

UGANDA: COMPANY PERSPECTIVES

AN ITC SERIES ON
NON-TARIFF MEASURES



Uganda: Company Perspectives

An ITC Series on Non-Tariff Measures

About the paper

Nearly half of Ugandan companies face challenges with non-tariff measures (NTMs), according to an ITC business survey.

Certification, labelling, packaging and rules of origin are their biggest challenges. Stronger quality infrastructure within the country will boost the competitiveness of small businesses, including laboratories for testing and certification. NTMs often create procedural obstacles such as delays, insufficient facilities and administrative hurdles, either in destination markets or in Uganda itself. Automated border clearance will help streamlining the export procedures and increase transparency.

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Foreword

One of the most pervasive barriers to market for many micro, small and medium-sized enterprises (MSMEs) are non-tariff measures (NTMs). A vast majority of these measures are important to protect the health and safety of consumers. But there are some that are unnecessary barriers to trade, which often prevent companies from sealing new deals, reaching new markets, and even from competing in traditional ones.

In Uganda, the message from the businesses that have taken part in the International Trade Centre's survey are that non-tariff measures keep them from competing at their best. This is especially true for small firms that want to expand by moving across borders. Nearly half of the Ugandan exporters and importers surveyed for this report express concern about measures such as border delays and lack of certification testing facilities. But Uganda is not alone; many of the 65 countries surveyed by the ITC have echoed similar concerns.

Ensuring access to product quality certificates, for example, matters greatly to companies. They are requested at destination markets and at the Ugandan border. However, as ensuring export quality is key for trade competitiveness, Ugandan companies are calling for a reduction in the costs of quality certification procedures to help them address the challenge of compliance with the regulations.

Facilitating access to information is also one of the key recommendations. The Ministry of Trade, Industry and Cooperatives of Uganda has shown commitment to increase trade transparency and dialogue by requesting ITC to carry out the business survey and by taking action in response to the results. For example, through active capacity building and outreach to the private sector, Uganda has become the most active user of 'ePing', the information alert system for sanitary and phytosanitary measures and technical barriers to trade, which allows companies and policymakers to get timely information and engage dialogue on NTMs.

Such specific private sector insights are essential in helping Uganda shape strategies and policies to continue building a business environment that is conducive to trade.

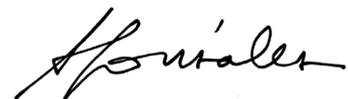
This report highlights these challenges and more that Ugandan exporters and importers face when complying with trade regulations and procedures. The findings reflect interviews with nearly 500 exporters and importers and summarizes options for addressing these challenges.

The recommendations have been shaped by Ugandan stakeholders – public authorities, private sector and trade and investment support institutions – in the consultative process that accompanied the survey.

Uganda's public and private sector can use this report as a toolbox to take a fresh look at trade obstacles and turn these into trade opportunities. The report also lays a strong foundation for long-term cooperation between ITC and Uganda to reduce trade barriers and improve business competitiveness.



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Acronyms

Unless otherwise specified, all references to dollars (\$) are to United States dollars, and all references to tons are to metric tons.

ACP	African, Caribbean and Pacific
COMESA	Common Market for Eastern and Southern Africa
EAC	East African Community
EU	European Union
GDP	Gross domestic product
GSP	Generalized System of Preferences HS Harmonized System
ITC	International Trade Centre
MAAIF	Ministry of Agriculture, Animal Industry and Fisheries
MAST	Multi-Agency Support Team
MFN	Most-favoured nation
NTB	Non-tariff barrier
NTM	Non-tariff measure
PO	Procedural obstacle
RoO	Rules of origin
SME	Small and medium-sized enterprise
SPS	Sanitary and phytosanitary
TBT	Technical barriers to trade
UNBS	Uganda National Bureau of Standards
UNCTAD	United Nations Conference on Trade and Development
URA	Uganda Revenue Authority
WTO	World Trade Organization

Executive summary

Burdensome NTMs affect almost half of Ugandan exporters

The ITC business surveys shows that nearly half of Uganda's companies face challenges with non-tariff measures (NTMs). The chief obstacles are certification, labelling, packaging and rules of origin. Better export-quality management within Uganda, including laboratories for testing, certification and standards development, would improve the competitiveness of small and medium-sized enterprises (SMEs). Automated border clearance would also reduce delays and increase transparency.

The survey found that 226 of the 493 interviewed companies (46%) struggle with regulations imposed by Uganda and partner countries, with agricultural exporters facing more difficulties than exporters from the manufacturing sector. Companies that export coffee and processed foods are among the most affected. In general, agricultural goods and food products are highly regulated for reasons of human health and safety, and environmental protection.

Most burdensome NTMs are associated with foreign regulations

Destination markets apply about two-thirds of the NTMs reported by Ugandan exporters. Countries in the East African Community (EAC) and the European Union (EU), Uganda's two biggest markets, impose the most NTMs.

Almost one-third of exporters' difficulties are due to regulations imposed by members of the EAC, which is also Uganda's top export market (buying 49% of its exports). This means the share of NTMs applied by EAC countries is proportionally lower than their export share. Conformity assessment and rules of origin are the toughest NTMs applied by EAC countries. Rwanda and Kenya imposed the greatest percentage of these regulations.

EU countries impose a proportionally higher share of NTMs than their share of Ugandan exports. EU countries buy 21% of Ugandan exports but apply more than 27% of the reported NTMs. The United Kingdom and Belgium apply the most NTMs among EU countries, with technical requirements and conformity assessment being the biggest challenges for Ugandan exporters.

A third of the reported NTMs are Ugandan 'export-related measures' and about 20% of these involve certifications required prior to export. Other Ugandan NTMs include taxes and charges on exports (4%) and licenses or permits to export (2%).

Technical measures and export regulations are exporters' top concerns

Sanitary and phytosanitary (SPS) requirements and technical barriers to trade (TBT) together comprise 46% of the difficult cases reported by Ugandan exporters. A quarter of the cases involve problems with technical requirements and 21% concern difficulties with conformity assessment.

While technical measures are the most reported NTMs for both the agriculture and manufacturing sectors, there are some differences. Technical requirements and problems with rules of origin and related certificates affect exporters of manufactured goods more than agriculture exporters. On the other hand, conformity assessment is a bigger problem for agriculture exporters than for exporters of manufactured products.

Both industries struggle with Ugandan export regulations, which make up 36% of the difficult NTM cases reported by agriculture exporters and 24% of those reported by exporters in the manufacturing sector.

Procedures hamper exporters' compliance with NTMs

Administrative hurdles, high fees and charges, delays and inadequate testing facilities affect Ugandan businesses both at their border and in destination markets. Delays are the biggest challenge, largely due to the need for certification or testing.

The survey finds that exporters often face difficulties not only because a given regulation is too strict or complex, but also – and at times solely – because of how it is enforced. While NTMs are official regulations in the exporting or importing country with which traders must comply, the way the authorities apply these regulations also burdens exporters.

More than half of the NTMs affecting Ugandan exporters are related to such barriers. Only 17% of the problems they face are due to stringent or complicated requirements, while 31% of their difficulties with NTMs stem from regulatory or procedural issues at home or in destination countries.

Exporters report 294 procedural hurdles that make it difficult to comply with NTMs. Most of these originate in Ugandan agencies (70%), followed by partner countries (28%) and a few in transiting countries (2%).

The way forward

There are several ways to help exporters cope with these obstacles and to support greater export development.

Infrastructure must be improved to ensure compliance with international standards. Suitable laboratory infrastructure is vital to expedite testing as well as research into product safety, quality and environmental sustainability, which are essential to develop and implement standards.

Ugandan companies struggle to meet foreign product standards such as SPS and TBT requirements covering labelling, product characteristics and fumigation, among others. Here, there is a need to better harmonize national standards to regional and international standards. The authorities should also seek to promote equivalence and mutual recognition of the conformity assessment schemes among trading partners.

The survey finds that border clearance controls are a major challenge to trade. To address this, customs and clearance processes should be fully automated to speed up the processes of goods in transit. An online system would further ensure transparency in procedures to reduce the number of informal payments that increase the cost of trade for business people.

ITC survey on NTMs

The results presented in this report are based on a business survey implemented by ITC, in collaboration with the Ministry of Trade, Industry and Cooperatives (MTIC) of Uganda. The survey aims to provide insights to help the Government of Uganda and the private sector work together to create an enabling environment with fewer or no trade barriers and greater export competitiveness for traders.

The survey assesses the Ugandan business community's perspectives on NTMs, details the trade obstacles confronting Ugandan companies and identifies bottlenecks related to trade procedures and cross-border operations. The survey was conducted from August 2015 to August 2016.

INTRODUCTION TO NON-TARIFF MEASURES

Defining non-tariff measures

Non-tariff measures (NTMs) are defined as ‘policy measures, other than customs tariffs, that can potentially have an economic effect on international trade in goods, changing quantities traded, or prices or both’.¹ The concept of NTMs is neutral and does not imply a direction of impact.²

Being ‘defined by what they are not’,³ NTMs comprise a myriad of policies other than tariff duties. NTMs are complex legal texts specific to the product and applying country. They are more difficult to quantify or compare than tariffs.

Given that legitimate reasons, including the protection of human, animal and plant health, may lead to NTMs, this report avoids making judgements on intentions and the term NTM is used. By design, the survey only captures NTMs that cause major difficulties for trading companies. NTMs analysed in this report refer to ‘burdensome NTMs’. Because obstacles to trade are complex, understanding their terminology and classification is important.

The diversity of NTMs requires a classification system. ITC’s NTM Surveys are based on the international classification developed by the Multi-Agency Support Team, incorporating minor adaptations to the ITC NTM Survey approach.⁴

Procedural obstacles and the trade-related business environment

Procedural obstacles (POs) refer to practical challenges directly related to the implementation of NTMs. For instance, problems caused by the lack of adequate testing facilities to comply with technical measures or excessive paperwork in the administration of licences. Inefficiencies in the trade-related business environment may have similar effects, but occur unrelated to specific NTMs. Examples include delays and costs due to poor infrastructure or inconsistent behaviour of officials at customs or ports.

A business perspective is imperative

ITC’s NTM Programme, launched in 2010, incorporates large-scale company surveys on NTMs, POs and trade-related business environment inefficiencies. NTM Surveys evaluate all major export sectors and all major importing partners.

NTM Surveys also allow companies to report the most burdensome NTMs and how they impact their businesses. Exporters and importers face NTMs and other obstacles every day. Because they know the challenges they face, a business perspective on NTMs is indispensable. At government level, understanding companies’ key concerns regarding NTMs, POs and trade-related business environments can help define national strategies to overcome obstacles to trade.

The full survey methodology is documented in ITC’s technical paper, *The Invisible Barriers to Trade – How Businesses Experience Non-Tariff Measures (2015)*.⁵

¹ Multi-Agency Support Team (2009).

² The term ‘non-tariff barrier’ implies a negative impact on trade. The Multi-Agency Support Team and the Group of Eminent Persons on Non-Tariff Barriers proposed that non-tariff barriers (NTBs) to trade be a subset of NTMs with a ‘protectionist or discriminatory intent’.

³ Deardorff and Stern (1998).

⁴ For further details on the Multi-Agency Support Team NTM classification, see Appendix II.

⁵ www.ntmsurvey.org/publication

CHAPTER 1 TRADE OVERVIEW



Uganda: Country overview

Economic situation

Uganda is a landlocked country located in East Africa about 800 kilometers inland from the Indian Ocean. It is bordered by Kenya in the east, South Sudan in the north, Democratic Republic of Congo in the west and Rwanda in southwest. Uganda is divided into 111 districts that are further subdivided into counties, subcounties and parishes.

