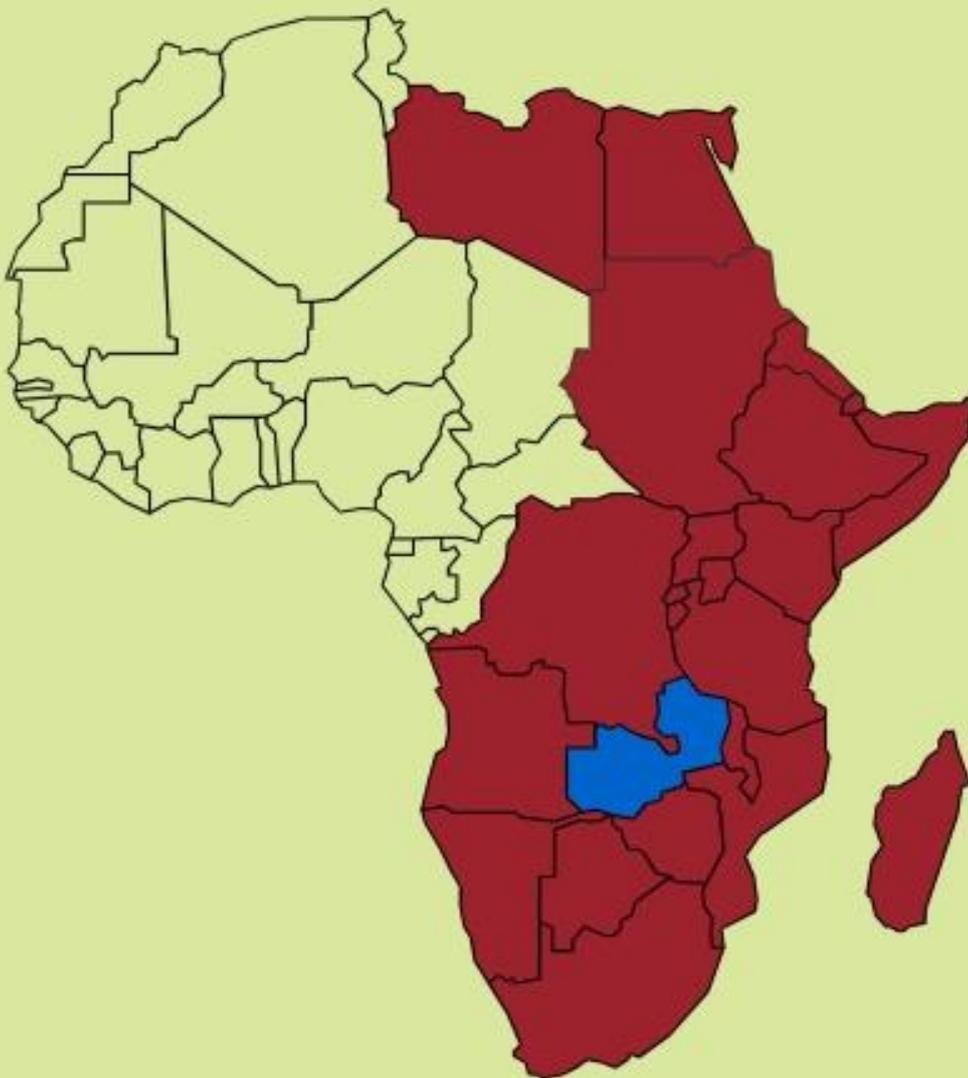


FROM COMESA-SADC TO TFTA

INTEGRATING THE VOICE OF THE CIVIL SOCIETY IN ZAMBIA



From COMESA-SADC to TFTA

Integrating the Voice of the Civil Society in Zambia

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Acronyms

ACB	African Centre for Biosafety
AGOA	African Growth Opportunity Act
ASCCI	Association of SADC Chambers of Commerce and Industry
CBTA	Cross Border Traders Association of Zambia
CET	Common External Tariff
CFTA	Continental Free Trade Area
CMR	Customs Management Regulations
COMESA	Common Market for Eastern and Southern Africa
CSOs	Civil Society Organisations
CSPR	Civil Society for Poverty Reduction
CSTNZ	Civil Society Trade Network of Zambia
CTDP	Centre for Trade Policy and Development
CTDT	Community Technology Development Trust
CTN	Common Tariff Nomenclature
CVTFS	COMESA Virtual Trade Facilitation System
DTIS	Diagnostic Trade Integration Study
EPAs	Economic Partnership Agreement
ESA	Eastern and Southern Africa
ESAFF	East and Southern Africa Small Scale Farmers Forum
FTA	Free Trade Area
GLM	Green Living Movement
JCTR	Jesuit Centre for Theological Reflection
KATC	Kasisi Agriculture Training Centre
MCTI	Ministry of Commerce, Trade and Industry
MFN	Most Favoured Nation

NAMA	Non Agriculture Market Access
NDP	National Development Plans
NIMCC	National Inter-Ministerial Coordination Committee
NSAs	Non-State Actors
NTBs	Non-Tariff Barriers
PELUM	Participatory Ecological Land-Use
PSDA	Private Sector Development Association
SACAU	Southern Africa Confederation of Agricultural Unions
SADC	Southern Africa Development Community
SAG	Sector Advisory Group
SMEs	Small and Medium Enterprises
STR	Simplified Trade Regime
TFTA	Tripartite Free Trade Area
TRIPs	Trade-Related Aspects of Intellectual Property Rights
TRS	Time Release Studies
WFO	World Farmers Organization
WTO	World Trade Organisation
ZACCI	Zambia Chamber of Commerce and Industry
ZAM	Zambia Association of Manufacturers
ZAM	Zambia Association of Manufactures
ZBF	Zambia Business Forum
ZCCN	Zambia Climate Change Network
ZCSD	Zambia Council for Social Development
ZCSMBA	Zambia Chamber of Small and Medium Business Associations
ZNFU	Zambia National Farmers Union
ZNFU	Zambia National Farmers' Union
ZRA	Zambia Revenue Authority

Acknowledgment

The research for this study was coordinated and written by Simon Ng'ona, Centre Director of CUTS Lusaka. We recognise the valuable insights that were drawn from participants in various project workshops from the COMESA Secretariat, private sector, civil societies and the government.

Special thanks are to the CUTS Lusaka project team as well as CUTS Nairobi for its financial support.

