

Discussion paper on the feasibility of changes in trade/investment relations and instruments

MATS Deliverable 5.3



MATS

making agricultural trade sustainable

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Summary¹

We place the question of change feasibility in the general context of food sustainability governance. Regrettably, our feasibility assessment must take account of SDG setbacks, the WTO and Climate Agreement sustainability gaps, structural debt crises, and the resulting challenges for regulators and operators. Our analysis also looks at various European Green Deal implementation problems and related WTO and AfCFTA issues. Through these narrowing transition pathways we present the MATS Case Study change proposals, classifying them along the four MATS-defined sustainability dimensions (1) Economy and Markets, (2) Social and Human, (3) Natural Capital, and (4) Policy, Governance and Regulation. Our feasibility assessment of these proposals in the light of national and international rules and principles (including the EU Green Deal), standards, and other social and environmental factors shows the implementation challenges and opportunities along the entire agri-food value chain. Although the global policy inertia appears to make changes even more difficult for MATS countries and products, and without opining on quality, we find that some proposals could be more easily implemented than others where further impact studies would be necessary, considering different, sometimes conflicting, views and interests. Most sustainability improvement actions will have to include hitherto 'outsiders' and vulnerable actors like smallholders, SME, women entrepreneurs, and even nomads. Public engagement and social and environmental stakeholder inclusiveness will thus be crucial to achieve the proposed changes. Moreover, all proposals will require consultations with all concerned regulators, operators, and business and CSO representatives – regardless of whether these proposals are addressed to one or all involved persons.

¹ This discussion paper is part of MATS Work Package 5 (**Transition Pathways and policy recommendations**). It follows up on Discussion Paper 4.3 (**The Political Economy of Trade Regimes**), the **Summary Report on 15 Case Study Results**, and the **Potential actions for change** identified in MATS Deliverables 3.5 and 3.7.

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Acronyms

AfCFTA	African Continental Free Trade Area Agreement
ARSO	African Organization for Standardization ²
AU	African Union (formerly OAU)
BCA	Border Carbon Adjustments (e.g. 'cap-and-trade', CBAM and others)
BIT	Bilateral Investment Agreements (often in EPAs)
C4SP	Centre for African Smart Public Value Governance (www.c4sp.org)
CAP	Common Agricultural Policy (EU)
CBAM	Carbon Border Adjustment Mechanism (EU)
Codex alimentarius	Consumer safety and protection organism (WHO+FAO)
CS	(MATS) Case Studies (https://sustainable-agri-trade.eu/#)
CSO	Civil Society Organisations
DC, LDC	Developing Countries, Least Developed Countries
Due Diligence	Here: Corporate social responsibility as part of the EU Green Deal (various regulations)
EAC	East African Community
EP, EC, Council	(European) Parliament, Commission, Council
ETS	Emissions Trading System (here: EU+)
EUDR	EU Deforestation Regulation ³
European Green Deal	Cf. 'Legislative Train Schedule' Package ⁴
GHG	Green House Gases ⁵
Globalgap	Good Agricultural Practices (https://www.global-gap.org/uk_en/)
IATP	Institute for Agriculture and Trade Policy ⁶
IBRD	International Bank for Reconstruction and Development (World Bank)
IEA	International Energy Agency (https://www.iea.org/)
IFI	International Financial Institutions (IBRD, Regional Development Banks, EU Climate and Development Funds)
IISD	International Institute for Sustainable Development (https://www.iisd.org/)
ITC	International Trade Centre (https://www.intracen.org/)
ITPGRFA	International Treaty on Plant Genetic Resources for Food and Agriculture

² Formed by OAU (currently AU) and UNECA in 1977 in Accra (Ghana), since 1981 headquartered at the Kenya Bureau of Standards in Nairobi (Kenya). An intergovernmental, non-profit-making regional association of African national standard bodies. Harmonisation of African standards has been championed through ARSO, with more than 1485 NBS standards harmonized. Cf. <https://www.arso-oran.org/> and https://www.arso-organ.org/?page_id=64 For African intellectual property harmonisation, see OAPI.

³ Regulation (EU) 2023/1115 dated 31 May 2023. Available at https://environment.ec.europa.eu/topics/forests/deforestation/regulation-deforestation-free-products_en (implementation postponed in October 2024 – 1 month before entry into force!)

⁴ [EUR-Lex Sources](#) (links as of 11 August 2024):

- Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, *The European Green Deal* (COM/2019/640 final, dated 11 December 2019). The *European Green Deal* is regularly updated at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52019DC0640>

- For *Due Diligence* cf. <https://www.europarl.europa.eu/legislative-train/search?keywords=due+diligence>

- For *FF55* and '*Guidelines*' cf. <https://www.europarl.europa.eu/legislative-train/package-fit-for-55>

⁵ Cf. Doha amendment to the Kyoto Protocol, December 2012, Article 1, Paragraph B

⁶ Minneapolis, Washington, D.C.; Berlin (<https://www.iatp.org/>)

KJWA	Koronivia Joint Work on Agriculture (organised by FAO)
MDG	Millennium Development Goals
MRA	Mutual Recognition Agreement
NDC	Nationally Determined Contributions (UNFCCC)
NTM / NTB	Non-Tariff Trade Measures / Non-Tariff Trade Barriers
OAPI	Organisation Africaine de la Propriété Intellectuelle (https://ig-oapi.org/)
PPM	Production and Processing Methods
RAI	Principles for Responsible Investment in Agriculture and Food Systems (FAO/CFS 2014)
REC	Regional Economic Agreement (e.g. EAC, SADC and ECO-WAS, altogether 8 RECs mentioned in the AfCFTA)
RTA / FTA / EPA / TSD / DCFTA	Regional Trade Agreements / Free Trade Agreements / Economic Partnership Agreements (new EU treaties: with Trade and Sustainable Development Chapters: TSD) / Deep and Comprehensive FTAs (EU)
SADC	Southern African Development Community
SDG	Sustainable Development Goals (https://sdgs.un.org/)
SDT / GSP	Special & Differential Treatment / Trade Preferences
SPS	Sanitary and Phytosanitary Measures (WTO Agreement)
TBT	Technical Trade Barriers (WTO Agreement)
Trade4SD	Trade for Sustainable Development (https://www.trade4sd.eu/)
UNFCCC	United Nations Framework Convention on Climate Change ⁷
VC	Value Chain
VPA	Voluntary Partnership Agreements (e.g. for deforestation mitigation)
WTO	World Trade Organization

⁷ More precisely, the UNFCCC comprises the Bali Action Plan (2007), the Copenhagen Accord (2009), the Cancún agreements (2010), and the Durban Platform for Enhanced Action (2012).

I. Introduction

The objective of MATS is to describe and to analyse efforts to make agrifood trade more 'sustainable' in all respects of this term. In this discussion paper, we describe and analyse the more than fifty policy change proposals made in our fifteen 'bottom-up' case studies (CS).⁸ We consider that this reality check is quintessential for an understanding of the set-back noted for virtually all SDG. Our change proposals aim at contributing to the improvement of agrifood trade sustainability by way of more equitable and inclusive trade and investment relations and instruments.

This discussion paper (MATS Deliverable 5.3) is delivered together with three other WP5 outputs: *Vision of sustainable trade regimes* (WP5.1), *Transition pathways and roadmapping of desirable changes* (WP5.2), and *Recommendations for improving the sustainability impact of trade regimes* (WP5.4). It has the following structure. Section II reviews the recent setbacks in food sustainability governance. Without multilateral progress and guidance, unilateral measures like FF55 may serve EU interests and commitments, but without responding to sustainability objectives and interests of small developing countries and communities. This is where MATS can come in with its own impact studies and change proposals. In Section III we summarise the proposals emerging from our CS, grouped in Table 1 by the four Sustainability Dimensions earlier laid down and defined by MATS. We then look at the impact of the European Green Deal on MATS countries and products (Section IV). Our tentative assessment of CS change proposals in the light of national and international constraints, Green Deal opportunities and relevant socio-ecological factors reveal both the reform potential and the multifaceted challenges (Section V). This discussion paper should feed into the recommendations under WP 5 for improving the sustainability impact of trade regimes,

⁸ In this discussion paper we use the CS titles as follows:

- #1 Coffee in Uganda & Tanzania
- #2 Oats VC in the Nordics
- #3 Finnish dairy production
- #4 Agrifood Exports in Tanzania, Ethiopia, Uganda, and Ghana
- #5 Sustainable VCs and livelihoods in Ghana
- #6 Living incomes for cocoa farmers (West Africa)
- #7 Impacts of EU policies on local dairy VCs (West Africa)
- #8 Belgian ethanol imports vs EU MS human rights violations
- #9 Human rights due diligence in the coffee value chain
- #10 Beef and policy coherence for sustainable development
- #11 Private standards and sustainable trade
- #12 Ethical Trade Initiatives in the South African Wine Industry
- #13 Dairy production, standards and global competitiveness
- #14 MATOPIBA Brazilian frontier soybean-meat complex
- #15 Deep and Comprehensive Free Trade Agreements impact

namely in WP 5.4. Please note that our conclusions merely flag some possibilities, including our suggestions for process improvements and inclusiveness with new responsibilities for all – without prejudging in any way policy and operator choices (Section VII).

II. Food sustainability governance

Today, national trade policies appear to evolve more rapidly over time and new topics and instruments keep emerging in the political economy of trade (Bown 2015). This is a challenge for everybody, last but not least for activist observers and academic analysts. What are the recent milestones on this fast and difficult road?