About 75% of Uganda's 35 million⁶ population dwell in rural areas, though the urban population has grown multiple times – from 1.7 million in 1991 to nearly 7.4 million in 2014. Uganda has the youngest population in the world, with more than 73% under the age of 30.

Uganda's gross domestic product (GDP) was \$25.5 billion⁷ in 2016 and its economy expanded 4.6% in 2015–16, slightly lower than the government's target of 5%.⁸ The lower growth rate is due to a drop in international commodity prices, a decline in private sector credit and depreciation of the local currency (Uganda shillings) as a result of negative sentiments and uncertainty in the runup to the 2016 general elections. However, this growth is significantly higher than the projected growth rate of Sub-Saharan Africa economies, estimated at 3% in the same period.

With a GDP per capita of \$662, Uganda is categorized as a least developed country (LDC).⁹ Uganda has steadily reduced its poverty rate, with roughly 20% of the population below the national poverty line in 2012–13.¹⁰ In the early 1990s, more than five Ugandans were below the poverty line for every Ugandan in the middle class. There are now almost twice as many Ugandans in the middle class – living above twice the poverty line – as there are poor.

⁶ Uganda Bureau of Statistics (2016), The National Population and Housing Census 2014

⁷ World Bank, World Development Indicators (2016).

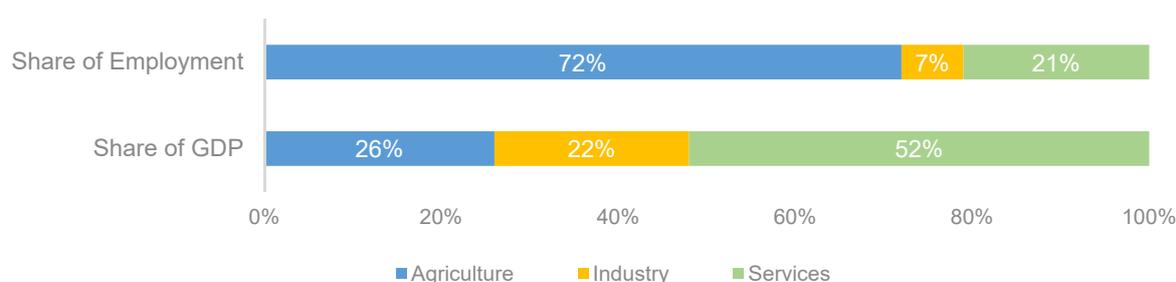
⁸ Ministry of Finance, Planning and Economic Development – Performance of the Economy, June 2016.

⁹ World Bank, World Development Indicators (2016).

¹⁰ Ministry of Finance, Planning and Economic Development, Uganda Poverty Status Report – November 2014.

Uganda's economy grew at an annual rate of around 5.5% between 2010–11 and 2013–14. Agriculture remains the backbone of the country's economy, contributing 20% of the GDP while employing 72% of the labor force (Figure 1). Seventy-seven percent of women and 63% of youths are employed in this sector. Over the first National Development Plan period (2010–15), however, the sector registered sluggish growth of about 1% annually.¹¹ Agriculture is still dominated by smallholder farmers engaged in food and cash crops, horticulture, fishing and livestock farming rather than large-scale commercial farming. The sector's strength is leveraged through, among others, the National Agricultural Policy 2013, which sets a solid framework to guide investment and delivery of agricultural services.

Figure 1 Sector contributions to GDP and employment, 2016



Source: World Development Indicators, World Bank

Cereals (maize, millet, sorghum, rice), root crops (cassava, sweet potatoes, potatoes), pulses (beans, cow peas, field peas, pigeon peas) and oil crops (groundnuts, soya beans, sim sim), plantains and coffee are among the major food crops produced in Uganda.¹²

The industrial sector, which contributes 22% of the country's GDP (Figure 1), has enjoyed steady annual growth of about 7% since 2000.¹³ Key industrial subsectors include manufacturing (formal or informal), construction, mining and quarrying, electricity generation and water services. Industrial growth in Uganda has been largely driven by expansion in construction, rather than investment in machinery and equipment, which is essential for industrial sector expansion and future economic growth. Construction contributes 16% of GDP, followed by manufacturing, which adds about 7%. Overall, 7% of the workforce is employed in the industrial sector.

The government has worked hard to attract private investment in mineral resources exploration and development by providing geo-scientific information on minerals, and managing equitable and secure titles systems for the mining industry. In 2012–13, mineral's contribution to the GDP is estimated to be 0.3%.¹⁴

Manufacturing in Uganda consists predominantly of last-stage (end-product) assembly and raw materials processing, a high share of which is food processing. Both of these are low value-added activities. There are few capital goods industries. Agri-processing firms account for about 39% of manufacturing establishments in Uganda.¹⁵ In addition, Ugandan manufacturing firms are high-cost producers that are characterized by high excess capacity, with utilization of the installed capacity averaging 50%.

¹¹ Rwabizambuga, A., Muhumuza, T. and Nsereko, S.P. 2016. Uganda 2016. African Economic Outlook.

¹² Uganda Census of Agriculture (UCA) 2008/09.

¹³ Eastern Africa's Manufacturing Sector - Uganda Country Report, 2014 African Development Bank (AfDB).

¹⁴ The Second National Development Plan 2015/16 – 2019/20. Kampala, National Planning Authority.

¹⁵ The 2012 Statistical Abstract, Kampala-Uganda UBOS (2010) and the Science, Technology and Innovation Uganda's Status Report 2008/2009, Kampala-Uganda.

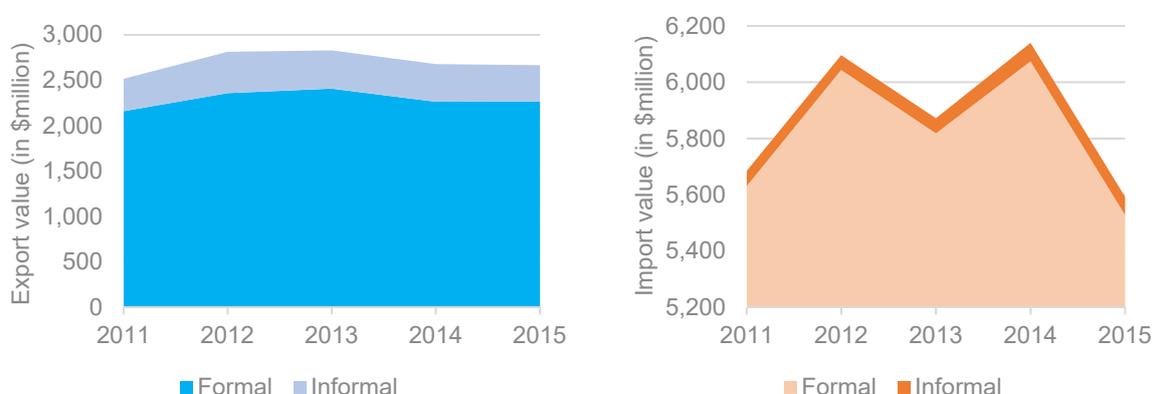
Between 2013 and 2014, manufacturing increased 10% in the index of production, which measures changes on a quarterly basis of volume produced by the manufacturing sector.¹⁶ Food processing has been one of the best performing subsectors in the last few years.

Services are a major and growing sector of Uganda's economy, accounting for more than half of the economy and employing about a quarter of the workforce. Leading subsectors include wholesale, retail trade and transport.¹⁷ The services sector grew an annual 6.5% in 2016, and the authorities expect the sector's contribution to GDP to reach 58% by 2040.¹⁸

International trade patterns

Uganda exported almost \$2.7 billion worth of goods in 2015 – up from \$813 million in 2005. Exports grew at an annual rate of 5.3% in this period. Imports in 2015 were valued at \$5.6 billion – more than twice its exports – and were growing at a rate of 4.98% per annum (Figure 2). As a result, Uganda's trade deficit has widened more than threefold since 2005 to \$3 billion in 2015.

Figure 2 Summary of Uganda's external trade statistics, 2011–2015



Source: Uganda Bureau of Statistics (2016). Statistical Abstract.

Informal exports in 2014 amounted to \$400 million or roughly 15% of total exports. Formal exports stagnated between 2014 and 2015 while informal exports was decreasing by 5%. In contrast, informal imports make up only a small portion of total imports (1%) valued at \$64 million in 2015 (Figure 2).

Preferential market access to Ugandan products

Most Ugandan exports enjoy preferential tariffs or duty-free access to the majority of the country's major markets. Uganda's agriculture export basket is relatively narrow. In its largest export market, seven products at the HS 2-digit level and 10 at the HS 6-digit level make up 95% of exports (Table 1). Among the major importers, Rwanda and Kenya apply the highest most-favoured nation (MFN) rates, with weighted averages of 32.5% and 26.9% respectively. However, most agriculture tariff lines (100%) are eligible for duty-free in all major importing countries. Agriculture exports to China are concentrated in two products at the HS 6-digit level, making up 95% of these exports.

Exports of manufactured goods are relatively more diverse than agriculture products. In Rwanda, 95% of the exports are composed of 117 products at HS 6-digit level while in the EU, only 20 products are at the same level. Almost all Ugandan manufactured products are eligible for duty-free access in its top five markets, with the exception of the United Arab Emirates.

¹⁶ Uganda Bureau of Statistics, Statistical Abstract 2015.

¹⁷ World Development Indicators, World Bank.

¹⁸ Uganda Bureau of Statistics 2016.

Part A of the Third Schedule of the EAC Customs Management Act governs export prohibitions in EAC countries. This includes export prohibitions decided and enforced by individual members when necessary. Uganda applies no voluntary export restraints, however. In addition, certain products require export authorization, as listed in Part B of the Third Schedule. Items on this list include lead scrap, fresh unprocessed fish, cloves, wood charcoal and used automobile batteries.

Uganda applies export taxes of 1% on coffee, 2% on cotton and \$0.8/kg on raw hides and skins. These charges aim to promote local industry.¹⁹

Table 1 Tariffs applied and preferences granted by major importing partners

Uganda's major export markets (2014)	Diversification 95% trade in number of		Average MFN of traded tariff lines		Preference margin	Duty-free imports	
	HS-2 digit	HS-6 digit	Simple	Weighted	Weighted	Tariff lines (% of total)	Value (% of total)
Agricultural products							
European Union	7	10	10.8%	1.9%	1.9%	100%	100%
Kenya	12	27	22.8%	26.9%	26.9%	100%	100%
Rwanda	13	27	23.4%	32.5%	32.5%	100%	100%
China	2	2	7.2%	9.7%	9.7%	100%	100%
United States	3	5	1.0%	0.2%	0.2%	100%	100%
Non-agricultural products							
Rwanda	33	117	14.8%	21.6%	21.6%	100%	100%
European Union	11	20	3.4%	6.3%	6.3%	100%	100%
United Arab Emirates	2	3	4.6%	0.8%	0%	8.3%	84.8%
Tanzania	18	68	13.5%	7.7%	7.7%	100%	100%
Hong Kong SAR	2	5	0%	0%	0%	100%	100%

Source: World Tariff Profiles 2016.

Commodity exports

At an aggregated level, 'Coffee, tea, maté and spices' is Uganda's biggest export commodity group, valued at \$478 million (21% of total) (Figure 3). The other top Ugandan exports are petroleum products (\$149 million), 'cereals' (\$142 million), fisheries (\$118 million) and 'iron and steel' products (\$87 million).

Traditional exports account for about 25% of formal exports.²⁰ Coffee – one of the most important traditional products – remains the main foreign-exchange earner, with exports rising significantly in recent years. Coffee made up 18% of total formal exports in 2015 (Table 2), though it is affected by price volatility on the world market and fluctuation in domestic production.

