



Economic Partnership Agreements and Namibia: Implementation and the role of Non-State Actors

Southern Africa Trust

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Acronyms

ACPs	African, Caribbean and Pacific Countries
AGOA	African Growth and Opportunity Act
AU	African Union
BLMNS	Botswana, Lesotho, Mozambique, Namibia and Swaziland
BLNS	Botswana, Lesotho, Namibia and Swaziland
CET	Common External Tariff
CFTA	Continental Free Trade Area
COMESA	Community of East and Southern Africa
EAC	East African Community
EC	European Commission
ECOWAS	Economic Community of West African States
EPA	Economic Partnership Agreement
ESA	Eastern and Southern Africa
EFTA	European Free Trade Agreement
EU	European Union
FTA	Free Trade Agreement
GDP	Gross Domestic Product
GIs	Geographical Indications
GNI	Gross National Income
GSP	Generalised System Preferences
MFN	Most Favoured Nation
NDP	National Development Plan
NSW	National Single Window
NTB	Non-Tariff Barrier
PTA	Preferential Trade Agreement
REC	Regional Economic Community
SA	South Africa
SACU	Southern African Customs Union
SADC	Southern African Development Community
SPS	Sanitary and Phytosanitary
TBT	Technical Barrier to Trade
TDCA	Trade, Development and Cooperation Agreement
TFTA	Tripartite Free Trade Agreement
TRQs	Tariff Rate Quotas
UNECA	United Nations Economic Commission for Africa
WTO	World Trade Organization

SADC EPA Status: Provisionally in force since 10 October 2016

The SADC EPA consists of 6-member states: Botswana, Lesotho, Mozambique, Namibia, South Africa and Swaziland. The negotiations with the EU were concluded on 15 July 2014 and all members signed the agreement on 10 June 2016. The EU Parliament consented to the agreement on 14 September 2016. Subject to ratification by all the EU member states, the agreement provisionally came into force on 10 October 2016. Mozambique ratified the agreement on 28 April 2017. Angola participated as an observer in the negotiations and has the option to join at a later stage. The joint Trade and Development Committee held their first meeting from 16 - 17 February 2017. To date, the Parties have tackled issues surrounding the implementation of the agreement including the issues of EPA monitoring and civil society involvement. Soon Mozambique will join the ranks of the other members when it ratifies the agreement, thereafter the agreement will enter provisionally into force.

1. Introduction

Namibia is a country of 2.3 million people in the southwest of Sub-Saharan Africa bordering the South Atlantic Ocean between Angola and South Africa, with a total surface area of 824 292sq/kms. The country shares borders with Angola (1 427 km), Botswana (1 544 km), South Africa (1 005 km), Zambia (244 km) and Zimbabwe, a situation that explains the country's commitment to regional integration. With a GDP of US\$10.65 billion (official exchange rate), Namibia's largest trading partner is South Africa, which is the source of 56% of its imports in 2014, according to the World Bank's World Integration Trade Solution. Namibia's economy is heavily dependent on the extraction and processing of minerals for export. Mining accounts for 11.5% of GDP but provides more than 50% of foreign exchange earnings. Rich alluvial diamond deposits make Namibia a primary source for gem-quality diamonds. Marine diamond mining is increasingly important, as the terrestrial diamond supply has dwindled. The rising cost of mining diamonds, especially from the sea, combined with increased diamond production in Russia and China, has reduced profit margins. Namibian authorities have emphasized the need to add value to raw materials, do more in-country manufacturing, and exploit the services market, especially in the logistics and transportation sectors.

Summary of macro-economic indicators

Item	2012	2013	2014	2015	2016	Average (2012-2016)
Inflation (%)	6.7	5.6	5.4	3.4	6.7	5.6
GDP current prices (N\$ Billion)	106.9	122.8	138.7	147.5	159.1	135
Revenue (N\$ Billion)	38	41.9	49.9	52.2	51.5	46.7
As % of GDP	33.7	32.8	35.3	35	32.4	33.8
Government expenditure (N\$ Billion)	38.1	46.7	58.7	64.6	61.5	53.9
As % of GDP	33.8	36.6	41.6	43.3	38.7	38.8
Budget Balance (N\$ Billion)	-0.1	-4.8	-8.8	-12.4	-10	-7.22
As % of GDP	-0.1	-3.8	-6.2	-8.3	-6.3	-4.9
Total Government Debt (N\$ Billion)	27.5	30.9	36	59.8	66.8	44.2
As % of GDP	24.4	24.2	25.4	40.1	42	31.2
Exports of goods (N\$ Billion)	46.4	50.6	53.7	57.7	68	55.3
Imports of goods (N\$ Billion)	64.3	71.3	88	103.1	106.2	86.6
Trade balance (N\$ Billion)	-17.9	-20.7	-34.3	-45.4	-38.2	-31.3
Growth in revenue (%)	27.1	10.3	19.1	4.6	-1.3	11.96
Growth in expenditure (%)	4.1	22.6	25.6	10.1	-4.8	11.52
Growth in debt (%)	11.3	12.4	16.5			

Source: Gov. of Namibia 2017

Namibia's economy is relatively diversified with roughly 59% of GDP coming from the tertiary sector, while mining (diamonds, copper, zinc, uranium) and agriculture (beef, fish) remain significant export earners. In fact, the manufacturing sector's contribution to GDP has reportedly increased from 5.3% in 1990 to 11.3% in 2012, mainly due to the rapid expansion of fish and meat processing and some mineral beneficiation, the areas in which manufacturing activities are currently concentrated.

Despite its upper middle-income status, Namibia faces wealth distribution challenges, with a high Gini Coefficient of 0.597 according to 2016 statistics from the Bank of Namibia. According to the World Bank, Namibia has a gross national income (GNI) per capita of \$5 820 and a gross national income of \$21.87 billion, based on purchasing power parity (PPP) dollars (2016). Recent annual economic growth of GDP averages between 4-5%, while in 2016, the average inflation rate in Namibia amounted to about 6.73% compared to the previous year of 3.4%. The government has

noted that the impressive economic growth has not reduced unemployment or improved social and economic inequalities to the desired levels. Poverty in Namibia fell from 28.7% in 2009/10 to 18% in 2015/16, partly because the economy depends heavily on the mining sector, which does not demand many unskilled labourers. As a result, most of Namibia's workers who lack advanced skills or education must rely on subsistence agriculture for their livelihood.