As a matter of fact, there had been substantial improvements under the MDGs between 1990 and 2015. The *2030 Agenda for Sustainable Development* had noted, for example, reduced overall poverty and hunger (MDG1), infant mortality (MDG4), and improving access to drinking water (MDG7) (UN, 2015). However, the overall assessment turned bleak, not only because of what has often been called a polycrisis. The SDG Mid-Term Review in the UNGA, in September 2023, found general failure to achieve any SDG by 2030. UN Secretary-General António Guterres warned that ‘unless we act now, the 2030 Agenda will become an epitaph for a world that might have been.’⁹ After the 2024 Session of the High-Level Political Forum on Sustainable Development (8-17 July 2024), the IISD sadly noted that “only 17% of the SDGs’ 169 targets are on track to be achieved, nearly half are showing minimal or moderate progress, and progress on over a third has stalled or even regressed.” (IISD 2024, p.15)

On the “societal” and “development”-oriented side, the IISD has become the most prolific and competent contributor to studies, and to many panels held at the annual WTO Public Forum. Its work extends beyond trade and deals with investment, debt, and finance. In 2023, it published the *IISD Model Contract Clauses for Responsible Investment in Agriculture*, with customizable legal provisions and guidance to help implement international best practices, and intergovernmental principles (RAI; Aust, 2020).¹⁰

⁹ Press Release 23 April 2023 on ‘Progress towards the Sustainable Development Goals: Towards a Rescue Plan for People and Planet’, available on 2 March 2024 at <https://www.un.org/sustainabledevelopment/blog/2023/04/press-release-un-chief-calls-for-fundamental-shift-to-put-world-back-on-track-to-achieving-the-sustainable-development-goals/> (emphasis added)

¹⁰ Sarah Brewin, S and N Maina. Cf. IISD Press Release dated 26 October 2023 available at <https://www.iisd.org/publications/guide/model-contract-clauses-responsible-agriculture-investment>

What about the SDG 2 Indicators? A FAO-coordinated *Food Coalition* found, in 2021, that the pandemic had derailed SDG 2 progress. Data collected under the two relevant SDG Indicators 2.1.1 [Prevalence of Undernourishment (PoU)] and 2.1.2 [Prevalence of moderate or severe food insecurity in the population, based on the Food Insecurity Experience Scale (FIES)] showed that: “the world is not on track to achieve Zero Hunger by 2030. If recent trends continue, the number of people affected by hunger could surpass 840 million by 2030.”¹¹ The Special Edition of the SDG Report 2023 recalled that: “the number of people facing hunger and food insecurity has been rising since 2015, with the pandemic, conflict, climate change and growing inequalities exacerbating the situation.”¹²

Are these two negative milestones a consequence of the two relevant multilateral treaties? Have a look.

- The Sixth Climate Agreement Conference of the Parties took place in Abu Dhabi, in December 2023, with 30'000 registered delegates and observers. The COP28 Presidency, together with the Consultative Group for International Agricultural Research (CGIAR), the International Fund for Agricultural Development (IFAD) and the World Bank announced the extension and deepening of the *Agrifood Sharm-El Sheikh Support Program*, a three-year initiative to facilitate dialogue and knowledge sharing among global and regional policymakers.¹³ However, what looks like a decisive pledge on the road to an ambitious scaling up of multilateral climate action and mitigation programme for agriculture is, in reality, a further step back from the standard-setting task called Koronivia Joint Work on Agriculture (KJWA), initiated in 2017 in Fiji. It appears that climate ministers still refuse to set binding climate footprint reduction standards and procedures such as a fossil fuel phase-out.¹⁴ Moreover, international organisations such as the FAO continue being prevented from laying down binding sustainability standards such as the *Multilateral Good Agricultural Practices*. In short, nothing in this declaration obliges governments or non-state actors to reduce the climate footprint of their agricultural production, agri-food processing and trade.

¹¹ *Food Coalition: A Covid-19 Response*, FAO (2021), <http://www.fao.org/food-coalition/en/> (emphasis added)

¹² The Sustainable Development Goals Report 2023: Special Edition. Available at <https://unstats.un.org/sdgs/report/2023/>

¹³ Cf. X (formerly Twitter) announcement dated 10 December 2024 (Food, Agriculture and Water Day) @ <https://twitter.com/FAOclimate/status/1733764790957301826>

¹⁴ COP28

- The Thirteenth Ministerial Conference of the WTO (also held in Abu Dhabi, between 26 February and 2 March 2024) was yet another result-free event. It ended without a single decision in respect of agriculture – not even for an agricultural negotiation work plan (with or without ‘a permanent solution on public stockholding’). The Chair’s draft had envisaged Members agreeing *inter alia* on the formulae and other criteria for cutting domestic subsidies. Trade ministers claiming “mutual supportiveness” with non-trade rules still refuse to negotiate WTO-compatible, climate-friendly energy or food subsidies.¹⁵

This shows that blaming a “polycrisis” for such clear international governance failures is probably too easy for describing a conundrum like food security under climate stress (IPCC, 2019). According to FAO, global commodity and many staple food prices are today lower than before the Russian invasion of Ukraine - despite the pandemic, trade wars, energy crises, inflation, natural disasters and trade route disruptions.¹⁶ Cereal exports by the five biggest exporting countries kept increasing too.¹⁷ Investments in large agricultural projects have resumed in wealthier developing markets, often times regardless of the often quoted *Principles for Responsible Investment in Agriculture and Food Systems*, known as RAI (FAO/CFS 2014; OECD, 2023a). Like FDI in other sectors, the few, present food trade rules of the WTO seem to play no role. Nor do BIT commitments disallow small farm expropriations, border protection at the expense of local SME and urban consumers, or foreign competitors benefitting from non-qualified input subsidies and land leases without monitoring.

Without new multilateral commitments, agreed standards, or additional food security finance, the EU and others seem to have no choice but to go it alone.

A structural problem appearing here is that vulnerable exporting producers in poor countries may lack the knowledge and resources to compete, and poor consumers increasingly suffer from inflation-driven retail prices for many basic foodstuffs. National and local food security leaves behind the poor and the hungry.

¹⁵ For this author’s views on the Multilateral Stalemate see MATS Blog on *Novel Approaches in Sustainable Food Trade* dated 6 June 2024 (<https://sustainable-agri-trade.eu/novel-approaches-in-sustainable-food-trade/>)

¹⁶ Source: FAO Food Price Index (FFPI) downloaded on 31st May 2024, defined here: <https://www.fao.org/news-room/detail/fao-food-price-index-inched-up-in-may-for-third-consecutive-month/en>

¹⁷ Source: UN COMTRADE, downloaded on 31 May 2024 at <https://comtradeplus.un.org/TariffIn>

Do we have to recognize that governments and international organisations fail to address the problems by revisiting the present rules and engaging in multilateral negotiations? What can our Case Studies, data modelling and research results say about the adequacy of the climate and the trade treaty rules, commitments, and policies? What about present and proposed investment standards? Can we find a sustainable way out of the guarantees still offered under the *Bilateral Investment Treaties* condoning land grabbing and contracts with “regulatory freeze” and “stabilisation clauses” against higher environmental regulations or minimum wage increases? (Musselli & Mariotini de Oliveira, 2022)

Many MATS projects report increasingly difficult field conditions. In a Discussion Paper published in January 2024 we had to conclude that virtually all the 15 MATS Case Studies found non-sustainable food trade in their products and countries, and SDG regressing for small producers and poor consumers (WP4.3 DP). The feedback from these projects showed 14 (out of 15) underperformers.

It is probably fair to say that agricultural policy reforms and market access improvements for more climate and trade friendly food security have become a remote target under the present circumstances.

Our CS often start with production and investment patterns, and producer sustainability concerns. Here, we look at the various proposals for changes in trade and investment policies and patterns, including social, economic and environmental aspects and the benefits of sustainable trade and investment.

Many EU trade related measures (on due diligence,¹⁸ deforestation,¹⁹ forced labour,²⁰ CBAM²¹ etc.) target production and trade patterns we also found in our CS. The rapidly evolving EU Green Deal may provide guidance for sustainability improvements by suppliers. This, however, can be a challenge for countries and producers without comparable resource endowments or support programmes. While the Green Deal is not a threshold, its minimum performance requirements, rapidly increasing procedural prescriptions, and

¹⁸ Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on Corporate Sustainability Due Diligence and amending Directive (EU) 2019/1937. Cf. https://ec.europa.eu/commission/presscorner/detail/en/qanda_21_1806 and <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52022PC0071>

¹⁹ For a critical assessment see DeValue et al (2022)

²⁰ Cf. : [https://www.europarl.europa.eu/thinktank/en/document/EPRS_BRI\(2023\)739356](https://www.europarl.europa.eu/thinktank/en/document/EPRS_BRI(2023)739356)

²¹ European Commission: Directorate-General for Taxation and Customs Union, *Carbon border – Adjustment mechanism*, Publications Office, 2021, <https://data.europa.eu/doi/10.2778/584899>

sanctions for non-compliance, may create market diversions and income reductions rather than increases in sustainable production. Understanding the new EU production and import requirements thus becomes relevant especially in countries wishing to maintain, or gain, EU market access.

III. Change proposals for Trade regimes and Policy instruments

For many developing country agrifood exports, Europe is not the only (nor the final) destination but still the main market. Increasing EU sustainable import constraints thus pose a new challenge along the whole value chain. Alternatives in the form of trade diversion may benefit Intra-African trade or exports to less demanding markets, yet at a lower price. Unfortunately, both the multilateral climate and trade fora (UNFCCC and WTO) have failed to move forward consensus on new sustainability standards and rules, or to help avoiding new trade barriers. When we look at the competitiveness of food imports we neglect a number of non-EU national and non-binding international standards. This impairs a global assessment of several export opportunities for MATS countries and products. Even under an EU import perspective, an overall feasibility assessment of the MATS proposals also depends on the capacity and willingness of developing country governments and operators to comply with new EU standards.

What did we find in our 15 CS?²² MATS case studies typically start with on-farm production conditions, issues and sustainability concerns of operators and CSO, before discussing pertinent investment and processing regulations, and trade impacts on different markets. The following *Table 1* summarises the change proposals made under CS-specific grassroots conditions. In Sections IV and V, we will show that even though this is a rather production heavy “bottom-up approach” it nevertheless shows both national and international trade issues from which we can draw useful and realistic sustainability lessons.

The MATS consortium has designed a desirable picture of the future in the form of 38 vision statements, categorized in the four dimensions of sustainability defined by MATS (Economy and Markets; Social and Human; Natural

²² The (continuously updated) list of all MATS Case studies is here: <https://sustainable-agri-trade.eu/case-studies-overview/>

Capital; Policy, Governance and Regulation).²³ This will be our grid for the CS change proposals in Table 1.