Among the main traditional export commodities, coffee was followed by tobacco, tea and cotton. Tobacco exports climbed from \$70 million in 2012 to \$120 million in 2013, but fell back to \$66 million in 2014 and \$73 million in 2015. Tea exports, which also fell back, were valued at \$70 million in 2015 (Table 2).

The share of non-traditional exports to total formal export earnings was about 75% in 2015. Earnings from non-traditional exports rose from \$1.5 billion in 2011 to \$1.7 billion in 2015 (Table 2). Petroleum,

¹⁹ WTO, 2012, Trade Policy Review: EAC members.

²⁰ Based on Uganda's national commodity classification, where exports are categorised into traditional and non-traditional exports, 2014.

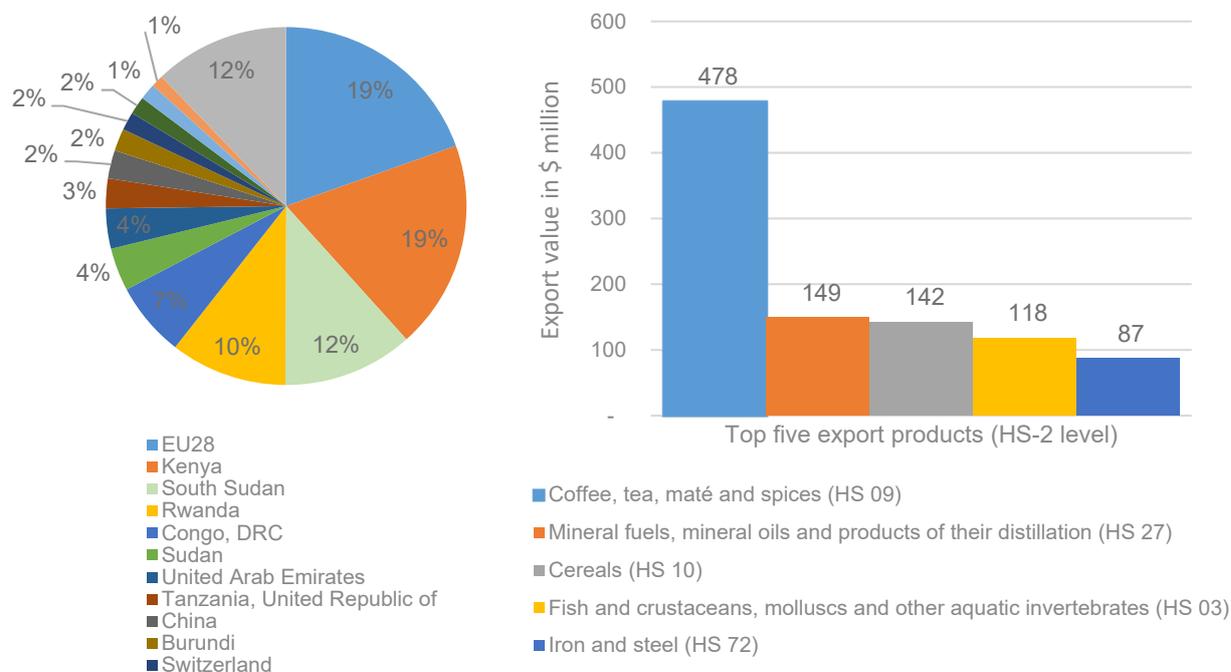
fisheries, cement and animal or vegetable fats and oils were some of the largest earners among such exports.

Table 2 Formally traded traditional and non-traditional commodities, 2011–2015

Export product		Export value (in \$'000)				
		2011	2012	2013	2014	2015
Traditional exports	Coffee	466,659	372,166	425,407	410,064	402,634
	Cotton	86,011	74,898	31,686	21,918	20,778
	Tea	72,126	73,902	85,589	84,739	70,317
	Tobacco	53,981	69,746	120,201	66,018	72,897
	Subtotal	678,777	590,712	662,883	582,739	566,626
Non-traditional exports	Fish and fish products	136,218	128,322	126,727	134,791	117,597
	Petroleum products	104,369	136,698	131,892	144,894	125,404
	Cement	94,025	106,867	102,885	89,097	80,016
	Sugar & sugar confectionary	81,872	122,672	85,304	68,937	65,724
	Maize	26,752	56,916	42,254	43,567	91,055
	Animal or vegetable fats and oils	101,111	110,427	100,050	102,321	78,959
	Iron and steel	75,507	83,240	94,320	93,129	86,597
	Other	860,446	1,021,639	1,061,420	1,002,489	1,055,031
	Subtotal	1,480,300	1,766,781	1,744,852	1,679,225	1,700,383
Total	2,159,077	2,357,494	2,407,736	2,261,965	2,267,009	

Source: Uganda Bureau of Statistics (2016). Statistical Abstract.

Figure 3 Markets for Ugandan exports and top five export products, 2015



Source: ITC Trade Map, 2016

The five-country regional bloc of EAC is the largest market for Ugandan exports. In 2015, Uganda exported goods worth \$772 million (34% of total exports) to the EAC countries – among which Kenya was the biggest importer, buying \$427 million or 19% of Ugandan exports. Rwanda imported \$238 million from Uganda, followed by Tanzania (\$61 million) and Burundi (\$46 million) (Figure 3).

The European Union (EU28) is also a major market for Uganda. Combined Ugandan exports to EU28 countries was \$443 million, or nearly a fifth of total exports. Within the EU28, the top importers of Ugandan goods include Italy (\$101 million), the Netherlands (\$78 million), Germany (\$76 million) and Belgium (\$69 million).

Exports to the Common Market for Eastern and Southern Africa (COMESA), excluding EAC members, amounted to \$163 million (7%) with the Democratic Republic of the Congo being the largest importer, at \$153 million.

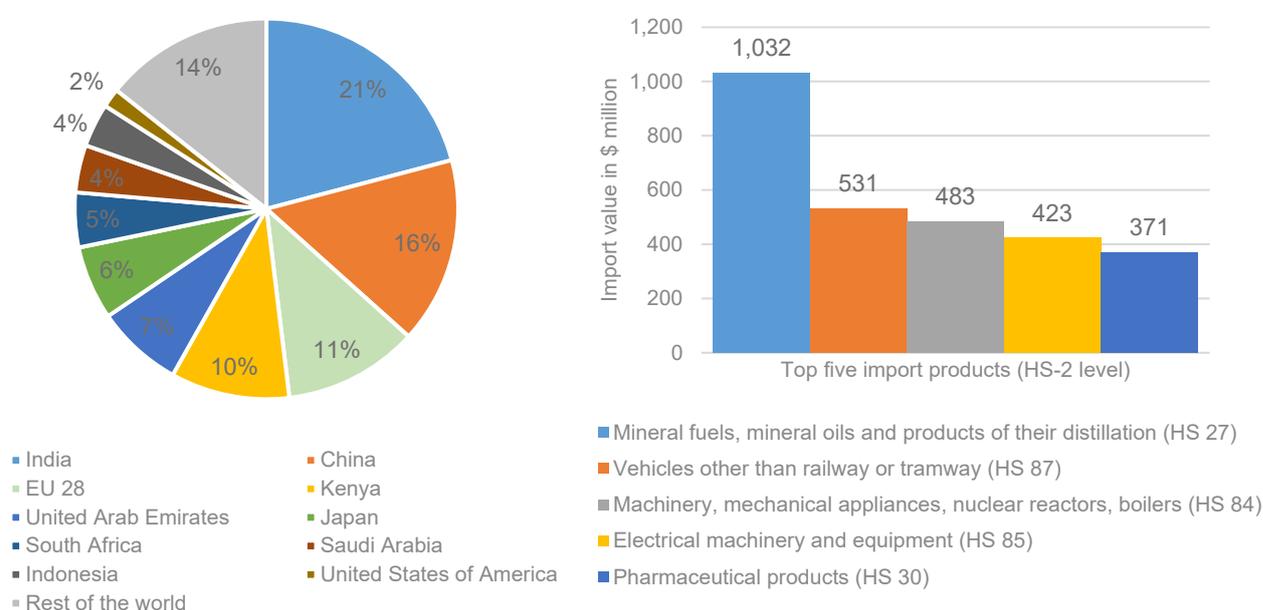
Other major importers of Ugandan goods include South Sudan (\$265 million), China (\$58 million) and Switzerland (\$37 million) (Figure 3).

Commodity imports

Uganda’s main import commodity is petroleum products, valued at \$1 billion in 2015. Other key imports are ‘vehicles other than rail or tramway’ (\$531 million), machinery and appliances (\$483 million), ‘electrical machinery and equipment’ (\$423 million) and pharmaceutical products (\$371 million) (Figure 4).

India and China are the two biggest suppliers to Uganda. In 2015, Uganda imported merchandise worth \$1.2 billion from India (21%) and \$875 million from China (16%). The EU28 (\$630 million), the United Arab Emirates (\$406 million) and Japan (\$347 million) are other important suppliers. Among African countries, Kenya (\$555 million) and South Africa (\$257 million) are the only large suppliers to Uganda (Figure 4).

Figure 4 Markets for Ugandan imports and top five import products, 2015



Source: ITC Trade Map, 2016.

Multilateral, regional and bilateral trade agreements

Uganda is a member of two main regional agreements: the East African Community and the Common Market for Eastern and Southern Africa. The EAC has four other members – Burundi, Kenya, Uganda and Rwanda – while COMESA is a much larger trade bloc, with 19 members spanning the African continent. All EAC members, except Tanzania, are also part of COMESA. Together, the EAC and COMESA are the biggest destination for Ugandan exports.

Uganda's trades with the European Union under the Economic Partnership Agreement and other non-reciprocal trade concessions such as the Everything But Arms arrangement. Following the EAC, the EU28 is the second-largest regional market for Uganda.

Asian countries are major suppliers to Uganda. Imports from four Asian countries – India, China, the United Arab Emirates and Japan – alone account for half of Uganda's total imports.

Uganda has been member of the World Trade Organization (WTO) since 1995 and a member of the General Agreement on Tariffs and Trade since 1962. As an original member of the WTO, Uganda grants MFN treatment to all trading partners. The country has been an active participant in the WTO's Doha Development Agenda trade negotiations, with its main interests being simplified preferential rules of origin and the elimination of both non-tariff barriers and export subsidies. Moreover, Uganda has advocated for additional technical and financial assistance to meet SPS and technical requirements.²¹

Uganda has bound 15.7% of all its tariff lines. Its average MFN tariff was 12.8% in 2015, while its simple average final bound is 73.1%.²²

Uganda receives non-reciprocal trade preferences under the Generalized System of Preferences (GSP) schemes of Australia, Belarus, Bulgaria, Canada, the European Union, Iceland, Japan, New Zealand, Norway, the Russian Federation, Switzerland, Turkey and the United States. Moreover, as an LDC, Uganda benefits from non-reciprocal trade preferences from Armenia, Chile, China, India, Kazakhstan, Kyrgyzstan, Morocco, Tajikistan, Thailand and Republic of Korea. However, Uganda is not a signatory to the Agreement on the Global System of Trade Preferences among Developing Countries (GSTP).²³

National trade policy and export tariffs

The national trade policy, launched in 2007, aims to transform Uganda into a dynamic and competitive economy in which the trade sector stimulates the productive sectors, and to move the country out of poverty, into wealth and prosperity. The policy's mission is to develop and nurture private sector competitiveness, and to support the productive sectors of the economy to trade at both domestic and international levels, with the ultimate objective of creating wealth and employment, enhancing social welfare and transforming Uganda from a poor peasant society into a modern and prosperous society.²⁴

This national trade policy feeds into the National Development Plans I & II and Uganda Vision 2040 to achieve 'a transformed Ugandan society from a peasant to a modern and prosperous country within 30 years'. The focus of Uganda Vision 2040 is to strengthen the economy to exploit opportunities in the oil and gas sector; tourism, which has long been a key productive sector; minerals; information and communications technology; the abundant labor force; Uganda's favourable geographical location and trade, water resources, industrialization and agriculture.²⁵

Both national development plans build on the Vision 2040 goals. The focus of the mid-term (five-year) plans is for infrastructure building and enhancement of public-private partnerships for increased competitiveness for development. In the National Development Plan II, trade is considered a driver of growth by expanding and diversifying the domestic and export markets, in turn facilitating competitiveness of the productive sectors. MTIC is mandated to take the lead in seeking, negotiating

²¹ WTO, 2012, Trade Policy Review: EAC members.