Preface

Tripartite Free Trade Area (TFTA) was officially launched in 2015 to bring 26 African countries from Cairo to Cape Town under one market. While, the grand initiative is noble and in line with the Abuja Treaty that envisages for one African Economic Community, the integration process will have to incorporate the voices of the marginalised as represented by civil society organisations (CSOs) and other non-state actors (NSAs), for deep and meaningful integration. African regional economic communities are, most often than not, perceived as elitist and government-to-government cooperation, partly because of lack of participation from citizens of Member States. For decades, CUTS has been championing for change in approach where regional integration and trade policy making processes ought to be owned by all for better social and economic benefits.

With the aim of giving voice to the voiceless in the TFTA integration process, CUTS Nairobi implemented the ‘Integrating the Voice of Civil Society Organisations in Regional Integration Process in Eastern and Southern Africa’ (IVORI-ESA) project in Ethiopia, Kenya and Zambia in 2015. Research studies were successfully carried out in the three countries and three regional economic communities (RECs). A forward-looking ‘Engagement Framework and Action Agenda’ for Eastern and Southern African CSOs engagement on the TFTA negotiations and implementation processes has been developed under the project. An e-forum, the Eastern and Southern Africa CSOs Network on Integration and Development (ESACSONID) has also been formed as a discussion and information dissemination platform on regional integration, multilateral trade issues and other trade matters.

This research publication presents the state of involvement of Zambian non-state actors, particularly CSOs, in the Common Market for Eastern and Southern Africa (COMESA) and Southern Africa Development Community (SADC); and the ongoing TFTA initiative. I believe such documentation can serve as a baseline for upcoming interventions and studies.

It is my expectation that the findings of ‘From COMESA-SADC to TFTA: Integrating the Voice of the Civil Society in Zambia’ will generate further dialogue within national trade and regional integration forums; prompt government for an institutionalised and well financed engagement of the civil society in matters of trade; as well as guide the donor community on resource and skills gaps.

Let me conclude by expressing my sincere thanks to all who have been involved in the project, including Oxfam Novib for the financial support, IVORI-ESA partner organisations in the three countries and all national and regional stakeholders for their insights during interviews and project workshops. We at CUTS continue to strive to achieve social justice and economic equality within and across borders.

Pradeep S Mehta
Secretary General, CUTS International

Executive Summary

The full implementation of the Tripartite Free Trade Area (TFTA) would substantially simplify the complicated geography of regional integration schemes in Africa. However, for such initiative to be successful, countries participating in the TFTA need to experience mutual benefits from these initiatives. One precondition for beneficiation to happen will depend on the countries' ability to produce and trade competitively, which will only ensue if the right products and sectors of export potential are inclusively identified and developed.

Yet, participation in the identification process should not only be skewed towards those with vast trade potential and capacity. Equally, those operating at a smaller scale but with huge export potential have to participate in the process. Similarly, participation should be guaranteed when defining the trade reform agenda. In view of the fact that regional integration initiatives present a host of reform areas to be undertaken by member states, it is imperative that an effective, inclusive and transparent participatory mechanisms involving countries and different stakeholders is provided for.

This study was undertaken to understand the level and status of engagement of Civil Society Organisations (CSOs) and Non state Actors (NSAs) in the in trade and regional integration processes specifically the TFTA in Zambia.

Our study finds that Zambian stakeholders have a reasonable chance to participate in trade policy formulation processes. However, it also emerges that consultative mechanism has not been effective. In 2015 and part of 2014, the Trade and Industry Sector Advisory Group (SAG), did not seat despite having the mandate to seat every quarter to discuss key important issues around trade. This exemplifies lack of commitment to engage stakeholders in the trade process. However, despite the SAG not having sat in the recent times, it is clear that the Ministry was also able to engage in consultations on specific issues, for instance, the review of the 2010 Trade Policy.

The research concludes that a TFTA with improperly defined priority areas will fail to have much impact on the ground. Therefore, there is need to adopt a consultative mechanism that ensures equal and optimal participation of CSOs and other NSAs. The consultative mechanism should not only focus on improving the participation of stakeholders in the discussions on TFTA issues but it should have a decision-making mandate. This, therefore, entails that the consultative mechanism should be vested with at least the power to make recommendations to the relevant authorities who should be bound to either accept such recommendations or provide reasons for not doing so.

Introduction

The African continent has witnessed an important milestone on its path towards economic integration with the signing of the TFTA, covering 26 countries. These countries represent more than half the continent. The establishment of this TFTA resulted from integration efforts by three Regional Economic Communities (RECs), namely, the COMESA, the Eastern Africa Community (EAC) and the Southern African Development Community (SADC). The TFTA is based on three main pillars, a) market integration, b) infrastructure development, and, c) industrial development.

There are multiple obstacles to trade in the region and it requires efforts to increase and diversify industrial production and improve transport infrastructure. The TFTA trade negotiations have been clustered into two Tiers. In Tier1, negotiators have dealt with the liberalisation of trade in goods, by removing tariff and non-tariff barriers, and ensuring free movement of business people.

Tier 2 will tackle the gradual liberalisation of trade in services. Although the expected direct gains are moderate and will mainly benefit the more economically powerful countries, the real advantages should be broader, including an improved business environment, increased foreign direct investment, enhanced economic development in general, and, most importantly, bringing impetus to the realisation of the Continental Free Trade Area (CFTA).

The full implementation of the TFTA, heralding the CFTA, would substantially simplify the complicated geography of regional integration schemes in Africa. However, for both initiatives to be successful, countries participating in the FTAs need to experience mutual benefits from these initiatives. One precondition for beneficiation to happen will depend on the countries' ability to produce and trade competitively, which will only ensue if the right products and sectors of export potential are inclusively identified and developed.

Yet, participation in the identification process should not only be skewed towards those with vast trade potential and capacity. Equally, those operating at a smaller scale but with huge export potential have to participate in the process. Similarly, participation should be guaranteed when defining the trade reform agenda. In view of the fact that regional integration initiatives present a host of reform areas to be undertaken by member states, it is imperative that an effective, inclusive and transparent participatory mechanisms involving countries (member states) and different stakeholders is provided for.

Note that since regional integrations is an effective means to achieve development, the formulation and implementation of a country's regional policies should not just be the prerogative of the RECs Secretariat and governments of member countries.