Table 1: CS change proposals

Sustainability Dimension 1: Economy and Markets

Foster information symmetry and transparency **for consistent and clear information disclosure in transactions (CS1a+b)**

Strengthen protective policies to shield farmers from volatile world market prices **(CS1a+b)**

Develop promotion and marketing strategies **to strengthen the market access and visibility of agrifood products (CS1b)**

Promote Fair Trade accreditation **to ensure sustainable production costs, fair wages, and good working conditions for farm workers (CS1b)**

Develop context-specific Fair-Trade standards **to reflect local conditions (CS1b)**

Streamline compliance costs **with regulations and certification standards to support farmers economically (CS1b)**

Supporting the agricultural financial system for more sustainable credit facilities along the overall value chain of selected agri-food commodities. **(CS4)**

Enhancing domestic marketing policies for **more efficient and competitive pricing. (CS4)**

Strengthening linkages **between research, extension services, and farmers** for adoption of **best practices** and **meeting quality standards for accessing national and international markets. (CS4)**

Farmers' knowledge on environmental and climate impacts supports sustainable production. This can be achieved by sustainable agricultural practices training, environmental impacts, and precision farming techniques. **(CS3)**

Infrastructure for production, processing and marketing. (CS5+CS15a)

Tax deductions or accelerated depreciation for investments in technology and for improving transportation logistics. (CS5)

Nuancing agricultural and food policies can **promote local processing** of cocoa and other commodities. **Fair trade practices and market access reforms** to obtain **fair and equitable prices (CS6)**

²³ Source: <https://sustainable-agri-trade.eu/vision-statements/>

Fostering **symmetry and transparency information by enforcing accountability through regular audits and inspections** to monitor compliance with market regulations and protect the interests of all market participants. **(CS6)**

Investing in infrastructure with coordination mechanisms between government agencies, industry stakeholders, and development partners (CS7)

Enhancing **reporting requirements** of bioethanol supply chains **(CS8)**

Improving **stakeholder and communities' participation in policy design (CS8)**

Improving **due diligence processes** within development banks for **comprehensive assessments of socioeconomic and environmental project risks** throughout the project duration and evaluation **(CS8)**

Remedy mechanisms to ensure that communities receive justice, compensation for land and water degradation **(CS8)**

Enforcing **ethical standards and anti-corruption policies** for companies and political leaders or communities **(CS8)**

Enhancing **transparency and pricing mechanisms throughout the value chain**, governing **fair trade** or **direct trade, ensuring equitable farm revenues (CS9)**

Enhancing **enforcement mechanisms** to **ensure compliance with national legislation** in respect of **human rights**, with **monitoring, investigation**, and imposition of **penalties for violations**, fostering **responsible and sustainable business practices (CS9)**

Government grants and subsidies for technology and infrastructure improvements (CS10)

Financial support for farmers to **alleviate compliance costs (CS12)**

Price support mechanisms and targeted subsidies to cover production costs, with **price monitoring (CS5, CS13 and CS14)**

Prevent monopolistic practices to promote **fair competition** and **market access for SME (CS15a)**

Nuancing agricultural and food policies for a more comprehensive, sustainable, and self-reliant agricultural system (CS15a)

Engaging stakeholders along the value chain by involving farmers from the outset of project planning and design, and **more successful and sustainable outcomes for both infrastructure projects and the agricultural communities (CS15a)**

Promoting value-added products and a strong brand identity **for Tunisian olive oil (CS15b)**

Promoting alternative financing mechanisms for farmers with **microfinance institutions, cooperatives, and community-based lending initiatives (CS15b)**

Promoting **regulations to address monopolies and speculation** by **strengthening antitrust laws and fostering competition (CS15b)**

Sustainability Dimension 2: Social and Human

Integrate stakeholders along the value chain to **promote equity and fairness, improve competitiveness, and safeguard livelihoods (CS1a+b, CS5, and CS14)**

Strengthen associativity of smallholder farmers to improve their participation in decision-making processes **(CS1a)**

Enhance extension services to support sustainable production **(CS1b)**

Increase funding for R&D to generate new knowledge and technologies **(CS1b, CS5)**

Enhance farmers' knowledge and skills to bolster their bargaining power and participation in decision-making **(CS1b)**

Integrating stakeholders along the value chain is vital for promoting equity and fairness. This implies **strengthening producer cooperatives and SME to negotiate collectively with processors and retailers (CS2)**

Improving women's representation can advance gender equality and women's empowerment. Additionally, providing women with access to **credit, savings, and insurance** enables **investment in agricultural assets (CS2)**

Food systems assessments should shift focus on the **inclusion of social aspects within organizations**, with **both quantitative and qualitative social impact dimensions (CS2)**

Strengthening collaboration with non-state actors to address critical issues like **gender equality, pro-poor interventions, and climate change mitigation (CS4)**

Promoting women's ownership of land for greater gender equality and improved access to finance. This can be achieved by **revising inheritance laws and property rights to eliminate gender discrimination**, and by **engaging with community leaders and elders to discuss the benefits of allowing women to own land** and how it can contribute to the overall economic development of the community. **(CS4)**

Support fair labor practices to prioritize the needs and rights of local communities, smallholder farmers, marginalized groups and workers. Strategies should focus on **promoting gender equality and youth participation in agriculture**, and on equitable access to feed, veterinary services, financing, and technology **(CS5)**

Promoting and enforcing “no child labor” with awareness campaigns on the **harmful effects of child labor and the importance of education and child welfare, targeting both parents and the wider community**, along with government initiatives that provide financial assistance or subsidies to farmers in times of low income, which helps alleviate the need for child labor to supplement family income. **(CS6+CS9)**

Coordination on crucial aspects such as supply management, demand projections, and price negotiations. This involves setting up channels for regular exchange of information and data, covering production forecasts, market trends, and consumption patterns. Additionally, harmonizing export policies, tariffs, and quotas is essential to **prevent distortions and ensure fair competition among producers. (CS6)**

Strengthening associativity and promoting farmer group membership, to guarantee **accurate budgeting, meticulous accounting, and transparent financial operations (CS6)**

Equipping stakeholders with essential resources, knowledge, and alliances to **counteract the influence of economic actors opposing changes in trade and tax policies.** Stakeholders can effectively champion policy reforms, thereby contributing to **sustainable economic growth and enhancing food security. (CS7)**

Enforcing labor regulations in producer countries to comply with safety standards and protection of workers' rights. This includes conducting **rigorous inspections, imposing penalties for non-compliance, and implementing transparent pay structures along with regular wage reviews. (CS8+CS13)**

Promote the bargaining power of **farm workers to collectively bargain and obtain access to grievance mechanisms.** Companies should adopt support workers' rights and access to transparent, and effective workplace grievance mechanisms. **(CS9)**

Involving stakeholders across the coffee value chain promotes open and honest communication, building trust and transparency in decision-making. It enables **collaborative identification and assessment of risks** affecting all stakeholders, from climate-related challenges to market fluctuations and supply chain disruptions. **(CS9)**

Promoting gender-sensitive policies and measures that prevent discrimination based on gender in hiring, promotions, and salary decisions. These policies should develop and implement **strategies that foster an inclusive workplace culture** where diversity is valued and gender equality is prioritized. **(CS11)**

Promoting the implementation of **minimum wage policies** to ensure fair compensation for farm workers, while strengthening legal protections to prevent exploitation and ensure fair treatment. **More equitable pay structures** can contribute to long-term sustainability and **social stability** in farming communities. **(CS13)**

Nuancing **retirement age policies** through a gradual increase in retirement age, thus safeguarding the sustainability of retirement systems. This will alleviate poverty and enhance access to essential resources for aging workers and older individuals. **(CS13)**

Sustainability Dimension 3: Natural Capital

Promoting **investment in environmentally friendly technology** (ridge-terracing to trap rainwater and drip irrigation for banana and cocoa, sub-soiling to retain more water per cassava plant, and paddock grazing of goats) can lead to significant improvements in water retention, soil health, and efficient land use, which are critical factors for enhancing

productivity and sustainability in agriculture. By focusing on these practices, farmers can achieve better yields, more efficient resource utilization, and a more resilient farming system. **(CS4)**

Research institutions have been responsible for developing and providing farmers with new varieties and breeds of crops (cassava, banana, and cocoa) and animals (goats) suited to different consumer requirements. However, it is necessary to **increase funding for R&D** to generate the next generation of breeds and varieties that can cope with climate change and evolving consumer tastes. **(CS4)**

Enhancing the documentation of good practices can significantly improve the productivity, health, and profitability of goat production systems, ultimately leading to **more sustainable and successful farming operations**. **(CS4)**

Promoting financial incentives or grants to poultry farmers to adopt **renewable energy technologies and promote energy-efficient practices** in their operations, aiming to reduce electricity consumption and alleviate the burden of high production costs. **(CS5)**

Promoting funding for R&D can generate new knowledge and technologies that drive industry advancement. Providing training and education on modern farming practices, disease prevention, and business management empowers smallholder farmers to improve their productivity and resilience. This, in turn, helps develop comprehensive strategies and initiatives to address key challenges and drive positive change in the poultry sector. **(CS5)**

Enhancing environmental regulations can enforce laws that prevent deforestation and land degradation in cocoa-producing areas by developing robust monitoring and enforcement mechanisms to ensure compliance with sustainable practices and penalize illegal activities. **(CS6)**

Enforcing policies to **ban or reduce palm oil imports** can involve enacting legislation to ban the import of palm oil linked to deforestation. This can include a complete ban or targeted bans on palm oil from regions known for unsustainable practices. Additionally, setting strict quotas on the amount of palm oil that can be imported and gradually reducing these quotas over time can encourage a shift away from palm oil. **(CS7)**

Nuancing biofuel production policies can advocate for policy reforms at the EU level. These reforms should aim to **revise biofuel mandates and incentives**, monitoring mechanisms, and prioritizing truly sustainable production methods in producer countries. This includes minimizing environmental and social impacts by addressing issues such as land rights, labor rights, and conservation practices. **(CS8)**

Strengthening legal frameworks can guarantee the enforcement of existing laws that protect **indigenous land rights** and ensure mandatory and meaningful consultation with indigenous communities on matters affecting their land and resources. **(CS8)**

Promoting women's land ownership can involve facilitating their access to and control over land resources through measures such as land redistribution and titling programs. This entails advocating for equal land ownership rights for women, including reforms in inheritance and property registration laws that recognize and safeguard women's land rights.