1.1 Namibia's Trade

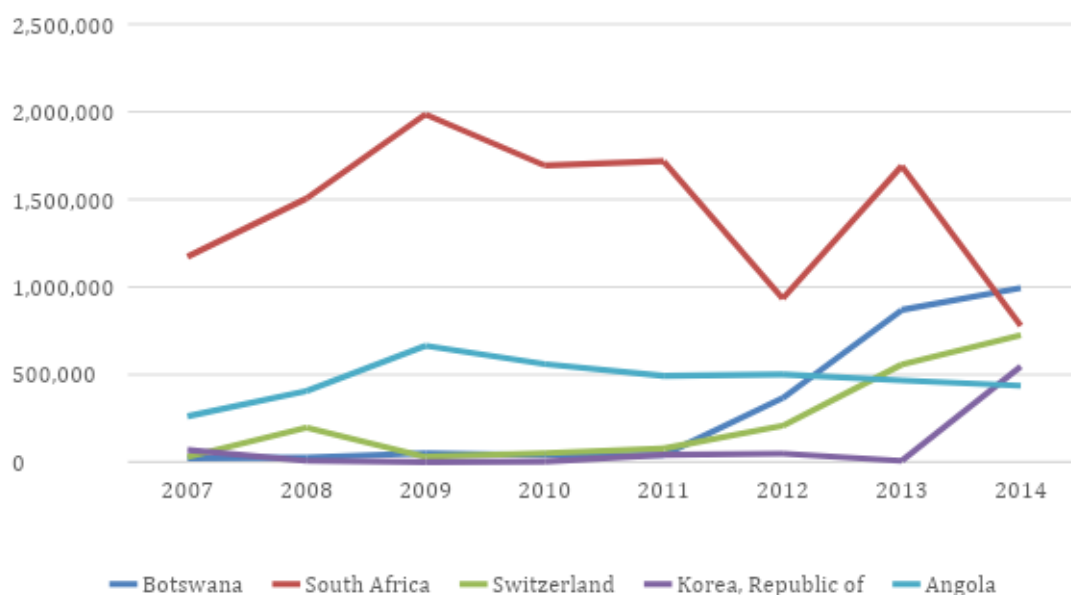
Namibia is a member of the Southern Africa Development Community (SADC). The SADC region provides the country with opportunities for expanding and diversifying its export markets, through access to a regional market of close to 400 million people. Namibia also belongs to the Southern Africa Customs Union (SACU) with South Africa, Botswana, Lesotho and Swaziland, which has a common external tariff and guarantees the free movement of goods among the member states. The SACU receipts have traditionally been an important source of fiscal revenue for the country. Namibia has relied on mining as a major source of the country's exports. Diamonds dominate exports from Namibia and have accounted for 21.1% of total exports in 2013, up from 16.5% in 2008. Other exports include metal ores and metals, and fish, beverages and animal products (especially beef), and table grapes, which are largely exported to Europe.

Namibia's exports were traditionally highly concentrated towards South Africa and Europe, but this changed in 2013 following the relocation of De Beers' London-based rough diamond sales to Gaborone. Namibia's top five leading export commodities in 2015 were diamonds (33%), copper cathodes, fish, copper ores and zinc with export earnings generated from these commodities amounting to N\$42.2 billion in 2015, or 72% of total export revenue in 2015.

In 2015, mineral fuel and oils, vehicles, boilers, electrical machinery and copper ores dominated the list of imports to Namibia. Overall import value rose by 6% on the back of domestic demand for foreign goods with an increase from N\$92.1 billion in 2014 to N\$97.6 billion in 2015. These listed commodities accounted for 44.8% of total imports in 2015, up from 38.8% in 2014 and the import bill for these commodities increased from N\$35.7 to N\$43.7 billion (or 22.4%).

Notwithstanding the increase in the consolidated import bill, there was a decline in imports of commodities such as vehicles, boilers, vessels and diamonds. Imported vessel imports fell by 66.2 % (from N\$12 billion to N\$4 billion) and diamonds by 32.5% (from N\$3.9 billion to N\$2.6 billion).

Top 5 importing markets for a product exported by Namibia



Source: ITC, Trademap, 2016

1.2 Namibia's National Development Strategy

In 2004, Namibia adopted Vision 2030, which articulates the country's medium-term development programmes and strategies to achieve its national objectives. Its goal is to improve the quality of life of the people of Namibia to the level of their counterparts in the developed world by 2030, aiming for an unemployment rate of less than 5%, and for the manufacturing and services sectors to constitute 80% of GDP.

Namibia's economy is highly dependent on exports of mining products, particularly diamonds, although livestock and fish are also important earners of foreign exchange. In the agricultural sector, Namibia aims to stimulate downstream agro-industries, improve competitiveness of agricultural industries, and increase the contribution of local agricultural production to the national economy. Based on Vision 2030, the industrial policy promotes value addition: it outlines the specific principles and objectives that will guide manufacturing in terms of production structure and standards. In order to achieve the objectives of the Vision, Namibia has been implementing National Development Plans (NDPs) since 2004. The 5th NDP or NDP5 is the latest covering the period 2017/18 to 2021/22.

The thrust of NDP5 is on industrialisation. NDP5 notes that a lack of industrialisation and infrastructure has contributed to Namibia's economic imbalance. In 2014, 31% of Namibian work force worked in agriculture, which contributed only 3.9% of the GDP. While drought and declines in prices on the global market are partly responsible for agriculture's relatively small contribution to Namibia's GDP, a lack of modernisation in farming techniques and a lack of infrastructure in business development have made the agriculture sector less efficient, less robust and less profitable. Accordingly, NDP5 is premised on modernizing and industrialising the major sectors of agriculture, fisheries, manufacturing, mining, tourism and by providing training opportunities to upgrade the skills of workers.

1.3 Regional and international trade

With its small domestic market, Namibia places significant attention on regional economic integration through its membership in SACU and SADC. The relevance of trade policy for Namibia's economic growth and development is recognized in the country's Fourth National Development Plan, which prioritises further trade integration in regional and international markets. Namibia's Industrial Policy (2011) also recognizes the need to participate in intra-regional and international trade as a central factor for growth and development.

Namibia is also a member of the World Trade Organization (WTO) since its inception in 1995. It was previously a member of the Common Market for Eastern and Southern Africa (COMESA), from which it withdrew in May 2004. Namibia has benefited under the US African Growth and Opportunity Act (AGOA) since it was enacted in 2000, thereby allowing producers to use third-country fabric provision in qualifying clothing exports. Since the closure of textile manufacturer Ramatex (which employed 600 employees) in 2005, there has not been significant uptake of AGOA benefits, since Namibia has been trading with the US mostly under the Most Favoured Nation (MFN) Agreement. Apart from textiles, other products potentially benefiting from the AGOA are ostrich meat, grapes, dates, fish, and handicrafts. AGOA is a nonreciprocal trade preference programme that provides duty-free treatment of exports to the US of certain products from eligible Sub-Saharan African (SSA) countries.

Namibia's trade policy (on goods) is mostly set within the SACU context by virtue of the common external tariff (CET). The 2002 SACU Agreement provides for national trade bodies to be established in all SACU countries, to oversee SACU matters (including tariff changes and trade remedies) and to make recommendations to the Customs Union Commission via the SACU Tariff Board. However, such national bodies have not yet been established. Namibia is party to the SACU-European Free Trade Association (EFTA) Agreement, which comprises of Iceland, Liechtenstein, Norway and

Switzerland; and the SACU Preferential Trade Agreement (PTA) with MERCUSOR countries. Most recently Namibia joined other SACU members in signing the Economic Partnership Agreement (EPA) with the European Union (EU).