Other stakeholders such as non-state actors, including civil society, have an equally important role to play. Adopting such inclusive process would enhance both the policy ownership among the state and non-state actors and implementation coherence among member states and different stakeholders. This paper, therefore, makes an exploration and attempts to understand political economy issues on regional integration - specifically hinging on participation and involvement of CSO/NSAs in regional integration processes.

Objectives

To understand the level and status of engagement of CSOs and NSAs in the in trade and regional integration processes specifically the TFTA. To understand the status and level of engagement of NSAs, with reference to CSOs, in the trade and regional integration processes specifically the TFTA.

Methodology

The study makes use largely of secondary data sources, although interviews were also held with government and regional integration bodies. The study relied heavily on the review of previous studies and the findings from the previous studies also formed the basis of engagement of key informants, which included i.e. COMESA, SADC and EAC, Ministry of Commerce, Trade & Industry, ZDA and Business Associations, Zambia Association of Manufactures (ZAM) and Private Sector Development Association (PSDA) to understand their views on the TFTA processes. Structured questions were prepared for the purpose of the key informants interviews. Findings from the interviews as well as from secondary sources were then used to draw up this study.

Zambia's Involvement in Regional Economic Integration

Zambia is a founding member of the World Trade Organisation (WTO). With regard to commitments in the WTO, the country has made binding commitments in Agriculture at 125 percent (Ministry of Commerce, 2012). Under the Non Agriculture Market Access (NAMA), the country has not made any commitments. For Trade in Services, the country has not submitted any offers. Regarding intellectual property, the country is working on becoming compliant with the Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPs) and has to this effect been undertaking a review and update of legislation (Ministry of Commerce, 2012).

Within Africa Zambia is also a member of both COMESA and SADCRECs. As a result, the country has been actively engaged in the implementation of integration programs and projects at both regional and multilateral level. The country's participation in regional and multilateral trade arrangements has had implications on how the country engages in trade policy-making decisions. Cheelo, C., *et al.* (2012) show that as of 2010, Zambia's multilateral trade was based on a fairly streamlined ad valorem external tariffs structure, comprising four bands: 0 percent, 5 percent, 15 percent, and 25 percent.

Within this structure, tariffs are applied on a Most Favoured Nation (MFN) basis to imports from other WTO member states. In 2010 the country had a total of 6,009 tariff lines, down from the estimated 6,234 lines in 2004, implying that some amount of tariff simplification and harmonisation had happened which ideally shows the country's commitment in the liberalisation agenda as prescribed in the regional and multilateral framework.

During 2010 the largest portion of MFN tariffs (31 percent of all tariff lines across all bands) was in the 15 percent tariff band and rather fewer were in the 5 percent band. In the same period, while Zambia was granting duty-free and quota-free access to all goods originating from COMESA FTA member countries, it was concurrently applying two sets of tariff structures to SADC and to South Africa under the SADC Trade Protocol. For goods from the 'rest of SADC' (i.e., all SADC excluding South Africa), most tariff lines (73 percent) were at a 0 percent duty rate and only 3 percent were at the 25 percent rate. For South African goods particularly, 48 percent of the tariff lines were at 5 percent duty while 35 percent were at 0 percent; relatively smaller allocations, 1 and 3 percent respectively of the tariff lines were at 15 percent and 25 percent (Cheelo, Malata, & Tembo, 2012)

Table 1: Zambia's Tariff Structure, 2010

	CD		SSA		SDC	
	Lines	%	Lines	%	Lines	%
0%	1,328	22%	2,114	35%	4,399	73%
5%	884	15%	2,913	48%	3	0%
10%	0	0%	21	0%	0	0%
15%	1,923	32%	36	1%	25	0%
25%	1,874	31%	175	3%	154	3%
Blank lines	0	0%	750	12%	1,428	24%
Lines not matched	0	0%		0%	0	0%
All bands	6,009	100%	6,009	100%	6,009	100%

Note: CD = MFN customs duty rate; SSA = rate to goods originating from South Africa only; SDC = rate to goods originating from other SADC member states excluding South Africa
Source: (Cheelo, Malata , & Tembo, 2012)

Besides the trade reforms explained above, the country has been a key initiator and participant in processes that have endorsed the said reforms. The country has been an active participant at all critical Summits of both SADC and COMESA and has hosted several meetings to press for implementation of the various resolutions at both COMESA and SADC. This includes influencing and participating during the launch of the COMESA FTA on 31 October 2000 as well as the COMESA Customs Union in June 2009.

Zambia also played an active role together with other Member states in enhancing trade in SADC, especially following the launch of the SADC (FTA) in 2008. This includes granting duty-free and quota-free access to goods originating from the SADC region in line with the SADC FTA as already discussed.

It is important to note that on 1 January 2012, Zambia was supposed to start complying fully with the duty-free, quota-free stipulations of the SADC FTA. This was based on completion of the tariff phase-down period concluded in 2011. Reportedly, the domestication and full implementation of the FTA was provided for in Zambia under Statutory Instrument Act 103. (Cheelo, Malata , & Tembo, 2012).

Apart from the existing FTAs that Zambia now fully participates in (COMESA and SADC), the country is gearing up to join the COMESA Customs Union. The Customs Union will imply adoption of a Common External Tariff (CET), a Common Tariff Nomenclature (CTN), and Customs Management Regulations (CMR). This will essentially define Zambia's common external trade policy position. The CET for COMESA has been proposed as shown in Table 2.

Table 2: COMESA CET Structure

CET Category	Lines	% of total lines on CET
0%	2,709	39%
10	2,196	32%
25	1,998	29%
Total tariff lines	6,903	100%

(Cheelo, Malata , & Tembo, 2012)

Over the course of the past few years, notable involvement of Zambia in COMESA includes supporting the COMESA Monetary Institute, which started operations on 07 March 2011; successfully hosting the Tenth AGOA Forum in 2011 in which the COMESA Member States adopted a common position in engaging the US government on the programme; and involvement in the work programme for the implementation of the Time Release Studies (TRS) together with Malawi, Mauritius and Sudan, a programme intended to assess the effectiveness of customs and other border management agencies. This followed hosting of the first meeting on TRS on 21-23 February 2011 in Lusaka (COMESA, 2011).

