieved on the ground

The market recognition of government run/ supported quality assurance, has mainly been situations where international requirements pre-suppose so as highlighted in the examples below;

- The Sanitary and Phytosanitary component is managed by the government through the competent authority i.e. MAAIF to issue certificates at the airport before products are released for export. This is a good system but actual implementation in Uganda is still weak, as it requires a lot of prior inspections before products reach the airport, which in practice are not normally carried out.
- The government also carries out the Pest Risk Assessment; this is a surveillance system to know the present situation of pests and diseases in the country. This is done annually but most exporters and more so the smallholder outgrower schemes are not aware of the results.
- NEMA does also carry out assessment of the impact on the environment when it comes to big investments in agriculture, and a certificate of compliance is issued. This is well recognized in the local market. However, small growers and business are normally not assessed and can easily avoid the process due to NEMA not being well staffed.
- UNBS is also a government body that handles development and certification of standards in the country. UNBS is very active and active and popular, and it awards a "seal" of quality, which is universally accepted in Uganda. Unfortunately, UNBS's work is only active in the manufacturing and processed food sectors, and not in agriculture, and so far only its microbiology laboratory is internationally accredited.

There are advantages of a government sponsored GAP compared to private GAP standards, these include:

- The government has already established several departments throughout the country that just need strengthening especially through local governments, therefore surveillance or monitoring may be easier in addition to information dissemination.
- The government has a better mechanism and structures when it comes to dealing with international donors in the implementation of programs, advocacy and enforcement, and would be more acceptable in working with organizations like UNCTAD that mainly works through governments. In addition the government can have an upper hand in handling conflicts in case they develop related to acceptance of the standards developed in one country compared to another.
- The government has a political will when it comes to the implementation of national programs therefore adherence and enforcement can easily be achieved.

Regarding Government Supportive Policies that can be put in place towards establishment of national GAP.

Currently, the substantive law that regulates the horticultural commodities for export is the plant protection Act 1962 CAP 244 and several ordinances; 1937 and 1977. This is complemented by the Control of Agricultural statute 1989 that has been revised and passed by the parliament in 2006, but has not been accented by the president, The Seed statute 1994, The Uganda National Beureau of Standards 2001 and the NEMA statute 1995, all which support the endeavours to establish a national GAP, and have a quality assurance system in place for horticultural products in Uganda. What is needed is to implement these laws in a more coordinated manner and revise those that are too old in order to strengthen their relevance to a national GAP development process. There is also a need to strengthen collaboration with the private sector in this process and take advantage of other existing policies like the National Agricultural Advisory Services (NAADS), National Agricultural Research Organization (NARO) etc.

There is also a need for a substantive Land management policy where farmers will be controlled or assisted to limit dividing their land into smaller pieces which lead to loss of fertility through soil erosion. Therefore this policy should emphasize land consolidation and better management for higher yields.

Sub-regional initiatives for the development of a regional GAP include:

- Recently East African countries are in the process of forming the East African Horticulture task force on EurepGAP initiated by the East African secretariat in Arusha, it will be responsible for coordinating activities within the three countries.
- There was also an initiative supported by COLEACP for east and central African countries to harmonize the National codes of practice, this led to the development of the present Uganda National horticulture code of practice, that was supported by the USAID funded IDEA Project. This is the only documented effort by the horticulture industry to manage and establish efforts towards GAP.
- The present initiative to create the AfricaGAP is another development in the region to tackle the issue of GAP; this is geared towards the development of a common approach towards keeping an updated record on the national GAP. This has also stimulated discussions about the development of UgaGAP, which would be benchmarked towards other standards in the market.
- The three East African countries have recently reviewed their approach towards the Sanitary and Phyto-Sanitary (SPS) system in the region. People from the competent

authorities or ministries met to review the regional effort to access information in this area [8]

Supportive role of International Organizations in Particular UNCTAD and FAO.

The process of building a National GAP in Uganda requires participation of all stakeholders, and orienting national circumstances or requirements in line with current trends in the international markets regarding the production, handling and marketing of Horticultural products. Currently, as already highlighted, there are a number constraints, which include but not limited to:

- Lack of stakeholder organization in the horticultural export sector (Different exporter associations that do not recognize each other.
- Absence of an organized extension system both in the private and public sector that is well focused and coordinated to the component areas of a National GAP.
- Insufficient capacity in the technical issues regarding GAP.
- Insufficient capacity in inspection of compliance to GAPs.
- Lack of organized out grower schemes and clear focus to specific enterprises.
- Low/limited participation of horticultural industry stakeholders in international standards formulation process.
- Limited capacity in implementing and monitoring of food safety issues
- Poor infrastructure or absence of basic infrastructure at both farmers and exporters' level to ensure compliance to minimum food safety requirements and GAPs in general.