2. Economic Partnership Agreements (EPAs)

A historical perspective

Trade between the EU and the Africa, Caribbean and Pacific (ACP) group of countries was governed by successive conventions known as the Lomé Conventions (1970 – 2000). Under these Conventions, products from ACP states enjoyed preferential market access to Europe. However, the coming into force of the WTO in 1995 had the effect of making the preferences such as those enjoyed under Lomé Conventions, incompatible with the rules on non-discrimination particularly the rule on Most Favoured Nation (MFN), and the rules on regional integration. Continued preferential access to the European market by the ACP countries discriminated other developing countries that were outside the ACP group of states and which did not enjoy similar market access. This issue was brought to the attention of the WTO by some Latin American countries including Brazil. Consequently, the ACP and the EU were obligated to revise their trade arrangements to make them compatible with the WTO rules.

The Cotonou Agreement, signed in June 2000, provides for the conclusion of WTO compatible trading arrangements and progressively removing trade barriers. In this regard, negotiations of EPAs would be undertaken with ACP countries that considered themselves willing to do so, at the level they deemed appropriate and in accordance with the procedures agreed by the ACP group. The Cotonou Agreement clearly indicates that the trade elements represented a major departure from those associated with the Lomé Conventions that previously governed trade relations between the two parties. It is implied that if they are WTO compatible, the nonreciprocal trade preferences embedded in the Lomé Convention would be transformed by the new arrangement into a relationship (EPAs) based on reciprocity. It is important to point out the core principles of the Cotonou Agreement on economic and trade cooperation include that:

- Economic and trade cooperation shall be based on a true, strengthened and strategic partnership
- Economic and trade cooperation shall build on regional integration initiatives of ACP states, bearing in mind that regional integration is a key instrument for the integration of ACP countries in the world economy
- Economic and trade cooperation shall take account of the different needs and levels of development of the ACP countries and regions. In this context, the parties re-affirm their attachment to ensuring special and differential treatment for all ACP countries and to maintain special treatment for ACP LDCs and to taking due account of the vulnerability of small, landlocked and island countries (ACP-EU Partnership Agreement, 2000)

It was anticipated that EPAs would be negotiated from September 2002 and the new trading arrangements would enter into force on 1 January 2008, unless earlier dates were agreed between the Parties. However, none of the African negotiating groups was able to reach a final agreement on EPAs by the stipulated deadline. Instead most of the non-LDC countries in Africa initialled interim EPAs with the EU "to avoid trade disruption". Technically, exports from non-LDC countries faced the threat of higher tariffs in the EU if no agreement was reached to replace the preferences established by the Lomé Conventions. Least developed countries (LDCs) have another arrangement with the EU, the Everything But Arms (EBA) Initiative that allows their exports to enter the EU duty free and quota free, hence they were not under pressure to conclude EPAs.

Considering the above history, the EPAs are trade and development arrangements between the EU with ACP developing countries, with negotiations that commenced on 27 November 2002. These

agreements take the form of a reciprocal trade regime aimed at replacing the Cotonou preferential trade agreement between the EU and the ACP countries.

The full and comprehensive EPAs will cover both trade in goods and services. In the services sector, the EPAs will be extended to cover the liberalization and building supply capacity of ACP countries in labour, business, distribution, finance, tourism, culture, and construction and engineering related services. Additionally, there will be cooperation in competition policy, trade and labour standards, protection of intellectual property rights, sanitary and phytosanitary measures, and trade and environment.

2.1 What is the SADC-EU EPA?

The SADC–EU EPA is a reciprocal but asymmetric trade agreement that was concluded by a sub-group of the SADC members including Botswana, Lesotho, Mozambique, Namibia and Swaziland (BLMNS) and South Africa (SA). Other members of the SADC region – the Democratic Republic of the Congo (DRC), Madagascar, Malawi, Mauritius, Zambia Zimbabwe and Seychelles – are negotiating EPAs with the EU as part of other regional groups, namely Central Africa (DRC) or Eastern and Southern Africa (ESA). Angola has not joined the SADC group or any other group, but still has the option to join at a later stage. Tanzania is negotiating as part of the East African Community.

South Africa negotiated and entered into the Trade Development and Cooperation Agreement (TDCA) with the EU. The Agreement was signed on 11 October 1999 and entered into force in 2000 with a transitional period of 12 years for South Africa and 10 years for Europe in terms of its enforcement. The SADC-EU EPA will replace the trade chapter of the TDCA for South Africa.

The negotiations for SADC–EU EPA commenced in July 2004 (with South Africa officially joining the process in 2007) and were concluded on the 15 July 2014. Thereafter, the SADC EPA was signed on 10 June 2016 and entered provisionally into force on 10 October 2016.

The SADC–EU EPA negotiations were launched on the 8th July 2004 in Windhoek, Namibia, with both sides agreeing on a joint roadmap setting out the principles, organisation, main stages and timeframe of the negotiations. The Agreement was to be finalised by December 2007. In addition, a Regional Preparatory Task Force (RPTF) was established composed of experts from the SADC Secretariat, SADC EPA Member States and the European Commission. Its task was to ensure the link between trade and development and to support the identification of EPA-related technical assistance needs.

2.2 SADC EPA Negotiating Structure

SADC established a negotiating structure and nominated the Minister of Trade and Industry of Botswana as Chief Coordinator for the SADC group. Each member country of the SADC EPA group was entrusted with coordinating one or more of the negotiation subjects. SADC has also set up an EPA unit within its Secretariat to coordinate the negotiation process with Member States and prepare negotiation positions. The EPA Unit was headed by a Chief Technical Adviser and staffed with experts seconded from Member States of the SADC EPA group.

At the national level, the EPA negotiations were Government-to-Government, although internal consultations were carried out with relevant Non-State Actors (NSAs). It was noted that there was considerable interest in being involved in the SADC EPA negotiations by NSAs. However, in a survey by Phiri and Themba in 2007, they indicated that there was low negotiating capacity in the country among the NSAs. Organisations such as ATF, were relying on Tralac to boost their capacity. The Namibian Government at the time of negotiations had a total negotiating team of 49 officials from various relevant ministries (Finance, Agriculture, MTI, National Planning Commission). The

negotiating team consulted the relevant NSAs prior to the negotiations and was chaired by the permanent Secretary for the Ministry of Trade and Industry (MTI).