Additionally, fostering women's participation in coffee sales is crucial for empowering them economically and socially within coffee-growing communities. **(CS9)**

Strengthening farmers' knowledge and skills can support sustainable production and increase the acceptability of avocado and mango cultivation among consumers. This can be achieved by developing and offering training programs focused on **sustainable farming**. **(CS11+CS15a)**

Increasing funding for R&D can prioritize research on innovative pest and disease management strategies and enhance the adoption of new technologies and practices to boost overall crop productivity for mango and avocado cultivation. This will increase profitability for farmers by improving yields and reducing losses, thereby contributing to rural development and economic growth. **(CS11)**

Enhancing **transparency and accountability mechanisms** can ensure that all information related to the Authorization of Native Vegetation Conversion is publicly accessible, including applications, approvals, and associated documents. This involves establishing clear lines of accountability within regulatory bodies, specifying roles and responsibilities for each stage of the authorization process. Furthermore, mechanisms should be established for the public and civil society organizations to report suspected illegal deforestation activities, ensuring these reports are taken seriously and investigated promptly. **(CS14)**

Promoting the refinement of the definition of savanna landscapes within EU regulations can involve broadening definitions and advocating for the inclusion of "other wooded land" and "natural grasslands" within the criteria for deforestation-free products (EUDR). This approach ensures **comprehensive protection of savanna landscapes** such as the Cerrado, underlining their importance for biodiversity conservation, water regulation and the provision of ecosystem services. **(CS14)**

Enhancing **trade measures tied to environmental and social performance** can be crucial to promoting sustainable land use practices. It's imperative to advocate for stricter environmental and traceability requirements, especially to meet the demands of export markets, particularly China. **(CS14)**

Promoting **investment in infrastructure development** can garner government support and secure the necessary funding and resources to improve storage capacity for small farmers. This includes advocating for the inclusion of agricultural storage infrastructure in national and regional development plans and supporting the creation of agricultural innovation hubs that focus on developing and scaling affordable storage technologies. **(CS5+15a)**

Nuanced restrictive seed policies of the UPOV Convention can strengthen Egyptian agricultural sovereignty, support local farmers and promote sustainable agricultural practices. Need for provisions allowing smallholder farmers to save seed for non-commercial use and by increasing funding and support for national breeding programs focused on developing varieties adapted to local conditions. **(CS15a)**

Strengthening regulations for land use planning and management can involve the development comprehensive land use plans to identify suitable areas for olive cultivation

and promote diversification of agricultural activities. By doing so, Tunisia can enhance the sustainability, productivity, and resilience of its olive farming sector. **(CS15b)**

Enforcing regulations for sustainable water management can be crucial for promoting sustainable agricultural practices, ensuring water security, and safeguarding the environment for future generations. This includes implementing restrictions on groundwater extraction and offering incentives for water-saving practices. Moreover, encouraging the adoption of water-efficient irrigation techniques, such as drip irrigation and micro-sprinklers, can significantly reduce water usage in olive oil production while maintaining crop productivity. **(CS15b)**

Sustainability Dimension 4: Policy, Governance and Regulation

Enhance **stakeholder participation in policy design** to clarify implementation frameworks and ensure inclusive decision-making **(CS1a)**

Enhance governance structures to change the dynamics of agrifood systems and contribute to sustainable development **(CS1a+b)**

Simplify bureaucratic procedures to enhance farmers' active participation and engagement in food systems **(CS1a)**

Enhance financial and technical support for farmers to meet sector requirements and adopt sustainable practices **(CS1a and CS5)**

Promote investment in new infrastructure to strengthen the enforcement of regulations **(CS1a)**

Promote taxation incentives to reduce administrative burdens and bolster domestic products competitiveness in the market **(CS1b)**

Fostering organizational change that ensure the **integration of social sustainability standards** regarding labor into overall sustainability reporting efforts. This entails transitioning towards even higher levels sustainability in the Nordic oats value chains by reshaping how companies approach and prioritize social sustainability. It involves expanding involvement beyond dedicated sustainability units to include HR departments and the broader organizational structure and increasing transparency on pricing and supply relationships. **(CS2)**

Promoting the establishment of **public agencies dedicated to export promotion** can significantly enhance efforts to support the development of the cassava, plantain, and goat value chains, leading to increased export opportunities and economic growth. These agencies can assist stakeholders in developing and promoting their brands in target export markets, while also fostering Public-Private Partnerships to ensure comprehensive and effective support across the value chains. **(CS4)**

Developing a specific policy statement for the **enhancement of the role of goat products** can encourage Ethiopia's food and nutrition security strategy. This can be achieved by engaging with policymakers, agricultural stakeholders, and nutrition experts to advocate for their inclusion and highlighting their nutritional benefits and economic potential. **(CS4)**

Strengthening coordination mechanisms within ministries and agencies can help them work more cohesively, ensuring that policies are coherent, effectively implemented, and capable of driving sustainable agricultural development. This involves outlining clear roles, responsibilities, and **collaborative strategies to ensure all policies are complementary** and not contradictory. **(CS5)**

Enhancing the **dissemination of government initiatives** can boost awareness and participation in poultry sector programs, ensuring they reach and benefit a broader spectrum of stakeholders across the entire value chain. This involves actively engaging with poultry farmers, associations, cooperatives, and other stakeholders at the grassroots level to effectively communicate information about government programs. **(CS5)**

Supporting policies that promote sustainable agricultural practices in Ghana can enhance the competitiveness and diversification of the agricultural sector, thereby contributing to economic development while safeguarding environmental and social standards. This entails **incorporating sustainability criteria into trade policies** and industrial transformation agendas. **(CS5)**

Enhancing stakeholder participation in policy development can avoid misunderstandings and unrest among value chain actors (including farmers and NGOs), which can hinder the implementation of policy frameworks such as Living Income Differential (LID) **(CS6)**

Gradually **strengthening import restrictions** can provide the local dairy sector with the necessary time to adapt to shifts in demand and production capacity. Making imports of milk powder contingent upon processors integrating a specific proportion of local milk into their production processes can effectively boost the demand for local milk and **bolster support for domestic producers**. **(CS7)**

Promoting **adjustments to policy regulations at the WTO and EPA** levels can address the unique challenges faced by West African nations in safeguarding their dairy systems, ensuring transparency and accountability in the implementation of trade policies to build trust among stakeholders. **(CS7)**

Encouraging the **implementation of sustainability labelling** for beef can attract consumer attention to sustainable products, influencing purchasing decisions and increasing access to international markets where sustainability is a key criterion. Additionally, it can enhance brand reputation and foster customer loyalty. **(CS10)**

Enhancing the **implementation of tariffs and quotas on imported beef** can make it less competitive compared to locally produced beef and limit the amount of beef that can be imported. This ensures a **larger market share for local producers**, helping to mitigate the negative impact of low-priced imports and strengthen the local beef production industry. **(CS10)**

Strengthen **fair trade standards for certified production** may offer smallholder farmers (mango, avocado) with access to nearby markets (roads) a greater ability to cover the average cost of sustainable agricultural production and certification, access to financial services for agricultural investment, and thereby the adoption of new technologies that are

necessary for compliance with sustainability standards and protection against price fluctuations. Further, formal institutions (the government providing subsidies) and informal institutions (trust among farmers and traders) can act as substitutes in supporting farmers to adopt sustainable production standards. **(CS11)**

Promote **investment in upgrading storage facilities** such as cold warehouses and transportation infrastructure like roads and refrigerated trucks, while expanding capacity to accommodate higher volumes of produce and alleviate congestion. (CS11)

Promoting tax incentives, such as **deductions or credits for investments in technology, infrastructure, and sustainable practices**, can improve access to financing and encourage more investment in the sector. This also involves providing clear and consistent guidelines for businesses to follow, minimizing uncertainty and reducing the risk of incurring additional costs. **(CS11)**

Supporting policies that promote good practices can **ensure that certification standards explicitly require the adoption of sustainable farming techniques, animal welfare standards, and environmental conservation**. This involves implementing cost-effective audits and inspections to ensure that certified farms consistently adhere to these good practices, and that adoption is happening in the first place. **(CS11)**

Promoting **fair trade certification schemes** can ensure farm workers receive fair wages and working conditions, encouraging consumers to support ethically produced agricultural products. Additionally, **supporting living wage campaigns** aims to establish and secure formal wages. **(CS12)**

Promoting **fair trade accreditation** can ensure adherence to social standards valued by target niche markets, encompassing certifications related to fair labor practices, environmental sustainability, and community development. This effort involves crafting a compelling brand narrative around ethical sourcing, sustainability, and community engagement. Emphasizing the wine product's unique social and ethical attributes can set it apart from competitors. Additionally, maintaining transparency in the wine supply chain and production processes is crucial, providing consumers with clear information about the social standards adhered to and the impact of their purchasing decisions. **(CS12)**

Promoting **robust traceability systems** can create immutable records of soy origin, ensuring transparency and traceability throughout the supply chain. This includes the use of block chain technology and clear labeling and documentation to distinguish certified products from non-certified ones. **(CS14)**

Local leaders in Brazil report corrupting authorities like notaries and judges to validate fake land titles. So, **strengthening anti-corruption regulations** can enhance the enforcement of laws designed to prevent corruption, including imposing strict penalties on both companies, political leaders, notaries and judges involved in unethical practices. Additionally, establishing monitoring mechanisms to track corporate and governmental activities related to land use and resource extraction is essential. **(CS14)**