²² World Tariff Profiles (2016).

²³ WTO, 2012, Trade Policy Review: EAC members.

²⁴ Ministry of Trade, Industry and Cooperatives (2007). National Trade Policy.

²⁵ National Planning Authority (2013). Uganda Vision 2040.

and increasing market access for Uganda's goods and services in regional and international markets including the WTO, COMESA, EAC and the EAC-SADC-COMESA tripartite arrangement.

Cereal production rose in 2014 – rice by 10.9%, wheat by 8.8% and millet by 3.9%, though production of both maize and sorghum increased by less than 1% each. Roots and tubers such as cassava and potatoes had mixed fortunes, with a decrease of 5.7% and an increase of 3.4% respectively, while sweet potato production rose 2.9%. There was a general decline in production of field peas (33.3%), cow peas (19.9%) and beans (6.9%) in 2014. Oil crops also advanced less than 1%, though sunflower production rose 3%.

CHAPTER 2 PROFILES OF TRADING COMPANIES



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Survey implementation and sampling

ITC, in collaboration with the Ministry of Trade, Industry and Cooperatives, implemented the NTM business survey in Uganda between August 2015 and August 2016.²⁶ The survey aims to provide a better understanding of the trade obstacles hampering Ugandan companies and to identify potential bottlenecks related to trade procedures and cross-border operations. Insights from the survey will help the private sector and the government create an enabling environment for private sector development and improve Uganda's export competitiveness.

Prior to the survey, ITC compiled a list of more than 2,000 Ugandan exporters and importers.²⁷ This registry was used to calculate the sample size and to contact the companies for interviews. A stratified random sampling method was used to calculate the sample size for the survey's telephone interview phase. This approach ensures that the samples required for each sector correspond to the size of the sector. The general survey methodology was adjusted to the needs and requirements of Uganda.

The two-stage survey process

First stage: telephone interviews (phone screening)

The first step involves screening companies by telephone. Company characteristics such as main sector of activity, the direction of trade and whether the business experienced difficulties with NTMs are verified during this stage. A total of 493 companies were interviewed by telephone.²⁸ Of these, 422 were engaged only in exports while 81 involved in both importing and exporting. Another 71 companies were engaged only in imports. (Figure 5).

The telephone interviews focused on the company's export and import sectors, size and whether it had been affected by burdensome regulations or procedures in the last 12 months. The interviews identified

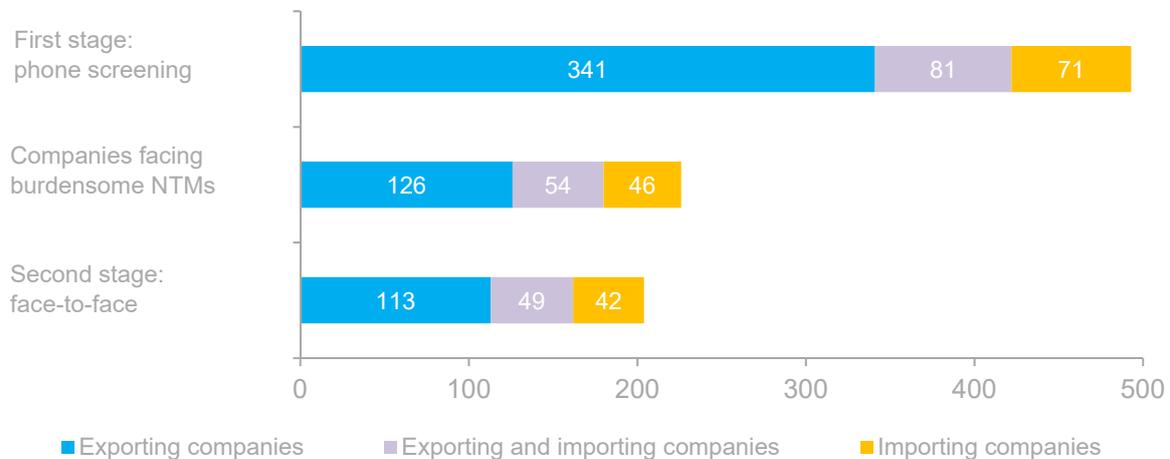
²⁶ International Development Consultants Limited implemented the survey on behalf and under the guidance of ITC.

²⁷ The registry was compiled using company information provided by the Uganda National Export Promotion Board, the Uganda Revenue Authority and the Uganda Manufacturers Association.

²⁸ From the registry of more than 2,000 companies, 730 were contacted to participate in the interview, of which 493 agreed and completed the telephone-screening interviews (68% participation rate).

226 companies (54%) that faced regulatory or procedural obstacles to trade. Subsequently, 204 of these companies were interviewed face-to-face to understand the exact nature of their problems.

Figure 5 Number of companies interviewed by telephone and face-to-face



Source: ITC NTM Survey in Uganda, 2016.

Second stage: face-to-face interviews

Companies that reported encountering trade obstacles during the telephone interviews were invited to participate in face-to-face interviews aimed at gathering detailed information about the causes and types of NTMs.

Of the 204 companies that participated, 113 were exporters, 49 were exporters and importers, and 42 were only importers (Figure 5). Typically, survey respondents are general managers or employees responsible for the export and import process. All responses are treated with utmost confidentiality. The face-to-face interviews were conducted in English and usually lasted from 45 to 60 minutes.

Stakeholder consultations

ITC and MTIC jointly organized a national stakeholder meeting in Kampala in October 2016 to present the survey results and initiate discussions about the actions needed to alleviate problems caused by NTMs. The recommendations in this report are based on talks with relevant stakeholders and experts.



National stakeholder meeting on non-tariff measures jointly organized by ITC and the Ministry of Trade, Industry and Cooperatives, in Kampala on 26 October 2016

Profiles of interviewed companies

Surveyed companies are mostly small-scale enterprises

Most of the interviewed companies (69%) are small enterprises and 10% are microenterprises. Medium-sized and large companies make up 8% and 13% of the sample, respectively (Figure 6).

The classification of companies matches the national definition based on the number of employees. Businesses with fewer than 10 employees are classified as microenterprises while those with 11–100 workers are classified as small. Medium-sized enterprises employ 101–200 people and large companies have more than 200 employees.

Figure 6 Size and location of interviewed companies

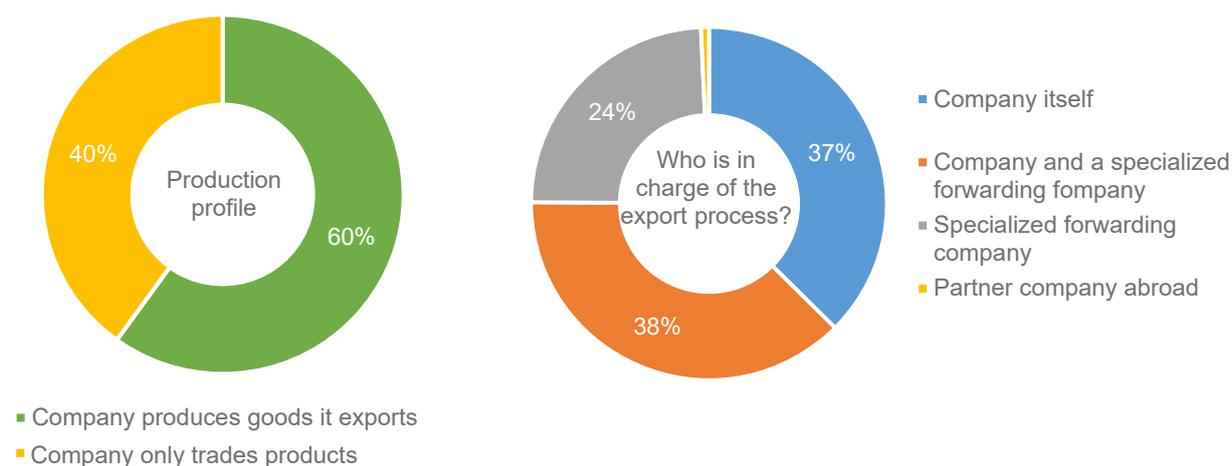


Source: ITC NTM Survey in Uganda, 2016.

Most of the companies are based in Kampala

Most of the surveyed companies (72%) are based in the capital, Kampala. The rest are located in other parts of the country, including Jinja, Entebbe, Mukono and 30 other smaller towns (Figure 6).

Figure 7 Production profile and export processing of exporting companies



Source: ITC NTM Survey in Uganda, 2016.

NTM Survey results are representative by sector

More than 60% of surveyed exporting companies are active in the agricultural sector dealing in 'fresh foods and raw agri-based products' or 'processed foods and agri-based products'. Most of these companies (220) export fresh farm products such as fruits and nuts, vegetables, coffee and spices. Seventy-one companies in the agriculture sector export processed food and agri-based goods (Table 3). This number reflects the fact that Uganda's main exports are raw farm products.

Furthermore, 31% of the surveyed companies are active in the manufacturing sector. A quarter of these companies are involved in low-tech manufacturing, which includes exports of 'wood products', 'clothing and textiles' and 'miscellaneous manufacturing'. Uganda has very few medium- and high-tech companies, so these cover only a small portion of the NTM business survey. Overall, the medium-tech manufacturing sector, which includes exporters of 'chemicals', 'transport equipments' and 'machinery and electronics', makes up 7% of the survey's exporting companies.

In the case of imports, most of the surveyed companies are importers of manufactured goods (86%). Only 14% import agricultural products (Table 3).

Table 3 Number of interviewed exporters and importers from different sectors

Sector		Exporters	Importers
Agri-food	Fruit and nuts	41	8
	Vegetables and other edible vegetable products	20	
	Coffee and coffee substitutes	39	
	Spices	34	
	Other fresh food	86	
	Processed food	71	13
Low-tech manufacturing	Wood, wood products and paper	36	13
	Textile and clothing (incl. leather)	28	14
	Miscellaneous manufacturing	29	22
Medium-tech manufacturing	Chemicals	16	20
	Transport equipment	8	18
	Machinery and electronics	4	29

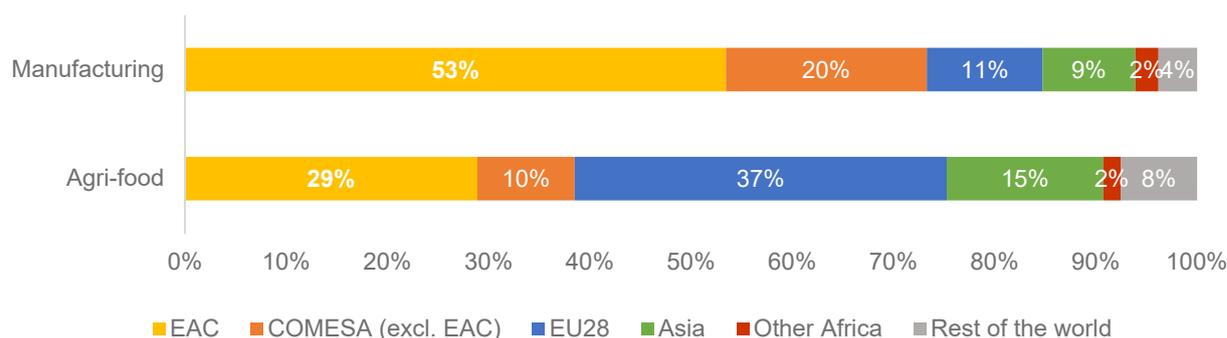
Source: ITC NTM Survey in Uganda, 2016.