2.3 Issues covered by the SADC EPA

An agreement oriented towards development?	
Establishes a Free Trade Area (FTA) on goods (Asymmetric trade opening)	Under the SADC EPA, the EU will guarantee BLMNS 100% free access to its market. The EU has also fully or partially removed customs duties on 98.7% of imports coming from South Africa. The SADC EPA states do not have to respond with the same level of market openness. Instead, they can keep tariffs on products sensitive to international competition. For that reason, SACU removes customs duties on only around 86% of imports from the EU and Mozambique only 74%.
Customs duty	The EPA agreement prohibits the introduction of new customs duties on goods imported by the parties covered under the agreement. It also prohibits the increase of duties to those already applied in trade between the Parties as from the entry into force of the Agreement.
Prohibits export duties or taxes	The agreement prohibits new customs duties or taxes imposed on or in connection with the exportation of goods. It also prohibits the increase in duties for those already applied, in the trade between the Parties from the date of entry into force of the Agreement.
More favourable treatment resulting from the FTA	Any more favourable treatment applicable as a result of either part collectively or individually entering an FTA with third parties shall extend to the other party.
Safeguards on imports	The EPA contains many "safeguards" or safety valves. EPA countries can activate these and increase the import duty in case imports from the EU increase so much or so quickly that they threaten to disrupt domestic production. There are no less than five bilateral safeguards in the agreement. In addition, should the EU apply a safeguard under WTO rules, the EU offers its EPA partners a renewable 5-year exemption from its application, so the SADC EPA countries will still be able to export. However, the safeguards can only be applied under certain conditions and with limitations.
Possibility of flexible sourcing	The rules of origin determine which products can benefit from the trade preferences. In the SADC EPA, they have been formulated in a way to make it much easier for SADC EPA countries to benefit from reduced EU customs duty rates for their textiles products using imported fabric. This will benefit textile industry in countries such as South Africa or Lesotho.
Conditions in agri-food trade	It's the first agreement eliminating the possibility for the EU to use agricultural export.
An agreement supporting economic diversification in SADC EPA states?	
Access to intermediate goods	The EPA reduces the import duties on many of the intermediate goods like fertilizers, chemicals and machinery, making it easier for southern African industries to diversify and add more value to their products.
Protection of industry	The EPA contains clauses that let SADC EPA partners protect their infant industries, applicable under certain conditions.
Rules of Origin and Cumulation	Whether a product can or cannot be exported to the EU with a reduced or zero duty rate always depends on its origin. In the SADC EPA, the rules defining the origin are formulated in a way to support development of new value chains in the region. The so called cumulation of origin will allow for example applying discount tariffs on EU border for fruit harvested in one country of the region and then

	preserved and canned in another. This type of flexible rules of origin will benefit companies in agri-food, fishery and industrial sectors.
An agreement promoting democracy and sustainable development?	
Adherence to principles	Article 2 of the SADC EPA recalls that the agreement is based on the principles of respect for human rights, rule of law, and democracy.
Conditionality of trade benefits	It confirms that under the existing Cotonou Agreement “appropriate measures” can be taken if a Party fails to fulfil its obligations in respect of these fundamental principles. Suspension of trade benefits is one such measure, even if this would be an action of last resort.
Respect of environmental and labour standards	State parties to the SADC EPA confirm that any new or modified legislation on labour conditions or environmental practices that they may adopt will follow internationally recognised standards. It also means that they cannot weaken labour or environmental protection to encourage trade or investment. To ensure the rules are respected, each participating country will also have a possibility to request consultations on questions of sustainable development, involving representatives of civil society.
Reconfirmation of Cotonou Agreement clauses	EPAs are based on the Cotonou Agreement of 2000. The provisions of the Cotonou Agreement on human rights, on sustainable development, and on dialogue including parliaments and civil society, continue to apply. As such, the EPA offers some of the most complete protection of human rights and sustainable development available in EU agreements.
An agreement strengthening regional integration in southern Africa?	
Improving the Southern African Customs Union	Botswana, Lesotho, Namibia, South Africa and Swaziland together form the Southern African Customs Union, the oldest existing customs union in the world. A customs union's principal characteristic is a common external tariff for imports. In the case of imports from the EU, however, the SACU members today do not all impose the same duty. In other words, the union is not functioning in an optimal way. The SADC EPA now harmonises the SACU tariffs imposed on imports originating in the EU and consequently improves the functioning of the customs union - strengthening regional integration.
More intra-regional preferences	Each SADC EPA state has agreed that any advantage it has granted to the EU shall also be extended to the other SADC EPA states.
An agreement good also for the EU?	
Re-anchoring EU-Africa trade relation	African countries are climbing up the “Doing Business” rankings. New businesses are emerging, and African countries are becoming less dependent on commodities. The EPA is one of the instruments that can help EU business benefit from this new African energy and potential. EPAs can be essential in re-anchoring the trade bonds between Africa and the EU.
Better access to the market	The EU already has a Trade, Development and Cooperation Agreement with South Africa since 2000. In exchange for more market openings provided to South Africa, the preferential access to the South African market that the EU enjoys today will be extended to include agricultural products such as wheat, barley, cheese and pork. SACU will align itself to this market access regime.
Protection of geographical indications	More than 250 traditional product names (Geographical Indications or GIs) from the EU and more than 100 South African GIs will be protected. E.g. a producer in a country other than South Africa cannot market a tea processed from a plant from its own territory

	under the symbolically important name Rooibos. The same applies to EU traditional product names.
Full respect of WTO rules	The EU's trade policy towards the SADC EPA region will now be fully in line with WTO rules. A solid and fully respected rules-based trading system is of crucial importance for the EU.

Source: Adapted from http://trade.ec.europa.eu/doclib/docs/2014/october/tradoc_152818.pdf

2.4 Challenges and opportunities of EPA

The signing of the Structural Adjustment type of interim EPAs has taken place at a time when African countries are experiencing negative structural changes in their economies. These changes have been necessitated by the implementation of structural adjustment programmes (SAPs) that have been further entrenched into the EPAs. The UN Economic Commission for Africa, in its 2009 Economic Report on Africa, notes that between 1960 and 2007, the GDP contribution of agriculture value added in Africa decreased from 41 to 22%. During the same period, the GDP share of industry increased from 17 to 32%, while the share of services recorded a rise from 42 to 46%. The report further notes that this structural change has not resulted in the type of economic diversification that is most needed to sustain growth and development in the long term.

Evidence is already showing that over time, the African productive structure has become less diversified and the implementation of EPAs in their current form will further weaken any prospects of developing the productive base that is critical in supporting the industry and services sectors. Many African countries are stuck in a one-sided dependence on exports of raw materials. Many agree that countries need to diversify their economies if they are to achieve sustainable development. In the EPA negotiations, the EU pushed hard to ban export taxes. After protracted negotiations, the EU succeeded as export taxes can only be imposed under certain conditions, which are difficult to ascertain for SADC countries. These taxes are important tools for African countries to ensure that the raw materials are value added and can be exported as semi-finished or finished manufactured goods.

Several contentious issues have attracted attention amongst negotiators, politicians, civil society organisations, as well as wider EPA stakeholders:

- The definition of 'substantially all trade', setting out the level of tariff liberalisation required by ACP countries
- Transitional periods for tariff liberalization (which were deemed too short)
- Abolishment of Export taxes
- National treatment (of goods originating from the EU)
- Free circulation of goods (within ACP regions), which was being prohibited for regions that had not signed an EPA if the goods would end up being on the European Union market
- Bilateral safeguards (especially the conditions)
- Infant industry safeguards (especially the conditions)
- The most favoured nation clause
- The 'non-execution' clause (which provides for the possibility of trade sanctions in the event of violations of democratic or human rights principles)

The Ministerial Declaration made a call to review these issues during negotiations towards full EPAs, to ensure that the trade agreements would safeguard development and regional integration. In addition to the AU list, negotiators in Africa and elsewhere have also separately highlighted two more issues of importance in the texts: rules of origin reform and the 'standstill' clause in goods, which prohibits any increases to tariffs once agreements enter into force.

At the all-ACP level the issue of contentious clauses in the EPAs was formally included in the ACP Council's June 2008 Declaration and the ACP Heads of State summit in Accra in October 2008, where the mandate was given for a high-level tripartite delegation to undertake a visit to EU

member states and the EC. Amongst the country responses, Angola, Namibia and South Africa sent a letter to the EU member states outlining their concerns on the text of the SADC interim EPA. The concerns raised were not fully addressed in the EPA signed in 2016. These include challenges of export taxes, safeguards, regional integration, rules of origin and scope of liberalization.