In addition, the Government of Zambia has been working with stakeholders, including development partners, to resolve the challenges in deepening regional integration through trade facilitation. For example, Zambia embarked on a programme of constructing One Stop Border Posts in collaboration with adjoining countries. Zambia also facilitates cross border trade for small traders through the Simplified Trade Regime (STR) in alignment with the COMESA framework. One issue that has emerged over the years after lowering of tariffs is the eminence of Non-Tariff Barriers (NTBs). A regional approach under COMESA has been designed to address NTBs. For COMESA, regulations have been developed for member countries to domesticate.¹ In this regard, Zambia is reportedly in the process of developing a strategy on the elimination of NTBs (Ministry of Commerce, 2012).

Another important element that cannot escape the regional and multilateral trade discussions is the issue of what constitutes the list of sensitive products to be protected from the negative effects of tariff liberalisation due to their strategic position to the country's development. In 2012, Zambia organised a workshop of 40 stakeholders drawn from the public and private sector who came up with the country's list of sensitive products.

Since 2011, Zambia started implementing the COMESA Yellow card issued to its motorists destined to other member countries. The country also hosted the launch of the Tripartite Non-Tariff Barriers Online reporting, monitoring, and eliminating mechanism on 09 April 2013 in Lusaka, Zambia (COMESA, 2013); and in 2015, signed an MoU with COMESA to conduct six training

¹ Note: These regulations are part of the Council Decision number 3 on the resolution of NTBs

programmes for Zambian stakeholders involved in transit trade on the COMESA Virtual Trade Facilitation System (CVTFS) that targeted transporters, clearing agents and government agencies. This saw Customs officers, ICT experts and border officials of the Zambia Revenue Authority (ZRA) being trained, together with 24 transport companies operators, and 35 Clearing Agents drawn from Zambia border posts and from within Lusaka.²

Within SADC, Zambia has been involved in various regional projects and policy formulation and implementation activities. Over the years, in 2012, Zambia was one of the three countries (including Malawi and Mozambique) to receive a grant from the AfDB-NEPAD-Infrastructure Project Preparation Facility (IPPF) through the SADC Secretariat to conduct the Feasibility Study on the Navigability of the Shire-Zambezi Waterways which enabled it to develop Legal Frameworks for the Malawi/Zambia and Mozambique/Malawi One Stop Border Posts. Other SADC spearheaded projects involving Zambia include ratification of the Zambezi River Basin Commission (SADC, 2012).

In the midst of all these developments, it is important to note that both SADC and COMESA are poised to establish a Customs Union.³ But this has its own implications on Zambia. Firstly, Zambia cannot be a member of two separate customs unions of SADC and COMESA. Overlapping membership by CU members in different regional economic communities will require rules of origin restrictions and more importantly border controls to ensure that goods that enter under preferences in one country are not diverted into the remaining CU members' markets who are not party to the preferential trading arrangement. These procedures undermine a key objective of forming a customs union, namely the removal of restrictions on internal trade flows (Edwards & Lawrence, 2012).

Remedying these inconsistencies rests heavily on the success of the Tripartite FTA which was launched on June 10, 2015. Zambia, being one of the ratifying countries to the TFTA, will have duty free access (subject to rules of origin requirements) into partner countries. In this case Zambia's participation in the COMESA CU will be compatible with continued preferential market access into the other SADC members. Zambia, however, will still be required to make a choice as to whether it joins either the proposed SADC CU or the COMESA CU.

Further, it is clear in the narrative of the TFTA that this FTA is a building block to the Continental FTA expected to kick in by 2017. Zambia participated in the African Union Ministers of Trade meeting in Addis Ababa, Ethiopia

² <https://www.trademarka.com/news/comesa-prepares-for-regional-trade-facilitation/> accessed 03 September 2015

³ A customs union involves establishing a CET based on common trade nomenclature and a common system of tariff revenue management and administration. An important characteristic of a well-established customs union is the formulation of common external trade policies including trade remedies such as safeguards, anti-dumping and countervail measures

convened by the African Union to prepare for the launch of negotiations for the CFTA.⁴

Given the above narrative, it is clear that Zambia is one of the few countries in COMESA and SADC that has been very actively involved in regional integration issues and projects since the two institutions were created. Nonetheless, the country continues to face its own challenges with regard to the processes of domestication and harmonisation of regional policies and decisions. Further, Zambia recently undertook a review of her Diagnostic Trade Integration Study (DTIS) in 2013, which has among other things validated the identified challenges that the country is facing in accelerating its regional economic integration agenda (Ministry of Commerce, 2012).

The specific challenges Zambia is currently facing include:⁵

- **Institutional Capacity needs** – It relates mainly to financial and human resources. With regard to human resource, Zambia continues to face challenges due to insufficient technical expertise in the areas of monitoring and evaluation, quantitative analytical skills, as well as negotiating skills. With regard to financial resources, institutions implementing regional programmes and initiatives are generally not adequately funded in order to meet the intended objectives.
- **Poor Trade Mainstreaming** - Lack of institutional coordination and slow pace in domesticating and implementation of Regional trade commitments under the various RECs and multilateral trade agreements that Zambia is party to.
- **Services** – Zambia is expected to schedule key sectors under COMESA. A major challenge encountered in the scheduling process has been the fact that legislation relating to the Companies as well as the Insurance subsector was still under review as of the time of submission of the revised schedule. Member states have advised the country to submit its commitment on insurance after finalisation of review process.

⁴ See: <https://www.lusakatimes.com/2015/05/17/mwanakatwe-joins-other-african-ministers-for-pre-continental-free-trade-area-launch-in-ethopia/>

⁵ Note. These challenges have also been acknowledged in the Regional Integration Capacity Building (RICB) Project Proposal submitted to COMESA under the Regional Integration Implementation Programme (RIIP) Support to the Government of The Republic of Zambia (GRZ)

Involvement of Civil Society/Private Sector Organisations in Regional Integration Processes in Zambia

Mechanisms to Involve CSOs and PSOs in Zambia in Regional Integration Process

Although there are not many CSOs that are dedicated to regional integration and trade issues, the Government of Zambia has made sure that it creates avenues through which CSOs' views and concerns on the subject are captured. Discussions with the Ministry of Commerce Trade and Industry revealed that mechanisms that have been put in place to involve CSOs in national trade policy making processes include the following:

- consultations in public private dialogue forums,
- sector development reform programmes,
- ad hoc committee arrangements,
- the annual business forum; and
- calling CSOs for consultations as and when an issue arises.