Enhancing state subsidies can better support smallholder farmers by reintroducing **targeted subsidies** to provide financial relief and access to essential inputs such as fertilizers

and seeds. Developing a tiered subsidy program that offers **higher support levels for small and medium-sized farms compared to large commercial farms** will ensure equitable resource distribution. **(CS15a)**

Small-scale farmers often lack bargaining power, placing traders or intermediaries in a dominant position with control over prices and exerting pressure on farmers to sell. Therefore, **strengthening farmers' knowledge and skills** can empower small-scale farmers, enhancing their bargaining power in negotiations. This enables them to secure better terms, develop effective marketing strategies, and establish fair contract farming arrangements. By engaging in transparent transactions with traders and intermediaries, farmers can uphold fair trading practices, reducing their vulnerability to market exploitation. **(CS11+CS15a)**

Strengthening protective policies can diminish Tunisia's reliance on imported vegetable oils, bolster the surplus of exportable olive oil, and mitigate vulnerability to global market fluctuations. This entails **negotiating favorable trade agreements** to secure stable markets for olive oil exports and reliable sources for vegetable oil imports. Additionally, it involves developing policies that strike a balance between the export of olive oil and domestic consumption needs. **(CS15b + Kay, 2023)**

Promoting public-private partnerships can foster collaborative efforts to deliver cost-effective support services to small farmers. Advocating for a **reconsideration of government resource allocation** ensures that support programs adequately address the needs of small-scale producers. This may entail **providing subsidies or incentives to encourage private service providers** to extend their reach to underserved communities. **(CS15b)**

Source: Author compilation using D3.5 and D3.7 summaries. Emphasis added.

With these CS findings and proposals grouped by the four MATS sustainability dimensions, we now turn to a tentative assessment of the EU Green Deal impact on African food trade.

IV. MATS and the EU Green Deal

The European Commission published its Green Deal proposals for the first time in 2019. These proposals provide a framework for the EU to reach its carbon neutrality targets. The 'Fit-for-55' climate package was published in July 2021 as a part of the Green Deal, including a dozen legislative proposals concentrating on climate policy initiatives. The purpose of the FF55 package is to revise and update the existing EU legislation and propose new initiatives aligned with the EU climate goals. Breaking ground with previous commitments and treaties involves autonomous standard setting. It also means that impact assessments focus on domestic production and interests. Import regulations trying to offset unfair competition by producers with lower climate mitigation and social standards can act as trade restrictions. Many unilateral

FF55 standards also apply to agriculture. In the absence of binding treaty rules and commitments, the question arises whether these new European standards take impact issues into account, or diverge from the multilateral cooperation approach intended under the Paris Climate Agreement. Given the size of the European market foreign suppliers may then call for a WTO compatibility assessment. Small producers, without exports to Europe, may face an even bigger negative impact. This is where MATS comes in with its own impact studies and policy advice. (Carlson, Häberli and Steiner, 2023; Carlson & Steiner MATS 2023).

The EU's carbon pricing scheme called CBAM is a first example of such a unilateral measure. It is a cornerstone for the whole EU Green Deal since it aims at an equal treatment of 'greener' domestic producers and of importers of 'like' products. At this point, however, CBAM only indirectly impacts on African food exports to Europe (Häberli, Steiner & Carlson, 2024).²⁴ In our MATS working paper 12/2023 on the EU Proposals for Deforestation-Free Products and for a Green Claims Directive we find that EUDR already impacts on six commodity imports right down to farm and family levels, such as cocoa and coffee farms in Ghana or Tanzania (Illien et al., 2023; Häberli, Carlson & Samant MATS 2023).

Regrettably, it appears that the EPA Joint Committees have not had an opportunity to discuss some of these FF55 regulations. Many impact studies commissioned by the EC before the adoption of FF55 measures have apparently not been published.

This discussion paper cannot go into details on FF55 impact in MATS countries and products. MATS and its research partners Trade4SD and IISD²⁵ recognize the vital role of agrifood trade in global food security and economic growth. We also acknowledge the necessary trade-offs between trade practices and the environmental, social, and economic dimensions of sustainable development. At the same time, we consider that substantial additional research is required to get a clearer picture of this rapidly evolving policy challenge. The challenge is to ensure that trade contributes to achieving the UN Sustainable

²⁴ Häberli, C., Steiner, B., Carlson, M. (2024) Will CBAM promote greener African-EU agri-food trade? Journal Article (peer review ongoing)

²⁵ Relevant IISD contributions to this debate are in our References (cf. IISD 2024, IISD 2023a, IISD 2023b, IISD 2023c and IISD 2022).

Development Goals (SDGs) and fosters a resilient and inclusive food system.²⁶

We can now try to assess some of the CS change proposals through the lens of national constraints and interest groups, international trade and climate rules and commitments, the EU Green Deal, and other relevant standards and factors. *Table 2* in the next section places the bold print in *Table 1* above in a randomly selected context: (1) national factors (e.g. tariffs, NTM, PPM regulations, finance, concerned interest groups like operators and CSO) (2) international trade and climate rules (WTO, Paris Agreement, EPA, RTA) (3) Green Deal/FF55 measures and (4) other intergovernmental or private standards (BIT, ILO, WHO, OECD 2023b, ISO, Globalgap etc).

²⁶ In May 2024 we have called for a strengthened analytical approach integrating sustainability considerations and contributing to a more holistic, evidence-based impact assessment of trade policies. Cf. MATS, T4SD and IISD (24 May 2024). Joint Statement: Leveraging opportunities for better-informed and more sustainable agricultural trade policies through the use of systemic methods. Available at <https://sustainable-agri-trade.eu/joint-statement-leveraging-opportunities-for-better-informed-and-more-sustainable-agricultural-trade-policies-through-the-use-of-systemic-methods/#:~:text=Joint%20Statement%3A%20Leveraging%20opportunities%20for%20better-informed%20and%20more,trade%20in%20global%20food%20security%20and%20economic%20growth>

V.Changes in trade relations and instruments: Relevant factors

MATS has defined the various facets of the four dimensions relevant for sustainable agrifood trade. Change management in difficult international and national circumstances is a process requiring context knowledge and careful strategic planning. To state what others should do is not enough. To be successful, 'sustainability' and other imprecise terms must include feasibility, interest weighing, human and financial resource planning.

Table 2: Change Proposals - Trade Regimes

1. Economy and Markets				
Sustainability Dimensions and Change proposals	National Factors	International Rules	Green Deal/FF55	Other Factors
Information symmetry and transparency (CS1a+b, 5, 6, 8)	SME organization and protection	TBT prevents import discrimination Child and force labour: evolving import trends demand MATS country and product cooperation.	EUDR demands (1) household and market data in producing countries (2) government cooperation (to be eligible for "light" EU import controls)	Market share differences impair symmetric information. Operator info will remain (partly) private. Regulators need confidential info treatment. Stakeholder commitments also required.

Fair trade standards, accreditation, and practices (CS1b, 6, 8, 9, 13, 14, 15a+b)	Norms, both voluntary and mandatory, require large adherence, impact assessments, monitoring, and sanctions against fraud. Who pays for the extra costs? How to treat imports?	ISO offers standardisation. Codex alimentarius addresses consumer deception (TBT not SPS!)	Labelling standards in various treaties	Size matters – like for organic food: info costs and monitoring reduced with bigger programmes. Complications from differences in importer standards (e.g. Kenyan coffee for EU or USA).
Protection against price volatility, price support mechanisms (CS1a+b, 5, 9, 13)	Insurance scheme reforms can address price volatility at home and on world markets.	WTO limits domestic price support and prohibits export subsidies.	Competing EU farm income includes price “buffers” (from direct payments)	AMIS (FAO/WTO) vs (costly) private market data can affect competition and market and commodity exchange price reactions at the expense of SMEs.
Promotion and marketing strategies (CS1b, 4)	Beneficiary issues and regulatory and financial challenges.	WTO “Green Box” allows for trade fair financing.	Anti-SME bias inherent in many (official) marketing support programmes.	Competitiveness (short and long term)
Public agencies dedicated to export promotion (CS 4)	-	-	-	Such agencies should include a SME window.
Targeted financial instruments (CS5, 10, 12)	Multiple (bank) governance issues. Priority setting by finance providers?	IFI rules and abuse (e.g. IBRD research vs lending practices),	CBAM payments under the (already existing) <i>Modernisation Fund</i> and a new <i>Social Climate Fund</i> with over €86 billion is only foreseen for EU member states and citizens, not for developing country carbon emissions.	Different operators and countries are impacted differently by FF55 for different Green Deal issues. Who decides?

<p>Comprehensive, sustainable, and self-reliant agricultural systems (CS1b, 3, 4, 5, 6, 7, 8, 11, 14, 15a+b)</p>	<p>Multiple mainly domestic governance issues. Self-reliance as an objective (at the expense of trade) with potentially contradictory (small/big) farm income, food security, and consumer price impacts.</p>	<p>No WTO rules. Climate impact assessments (NDC).</p>	<p>More sustainability may respond to FF55 requirements – and/or increase production prices beyond export competitiveness. CBAM will increase transport costs as of Year 1. This may reduce market access for remote farms and countries. EUDR, without in-situ impact assessments, may reduce commodity exports from deforested areas.</p>	<p>Politics based on defined sustainability standards. Informed and inclusive decision-taking, regulator, operator, CSO and consumer acceptance are crucial.</p>
<p>Improving women's land ownership, representation, and access to financial services (CS 2, 4, 9)</p>	<p>National regulators need advocates for equal land ownership rights, including for reforms in inheritance and property registration laws, enabling women entrepreneur investments in agricultural assets.</p>	<p>FF55 provisions should be reviewed for gender correctness.</p>	<p>Interestingly, some of the most successful agri-food marketing businesses in West Africa are managed by women (“Mama Benz”)</p>	<p>A role for CSO along the food value chain!</p>