2.5 Namibia's EPA prospects

The EPA is important to the country not only to ensure agricultural development (in light of the major products that are exported to the EU), but also to ensure the full growth and participation of the private sector in spearheading the economic and structural transformation as a result of implementing the EPA. The fundamental question is whether Namibia will be able to utilize the opportunities presented by the EPA with regards to global and technological standards that are beyond its control and how it can leverage these within the EPA context for socio-economic transformation. Whilst the EPA offers duty free and quota free access to the EU market of Namibian products, the conditions that are set out in the agreement as indicated in the table above may be prohibitive. E.g. the current agriculture exports to the EU are mainly beef and grapes - yet pushing a value-added approach to exports requires intensified and accelerated implementation of Namibia's industrial policy that revolves around manufacturing and specifically agro-processing. Such industrial capacity is required in the absence of competing products coming from the EU. Whilst infant industry protection clauses have been put in place, these are difficult to apply given the technical and institutional capacity required. This renders an EPA a one-sided agreement that can only facilitate EU trade into Namibia, rather than based on special conditions of the country.

3. Civil Society Organisations and EPA's

Many CSOs and Social Movements in the SADC and ESA regions maintained that EPAs were Free Trade Agreements (FTAs) that are an integral part of the EU's external trade policy, which is driven by a desire to dominate emerging markets. Despite their posture as 'partnership agreements', the CSOs noted that EPAs were clearly wrapped in the free market fundamentalism espoused by the international financial institutions and the WTO. They are driven by the agenda of transnational corporations to put profits before people, by surrendering the management of economies and exploitation of resources to 'the market' through an agenda of liberalization, privatization and deregulation.

As Free Trade Agreements, EPAs have been identified by CSOs as lacking in terms of clear commitment to sustainable development dimensions (see Randburg and Big Five declaration by trade unions in SADC, SEATINI statements on EPAs and Civil Society Statement on the Occasion of the 4th Africa Caribbean Pacific (ACP) Heads of State Summit, Maputo 21 June 2004).

Part of the Big Five Declaration of trade unions and researchers on EPAs noted the concerns in EPAs that were not fully addressed in the signed EPAs:

- EPA negotiations should address the multi-dimensional nature of the development process of ACP countries, namely, poverty reduction, sustainable development, gradual and smooth integration of the ACP countries into the global economy.
- ACP countries should have the scope to define and address development issues for themselves.
- EPA negotiations should be slowed down to allow for the carrying out of impact studies, to allow for proper consultations, and to ensure national and regional ownership of the outcomes.
- EPAs should consider the asymmetrical development between the EU and ACP countries and recognise that reciprocal opening of markets would result in revenue loss due to tariff reduction. [Loss of revenue, would affect the budget, resulting in increased deficits, reduced

spending on poverty reducing interventions in infrastructure, health care, education, safety nets amongst others, thereby exacerbating poverty].

- The EU must show political will in addressing the most serious problems ACP countries experience in attempts to access the EU market, including agricultural subsidies and non-tariff measures. EPA Negotiations should be guided by past experiences with liberalisation policies and Structural Adjustment Programmes (SAPs). The fear that trade liberalisation will result in a flood of cheap imports, thereby destroying 'infant' local industries, creating mass unemployment in the process, is a reality in the SADC and ESA regions.
- In view of the differences in the levels of development i.e. asymmetries in development, ESA and SADC states should not make the same level of commitment as EU countries under EPAs, especially with respect to market access. The EU must withdraw requests to negotiate the Singapore issues, namely government procurement, investment and competition policy which were rejected in the WTO. The EU must withdraw all requests that will have the effect of undermining intra-regional trade and development initiatives, or weakening national governments' ability to drive development and meet the needs of the poor (e.g. calls to privatise the delivery of public services such as water and other basic utilities)."

While they make references to the provision of additional resources for the removal of production, supply and trade constraints, CSOs were not convinced that EPAs set good parameters for these to be adequately addressed, to make them truly development- oriented.

Trade Unions saw EPAs as deals that would have dire consequences for African economies and jobs. Further, the liberalization of tariffs on goods, including agriculture, threatened small farmers and infant industries, spelling disaster for some of the most fragile economies in the world. In addition, the Unions lamented the rapid loss of government revenue, which they argued would paralyse African governments' abilities to invest in education, health and decent jobs, all of which are crucial to sustainable development. They dismissed the promises of aid for trade as a myth pointing out that there was no hard evidence that aid for trade can compensate for a steep and sudden liberalization of markets, particularly in a context where regional integration is still far off. The suggestions emanating from the Commission, that where a regional EPA cannot be signed, they would accept the signing of bilateral agreements with individual countries, were characterised as very negative developments that would surely throw into chaos the entire project of regional integration.

3.1 CSO's and the STOP EPA's Campaign

The Namibian government in 2005 developed the civic organisations partnership policy. The overall goal of the policy framework is to create a working partnership for the entire country, its citizens and their civic society organisations. The policy reflects those provisions of Vision 2030 that foresee CSOs working in close partnership with Government, utilising their capacities fully in their advocacy for the promotion of national development.

The partnership policy covers:

- A framework for collaborative, consultative and co-ordinated approaches to issues of public interest between CSOs and the Government.
- A mechanism for the exchange and flow of information on development activities for better co-ordination in order to minimise wastage of resources.
- Mechanisms to promote transparency, accountability, awareness and commitment among CSOs and their stakeholders.
- Criteria for evaluating the impact of CSOs on development (e.g. HIV/AIDS, employment, poverty reduction, environment, gender, democracy, good governance, regional development, youth, people living with disabilities, etc.).

Some CSOs in Namibia like One World Action and LARRI consistently engaged the government on EPAs at both the national and regional levels presenting petitions to and crafting positions on issues with other CSOs in the region.

The Stop EPAs campaign was launched in Lusaka in 2004 at the Africa Social Forum. The campaign was run by NGOs and social movements who strongly believed that trade could bring genuine benefits to the economies of ACP countries and to some of the poorest communities in those countries. From their initial analysis of the EPAs negotiations, the CSOs and social movements failed to see how the EU would afford the stated benefits for the ACP countries. It was for this reason that their (EU based CSOs) organisations were participating in or supporting campaigns led by civil society organisations from ACP countries to 'Stop EPAs'.

Several CSOs from the region and beyond were part of this campaign from its launch, through the negotiations up to eventual signing. These CSOs included the following:

- AIDC (SA)
- ANSA (regional)
- ATN /TWN (Ghana, regional)
- CTDPA (Zambia)
- DEP (Lesotho)
- ECONNEWS (Kenya)
- Economic Justice Coalition (Mozambique)
- EJA (SA)
- Gender and Trade Network (SA)
- ILRIG (SA)
- Labour unions (SADC and East Africa)
- MEJA (Malawi)
- MWENGO (regional)
- One World Action (Namibia)
- SEATINI (regional)
- SEJA (Swaziland)
- ZIMCODD (Zimbabwe)

The key issues the civil society organisations raised, as myths about EPAs and which they wanted to debunk and present to their governments were that:

- EPAs are about development
- The multilateral trading system is the hallmark of EU external policy
- ACP Governments do not oppose EPAs
- EPAs are needed for WTO compatibility
- The financial costs of EPAs can be overcome
- EPAs will foster regional integration

In "debunking these myths", the CSOs made a call to the EU during the subsistence of the STOP EPAs campaign to:

- Fulfil its commitment under the Cotonou Agreement and urgently begin to pursue alternatives with ACP countries, based on the principle of non-reciprocity instituted in GSPs and special and differential treatment in the WTO.
- Drop its offensive interest in areas beyond the WTO to which the ACP countries were opposed, specifically the so-called Singapore Issues of trade facilitation, investment, competition policy, and government procurement.