EAC and European Union are the main markets for most exporters²⁹

The main destination market for Ugandan exporters differ across sectors. As Figure 8 shows, most agricultural exporters (37%) identify the European Union (EU28) as the main destination market, followed by the EAC (29%), Asia (15%) and other COMESA countries (10%). The regional EAC countries are the main destination market for the majority of manufacturing exporters (53%), followed by COMESA (20%), the EU28 (11%) and Asia (9%).

²⁹ During the telephone interviews, companies are asked to identify their main market (region) based on the value of their sales. In the face-to-face interviews, companies are asked to identify destination markets (at the country level) for each of their export products (at HS-6 digit level). They are also asked to report any regulatory or procedural obstacles to trade they have faced when exporting their products to their corresponding markets.

Figure 8 Main destination markets for exporters, by sector



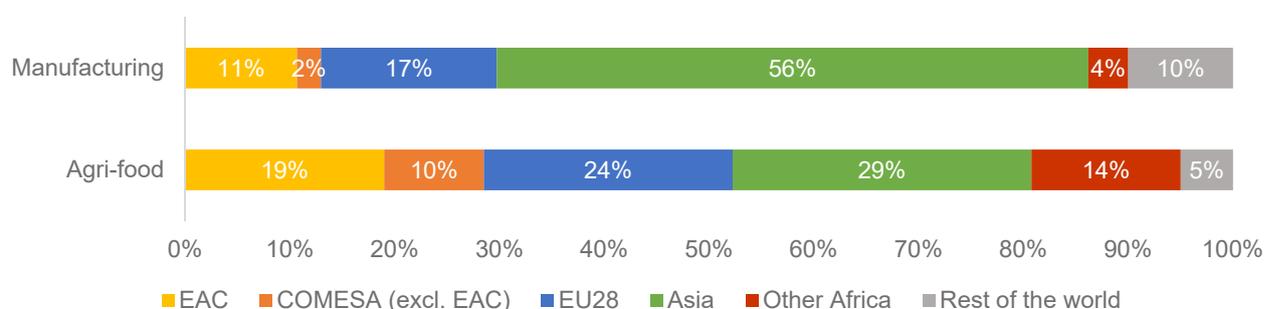
Source: ITC NTM Survey in Uganda, 2016.

Majority of imports come from Asia³⁰

Among the interviewed companies, 152 were importers and most imported manufactured products. More than half the importers of such goods identify Asia as their main supplying country, followed by the EU28 (17%) (Figure 9). Only 13% of importers identify the EAC and COMESA as the main supplying market for manufactured goods.

Asia also remains the main supplying market for agri-food products, but to a much smaller degree compared to manufactured goods. About 29% of agri-food importers buy mainly from Asia, followed by the EU28 (24%). The regional EAC and COMESA are the main supplying markets for 19% and 10% of Ugandan agri-food importers, respectively.

Figure 9 Main supplying markets for importers, by sector



Source: ITC NTM Survey in Uganda, 2016.

³⁰ During the telephone interviews, companies are asked to identify their main market (region) based on the value of their imports. In the face-to-face interviews, companies are asked to identify supplying markets (at the country level) for each of their import products (at HS-6 digit level). They are also asked to report any regulatory or procedural obstacles to trade they have faced when importing their products to their corresponding markets.

Participation of women in trading companies is very low

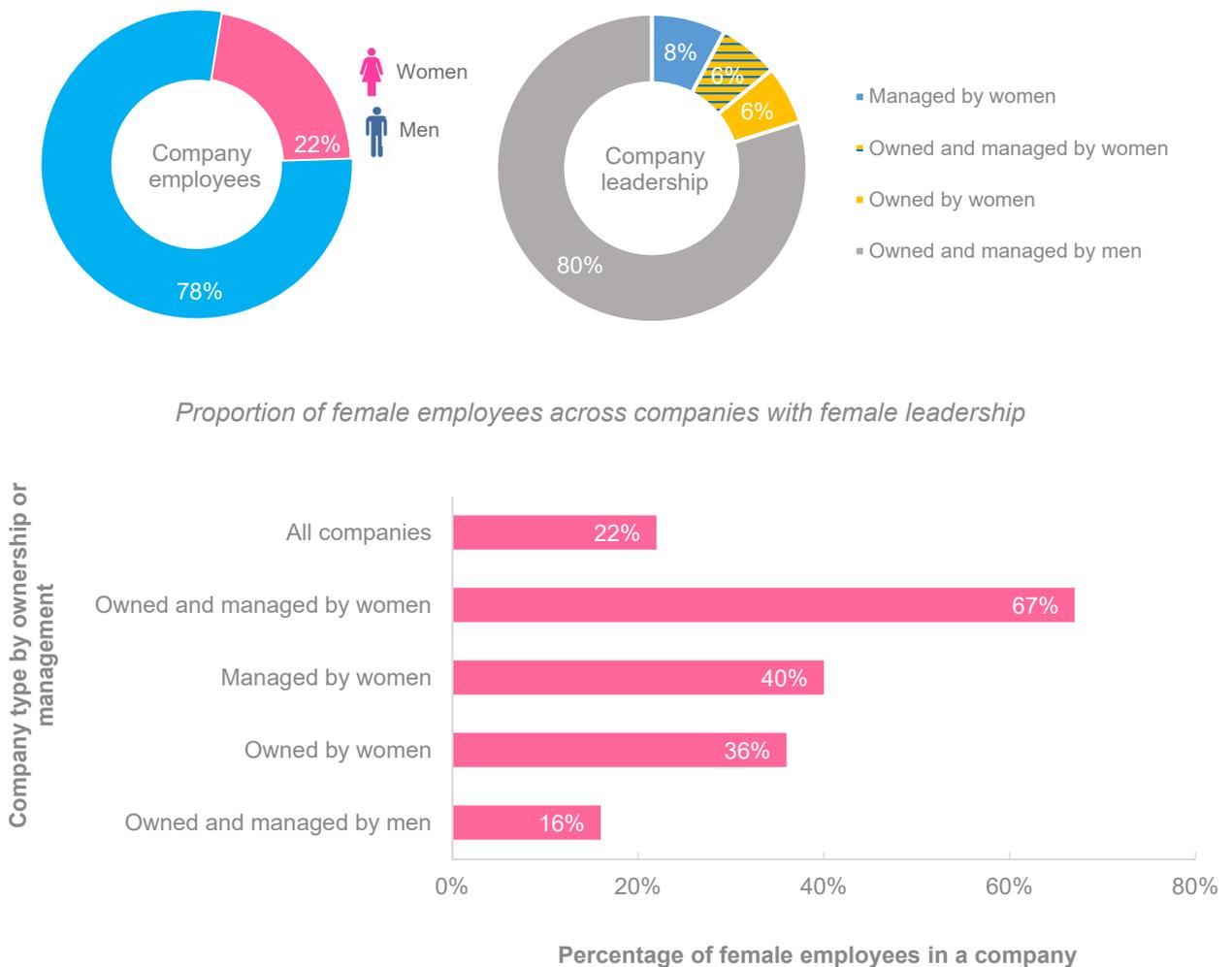
Only 22% of the employees at the average Ugandan trading company are female (Figure 10). The low employment rate of women in Uganda is highlighted by the fact that 67 companies, or 14% of those surveyed, employed no women. Furthermore, in 35% of the companies, fewer than 10% of the employees were women. Only 14% of the companies employed more women than men.

Large companies tended to employ more women (33%) compared to small and medium-sized companies (20%). There were no major differences across sector. A company in the agriculture sector had about 21% female employees while a manufacturing company had 23%.

The number of women in leading positions is also very low. Men own and manage most companies, with only 20% women-led. Women manage 8% of the companies and own 6%. Women own and manage 6% of the companies (Figure 10).

Female employment tends to be higher in companies owned or managed by women. The share of female employees in companies without female leadership is very low (16%) – which is below the national average (22%). Among companies that are managed or owned by women, female employment rates are higher – 40% and 36%, respectively. The female employment rate in Uganda is highest (67%) at companies that are both owned and managed by women (Figure 10).

Figure 10 Share of female employees in exporting companies and companies managed or owned by women



Source: ITC NTM Survey in Uganda, 2016.

CHAPTER 3 THE COMPANY PERSPECTIVE



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Aggregate results and cross-cutting issues

Forty percent of exporters are affected by burdensome NTMs

The NTM business survey finds that 226 of the 493 interviewed companies (46%) face restrictive regulations or related obstacles to trade in Uganda or abroad when exporting or importing.³¹ These difficulties relate to their current experiences or experiences in the past year.

NTMs or related obstacles to trade affect 40% of exporting companies.³² The survey covers 422 Ugandan exporting companies, of which 169 report NTM-related trade hinderances (Table 4).

The affectedness rate among importers is slightly higher. Among the 152 companies engaged in importing, approximately 45% have experienced regulatory or procedural obstacles.³³

Various factors make it difficult for companies to comply with NTMs. The conditions of a regulation may be too stringent or seek to restrict trade. For example, companies may not be able to export due to export prohibitions or because they are unable to meet quality requirements. In other cases, it could be related POs, rather than the regulation itself, that hinder exporters. These POs can occur in the home country, transit countries or destination countries.

³¹ According to the methodology, a company is considered to be affected by an NTM if at least one of its products is affected by a regulation applied by Uganda or one of its partner countries. See Appendix I for detailed survey methodology.

³² Among other countries ITC surveyed in the East African region, Malawi reports the highest rate of exporters affected by burdensome regulations (80%). The share of exporters experiencing burdensome regulations in other countries in the region such as Kenya and Tanzania is lower, at around 75% and 74%, respectively. The affected rate in other LDCs such as Guinea (93%), Bangladesh (91%), Cambodia (82%), Malawi (80%), Rwanda (71%), Madagascar (67%) and Nepal (51%) is higher. For details visit: www.ntmsurvey.org

³³ Note the small sample size of the importing companies when interpreting the results. The survey is more focused on the concerns of exporting companies.

NTMs mainly affect exporters of agricultural products

The NTM Survey results are representative by sector of export activity. About two-thirds of Uganda's total exports are agricultural goods, while manufacturing makes up the rest (Table 4).³⁴ Similarly, two-thirds of the companies interviewed are involved in agricultural export and one-third in manufacturing.

The survey found that NTMs hamper exporters of agri-food goods more than exporters of manufacturing products. While 35% of exporters from the manufacturing sector are affected, the rate for agricultural exporters tops 42% (Table 4). Exporters of coffee (62%) and processed foods (55%) are among the most affected. In general, agricultural and food products are highly regulated for reasons of human health and safety, and environmental protection.

Table 4 Share of companies affected by burdensome NTMs or other obstacles to trade

Company type	Sector	Total value in 2015 (\$ '000) ^{1/}	Sector's share in total exports	Number of surveyed companies ^{2/}	Share of companies facing restrictive NTMs
Export	Agri-food	1,350,323	67%	291	42%
	Manufacturing	671,367	33%	131	35%
	Subtotal	2,021,690	100%	422	40%
Import	Agri-food	739,303	17%	21	38%
	Manufacturing	3,637,933	83%	131	47%
	Subtotal	4,377,236	100%	152	45%
Total				493	46%

Note: ^{1/} Excludes trade in petroleum, minerals and arms.