2. Social and Human

Sustainability Dimensions and Change proposals	National Factors	International Rules	Green Deal/FF55	Other Factors
Promote equity and fairness, improve competitiveness, and safeguard livelihoods (CS1a+b, 2, 6)	Main addressees are MATS governments: transparency, data collection, impact assessments	<p>No special import constraints under international rules.</p> <p>But even equitable and fair trade agri-food products will not escape EU Green Deal regulations, unless special provisions are made for their (temporary) preferential market access.</p>	Even private Fair-Trade labels should avoid consumer deception, be trustworthy with a monitoring system, and reach retailer shelves in importing markets. This may imply higher costs for producers and/or consumers, and limit competitiveness. Food value chain participants should elaborate a coherent strategy.	Integration of social sustainability standards regarding labor into overall sustainability efforts. This entails transitioning towards sustainability in the oats value chain by reshaping how companies approach and prioritize social sustainability. It involves expanding involvement beyond dedicated sustainability units to include HR departments and the broader organizational structure. (CS 2)

<p>Strengthen associativity and operational and financial capacities of smallholder farmers (1a+b, 2, 4, 11, 14, 15a+b)</p>	<p>Associativity by better organization to take interest and performance diversity into account (avoid “commodity curse”). Common input purchase requires cooperation by banks and suppliers. Common marketing difficult and costly without quality self-control.</p> <p>See remarks above.</p> <p>Domestic vs export sales are decisive points for (niche?) marketing strategies.</p>	<p>Commodity exchanges to include SME offers and commodities (e.g. Ethiopia).</p>
<p>Support fair labor practices, act on child labour, and improve local community livelihoods (CS 2, 5, 6, 8, 9, 12, 13)</p>	<p>Domestic regulation and action can benefit from FF55 regulations involving due diligence and labour practices, also to improve safety standards and to protect workers' rights based on (ratified) ILO Conventions.</p> <p>Enhancing policies that support fair labor practices and improve local community livelihoods can prioritize the needs and rights of various stakeholders, including local communities, smallholder farmers, marginalized groups, and poultry sector workers. This contributes to inclusive and sustainable agricultural growth. Strategies should focus on promoting gender equality and youth participation in agriculture through targeted interventions, training programs, and capacity-building initiatives. (CS5)</p>	
<p>Promoting public-private partnerships (CS15b)</p>	<p>Promoting public-private partnerships can foster collaborative efforts to deliver cost-effective support services to small farmers. Advocating for a reconsideration of government resource allocation ensures that support programs adequately address the needs of small-scale producers. This may entail providing subsidies or incentives to encourage private service providers to extend their reach to underserved communities. (CS 15b)</p>	<p>External financing with SME facilities (IBRD, EU) may help in private sector investor and trader outreach.</p>

3. Natural Capital

Sustainability Dimensions and Change proposals	National Factors	International Rules	Green Deal/FF55	Other Factors
<p>Promoting investment in environmentally friendly technology (CS4, 5, 15a+b)</p>	<p>Competition with low cost low standard projects is a major challenge for both domestic and foreign agri-food production and processing investments, as long as both non-green and green investments benefit from initial or permanent support.</p>	<p>FDI is often overprotected (in BIT and EPA) and under-regulated (in investment contracts guaranteeing regulatory freezes). The only governance instrument on the side of the home country are Due Diligence rules applying to investments in developing countries. Pre-investment impact studies shaping investment contracts can take social, labour and environment regulations into account, thus avoiding sub-sustainability standard investments – especially if international development finance is part of the investment project.</p>		<p>Priority weighing, and a comprehensive ex ante and ex post monitoring are required especially in larger projects.</p> <p>Small projects may benefit from temporary exceptions, remittances, and other factors.</p>
<p>More sustainable and successful farming operations, land use planning and management, regulations for sustainable water management (CS 1b, 4, 5, 11, 15b)</p>	<p>(+ more R&D, more renewable energy technologies and energy-efficient practices)</p> <p>R&D components for natural capital projects must be tailored to concrete projects or regional development plans</p>	<p>Marketing agri-food products with (possibly more expensive) properties require cooperation along the food value chain, and retailer/consumer involvement for specific target markets.</p> <p>Regulators may need to accompany projects keeping in mind their standards and limits, e.g. for certification, monitoring, IP and investment protection.</p> <p>Strengthening regulations for land use planning and management can involve the development comprehensive land use plans to identify suitable areas for olive cultivation and promote diversification of agricultural activities. By doing so, Tunisia can enhance the sustainability, productivity, and resilience of its olive farming sector. (CS15b)</p>		

Enhancing environmental regulations. Developing **robust monitoring, enforcement and remedy mechanisms to ensure compliance** with sustainable practices and penalize illegal activities **(CS6, 8)**

Nuancing **biofuel production policies** can advocate for policy reforms at the EU level. **(CS 8)**

Nuancing regulations on **manure application per hectare and GHG emissions** can unlock opportunities for herd expansion and agricultural productivity within environmental sustainability constraints **(CS 3)**

Enhancing environmental regulations should be coordinated, and synchronized, in exporting and importing countries.

The best place would be in the competent international organisations, both horizontal (UN-FCCC and WTO) and technical (IEA etc.). Failing that, in the Joint Committees (FTA, EPA) and dialogues with EC, AfCFTA and RECs. (Kuhlmann & Agutu 2020)

New technologies useful for agri-food may involve specific non-agri R&D e.g. for biofuels and hydrogen. Same for monitoring and enforcement mechanisms (AI, data management etc.).

Both public and private R&D are required.

Decentralization of inspection and certification processes (CS1a)

Government **grants and subsidies (CS 6, 8, 9, 10, 12, 13, 15a+b)**

New funds and funding mechanisms appear both nationally and internationally, connected with treaty commitments and new conditionalities ('check-book diplomacy').

Potential MATS-type beneficiaries must use their network skills to access such funds, especially in LDC and poor countries.

This is a new role for CSO, requiring their own lobby skills and entailing new responsibilities and liabilities for a trust-based implementation.

4. Policy, Governance and Regulation

Sustainability Dimensions and Change proposals	National Factors	International Rules	Green Deal/FF55	Other Factors
<p>Enhancing stakeholder participation in policy design to clarify implementation frameworks and ensure inclusive decision-making (CS1a, 4, 6, 7, 8)</p> <p>Incorporating sustainability criteria into trade policies and industrial transformation agendas (CS 5)</p>	<p>Governments need policy reviewers advising them on the effective involvement of vulnerable farmers, population segments and SME in decision-making.</p> <p>A role for CSO ready to commit on delivery!</p>	<p>EUDR requires farm-level data and involvement along the food value chain.</p> <p>Traders and importers are liable for data correctness under FF55 regulations.</p>	<p>Simplifying and decentralising bureaucratic procedures can enable farmers to readily access and register for a wide array of services – without additional costs. (CS1a)</p>	<p>Nuancing agricultural and food policies for SME can facilitate their transition towards a more comprehensive, sustainable, and self-reliant agricultural system. This approach reduces dependence on imported inputs and large agricultural companies, fostering a resilient and equitable agricultural sector (CS15a)</p>
<p>Strengthening coordination mechanisms within ministries and agencies (CS 5, 6, 7)</p>	<p>Nothing new – but the new challenges make new efforts indispensable.</p>	<p>Exporting countries must know international norms and rules and operate coherently (1 agency) in international fora. (UNCCC, WTO, RTA, EPA, AfCFTA, RECs)</p>	<p>Process matters especially where data requirements and rapid developments in international relations and markets require constant adaptation.</p>	

Better/Best practices (ALL CS)	Supporting policies that promote good practices can ensure that sustainability standards explicitly require the adoption of sustainable farming techniques, animal welfare standards, and environmental conservation. This involves implementing regular audits and inspections to ensure that certified farms consistently adhere to these good practices (CS11)			Control and Trust required!
Trade measures tied to environmental and social performance (CS 14)	Enhancing trade measures tied to environmental and social performance can be crucial to promoting sustainable land use practices.	“Ecodumping” and “Sociodumping” are <u>not regulated</u> under WTO rules.	“ <u>Level-playing field</u> ”: Under EU and other import market regulations this is also a competition (and antitrust) issue.	Over-regulation may punish SME. But stricter environmental and traceability requirements are needed, especially to meet the demands of export markets (CS14)
Prevent monopolistic practices and strengthen antitrust laws and fostering competition (CS15a+b)	Very important “development” obligation of exporting country governments to ensure fair market access and pricing, also requiring support under EU Green Deal instruments (Due Diligence, EUDR)	A smallholder focus (perhaps with more flexible provisions) should be built into these regulations and cooperation instruments.	Prevent monopolistic practices, strengthen antitrust laws and foster competition to ensure fair market access and pricing (CS15a+b)	Over-regulation can be a problem, impacting on implementation capacities. This requires a specific reality check and priority-weighting e.g. for child labour.
Nuancing seed (and other) IP policies (CS 15a)	Nuanced restrictive seed policies of the UPOV Convention can strengthen Egyptian agricultural sovereignty, support local farmers and promote sustainable agricultural practices. Provisions allowing smallholders to save seed for non-commercial use and by increasing funding and support for national breeding programs focused on developing varieties adapted to local conditions. (CS 15a)			“Nuancing” IP can have availability and access drawbacks. Under UPOV SME may be exempt from constraints but not trade their own seeds but still benefit from national breeding programs. (Cf. ITPGRFA)

VI. Feasibility assessments

With the synthesis in Table 2 of the main policy change proposals by our CS we can now try to assess their feasibility, not forgetting the many caveats in terms of politics, finance and product and country specifics. We keep the four MATS sustainability dimensions as our grid, even though there are overlaps, (and different allocations in D 3.7). The assessments in this section allow for a 'horizontal lecture' of the MATS proposals in our conclusions (Section VII), together with D 5.1, 5.2 and 5.4. Taken together, WP5 thus provides a full picture of where MATS stands today – and where it could aim at tomorrow.

1. Economy and Markets

We find several strands of proposals potentially leading to more trade sustainability in the field of economy and markets.