In their strategy to get their messages out, the CSOs employed the inside and outside approach to maximize their impact.

Inside Strategy	Outside Strategy
<p>Going for Regional Negotiation Forum (RNF) meetings to gather information and lobby/advocate for positions with negotiators</p> <p>Engaging with the governments at national level, particularly the Ministries of Trade</p> <p>Engaging with AU and RECs</p> <p>Helping in preparing texts for negotiations</p> <p>Engaging parliamentarians particularly the portfolio committees responsible for trade and external relations</p> <p>Workshops with the private sector who were mostly engaged by governments as part of negotiations</p>	<p>Campaigns through materials production like brochures, policy briefs and statements</p> <p>Petitions to governments especially on key positions that were threatening livelihoods of small producers including farmers and infant industries</p> <p>Mobilising citizens against EPAs</p> <p>Engaging in Global week of Action (Trade Justice)</p> <p>Engaging in Global day of Action against EPAs - 27 September of each year (the date when EPAs were launched)</p> <p>Production of statements and demonstrations at key meetings</p> <p>Engaging with European governments, think tanks, EU parliament and CSOs</p>

Source: R. Machemedze, 2010 presentation at a SAPSN Meeting in Malawi

Was the campaign successful?

In their different engagements with various constituencies, CSOs had some mixed reactions. Some governments were completely dismissive of the CSOs' positions, lamenting that the organisations were alarmist and raising voices without evidence. Yet civil society was relying on some preliminary impact assessment studies that were undertaken by reputable institutions like the United Nations Economic Commission for Africa (UNECA) that EPAs would present serious challenges to ACP countries based on previous experiences with SAPs. In summary, the many meetings that the STOP EPA campaign held noted the following:

- Some governments were completely dismissive of the positions of CSOs on EPAs
- Some were receptive and wanted to hear the arguments (the UK government)
- Most MEPs met were openly against EPAs. Very supportive and helped in the EU power mapping
- Some trade negotiators were supporting CSOs in public but behind closed doors changed positions
- Some amongst the RECs saw CSOs as intrusive and worked out a strategy to remove them from the negotiating meetings (RNF)
- AU and many governments admitted that CSOs were correct especially on the development myth and on regional integration, as seen in many of the declarations they issued on trade and development matters
- CSOs were vindicated in most cases and governments started again to open the space for civil society on EPAs. Messages that became associated with CSOs on the EP



3.2 Namibian Non-State Actors and EPA's

A survey conducted by the USAID Southern Africa Global Competitiveness Hub in 2007 of the private sector and other NSAs around EPA negotiations in Angola, Mozambique, Namibia and Tanzania, revealed that a number of key private sector organisations were either involved with or were following closely the developments on the EPA negotiations in Namibia. The report noted the Agricultural Trade Forum (ATF) as having been active.

Agricultural Trade Forum (ATF) Meat Corporation of Namibia

The ATF represents 13 membership organisations, covering meat, agronomics, grain processing, table grapes, farmers in general, millers, dairy producers and poultry producers. The organisations include the Meat Board of Namibia, Namibia National Farmers Union, Namibia Agricultural Union and the Meat Corporation of Namibia.

The ATF also includes the Ministry of Trade and Industry, Ministry of Agriculture Water and Rural Development, the University of Namibia, the Polytechnic of Namibia and the Trade Law Centre of Southern Africa (Tralac). The ATF overall objective is "To promote agricultural production and processing sectors of Namibia in regional and international trade relations in a transparent way". The ATF engaged outside trade law experts in preparing its position and enhancing its own capacity. It also arranged sensitisation meetings for the NSAs.

The government has also been working closely with the private sector. The MTI involved the following business organisations: Namibia Trade Forum, Manufacturers, NCCI and The Agriculture Union (and to a lesser extent the Agricultural Trade Forum).

4. Regional Integration

According to the EU, the EPA promotes regional integration for various reasons:

- it strengthens the SACU by harmonising South Africa to SACU and bringing Mozambique closer to SACU
- the trade provisions of the EU-SA TDCA will be replaced by an agreement, which has been negotiated by all.
- imports coming from the EU will be subject to a single external tariff

While the EU believes regional integration in SADC revolves around SACU, civil society organisations argued that the first casualty of the EPA negotiation process was regional integration. SADC has 15 member states and whether EPA negotiations started and progressed, the region was subdivided into four sub-groups with individual member states opting to negotiate under the region, which they thought would best bring them economic benefits. The four regions, which absorbed SADC member states, are as follows:

- Central Africa (CEMAC): DRC
- East African Community (EAC): Tanzania
- East and Southern Africa (ESA): Madagascar, Malawi, Mauritius, Seychelles, Zambia and Zimbabwe
- SADC EPA: Botswana, Lesotho, Mozambique, Namibia, Swaziland and South Africa (Angola has not joined any of the groups)

The EU further notes that the EPA also strengthens regional integration in other ways, including through its **Rules of origin that allow regional cumulation**, the openness to other SADC states (Angola) joining the EPA, and through institutional strengthening of SACU. The dispute settlement mechanism in the EPA builds on the DSM provisions from TDCA and will apply to all SADC EPA countries. In addition, common provisions on trade management (such as safeguards) and common decision-making bodies will further strengthen the regional integration process. The EU believes regional integration has been strengthened notwithstanding the fact that SADC goes beyond SACU.