UNCTAD and FAO can play a crucial role in assisting the National GAP development process. This could be achieved through the following:

1. Building the technical capacity in both the public and private sector in issues regarding GAPs.

The technical areas that need capacity building include:

- Conduction of risk assessments along the supply chain, especially at the growers' level
 - Contingency planning in GAP management and implementation based on commercial and regularity trends in the international markets.
 - Set up appropriate information channels that will keep all stakeholders in the supply chain actively involved in the implementation and management of the GAP.
2. Assist in improving the existing physical infrastructure especially at farmers and exporters level to enhance the quality of handling and hence minimize food safety risks.
 3. Support the increased participation and engagement of developing countries like Uganda in international standards formulation, interpretation and management processes, this will reduce the risk of formulated standards being of little relevance to national circumstances and situations in the developing countries.

4. In the case of Uganda, provide guidance to the process of developing interpretative guidelines to complying with EUREPGAP, as well as overall development of national gap that is based on the involvement of all stakeholders, national circumstances and needs, as well as reflecting on the trends and requirements in the international markets.

5. In addition, FAO and other international organizations such as IFAD can contribute significantly to the building up of strong smallholder groups that are organized institutionally built and sensitized and are able to actively and effectively participate in the supply chain. Lack of organized groups of outgrowers that are focused on particular enterprises has been one of the biggest limitation in bringing them as effective and active players in the chain.

Further more, UNCTAD, FAO and other organizations, can particularly facilitate the process of formulating a national code that is realistically based on the local environment and international market requirements.

The success and acceptability of this process need to be bottom up and built on effective stakeholder participation. This requires establishing an institution that will bring together all stakeholders in both the private and public sector. The institution could therefore oversee and guide on a number of activities to the stakeholders, which may include;

- Be in charge of developing a National GAP
- Promote the code that has been developed, among the local stakeholders, and lobby for equivalence status with other international standards.
- Develop and coordinate a training and extension system on the code, to the growers and exporters.

With the horticultural sector, getting organized as a result of creation of the horticultural promotional organization of Uganda (HPOU) and subsequent bringing of all associations under one umbrella, the formation of a national taskforce on horticulture, composed of the private sector representatives through HPOU, and the government sector such a process is more acceptable now to all the stakeholders.

In Uganda, there are already other EUREPGAP activities supported by other organizations. In the last 3 years, The EU Pesticide Initiative Programme (PIP), has provided support to a number of horticultural export companies in areas such as

- Establishment of traceability systems
- Training in food safety management including use of HACCP
- Training of Trainers in integrated pest management (IPM), including safe use of pesticides.
- Establishment of Internal Control Systems for producer schemes looking towards EUREPGAP and Organic certification.

Other support have come from different organizations like the SIDA funded EPOPA programme that has been supporting producer schemes working towards complying with international organic standards (through establishment of internal quality management system and preparing them for certification as a means of accessing the international organic market.

Conclusion

The horticultural sector is an important area in Uganda because it employs millions of smallholder farmers in the country, and whose livelihoods depend on the production and marketing of these horticultural products. With the increasing requirements in the market regarding healthy and safety and the tightening market standards such as EUREP GAP, development of a national GAP system is more urgent than before. However, development of an effective and practical GAP system that could also be benchmarked against EUREP GAP will require support to allow for the participation of all stakeholders both from the public and private sector in the entire process, and building of the necessary basic infrastructure at the farmers level. There is also need to create a national Multistakeholder Committee covering all key areas in the sector, to coordinate all activities related to the development of a national GAP

References

1. Civil Aviation Authority (CAA) export statistics 2004 – 2005
2. Investment in Development of Export Agriculture (IDEA) Project statistics 1997 – 2003
3. Muwanga M.K. 2001. *Identification of the Constraints that affect Quality and Safety of Horticultural exports from Uganda*. A baseline study for the use of HACCP to improve marketing of fresh produce from Uganda.
4. Ministry of Agriculture, Animal Industry and Fisheries.- Uganda, 2004. *Manual of Standard Operating Procedures For Horticultural Commodity Inspection and Quality assurance*.
5. Kaggwa Umran. 2006. (Personal Communication). Horticultural Promotional Organization of Uganda (HPOU), Kampala.
6. Muwanga Musa. 2006. Personal Communication.
7. Kata F. 2005. *Opening Remarks by the Executive Director UEPB during the Annual President's Export Award 2004*.
8. Komayombi Bulegeya. 2006. (Personal Communication). Commissioner Crop Protection, Ministry of Agriculture, Animal Industry and Fisheries – Uganda.
9. Ministry of Finance, Planning and Economic Development 2001. Background to the Budget 2001.
10. Musiime E, Keizire B and Muwanga M. 2005. Organic Agriculture in Uganda. The need for a coherent policy framework. ACODE Policy Research Series No.11.