- (1) Unsurprisingly, given the title of MATS, not less than twelve CS make proposals for **comprehensive, sustainable, and self-reliant agricultural systems**.
 - a. A tentative assessment of these ambitious change proposals seems only possible for specific ideas. The ambitious proposals under the most complex MATS topic will require a comprehensive implementation plan, and a detailed feasibility study in a follow-up project. Moreover, proposals for production and investment improvements will have to start with multiple mainly domestic governance issues. For instance, increasing self-reliance as an objective (presumably at the expense of imports) with potentially contradictory (small/big) farm income, food security, and consumer price impacts will have to pass through an ex ante impact assessment with sometimes conflicting factors and policy instruments, even before the sustainable trade question can be raised. Incidentally, substituting more sustainable imports with less sustainable local products may be advisable only as a temporary stopgap measure.
 - b. International trade and climate rules might play a minor role here. The good news is that more sustainability may respond to FF55 requirements and thus open new market access opportunities. However, without a comprehensive sustainability strategy, increased production costs could place those products outside a standard-protected import market. What matters for all these proposals is the need for sustainability standards defined through informed and inclusive decision-taking, with regulator, operator, CSO and consumer participation, possibly including relevant sustainability regulations, approval processes, and operators

on retail markets. For export projects, export competitiveness comes last but not least.

- (2) **Information symmetry and transparency** are seen as paramount for sustainability improvements (5 CS). Indeed, market share differences can impair symmetric information without government intervention. Vulnerable farmers and SME often require better organization and protection from market speculators.
 - a. However, operator knowhow will always remain (partly) private. And regulators need confidential info treatment. On the other side, stakeholder commitments are also required for more transparency.
 - b. Here again, no major international rules apart from notification procedures. And WTO/TBT rules prevent import discrimination.
- (3) Five CS call for improved **fair-trade standards, accreditation, and practices**.
 - a. Fair trade is a self-defined claim. Size matters – like for organic food: data collection and independent monitoring can be reduced with bigger programmes. Differences in importer standards and retailer constraints hurt especially small exporters (e.g. Kenyan coffee for export to EU or USA, or human rights concerns leading UK or German retailers to refuse Ugandan coffee). To have an impact on production and trade, norms, both voluntary and mandatory, require large adherence, impact assessments, monitoring, and sanctions against fraud. Who pays for the extra costs? How to treat imports?
 - b. For once, help comes at the international level: ISO offers standardisation and recognition procedures. *Codex alimentarius* addresses consumer deception. WTO/TBT rules can protect against protectionist import conditions. And an increasing number of RTA and EPA contain binding and enforceable rules on accreditation, and practices.
- (4) A cluster of 5 CS demands **protection against price volatility, price support mechanisms**.
 - a. Targeted financial instruments can protect farmers from price volatility caused by rising input costs or unforeseeable market developments. Unfortunately, poor developing country pockets are less deep than farm pay-outs under US or EU direct payments acting as price “buffers”, whether “green” or not. The same goes for national price support mechanisms.
 - b. AMIS (FAO) and WTO Trade Policy Reviews show the extent of such payments even in countries like India and Brazil. WTO prohibits export

subsidies and limits domestic price support. Two innovative instruments also available to poor producers come to mind: (1) New risk insurance schemes can protect producers against price volatility. (2) Market and commodity exchange start opening up to (organised) SME participating in export trade. Money? There is no free lunch, but Ethiopia (sic!) shows the way: a weather insurance programme was set up for farmers without cash (“insurance for work”), and the Addis Ababa commodity exchange had regional coffee storehouses with farmers able to accept, or refuse, prices made in London. Other schemes with producer decision-making prop up in Tanzania, Burkina Faso, and Sierra Leone.

Many proposals address **specific problems** in their countries and products:

- (5) **Promotion and marketing strategies** (2 CS). These proposals raise beneficiary issues and regulatory and financial challenges. For Africa and its traditional commodity exports, a number of proposals keep show improvement possibilities without exacerbating inter-African competition (Tralac, 2017). No international rules stand in the way, but apart from multiple funds made available for trade fair participation, finance is always a problem.
- (6) Public agencies dedicated to **export promotion** (1 CS). Public agencies assist SME and bigger stakeholders in developing and promoting their brands jointly in target export markets. Public-private partnerships can up the ante to cover at least part of the required funds.
- (7) **Targeted financial instruments** (3 CS). Given the limited availability of public funds in poor developing countries and SME, we see the biggest potential in development banks with such priorities. To avoid priority setting by finance providers, beneficiaries must be contributing to such carefully designed schemes without risk insurance.
- (8) Finally, our CS see **gender issues** as a too often neglected area with important improvement possibilities along the food value chain (3 CS). The representation of women in decisions on the purchase, sale or transfer of assets is easy to call for. Nevertheless, (1) Land ownership by women will increase by revising inheritance laws and property rights, and by engaging with community leaders and elders to discuss the benefits of allowing women to own land (CS4). Regulators also can and should improve women's representation. Taking better into account differences in risk taking and management, access to financial services, credit, savings,

and insurance can be improved, to enable investment in agricultural assets and fostering sustainable livelihoods. Economic empowerment of women is progressing in many countries “by default” – i.e. when men leave their farm and family to migrate. Here as well we see a women promoting role for CSO along the food value chain! For export trade, ITC has a large, successful programme (<https://www.shetrades.com/>). But FF55 provisions should be reviewed for gender correctness.

2. Social and Human

Basically all CS with change proposals for a more sustainable use of social and human resources call for a **better integration of stakeholders along the value chain** to promote equity and fairness, improve competitiveness, and safeguard livelihoods. To reach this broad objective, better bargaining power and participation in decision-making requires skills training and **collective negotiation capacities**. (8 CS)

- (1) CS 2 makes a further very important proposal to shift the focus of **food systems assessments** by including social aspects within organizations, with **both quantitative and qualitative social impact dimensions**.
- (2) Ensuring **fair labour practices** helps to appropriately prioritize the needs and rights of local communities, smallholder farmers, marginalized groups and workers. The same goes for **decent working conditions** for agricultural workers. **Enforcing labor regulations** ensures compliance with safety standards and protection of workers' rights. This includes conducting rigorous inspections, imposing penalties for non-compliance, and implementing transparent and **equitable pay structures**, along with regular wage reviews. (5 CS)
- (3) **Gender equality and women's empowerment** to invest in agricultural assets goes through access to credit, savings, and insurance. This also requires measures preventing discrimination based on gender in hiring, promotions, and salary decisions. Of equal importance is women's ownership of land, discussed above. Gender-sensitive policies are also necessary for strategies that foster an **inclusive workplace culture** where diversity is valued and gender equality is prioritized. (4 CS)
- (4) **Child labor** abolition and prevention requires awareness campaigns, along with financial assistance or subsidies to farmers in times of low income. (1 CS)

A tentative, general feasibility assessment has to recognise that social policies are among the most sensitive topics both at national and international levels. Binding multilateral treaty rules are limited to ratified ILO Conventions e.g. for forced and child labour (Häberli, 2017). Most RTA and EPA commitments remain formulated as objectives and in preambular language, sometimes with a consultation process (Vietnam). Dispute settlement is absent in WTO and rare in RTA (Guatemala, Korea). In EPA, these provisions are part of the Trade and Sustainable Development Chapter (TSD) i.e. with development cooperation, consultations and financial support but without dispute settlement (Häberli, 2017). In my opinion this is not "soft law". Stakeholder alliances, retailer/consumer demand, intergovernmental process (and political pressure) can move national regulations and societal concerns. On the other side, economic crises may leave few options for vulnerable communities, SME, women, and parents. However, this is where CSO can play a new, very important role! (IATP)

3. Natural Capital

The main proposals for a more sustainable natural capital management address the need for more **investment in environmentally friendly technology and infrastructure**. This includes R&D with this objective, and some precise proposals e.g. for ridge-terracing to trap rainwater and drip irrigation, sub-soiling for water retention, and paddock grazing of animals. Significant improvements in water retention, soil health, and efficient land use are expected, which are critical factors for enhancing productivity and sustainability in agriculture. By focusing on these practices, farmers can achieve better yields, more efficient resource utilization, and a more resilient farming system. (5 CS)

Many CS address six **specific natural capital topics**:

- (1) **Documentation of good and sustainable farming practices** can significantly improve productivity, farmer health, and profitability. (2 CS)
- (2) **Renewable energy technologies** can promote energy-efficient farming practices, reduce electricity consumption and production costs. **Transparency and accountability mechanisms** can ensure that all information related to the Authorization of Native Vegetation Conversion is available. However, two CS would like to **revise biofuel production policies** in MATS countries including the EU, or **palm oil production and**

- imports**, including mandates and incentives, monitoring mechanisms, to prioritise truly sustainable production methods in producer countries. (3 CS)
- (3) **Regulators** are asked to enhance environmental regulations and to enforce laws preventing deforestation and land degradation. (2 CS)
- (4) Indigenous peoples' and women's **land rights** are specific, special priorities requiring several improvement measures contributing to more sustainability in farming, grazing, **forest resource management** and **water protection**. This requires specific protection measures and legal security for community and private businesses. (5 CS) No MATS CS has addressed the problem of measures taken to sustain **nomads** (Masai in Tanzania)
- (5) **Tying trade measures to environmental and social performance** has been proposed for promoting sustainable land use practices. Advocating for stricter environmental and traceability requirements, will also meet the demands of export markets. (2 CS)
- (6) Access to sustainable **seeds** are a special problem. The restrictive seed policies of the UPOV Convention may impair local farms. Smallholder farmers need to save seed for non-commercial use. Governments should increase funding and support for national breeding programs focused on developing varieties adapted to local conditions. (CS 15a; Vernooy, Sthapit & Bessette 2020)

At the national level, **R&D components for natural capital projects** must increase competitiveness and be tallied to concrete projects or regional development plans. Marketing agri-food products with (possibly more expensive) properties require cooperation and efficiency along the food value chain, and retailer/consumer involvement for specific target markets. Revising bio-fuel and palm oil regulations and policies may look like teaching MATS governments. Regulators may need to accompany projects keeping in mind their standards and limits, e.g. for certification, monitoring, IP and investment protection. Strengthening regulations for land use planning and management can involve the development of comprehensive land use plans to promote diversification of agricultural activities.