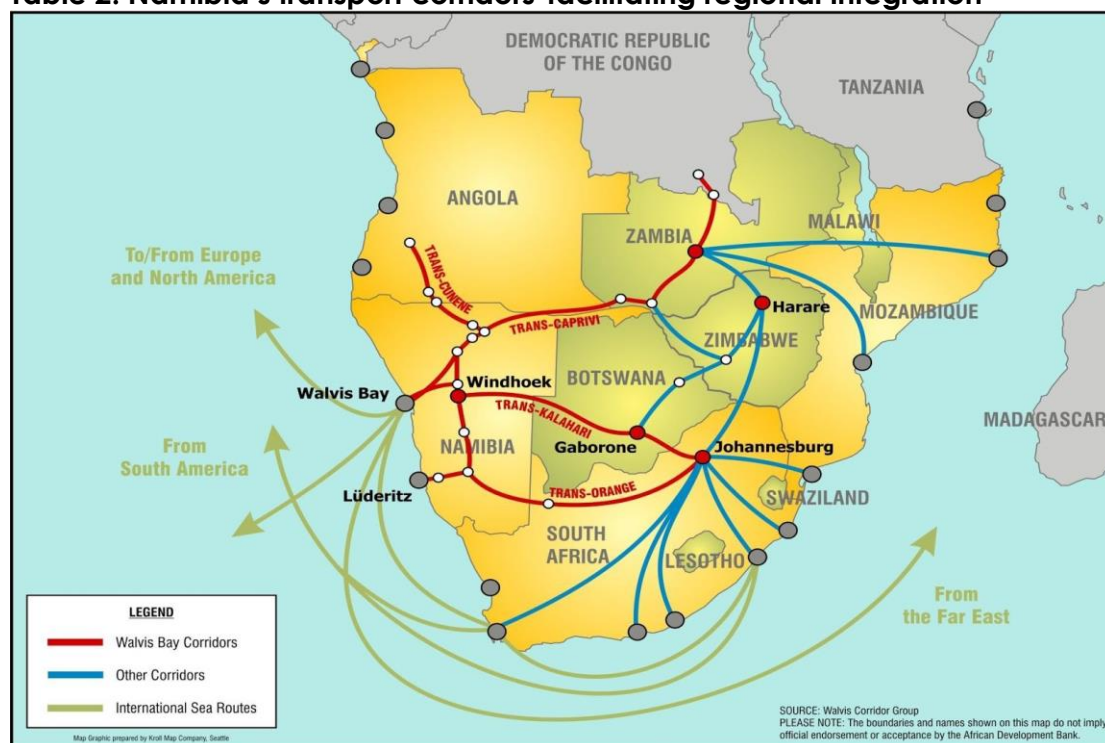
Furthermore, "regional preference provisions" rule out a possibility for the SADC EPA countries to grant products originating in other SADC EPA countries a less favourable treatment than to those imported from the EU.

Notwithstanding the above, in January 2009 Angola, Namibia and South Africa issued a demarche to the European Union raising serious concerns on the EPA. One of the issues they raised was that EPAs would permanently disrupt ongoing regional integration initiatives in the region. The three countries noted in their statement:

- "First, the SADC-wide integration process will be compromised if the current approach persists. As it stands, members of SADC will be required to establish at least four separate EPA trade arrangements with the EU
- Each of these separate trade arrangements have different product coverage, different time frames for tariff phase down, and different exclusion lists, and will therefore require a new layer of customs administrative measures to avoid trade deflection in SADC and COMESA
- This will set back and complicate ongoing processes of trade integration and trade facilitation in the region" (Joint Angola, Namibia and South Africa Demarche to the European Union Member States 7 January 2009)

As noted earlier, Namibia places significant attention on regional economic integration through its participation in SACU and SADC mostly because of its small domestic market. One of the key elements of regional integration is trade facilitation through interlinked transport systems combining road, rail and seaports. The map below illustrates Namibia's transport corridors that bring in economic benefits to the country and how they link with other corridors within the region and beyond. Namibia believed that regional integration was under threat from EPAs as a result of different trade arrangements members of SADC were signing with the EU, which would bring in unnecessary inconsistencies.

Table 2. Namibia's transport corridors-facilitating regional integration



Source: African Development Bank

According to the African Development Bank, Namibia's transport corridors have the potential to link SADC countries to markets in Europe and the Americas and become a logistics hub as a result of the country's geographical location. This is exemplified by the "Walvis Bay Corridors", a network of transport corridors linking Namibia with southern African countries comprising:

- **Port of Walvis Bay:** Namibia's largest commercial port, linking the country's multimodal transport corridors to local, SADC landlocked countries and international markets. The port receives about 3,000 vessels and handles 5 million tons of cargo each year. It has good port infrastructure, which ranks among the best in Africa and offers competitive tariffs. It is less congested than its main competitors in east and southern Africa.
- **Trans-Caprivi Corridor (Walvis Bay-Ndola-Lubumbashi Development Corridor):** This route can be accessed by road and rail, and is mainly used to transport goods for Zambia, Zimbabwe, the Democratic Republic of Congo and Malawi.
- **Trans-Kalahari Corridor:** This corridor is accessible via road and rail and is mainly used by Botswana and the northern provinces of South Africa, specifically Gauteng.
- **Trans-Cunene Corridor:** The route connects southern Angola through Tsumeb, largely for the transportation of goods and construction materials imported for the redevelopment of southern Angola.

5. Implementing EPA: The SADC Trade Facility

SADC secretariat with financial assistance from the EU is rolling out a SADC Trade Related Facility (TRF). This facility is a mechanism for financial and technical support to SADC member states to assist them to implement the commitments they made under the SADC Protocol on Trade (STP Window) and the Economic Partnership Agreements (EPA Window) between the SADC EPA group and the EU.

Indicative nominal allocations have been determined for eligible SADC Member States as follows:

Eligible SADC Member States	STP Window (EUR)	EPA Window (EUR)
Botswana	1 400 000	1 200 000
Lesotho	1 400 000	1 200 000
Malawi	1 400 000	
Mauritius	1 400 000	
Mozambique	1 400 000	1 200 000
Namibia	1 400 000	1 200 000
Swaziland	1 400 000	1 200 000
Tanzania	1 400 000	
Zambia	1 400 000	
Zimbabwe	1 400 000	
TOTAL	14 000 000	6 000 000

Source: SADC 2015

To benefit from the STP Window, a Member State must, among other criteria, have signed and ratified the SADC Protocol on Trade, at the time the programme was formulated, and for the EPA Window, a Member State must have signed the SADC-EU EPA.

The nominal allocations indicated above provide an indication of the maximum funds that a country can access.

A call for submission of proposals for funding under these windows was circulated in late 2015 to eligible SADC Member States. The broad areas eligible for funding include the following:

- **Customs Cooperation** (e.g. implementation of custom tariff nomenclature, harmonization and streamlining of customs and border procedures, use of modern technology to speed up customs and border processes, development and amendment of legislation)
- **Technical Barriers to Trade and Sanitary and Phytosanitary Measures (TBT and SPS)** (e.g. streamlining and harmonizing standards, certification and accreditation of laboratories, strengthening the capacity to respond to emergencies, SPS/TBT response strategies)
- **Rules of Origin** (e.g. harmonization and simplification of Rules of Origin, strengthening of enquiry points, establishment/strengthening of bar code units, establishment/strengthening of electronic certification of origin, creating/strengthening connectivity for efficiency in communication regarding movement of goods)
- **Trade Facilitation** (e.g. strengthening of one stop border posts, enhancing the use of ICT, improving the ease of arranging competitively priced shipments, enhancing the competitive framework of the private sector, improving the capacity to track and trace consignments)
- **Industrial Development** (e.g. industrial and trade needs assessment studies, formulation of prioritized sector development programmes, development of industrial policy, development and amendment of legislation and policy dialogue)
- **Trade Promotion and Development** (e.g. development of trade strategies and support of promotion activities)

- **Trade in services** (e.g. establishment of national enquiry points on services, compilation of services data, establishment of regulatory frameworks on services, scheduling of requests and offers)

Under EPAs eligible areas include:

- Trade Defence Instruments
- Trade Related Adjustment (impact assessment of revenue losses and required resource and adjustment support measures to be implemented, studies to identify Balance of Payments adjustment costs in cases of import surges in excess of exports to EU)
- Competition Policy (SADC 2015).