None of the mechanisms have any legal backing. That is, the process is not institutionalised. The Ministry believes that CSOs and other organisations should make contributions that feed into the country's position based on the research they have conducted.

One of the methods was to ensure that the CSOs are part of the Trade and Industry Sector Advisory Group (SAG)), which is responsible for outlining all trade expansion activities. Membership of the SAG includes two CTPD and CUTS International Lusaka as well as the Finnish Embassy as the donor coordinator.⁶ However, two out of 13 members is a very low ratio to ensure that all CSOs' views are captured.

The National Inter-Ministerial Coordination Committee (NIMCC) has been established within the existing stakeholder consultative mechanisms under the framework of the SAG on Trade and Industry. The NIMCC operates under the Trade and Industry SAG responsible for monitoring and implementation of regional programmes under COMESA as well as other RTAs. Since the

⁶ Other members of the TEWG include Ministry of Commerce, Trade and Industry; Ministry of Agriculture and Cooperatives; Zambia Development Agency; Zambia National Farmers Union; Zambia Export Growers Association; Zambia Association of Manufacturers; Ministry of Finance and National Planning; Zambia Association of Chambers of Commerce and Industry; Zambia Business Forum; and Zambia Revenue Authority.

establishment of the NIMCC, the committee has developed and adopted the COMESA Regional Integration Support Mechanism (RISM) Terms of Reference (ToRs) and undertook orientation for committee members in the fourth quarter of 2013. Currently, the 26 NIMCC membership (Table 3) also includes three CSOs.

Table 3: National Inter-Ministerial Coordination Committee Membership Composition

Government line Ministries	Government Parastatals, Departments and Agencies	Private sector	Civil Society
1. Ministry of Commerce, Trade and Industry	10. Zambia Development Agency	21. Zambia Association of Chambers of Commerce and Industry	24. Centre for Trade Policy and Development
2. Ministry of Foreign Affairs	11. Zambia Revenue Authority		25. CUTS
3. Ministry of Finance	12. Road Transport and Safety Agency	22. Zambia Association of Manufacturers	International Lusaka
4. Ministry of Agriculture	13. Zambia State Insurance Cooperation	23. Zambia National Farmers Union	26. Jesuit Centre for Theological Reflection
5. Ministry of Gender and Child Development	14. Central Statistics Office		
6. Ministry of Mines, Energy and Water Development	15. Road Development Agency		
7. Ministry of Transport Works, Supply and Communication	16. Zambia Bureau of Standards		
8. Ministry of Education, Science, Vocational Training, Early Learning	17. Competition and Consumer Protection Commission		
9. Ministry of Justice	18. Zambia Weights and Measures Agency		
	19. Immigration Department		
	20. Bank of Zambia		

Source: Ministry of Commerce, Industry and Trade

The membership list also confirms the interest from CUTS and CTPD. The Jesuit Centre for Theological Reflection was part of the organisations – but fell off after changing focus from trade to other issues. Both the private sector and

CSOs have three members each, which also shows efforts to ensure that the voice of CSOs is not diluted by other NSAs.

The SAG has generally ensured that deliberate efforts are done to have the voice of CSOs heard. SAGs, which comprise both state and non-state actors, are designed to facilitate participation of non-state actors in the formulation, implementation, monitoring and evaluation of government policies and development plans. As a result, these are more preferred during the discourse of national development plans rather than regional integration issues.

Thus in Zambia, CSOs have opportunities to participate in trade and regional integration processes on formulation, implementation and negotiations on trade issues through the different working groups in the MCTI. They also use the platform of round table meetings with relevant ministries to lobby the government and run media campaigns. CSO participation in trade issues was also made possible through the formation of the National Working Group on Trade Facilitation, which was established in 2007. This was intended to discuss issues related to the Doha Development Round of WTO negotiations; development corridors; one stop border posts; trade facilitation initiatives of the Regional Economic Communities; and non-tariff barriers.

CSOs Involvement in Regional Integration Processes

Zambia has continued to register growth in the number of CSOs since the 1990s. Many of the CSOs operate as part of networks in Zambia and it is estimated that 73 percent of CSOs are members of networks which work under thematic umbrella organisations. However, communication outside these umbrella groupings is weak and there is still a high level of duplication of CSO activities due to a lack of coordination (EU, 2015).

Generally CSO's in Zambia have not shown much interest in regional integration agenda. The Ministry of Commerce, Trade and Industry identifies only two organisations⁷ as the only CSOs with a clear interest in trade –that is, the CTPD and CUTS International Lusaka. The two are identified based on their active independent interactions, interest and advocacy in trade policy discourse with the Ministry.

Although there are many CSOs in Zambia, most of them only work in trade and regional integration issues episodically and don't have trade and regional integration agenda as one of their core areas of work. For such CSOs, participation is mostly on consultation basis when there are developments at regional level, such as negotiations on trade issues. It can be concluded there are five main CSOs that work on trade and trade-related issues in general, and they are:

⁷ This is as per the Regional Integration Capacity Building (RICB) project proposal submitted by the Ministry to COMESA developed under the Regional Integration Implementation Programme (RIIP), which is not, however, a public document.

- CUTS International, Lusaka
- Centre for Trade Policy and Development (formally Civil Society Trade Network of Zambia)
- Civil Society for Poverty Reduction (CSPR)
- Jesuit Centre for Theological Reflection (JCTR)
- Caritas Zambia

CUTS International Lusaka was established on 20th February 2001 by in Zambia to function as a resource, co-ordination as well as networking centre, to promote South-South cooperation on trade and development, by involving state and NSAs. It has established links with NGOs, donor agencies, inter-governmental and governmental bodies, especially in the Eastern and Southern Africa (ESA).

The Centre has been working in the areas of competition policy, investment, consumer protection, regional and multilateral trade and regulation since its formation. CUTS International Lusaka is thus one of the leading CSOs working on trade and regional integration issues in Zambia. In addition to various initiatives on WTO issues and international trade in general, CUTS has also worked extensively on regional integrations issues through research and advocacy using its involvement in various committees and working groups of the Ministry of Commerce, Trade & Industry.