There are few, if any, **international rules constraints**. For example, however, "nuancing" IP (as proposed by CS 15a) can have availability and access drawbacks. Under UPOV and ITPGRFA, SME may be exempt from constraints

as long as they do not trade their own seeds, but still benefit from national breeding programs.

4. Policy, Governance and Regulation

Policy improvement recommendations cover the widest range in this field, starting with **stakeholder participation in decision-making** (8 CS). Stakeholders, of course, have different interests, and not all their partners may support proposals for **increasing beef tariffs** in Brazil (CS 10), **import restrictions** (CS 7), **strengthening anti-corruption regulations** (CS14) and public business-sensitive **information** (CS5). **Better governance structures** (with stakeholder consultation and support) can change the dynamics of agrifood systems. In addition, reducing **bureaucracy**, improving **sustainability labelling** (CS 10) and **dissemination and information about government programs** (CS 5) sounds good, and it will help SME, but adding too many regulations may not facilitate sustainable trade. This requires careful impact assessments and **collaborative strategies** to ensure all policies are complementary and not contradictory (CS 5).

- (1) Nine CS proposals call for more **financial and technical support, higher taxes, more infrastructure investments, and export promotion**. An interesting proposal is to support **private service providers** to extend their reach to underserved communities (CS 15b). Politicians do, too, but regulators and poor finance ministers may limit such ambitions.
- (2) More **coherence** could result with organisational changes ensuring the incorporation of social and environmental sustainability standards into overall sustainability efforts. (2 CS)
- (3) Finally, more **fair-trade standards** for certified production and accreditation brings about more sustainability. (4 CS)

Here again, we are mostly at the national level – a special challenge requiring deference for change proposals made to regulators with limited possibilities. Overregulation may stifle private initiatives. Few international rules and regulatory constraints exist; international pressure by financial institutions are not an ideal pathway. Proposals for adjustments to policy regulations at the WTO and EPA must therefore be formulated very clearly. Besides, the lack of governance is too often found at the intergovernmental level.

VII. Conclusions

MATS Case Studies provide a reality check with over fifty change proposals for a more sustainable agri-food value chain, highlighting public commitment gaps and including all relevant stakeholders in each country and for each product, especially hitherto 'outsiders' and vulnerable actors like smallholders, SME, women entrepreneurs and poor consumers. This is a unique opportunity and a call for action! With two qualifiers.

- Firstly, we recognize that the prime motivators for operator decisions include available and affordable human and natural resources, market signals, societal demands, cultural priorities, and sustainability concerns. Regulators act with trade and investment policy instruments as the most important government tools shaping the sustainability of agri-food trade, all along the food value chains (VC) 'from farm to fork'. These instruments, in turn, shape the policy framework for inputs, energy, production, processing, investment, wholesale and retail trading locally, and for exports, marketing, consumption, recycling and waste disposal.
- Secondly, we accompany the change proposals emerging from our 15 Case Studies with brief comments on the underlying legal, economic and political theory and their likely feasibility in their specific surroundings and vested interest groups.

The focus in this working paper is on the new import requirements in the EU Green Deal/FF55, simply because this is a new 'elephant in the room'. For many MATS countries and products Europe is a main export destination. 'Greener' import requirements can show the way – or build a new wall. However, this is not a 'North-South' debate. Some CS show similar problems and challenges and adjustment proposals for intra-African trade and for non-African countries (CS 2, 3 and 14). And at least one CS also considers the policy impact of some African countries on EU exports (CS 7). Finally, many of our proposals appear relevant for the impact of EU exports to other countries and products.

At any rate, the present turmoil in international relations, the set-back in trade and climate standards development and rulemaking and in the SDG delivery, and the unilateral industrial policies especially in rich countries, constitute as many special challenges for both operators and regulators in developing countries without negotiation clout or retaliation possibilities. In addition, the difficulties faced today by the EU Green Deal and the CAP do not

bode well for the implementation of these ambitious proposals in a development-friendly, equitable and inclusive way. Moreover, the important and apparently ever-increasing “green” data requirements right back to the farmer families and along the VC sustainability makes implementation difficult for all – but most of all for smallholders and SME. Unless implementation requirements accommodate or exempt small and vulnerable groups, traders may have to look for less green destinations (at lower prices), while importers may only buy from fully complying operators.

However, global warming, and the rapid development of African agrifood trade, will not wait for countless sustainability impact assessments, feasibility studies and new finance mechanisms (Shenggen Fan et al., 2018). Growing trade impediments such as new (“zero risk”) sanitary and phytosanitary restrictions beyond Codex standards and WTO-compatible requirements require urgent attention lest they disallow agri-food trade sustainability. The same goes for other non-tariff regulations on non-African export markets demanding, for instance, deforestation-free or child labour-free production. Our CS confirm that many such rules and practices require a mass of farm-based data which small and medium producers and traders cannot collect and submit without substantial, new support from their governments and from the EC. In many other MATS outputs, we offer details on some such impediments, and on future CBAM impacts. In addition, African trade continues to suffer from numerous *export restrictions*, affecting not least intra-African trade expansion – despite AfCFTA and RECs commitments and processes addressing what FAO recently described as a development prevention instrument; neither WTO reform attempts, or G7 and G20 resolutions, were able to abolish such export restrictions (Häberli, 2021).

The MATS project clearly shows the still missing vulnerability focus along the whole food value chain. Many agricultural policies and reform projects, regional investment finance, and trade facilitation and cooperation programmes with international donor inputs, do not explicitly address the new challenges faced by vulnerable farmers and their associations, women entrepreneurs, joint venture cooperatives, and small traders and investors.²⁷ Our CS found little or no examples for new forward-looking instruments, such as climate

²⁷ CS8 proposes some measures to avoid negative impacts of biofuel imports on the environment and human rights

risk mitigation for small farmers, SME investment facilities, specific risk insurance with micro-credits, or debt-for-nature facilities benefitting local communities.

A final caveat: most of our reform proposals require substantial changes in both production/investment and trade policies and practices. This also implies new roles for civil society support on the road to success (Onyango, 2024), both within the concerned countries and for imports in Europe – for instance with responsible CSO involvement in VPAs with SME’s substituting for non-manageable regulatory compliance for deforestation (Boonaert & Maertens, 2023).

MATS reaches the end of its three and a half years lifespan. Following up on our proposals is beyond our remit. But our grassroot findings are clear: increasing import impediments on developed country markets, both in substance and procedural, whether WTO-compatible and climate-friendly or not, endanger the small market shares of many African food exporters, unless the specific challenges are accompanied by adequate support measures for the most vulnerable (Adly & Meddeb, 2023; Anderson, Rausser & Swinnen, 2013). Self-sufficiency for tomatoes or olives will not increase national food security. Local sales, and intra-African trade will not automatically replace exports to Europe, if African food produce finds less markets in Europe or America. Hence development-sensitive importing country regulators cannot ignore the impact on our target groups.

We do posit, however, that our bottom-up findings can contribute in several ways to the institutional dialogue and the further development of agricultural policy formulation. First, we see new interaction in many places, initiated by and during our studies. Our own outreach events found interesting echoes.²⁸ Some of our publications have shown the correlation with outputs by related institutions (IISD), with our sister project (TRADE4SD),²⁹ and with similar

²⁸ For example, the MATS Workshop titled ‘Legal Dimensions of Agricultural Trade and Sustainability’ took place online on the 1st of March 2024. The workshop brought together MATS and external experts to discuss the legal dimensions of agricultural trade between the EU and other partners. Keynote by John Clarke (EC trade negotiator for 30 years (WTO + Bilateral)). The workshop was divided into three sessions, discussing general issues of trade, agriculture and environment in trade agreements, and a roundtable on intellectual property aspects of agricultural trade. Agreement was reached on the importance of published SIAs, and the usefulness of equivalence clauses (MRA) in EPAs. The full program is here: <https://sustainable-agri-trade.eu/wp-content/uploads/2024/02/MATS-workshop-incl-EU-FINAL.pdf>, and the recording of the workshop is here: <https://sustainable-agri-trade.eu/workshop-legal-dimensions-of-agricultural-trade-and-sustainability-on-1st-of-march-2024/>.

²⁹ “Fostering the positive linkages between trade and sustainable development” @ <https://www.trade4sd.eu/>: A Joint Workshop with T4SD and MATS took place in Geneva on 23 May 2024, resulting in a call for “Novel approaches and insights for evaluating sustainability of agricultural trade policies” (<https://sustainable-agri-trade.eu/fr/novel-approaches-and-insights-for-evaluating-sustainability-of-agricultural-trade-policies-on-23rd-of-may-2024/>)

commodity and country studies and programmes (C4SP, VCA4D).³⁰ Second, feedback on a “regulatory storm” by farmer organisations and traders in Europe is slowly reaching African capitals and, from there, the European Commission. The input into a transparent and inclusive institutional dialogue in EPAs would be the next best vehicle for agrifood trade improvements (Anouche & Boumaaz, 2019). Finally, and perhaps most importantly, we do hope that policymakers in the EU and in its member states will hear the grassroots calls for improvements and help, and effectively in-build those views into their own impact studies, reform proposals and sustainability promotion programmes.

Finally, looking at the almost incredible development of wireless and solar-powered communication facilities and transport systems in Africa, we are confident that the challenges faced by regulators, operators and support systems are opportunities which will not be missed. Diversity of situations and views alone will not lead to consensus. But for MATS, to be heard and to be involved in decision-making, especially in Europe, is a basic condition for the process of more sustainable agricultural trade and investment.

³⁰ https://capacity4dev.europa.eu/projects/value-chain-analysis-for-development-vca4d_en. Also interesting for MATS is the [Centre for African Smart Public Value Governance](https://www.c4sp.org/?i=1) (C4SP - <https://www.c4sp.org/?i=1>), a collaboration among scholars from [Middlesex University Mauritius](#) and [KPM Center for Public Management](#) (University of Bern, Switzerland). Noteworthy are their studies and webinars on (1) African Approaches to Tackle Grand Challenges and (2) Administrative Traditions in Botswana, South Africa (19 June 2024), Cape Verde and Senegal (18 September 2024).

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