^{2/} In Uganda, 81 surveyed companies were involved in both exporting and importing. These companies were interviewed separately about each activity and are included in the count for exporting and importing companies separately. The total of exporting and importing companies (493) represents the number of unique companies interviewed, not the sum of the subtotals in the table.

Source: ITC Trade Map, 2016, and ITC NTM Business Survey in Uganda, 2016.

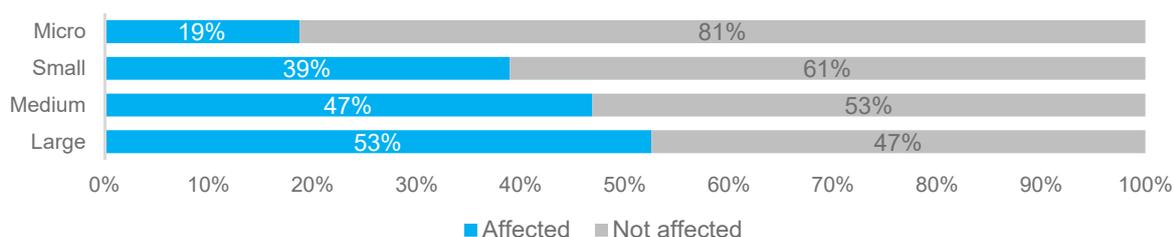
Share of affected companies is bigger among large companies

Share of large Ugandan companies affected by burdensome NTMs is more than the share of small and medium-sized enterprises (SMEs) affected. Overall, 19% of microenterprises, 39% of small companies, 47% of medium-sized companies and 53% of large enterprises report difficulties with NTMs (Figure 11). Given that large companies tend to have bigger portfolios of goods and more trading partners than smaller companies, they are more likely to face impediments. Smaller companies tend to focus their trade on few products and have fewer partners, which implies that they are less likely to encounter NTMs or POs.

However, NTMs and POs affect smaller firms more severely than larger firms. Given smaller companies' limited resources and small export portfolio, the impact of an NTM or a PO in one or more of their markets can be huge. In contrast, a more diversified large company can compensate for difficulties in some markets with other established business partners.

³⁴ When exports of petroleum, minerals and arms are excluded.

Figure 11 Share of Ugandan companies affected by NTMs, by size



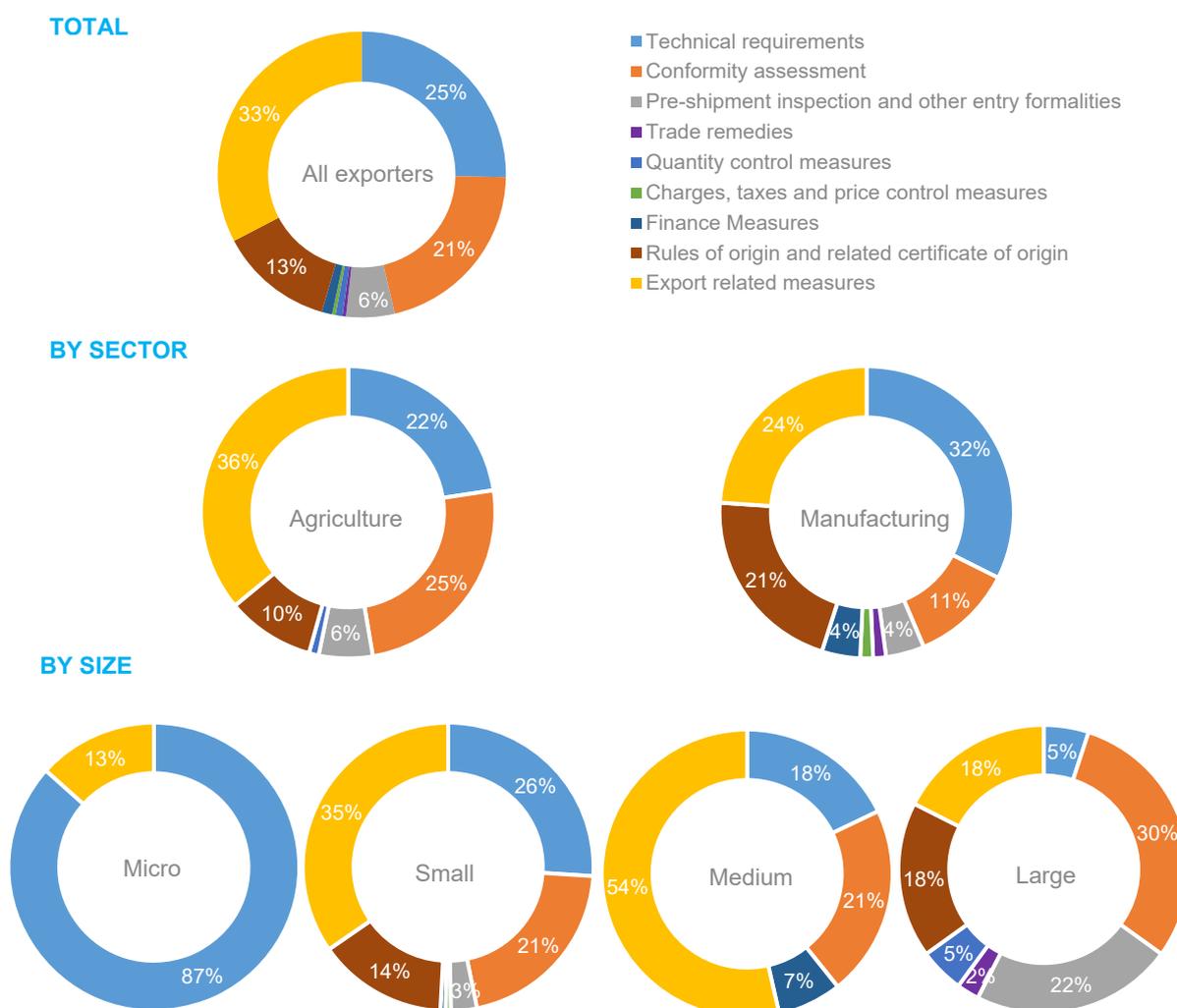
Source: ITC NTM Business Survey in Uganda, 2016.

Burdensome NTMs and other obstacles faced by exporters

Forty percent of the 422 exporters interviewed by telephone said they faced regulatory obstacles to trade. Of the 180 exporters that encountered NTMs, 162 agreed to detailed face-to-face interviews.

These companies reported 257 cases of burdensome NTMs and 294 cases of POs affecting exports. About two-thirds of these NTM cases concern regulations applied by partner countries, with the rest relating to NTMs applied by Uganda and a few by transit countries (Figure 12).

Figure 12 Types of burdensome regulations facing Ugandan exporters



Source: ITC NTM Business Survey in Uganda, 2016.

Technical regulations are the key concern for exporters

Companies across different sectors and of different sizes face diverse problems. Almost half (46%) of the difficult cases reported by Ugandan exporters involve technical measures (SPS and TBT requirements). These include:

- **Technical requirements:** Product specifications related to quality standards, safety, production process and sanitary obligations. They are usually imposed to protect consumer or animal health, the environment or national security.
- **Conformity assessment:** Procedures such as certification to prove compliance with underlying technical requirements.

A quarter of the reported cases concern difficulties with technical requirements, while 21% involve problems with conformity assessment (Figure 12). Obstacles faced during inspection and other customs clearance formalities make up 6% of the NTM cases, and difficulties with rules of origin or procedures involved in obtaining certificates of origin account for 13%.

Rules of origin requirements usually apply only to countries that have a preferential agreement with Uganda, so that all Ugandan exports to their territory have a certain level of local content to qualify for preferential treatment. For example, Uganda can export all products to the European Union at a zero tariff rate under their Everything But Arms agreement. But these goods require certification that they originated in Uganda to avoid re-export of products that come from other countries that do not qualify for this preferential treatment.

Exporters also face significant hurdles with Ugandan regulations. Some 33% of the difficulties reported are Ugandan 'export related measures' (Figure 12). Most of these (20%) involve export certifications required by Ugandan authorities prior to export (Table 5). Other commonly reported NTMs are taxes and charges on exports (4%) and licences or permits to export (2%).

Technical and export regulations are the key concern of exporters

Although technical regulations are the most reported NTMs in both the agriculture and manufacturing sectors, there are some differences. Exporters of manufactured goods report more problems related to technical requirements (32%) than agriculture exporters (22%). On the other hand, exporters of farm goods face more difficulties with conformity assessment (25%) compared with manufacturing exporters (11%) (Figure 12).

Difficulties with rules of origin or related certificates of origin are twice as pressing for the manufacturing sector (21%) than the agriculture sector (10%).

Ugandan export regulations are also a major hurdle for exporters in both sectors. They make up 36% of difficult NTM cases reported by exporters of agriculture products and 24% of those reported by the manufacturing sector.

NTMs by company size

Companies of all sizes have varying degrees of difficulty with different types of NTMs, with technical regulations deemed a major issue for all. Among microenterprises, 87% of the reported burdensome NTMs concern compliance with the technical requirements on products as demanded by destination markets. This compares to 26% for small-scale companies, 18% for medium-sized enterprises and 5% for large companies. For small, medium-sized and large companies, conformity assessment obligations to prove compliance with technical requirements make up 21%–30% of the NTM cases (Figure 12).

Large companies (22%) primarily reported difficulties with pre-shipment inspections and other border formalities. Rules of origins are also a concern of large companies (18%) and, to some degree, small enterprises (14%). NTMs related to quantity control measures are specific to medium-sized (7%) and large companies (5%) from the manufacturing sector.

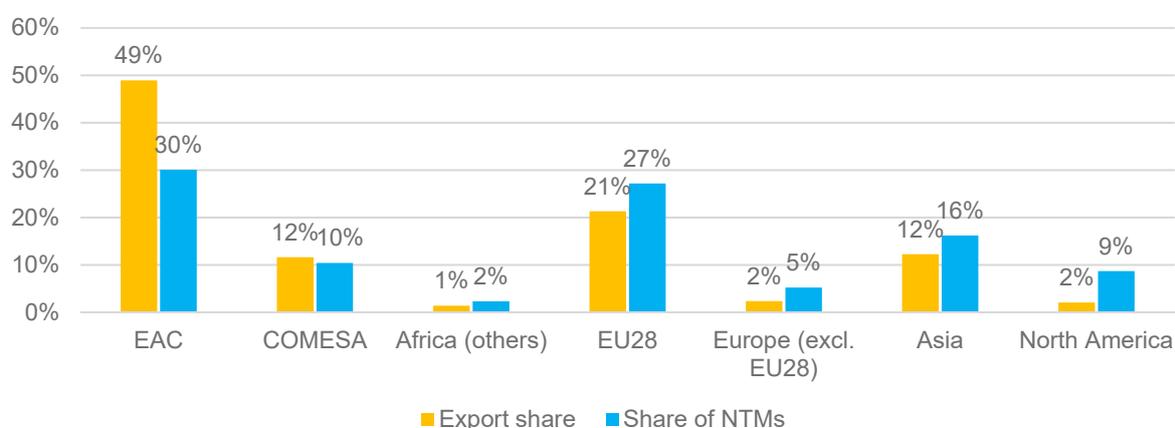
Ugandan export regulations comprise more than half of the NTMs reported by medium-sized companies and 35% of those reported by small enterprises. Among micro and large companies, difficulties with domestic export regulations account for 13% and 18% of the cases, respectively.

NTMs applied by partner countries

Destination markets impose about two-thirds of the NTMs reported by Ugandan exporters. Countries in the EAC and the European Union apply the most such measures. As mentioned above, these two regions are Uganda's two biggest markets.