The Centre for Trade Policy and Development (CTPD) is one of the few most active CSOs working on regional integration issues in Zambia. CTPD, formerly, Civil Society Trade Network of Zambia (CSTNZ) is a trade policy think tank which provides analytical research, capacity building and facilitation services in trade and investment to civil society, local private sector, small scale producer groups and government. It advocates for pro-poor trade reforms at national, regional and multilateral levels as well as facilitate for the participation of various stakeholders, including member organizations, in ensuring that trade is used as tool for poverty eradication.⁸ The Centre has created regional networks and affiliations to learn more about the policies in other countries to inform domestic trade policies.⁹

The CSPR is a CSO network that was established in 2000, primarily to ensure that civil society effectively and meaningfully participates in the design, formulation and implementation of the National Development Plans (NDP). It also monitors the NDPs to ensure government provides a means by which Zambia can effectively strategize on reducing the escalating levels of poverty. As an organization working on poverty issues, it has given its voice over several trade issues that have a bearing on poverty. This includes Economic Partnership Agreements (EPAs), which CSPR felt would threaten the

⁸ Hence, the CSTNZ promises to improve the systematic participation of CSOs on trade policy issues in Zambia

⁹ CTPD website at <http://www.ctpd.org.zm/programmes> accessed 3 September 2015

diversification of Zambia's economy from mining to other sectors. CSPR has also participated in monitoring all regional integration activities taking place in COMESA and SADC in as far as their impact on poverty in Zambia is concerned

The JCTR is a research, education and advocacy team that promotes study and action on issues linking Christian Faith and social justice in Zambia and Malawi. JCTR began in 1988 as a project of the Zambia-Malawi Province of the Society of Jesus and is similar in orientation to other Jesuit social centres around the world. JCTR has also done a lot of research work on regional integration as well as international trade in general on its own initiative. This includes the work that has culminated in the following publications:

- *Aid for Trade: The Path Away from Poverty? A case for its relevance to Zambia?*
- *Behind the Borders: Sanitary and Phytosanitary Standards, Trade Agreements and Challenges to Zambia*
- *Economic Partnership Agreements: A Challenge for Trade Justice.*

Finally, the Caritas Zambia was established in 2001 with the mandate to foster and uphold human dignity through promotion of human development. Caritas Zambia works mainly through four main areas: Democracy and Governance; The Church and State; Economic and Social Accountability; and Livelihoods & Climate Change Adaptation. As part of the CTPD, Caritas Zambia has participated in various platforms on international trade and regional integration, most notably issues to do with the EPAs and African Growth Opportunity Act (AGOA).

Apart from the above five key CSOs involved trade and regional integration at a fairly deeper level, other organisations that are involved in regional integration issues by virtue of being members of coalitions of CSOs include the Zambia Council for Social Development (ZCSD) which is a member of the SADC Council of NGOs; Zambia Climate Change Network (ZCCN); East and Southern Africa Small Scale Farmers Forum (ESAFF) – Zambia; Participatory Ecological Land-Use (PELUM) Association; Alliance for Agro-Ecology and Biological Diversity Conservation; Kasisi Agriculture Training Centre (KATC); Community Technology Development Trust (CTDT); Green Living Movement (GLM); and African Centre for Biosafety (ACB).

However, their lack of capacity, especially their inability to mobilize resources for participating in regional integration issues, constrains their vibrancy in Zambia. This is mostly reflected by their absence and lack of active participation during consultative meetings called by various sub-committees and working groups established by the MCTI (Ng'ona and Dube, 2012). During consultations with CSOs, the following issues were raised, which explain why there is limited vibrancy of CSOs in trade issues:

- Trade has not been classified as a priority area by some CSOs, as Government is seen as relying more on their own experts and consultants from outside the country on trade issues.
- CSOs have not been empowered to further take an active and vibrant role in national trade policy making or regional integration. This is also due to that fact that some CSOs are not well coordinated in their work. Instead, they prefer to work in isolation, presenting a challenge for government to create that space.
- Most CSOs work on areas that they have managed to get some support, especially donor support. Their limited participation thus reflects the failure to get institutional support to participate in trade issues
- Lack of awareness of the trade issues, including the trade process, due to limited information passed on to the CSOs. Many indicated that they are not aware of any consultations that the Government has done to solicit ideas from them on trade issues. In addition, many CSOs consulted during the study indicated that they are not aware of the TFTA process, as it is not part of their area of focus. Thus, awareness generation can also be pursued as a tool to ensure that CSOs develop an interest in trade and regional integration issues.
- Lack of capacity to work on trade issues as some organisations, including those actively involved in women empowerment, have rarely participated on issues to do with trade, despite the importance of trade on women empowerment, mainly due to lack of capacity. Many CSOs in Zambia do not conduct proper evidence based research that would assist them in effectively performing the roles that the Ministry would expect from them.

CSOs should consider improving their coordination to better utilise their limited resources. The vibrancy of CSOs on regional integration issues can also be enhanced if Government strengthens its relationship with CSOs by incorporating them to participate in major committees which discuss and endorse trade policies and other related issues.

As Kaliba (2014) identifies, there is lack of institutionalized mechanisms for citizens' participation in decision-making, with government administrative structures being highly centralized in Zambia. Another issue that constrains CSOs vibrancy is their overreliance on foreign donors for funding, including situations where they compete with each other for donors. This has made it common for CSOs to change their strategies and missions to align with those of their foreign funders, which becomes a problem if the funders withdraw from supporting trade issues.

In spite of their deficiencies as described above, there are many examples of relevant research and analysis done by CSOs in Zambia on the subject of trade policy, which have been helpful in generating informed debate and discussions and led to government action; for example, the review of the 2005 DTIS could

be attributed to, among others, the assessment done by CUTS Lusaka. Most noteworthy policy and research studies undertaken include the following:

- ‘The State of Trade Mainstreaming in Zambia’ by CUTS Lusaka;
- ‘Assessment of Zambia’s Diagnostic Trade Integrated Study’ (DTIS) by CUTS Lusaka;
- ‘For Whom the Windfall’ by CTPD and Caritas Zambia;
- The MDG8 studies focusing on trade, aid and debt by CSPR, CTPD and JCTR, respectively;
- ‘Impact assessment of Chinese economic activities in Zambia, Malawi and Mozambique’ by CTPD;
- ‘Social and Developmental Impact Assessment Of South African Investment In Zambia And Malawi’ by CTPD;
- ‘Understanding the linkages between Trade, Climate Change and Food Security by CUTS Lusaka’; and
- Study on debt management policy by JCTR.