5.1 Namibia programmes under the Trade Related Facility

The Namibian government identified three key areas for intervention with TRF support that will assist in implementation of the SADC Protocol on Trade and the EPA commitments. These areas are on industrialisation, trade facilitation and EPA Market Access and Policy Cooperation on Competition Policy and Trade in Services.

5.1.1 Industrialisation

Namibia, despite its middle-income status, faces challenges for the manufacturing sector, including those that require upskilling under the Industrial Upgrading and Modernisation Programme (IUMP) of 2012. Key among these are “to revise the country's production structure; improve the business investment climate and export policies; and increase the size of the SME sector” (SADC TRF Steering Committee, 2016). These aims align with the SADC Industrialisation Strategy and Roadmap that was agreed in April 2015, particularly the two pillars of industrialisation and competitiveness.

Namibia developed its industrial policy before the SADC Industrialisation Strategy and Roadmap. In order to take a holistic approach to its industrialisation objectives, Namibia will develop an action plan for its participation in regional value chains for certain specific products. Such interventions are expected to contribute to addressing supply side capacity issues affecting manufacturing to better meet opportunities for trade presented by the regional market, as well as the EU and other international markets.

5.1.2 Trade Facilitation

With its transport corridors linking the region and the rest of the world, Namibia intends to develop a National Single Window (NSW) that will be active by 2018 as directed by Cabinet. It was reported that the Ministry of Finance has already allocated resources to a number of activities in the areas of customs and the NSW, including the drafting of a new customs act (to replace the Customs and Excise Act 1998 and the Customs and Excise Amendment Act 2015, as well as other linked legislation to bring it into line with the SACU Model Act and the Revised Kyoto Convention) and a feasibility study for the NSW.

Several specific gaps related to these activities have been identified that would be supported under the TRF. These include “the drafting of the supporting regulations, interpretative notes and amended documentation for the new customs legislation, as well as the need for further consultations with stakeholders and the training of border officials on the proposed changes.” Key gaps have been identified by the government and include the need to upgrade the existing customs IT system and to undertake business process re-engineering for export, import and transit requirements in a range of government departments that will participate in the NSW.

In terms of human resource capacities of customs officials, Namibia will also require the modernisation and automation of trade processes related to rules of origin, including capacitating

customs officials at head office and border posts as well as private sector organisations that are involved in the processing of certificates of origin.

5.1.3 EPA Market Access and Policy Cooperation on Competition Policy and Trade in Services

In addition to raising awareness among Namibian businesses, there are several areas in the EPA that have already been identified for specific consideration to ensure full implementation by Namibia. These include SPS related measures that are important for exports of meat, plant and fisheries products. Namibia is also seeking to strengthen its capacity in the areas of competition policy and trade in services. These are trade-related matters covered by the EPA with a view to enhanced cooperation between the EU and Namibia going forward. The Namibian Competition Commission is a relatively new institution that is still building up its capacity to undertake competition investigations. A National Competition Policy has been drafted but has not yet been adopted. Once in place, there will be need to bring the Competition Act in line with the Policy and to engage with stakeholders on the implications of these changes. All these will be supported under the EPA implementation window.

6. Conclusion and policy recommendations

The EU has been the largest importer of Namibia's products with fish, meat and grapes generally accounting for 20-30% of the imports. The EPA is likely to bolster the country's trade, having been provided with duty and quota free access to the EU market. However, huge challenges may also hinder the country from benefitting from the EPA, given the asymmetries between the EU and Namibian economies.

For Namibia to benefit from the EPA, the Government must consider the following issues:

- Develop and build institutional and technical capacity for the effective implementation of trade commitments as a priority for meeting the EPA requirements. This is related to capacity to monitor trade movement and the impact of EU imports on various sectors particularly infant industries, agriculture etc.
- Namibia's economic players need to transform their business practices to be competitive to reap the potential benefits presented by EPAs for Duty-Free-Quota-Free (DFQF) market access into the EU for Namibia's products. This includes the development of standards for the products to meet the EU standards.
- Exploiting the opportunities created by the EPA means the government must institute proper dialogue platforms and mechanisms to address issues of concern to Namibia, including SPS and TBT measures. E.g. the 90/40-day rule is excluding communal farmers' cattle to qualify for the EU market access, depriving Namibia potential export volumes and foreign exchange earnings. The farmers need to be trained to ensure adherence to such provisions.
- The cost of compliance with EU standards is another area of concern as it increases the cost of doing business, eroding potential income and benefits for producers in Namibia. The Namibian government must seek resources particularly from the EU to address the technical capacities required to meet the EU standards.
- There is need for greater private sector involvement in the SADC/EU EPA structures and committees to address issues that could inhibit Namibia's capacity to derive maximum benefits. These include improving the understanding of the design and application of EU food safety, as well as animal and plant health standards (to reduce the costs of compliance for Namibian exporters to support accessing high value export supply chains); ensuring Namibia's preferential benefits are not eroded as the EU concludes new trade agreements with third parties, as preference erosion presents risks of crowding out Namibia's products in the EU market; and supporting the ongoing and planned strategies to enhance domestic production and value addition through the utilisation of a range of policy instruments, including infant industry protection and the limited use of export taxes for value addition.

- Establishment of policy impact analysis and domestic policy regulatory frameworks to continuously assess the impact of policies on domestic production and trade

For NSAs, it is important for them to consider the following:

- Ensuring that they are part of the EPA implementation committee when it is established at the national level in line with the EPA provisions, as well as the 2005 civil society partnership policy.
- Civil society should monitor the implementation of EPA in line with the provisions of the agreement and provide Government with information necessary to take measures that ensures national development.
- Raising awareness among the subnational constituencies of CSOs on the final provisions of EPAs is important, as all stakeholders are critical in trade and integration activities.
- Engage policy makers in Namibia to constantly demand progress reports from the government on the implementation of EPA for purposes of close monitoring

7. Recommended list of EPA Stakeholders to be involved in National Consultations

- Namibia Agriculture Trade Forum
- Namibian Manufacturers Association (NMA)
- Meat Co.
- Namibia NGO Forum (NANGOF)
- Namibia Chamber of Commerce & Industry (NCCI)
- INSIGHT Namibia
- Namibia Financial Institutions Supervisory Authority (NAMFISA)
- Institute of Public Policy Research National Union of Namibian Workers (NUNW)
- Team Namibia
- NEPRU
- Joint Consultative Committee (JCC) Bank of Namibia
- Namibia Indigenous Business Forum
- Urban Trust of Namibia
- One World Action
- !NARA Training Centre
- Bank of Namibia
- Namibia Breweries Limited
- Namibia Dairies (Pty) Ltd
- Namibia Agronomic Board
- Financial Brokers Company
- Namibia National Farmers Union (NNFU)
- Meat Board of Namibia
- Namibian Hake Fishing Association
- Simones Storm Securities
- Barlow World Investment Namibia (Pty) Ltd
- NAMDEB Diamond Corporation (Pty) Ltd
- First National Bank of Namibia (FNB)
- Legal Assistance Centre (LAC)
- Namibia Agricultural Union (NAU)
- Diaz Fishing Company (Pty) Ltd
- Namibia Chamber of Mines

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