It is not surprising that major export markets are reported to apply a large number of NTMs, given that trade flows to these markets are captured more frequently in the sample (though some are proportionally higher than others). Consequently, the fact that more NTMs are reported for these markets does not necessarily indicate more restrictive import policies. When interpreting this result, it is important to consider that the geographic structure of exports might play a role. The share of cases of burdensome NTMs and the share of exports across trading partners must be compared. This is done in Figure 13, where the domestic aspect of NTM-related trade obstacles is disregarded.

Figure 13 Share of total exports and NTMs applied by partner countries



Source: ITC NTM Business Survey in Uganda, 2016.

Most burdensome NTMs reported by Ugandan exporters are regulations in EAC countries (30% of such measures applied by partner countries), which is also Uganda's top export market (49% of exports). This means the share of NTMs imposed by EAC members is proportionally lower than their export share. Rwanda and Kenya apply most of these regulations. Difficulties with conformity assessment and rules of origin are the most reported NTMs enforced by EAC countries.

In the case of EU28 countries, the share of NTMs is proportionally higher than the share of exports. The EU28 imports 21% of Ugandan exports, but applies more than 27% of the reported NTMs. The United Kingdom and Belgium impose the most NTMs in the European Union. Technical requirements and conformity assessments are by far the biggest challenges for Ugandan companies.

The share of NTMs and exports in the COMESA countries is proportionally similar while in North America, EU28 and Europe (excluding the EU28), the share of NTMs is proportionally higher than the export share. The same is also true for Asian countries, which import roughly 12% of Ugandan exports but are responsible for 16% of the NTMs. Besides technical regulations, Ugandan exporters commonly report rules of origin (RoO) obstacles in Asia.

Several exporters said they were unaware of some of the preferential arrangements between Uganda and certain Asian countries prior to export and, as a result, had not obtained a rules of origin certificate in favour of their products.

Difficulties with export regulations of Uganda

A third of all reported burdensome NTMs are Ugandan 'export related measures'. Most of them (20%) are related to certifications required by Ugandan authorities prior to export. Other commonly reported NTMs include taxes and charges on exports (4%) and licenses or permit to export (2%) (Table 5).

Procedural obstacles impede exporters' compliance with NTMs

Exporters often face difficulties with a given regulation not only because it is too strict or complex, but also (and at times solely) because of the related procedural obstacles.³⁵

For Ugandan exporters, the primary problem with 53% of the reported NTMs is related to POs such as delays, insufficient facilities and administrative hurdles, either in destination markets or in Uganda itself. Only 17% of the NTMs are deemed difficult because exporters find the requirements too stringent or complex. Another 31% of NTMs are challenging due to both regulatory and procedural obstacles (Figure 14). The POs hindering compliance may occur either at home or in destination countries.

Exporters report 294 POs that impede compliance with reported NTMs, either domestic or foreign. Most POs occur in Ugandan agencies (70%), followed by partner countries (28%) and a few in transiting country 2% (Figure 15).

Table 5 Categories of NTM trade obstacles for exporters

NTM Chapter	NTM measure name	Share of NTMs
Technical requirements	Fumigation	5%
	Product characteristics, including quality or performance requirements	4%
	Prohibition because of national security; protection of human safety or health; environmental protection; or prevention of deceptive practices	4%
	Labelling	4%
	Tolerance limits for residues of or contamination by certain substances	2%
	Microbiological criteria on the final product	2%
	Packaging	2%
	Other technical requirements	2%
Conformity assessment	Product Certification	11%
	Testing	4%
	Inspection requirement	4%
	Others	3%
Pre-shipment inspection and border formalities	Pre-shipment inspection	2%
	Others	4%
Trade remedies	Safeguard duties	0%
Quantity control measures	Other quotas	1%
Charges, taxes and price control measures	Customs valuations	0%
Finance measures	Advance payment of customs duties	1%
Rules/Certificate of origin	Rules of origin and related certificate of origin	13%
Export-related measures	Certification required by the exporting country	20%
	Export taxes and charges	4%
	Licensing or permit to export	2%
	Other export related measures	7%
Grand Total		100%

Source: ITC NTM Business Survey in Uganda 2015-2016.

³⁵ For a definition of procedural obstacles, see 'Introduction to Non-Tariff Measures', Page 1. For a list of POs, see Appendix III.

Figure 14 Why exporters find NTMs burdensome



Source: ITC NTM Business Survey in Uganda, 2016

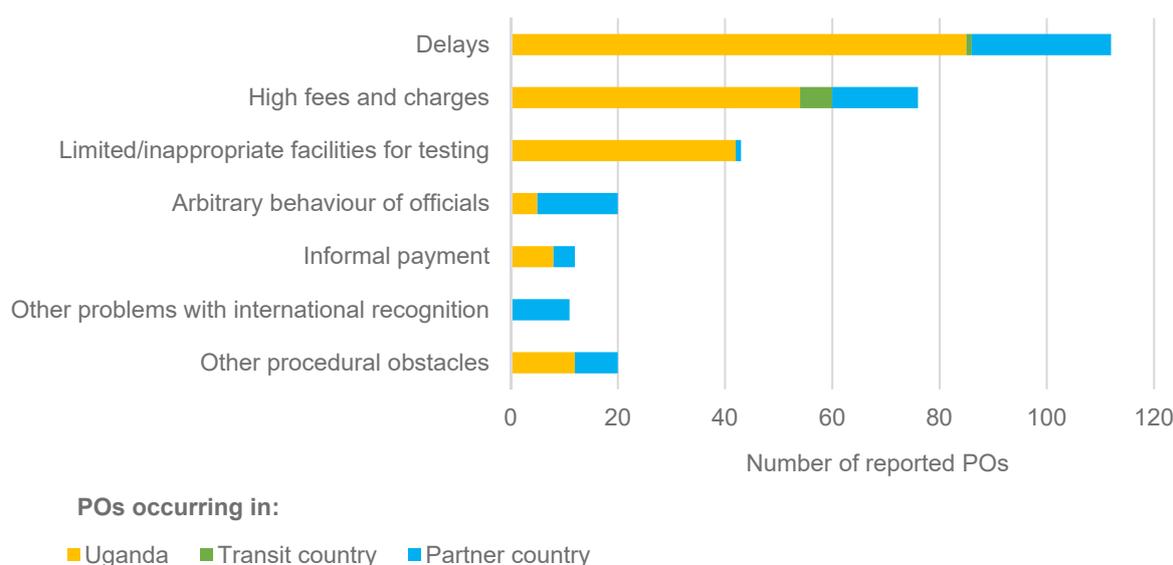
The main PO that exporters face is delays (38%), most of which occur in Uganda when obtaining the necessary certifications or testing. The largest number of such delays (24) occurred at the Ministry of Agriculture, Animal Industry and Fisheries (MAAIF), which is responsible for testing and certifying foods and agri-based products in Uganda (Table 6).

The second-highest number of delays occurred at the Uganda National Bureau of Standards (UNBS), with 16, while the Uganda Revenue Authority (URA) and the National Agricultural Research Organisation tied for third with 11 incidents each.

High fees and charges account for 26% of the POs, occurring mostly at UNBS and URA. As many of the surveyed companies are small enterprises, fees and charges related to requirements such as testing and certification can add up to become a significant financial burden.

Inadequate or inappropriate facilities for testing or certification – mostly at UNBS – comprise 16% of all reported POs. Arbitrary behaviour of officials and demand for informal payments make up 7% and 4% of the POs, respectively.

Figure 15 Types of procedural obstacles hindering Ugandan exports and where they occur



Source: ITC NTM Business Survey in Uganda, 2016

Table 6 Procedural obstacles in Ugandan agencies

Agency	Delays	High fees and charges	Limited / inappropriate facilities	Arbitrary behaviour of officials	Informal payment	Administrative burdens	Others	Total
Uganda National Bureau of Standards (UNBS)	16	10	17		3	1		47
Ministry of Agriculture, Animal Industry and Fisheries (MAAIF)	24	6	3	4	5	1	1	44
Uganda Revenue Authority (URA)	11	13	1	2		2	3	32
Ministry of Trade Industry and Cooperatives	7	8	8			1		24
Uganda Coffee Development Authority	7	9	2		1			19
National Agricultural Research Organisation	11	1	6					18
Uganda Export Promotion Board	4	4						8
Entebbe Airport			4					4
Dairy Development Authority	3							3
Entebbe Handling Services	2							2
National Roads Authority		2						2
National Chamber of Commerce and Industry		1						1
Not specified			4					4
Total	85	54	45	6	9	5	4	208

Source: ITC NTM Business Survey in Uganda, 2016

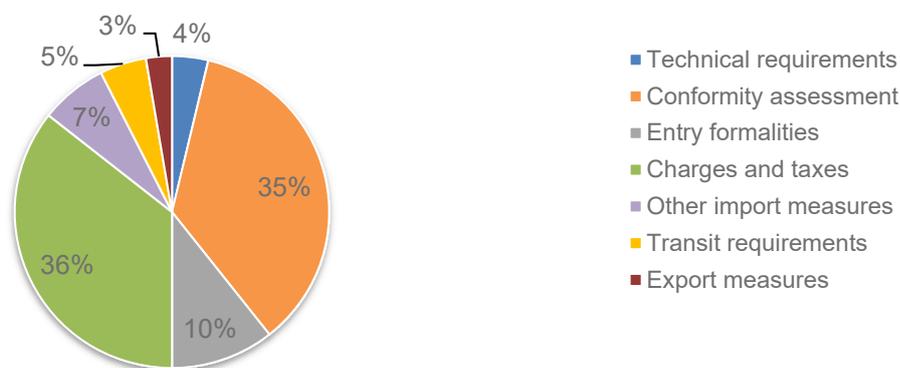
Non-tariff measures affecting imports

Most (131) of the 152 importers that were interviewed import manufactured products and the rest, agricultural goods. Overall, 45% of these companies experience problems with NTMs. Importers of manufactured goods were more affected (47%) than importers of agricultural items (38%) (Table 4).

Difficulties with various conformity assessment requirements (35%) – primarily Ugandan inspection and certification requirements – were among the most reported NTMs (Figure 16). Only 4% of the NTMs involved technical requirements; these were Ugandan import prohibitions or authorization requirements for SPS or TBT reasons.

Charges and taxes that importers must pay to Ugandan authorities make up 36% of the reported NTMs. These include service fees and internal taxes related to customs valuations. Difficulties with entry formalities such as customs clearance procedures make up 10% of the NTM cases. Some 5% of the burdensome NTMs relate to advance payments of customs duties.

Figure 16 Types of burdensome regulations affecting Ugandan importers



Source: ITC NTM Business Survey in Uganda, 2016

Procedural obstacles affecting imports

Almost all of importers' difficulties with NTMs stem from procedural obstacles. While 30% of the NTMs are difficult only due to POs, 68% are deemed burdensome because of both regulatory and procedural obstacles to trade (Figure 17).