Private sector involvement in regional integration Processes

Regional integration and trade policies affect directly, either positively or negatively, the private sector growth hence the importance of designing such policies in consultation with the private sector. Having realised this, the government of Zambia established various frameworks that have mainstreamed private sector’s participation in regional integration and trade policy-making processes. Various activities by development partners also encouraged initiatives for greater stakeholder consultations in the trade policy making process (CUTS, 2009). The private sector mostly participates through sectoral associations and umbrella bodies that include the following:

- Zambia Association of Chambers of Commerce and Industry
- Zambia Association of Manufacturers (ZAM)
- Zambia Chamber of Small and Medium Business Associations
- Zambia National Farmers Union (ZNFU)
- Eastern and Southern Africa small-scale Farmers Forum (ESAFF) Zambia
- The Cross Border Traders Association of Zambia (CBTA)

The Zambia Chamber of Commerce and Industry (ZACCI) is the leading private sector umbrella organisation in Zambia. It represents a huge network of companies of all sizes and sectors. Its participation in regional integration and trade has been facilitated through its membership in various regional bodies. For instance, ZACCI is a founding member of the Pan African Chamber of Commerce and Industry (PACCI), through which it also participates in trade issues in the continent. ZACCI is also a member of the Association of SADC Chambers of Commerce and Industry (ASCCI). ZACCI’s membership to both PACCI and ASCCI has enabled it to represent Zambia private sector bodies fully in all issues involved in regional integration and international trade within SADC and the continent.

Discussions with ZACCI revealed that the institution sits on technical working committees on trade expansion and trade facilitation in Zambia. This involvement has been facilitated by its own finances, with donor funds being used to complement their own efforts. Most of the contributions/inputs from them as well as other private sector organisations have often been taken on board as they are, demonstrating the importance with which they are regarded by Government.

The Zambia Association of Manufacturers (ZAM) is the representative sectoral association of Zambia's private sector businesses involved in the manufacturing. It also participates in regional integration and trade issues through the Zambia Association of Manufacturers (ZAM). ZAM also pioneered the formation of the Zambia Business Forum (ZBF), established to mobilize private sector input on cross cutting issues to influence Zambia government reform policy. Thus, ZAM is actively engaged in regional integration and international trade issues to ensure that Zambian manufacturers actively seize opportunities arising from discourses at such level.

The Zambia Chamber of Small and Medium Business Associations (ZCSMBA), established in 2000 is, the representative of small and medium scale enterprises in Zambia. Through ZCSMBA, the interest of SMEs gets represented in regional integration and trade issues. ZCSMBA as a network of Business Associations traverses 69 of the 72 districts of Zambia. ZCSMBA focuses on the promotion of trade, business, influencing policy decisions, collecting and disseminating relevant information and fostering relationships between Government, Business and Society.

Discussions with ZCSMBA revealed that the organisation has been actively involved in trade/development dialogue with the government. The mechanisms that have been used include invitation from government to participate in meetings relating to trade. ZCSMBA also sits in various committees on foreign and domestic trade under the Ministry of Commerce, Trade and Industry. Sometimes the government also shares official communication that they would have received from other countries to allow ZCSMBA to share with its members.

Farmers also participate in regional integration and international trade issues through their association, the Zambia National Farmers' Union (ZNFU). ZNFU is a national membership based organisation, with countrywide coverage, representing the agriculture industry. The members include:

- District Farmers' Association
- Commodity specialized associations
- Corporate Farming businesses
- The Agribusiness chamber and
- Association members.

Its involvement in international trade issues is evident from the fact that ZNFU is a founding member of the Southern Africa Confederation of Agricultural Unions (SACAU) as well as a member of the World Farmers Organisation (WFO). Over the years, the Union has made strides to ensure that Zambian farmers benefit from trade opportunities through collaboration activities with regional and international partners. For example, ZNFU, the European Union (EU) and COMESA joined hands for the construction of four new Agriculture Service centres. Discussions with ZNFU revealed that it has been involved in trade/development dialogue with the government over the years. This has been done through ZNFU involvement in trade committees as well as through invitations from government for the dialogue.

The Eastern and Southern Africa small-scale Farmers Forum (ESAFF) Zambia, was established with a mandate to ensure small scale farmers speak with one voice and influence policies that promote sustainable agro-ecology and improved incomes. ESAFF has been involved in trade/development dialogue with the government based on own initiatives and dialogue platforms for small scale farmers and policy makers as well as invitations from the government to sit on trade committees including appearing before parliamentary committees. This involvement has been facilitated by the donors such as Oxfam Novib, FIAN and WEMOs.

The CBTA is a membership based organisation, registered in 1998, comprising members from different parts of the country engaged in various forms of trade across borders. Its main objective is to provide a unified means of addressing the interests of small-scale traders locally and in neighbour states belonging to COMESA, SADC and EAC regions. CBTA has also provided training services to enable its members to fully exploit opportunities arising in international trade. With the support of the Finnish Embassy, in September 2014, the CBTA re-opened four Trade Information Desks intended for the revamping of the COMESA Simplified Trade Regime (STR); a scheme that provides duty exemptions for small scale traders.

Regulations Governing the Relation of CSOs/NGOs in Zambia

The legal framework governing the operations of CSOs in Zambia is multiple. About five pieces of legislation deal with registration, organization, and regulations of NGO activities. These included the Companies Act (Cap. 388); the Lands and Deeds Registry Act (Cap. 185); the Trustee Act, 1898 of the United Kingdom; the Societies Act (Cap. 119); and the Adoptions Act (Cap. 54). In an effort to address the multiplicity of legislation for NGOs, the NGO Act was introduced in 2009 (Kaliba, 2014).

A lot of issues have been raised with respect to the NGO Act. Most of the concerns with the Act are with respect to the ability of the NGOs to involve themselves in political governance rather than trade issues. Although it was enacted in 2009, the NGO Act was only implemented in July 15, 2013 when NGOs were called upon to register under the Act (Kaliba, 2014). The registration was then suspended after CSOs sought a court injunction.

Since the NGO Act generally serves as a harmonized platform for regulating NGO activities, a key description of its provisions as far as operations of NGO in Zambia are concerned would highlight the main compliance issues that CSOs in general are subjected to. Some of the intentions of the NGO Act are found in its preamble, and these include:

- Provide for the co-ordination and registration of non-governmental organisations;
- Establish the Non-Governmental Organisations' Registration Board and the Zambia Congress of Non-Governmental Organisations;
- Constitute the Council of Non-Governmental Organisations; and
- Enhance the transparency, accountability and performance of nongovernmental organisations.

Sections 5 and 6 of the NGO Act provides for a Non-Governmental Organisations Registration Board, consisting of fifteen part-time members, of which (a) two members are appointed by the Minister by virtue of their knowledge or experience in development and welfare management; (b) one person each would be from the Ministry responsible for health; Ministry responsible for home affairs; Ministry responsible for economic planning; Ministry responsible for community development; the Ministry responsible for local government; and a representative of the Attorney - General; (c) seven members would be elected by the Zambia Congress of Non-Governmental Organisations; and (d) the Registrar of NGOs who would be an ex-officio

member. This has been raised as an area of concern as the composition of the board is more government dominated compared to the CSOs themselves.

Section 7 of the NGOs Act outlines the functions of the Non-Governmental Organisations Registration Board, which, among other activities include the following¹⁰:

- (a) register NGOs;
- (b) approve the area of work of NGOs operating in Zambia;
- (c) maintain a register of national and international NGOs operating in Zambia, with the sectors, affiliations and locations of their activities;
- (d) recommend the rules and procedures for the audit of the accounts of NGOs;
- (e) receive and discuss the annual reports of NGOs submitted by them;
- (f) advise the government on the activities of the NGOs and their role in development in Zambia;
- (g) provide policy guidelines to NGOs for harmonising their activities to the national development plan for Zambia.

Concerns have been raised with respect to the functions of the Board, especially given its composition which is more biased in favour of the Government. Firstly, this makes NGO functions challenging, as the government dominated board has the power to determine NGOs' thematic and geographic areas of operation and in a way control their activities. Secondly, the power to provide policy guidelines to harmonise the activities of NGOs with the national development plan might make it easy for CSOs to be simply co-opted into assisting in the fulfilment of the political priorities of the government. Thirdly, the power to advise on strategies for efficient and effective planning and coordination of activities of NGOs is seen as treating NGOs as government subsidiaries, as opposed to independent entities free to formulate and execute action plans in line with identified priorities (Kaliba, 2014).

Registration of NGOs is provided for under section 10 of the NGO Act. NGOs, including international NGOs, are prohibited from operating in Zambia without being registered. Under section 14 of the Act, a registration certificate shall, unless cancelled, be valid for a period of five years from the date of issue. Application for renewal of the certificate must be made at least three months before its expiry as provided for under Section 16 of the Act. Since most CSOs in Zambia have been observed to frequently change their focus areas in line with donor funding, implementation of the Act might have some implications, as section 25 of the Act requires that notification be made to the Registrar, in writing, within fourteen days of the change in objectives or focus.

Self-regulation is however, also provided for under the NGO Act. Under sections 29 and 30, the Zambia Congress of NGOs, which is a collective forum

¹⁰ About 11 functions are given, while in this case only six that are considered more relevant for the context are given.

of all organisations registered under the Act, is provided for. This Congress adopts its own structure, rules and procedures to provide directions to the Council of NGOs, responsible for the management and control of the affairs of the Congress. The Council has 12 members who are representatives of NGOs registered under the Act. It is the Council that develops, adopts and administers the Code of Conduct for NGOs and facilitates and coordinates the work of NGOs operating in Zambia.

This generally sums up the operating environment which CSOs dealing with regional integration and any other issue in Zambia has to operate in.

Conclusion and Recommendations

It is clear that Zambian stakeholders have a reasonable chance to participate in trade policy formulation processes. However, it also emerges that consultative mechanism has not been effective. In 2015 and part of 2014, the Trade and Industry SAG, did not seat despite having the mandate to seat every quarter to discuss key important issues around trade. This exemplifies lack of commitment to engage stakeholders in the trade process. However, despite the SAG not having sat in the recent times, it is clear that the Ministry was also able to engage in consultations on specific issues e.g. the review of the 2010 Trade Policy.

But it has to be acknowledged that most non-state stakeholders, and some in the relevant government ministries, lack the technical knowledge and capacity to take full advantage of participation opportunities. This, therefore, raises the need to streamline consultative mechanisms if capacity constraints are to be addressed - at least in part.

At regional level, the findings also generally show a lot of challenges as far as CSOs and other non-state actors' participation in the regional integration agenda. Compared to the private sector, which is directly affected by the policies and have better analysis of policy impact, CSOs are engaged by the regional bodies less often. In SADC and EAC CSO's participation is seemingly guaranteed as it is provided for expressly in the treaty. COMESA on the other hand has only given preference to private sector which is also covered under SADC and EAC Treaties.

In the same vein, what is worrying has been the absence of a mechanism to engage CSOs and other non-state actors in the TFTA. Despite SADC and EAC having mechanisms for CSO and other non-state actors engagement, the findings of this paper shows that these mechanism have not been used to get inputs, views etc. to inform the processes. It is therefore quite apparent that there is a risk that a non-inclusive TFTA treaty can be adopted with the omissions of interest of marginalised stakeholders. With this raised, below are some of the recommendations:

- A TFTA with improperly defined priority areas will fail to have much impact on the ground. Therefore, there is need to adopt a consultative mechanism that ensures equal and optimal participation of CSOs and other Non-State Actor. The consultative mechanism should not only focus on improving the participation of stakeholders in the discussions on TFTA issues but it should have a decision-making mandate. This therefore entails that the consultative mechanism should be vested with

at least the power to make recommendations to the relevant authorities who should be bound to either accept such recommendations or provide reasons for not doing so.

- Improving the capacity of the CSOs for regular participation in stakeholder consultations through better CSO internal coordination will require little resources but can pay substantial dividends.
- Capacitating the existing institutional arrangements for stakeholder consultations and increase the focus of their work, preferably on sectoral lines will greatly improve the effective participation of stakeholders. The legal mandates of these mechanisms should be clarified to endow them with some advisory role.
- Improving the links between the secretariats of the umbrella organisations and their respective constituencies to ensure regular two-way inputs and feedback should be a priority for both the private sector and CSOs.
- Building knowledge and expertise of all stakeholders on priority trade issues, e.g. those related to regionalism and national, regional and multilateral trade policy formulation should be undertaken by MCTI.
- Improving coordination and interaction between RECs, relevant line ministries and other government agencies and CSOs to either provide inputs/feedback on or assist in the implementation of trade policy measures is urgently needed.

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