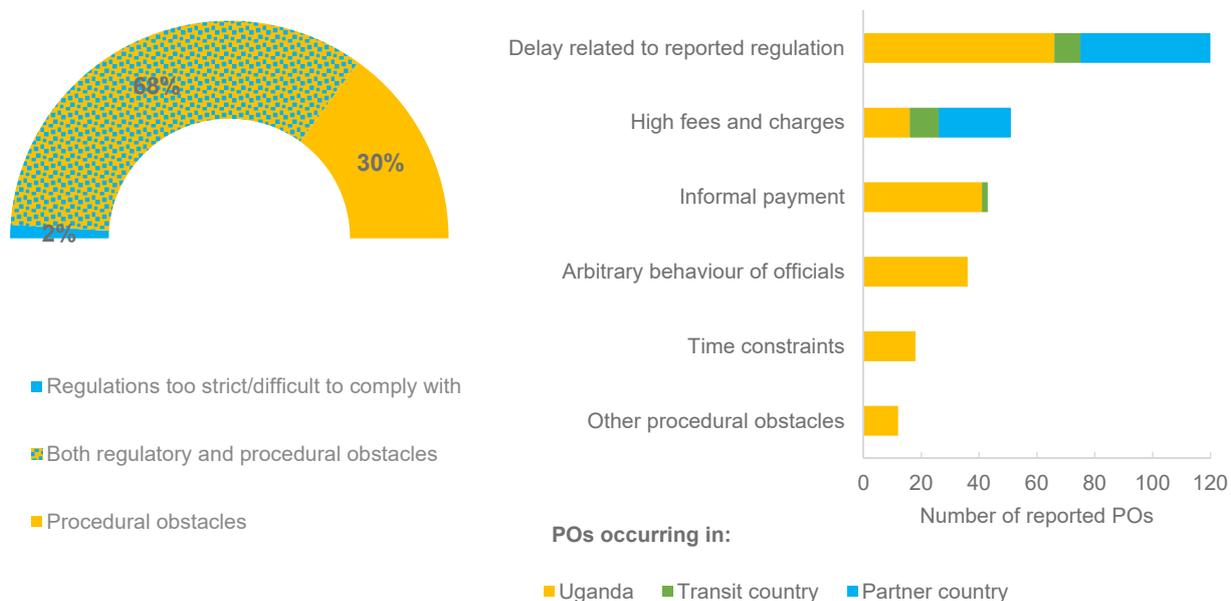
Importers report 280 incidents of POs, most of which occur in Uganda (68%), with the 25% in the supplying country and 7% in the transit country.

The most commonly reported PO was delays – roughly half of which occur in Uganda and the rest in partner and transit countries. Most of these delays are linked to conformity assessment – for instance, waiting for certifications – and customs clearance processes (Figure 17). Importers also express concerns about high fees and charges for testing or certification, and additional taxes and charges. Demand for informal payments by Ugandan authorities make up 15% of the reported POs.

Importers face the most POs – including delays, arbitrary behaviour of officials, informal payments, etc. – when dealing with customs valuations, fees and other charges.

Most POs occur at URA, the agency tasked with ensuring that importers comply with Ugandan regulations. The three POs importers report the most at URA are delays, informal payments and arbitrary behaviour of officials. Importers also complained that URA insists on short deadlines for completion of compliance procedures (Table 7).

Figure 17 Why importers find NTMs burdensome and the types of procedural obstacles



Source: ITC NTM Business Survey in Uganda, 2016.

Table 7 Procedural obstacles at Ugandan agencies that affect importers

Agency	Delays	Informal payment	Arbitrary behavior of officials	Time constraints	High fees and charges	Others	Subtotal
Uganda Revenue Authority (URA)	40	34	30	18	10	5	137
Uganda National Bureau of Standards (UNBS)	11	2	5		4	1	23
Entebbe Handling Services	8		1				9
National Roads Authority	4	4					8
Ministry of Agriculture, Animal Industry and Fisheries	2	1			1	1	
Ministry of Works and Transport						4	4
Ministry of Health	1						
National Agricultural Research Organisation					1		
Not specified						1	
Total	66	41	36	18	16	12	189

Source: ITC NTM Business Survey in Uganda, 2016.

Company perspectives on the trade-related business environment

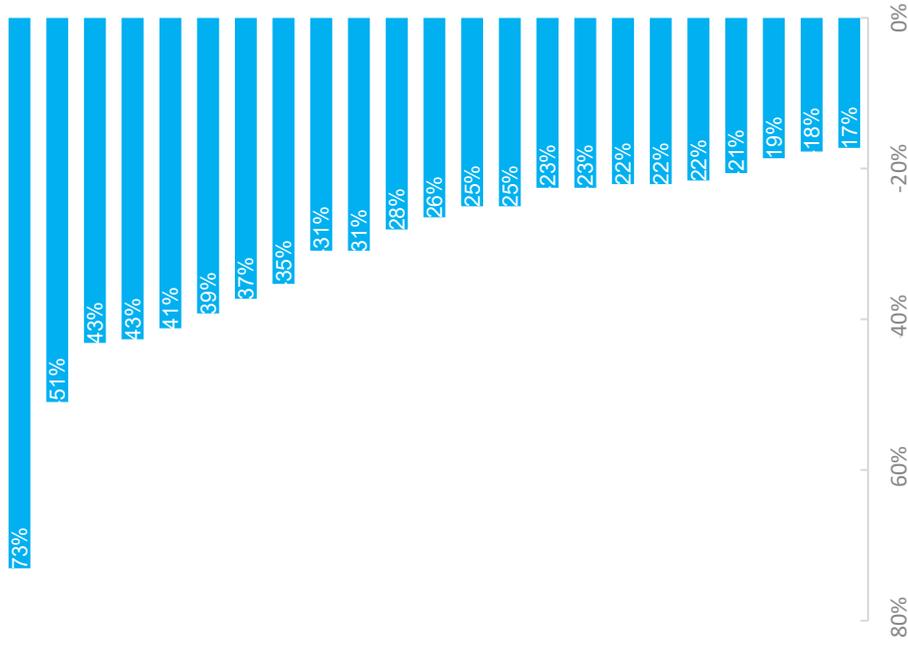
Surveyed companies identified assorted challenges in Uganda's trade-related business environment. Inefficiencies in the business environment are generic problems unrelated to specific regulations, but which affect companies' ability to export or import. Companies were asked to identify factors that hinder their ability to conduct business and how these conditions have changed in the last five years.

The main business environment concern in Uganda is general time delays, identified by 73% of companies. Other common problems tied to the business environment include a limited transportation system (51%), issues with electric supply (43%), arbitrary behaviour of officials (43%) and corruption (41%) (Figure 18).

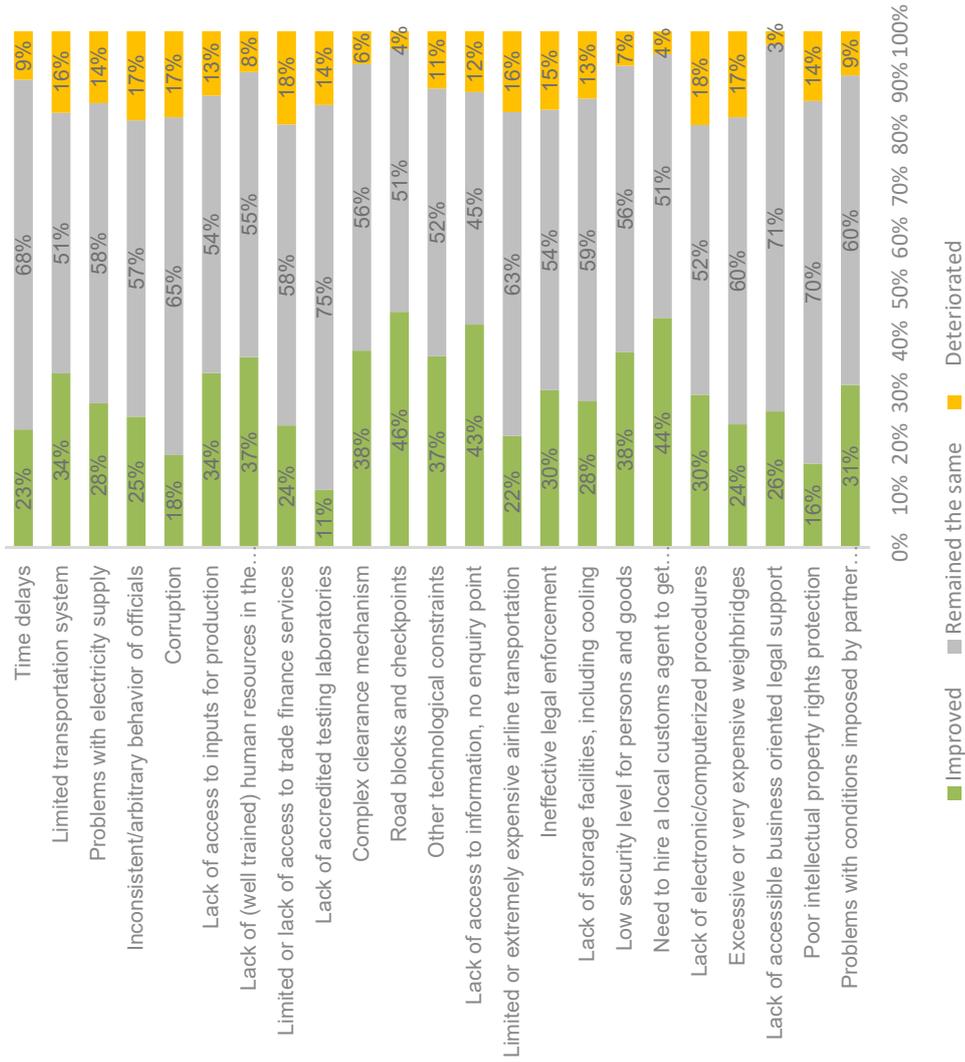
The survey shows some positive changes in the last five years with regards to checkpoints – 46% of the affected companies agree the situation is improving. Around 34% and 28% of the respondents also agree that transportation system and electricity supplies are improving. However, most respondents do not see improvements in the area of accredited testing laboratories – only 11% agree that there have been improvements (Figure 18).

Figure 18 Company perspectives on the trade-related business environment

Share of companies whose business is negatively affected by current business environment conditions



Affected companies' perception on how business environment conditions have changed in the last five years



Source: ITC NTM Business Survey in Uganda, 2016.

Agricultural sector

The role of the sector

Uganda is endowed with a warm climate, ample fertile land and regular rainfall – all of which provide one of the best environments for agricultural production in sub-Saharan Africa. Agriculture has, hence, been the backbone of Uganda's economy. It contributes to more than 25% of GDP and 48% of exports, and employs 72% of the working population (2012–13).³⁶ Agriculture is a key determinant in the country's poverty-reduction efforts. Agriculture has considerable influence on GDP growth. It also accounts indirectly for a significant proportion of growth, through forward and backward linkages to the service and industrial sectors.

Uganda's long-term agricultural growth trend since the mid-1980s has been impressive.³⁷ With this lengthy and sustained period of growth, Uganda has achieved the distinction of being one of the most successful nations in terms of poverty reduction. In recent years, however, the sector's performance has been less impressive. Real growth in agricultural output fell from 7.9% in 2000–01 to 0.1% in 2006–07, eventually recovering to 2.6% in 2008–09.³⁸ It is also short of the 6% growth target for the sector set by African governments under the Comprehensive Africa Agriculture Development Programme.

Table 8 Export volumes of key Ugandan agriculture products, 2011–2015

Commodity	Unit	2011	2012	2013	2014	2015
Traditional Exports						
Coffee	Tons	188,623	161,656	220,546	206,831	216,064
Cotton	Tons	25,587	43,258	18,671	12,674	15,440
Tea	Tons	55,650	54,855	61,971	60,296	53,458
Tobacco	Tons	19,284	31,684	55,818	25,461	27,665
Non-Traditional Exports						
Fish and fish products	Tons	21,552	22,928	20,087	17,597	18,052
Animal/vegetable fats & oils	Tons	70,791	73,505	79,540	85,299	79,784
Sugar & sugar confectionary	Tons	110,469	158,285	124,852	118,507	124,619
Beer	'000 Litres	23,932	22,609	27,069	17,588	15,694
Maize	Tons	89,246	174,776	122,107	134,903	358,592
Cocoa beans	Tons	17,936	19,664	26,352	25,720	25,915
Roses and cut flowers	Tons	3,436	4,297	4,364	3,935	4,184
Rice	Tons	38,254	69,914	71,017	57,053	52,997
Beans and other legumes	Tons	35,920	30,357	37,785	39,368	157,779
Sesame seeds	Tons	14,841	11,503	22,055	40,504	41,379
Water	'000 Litres	21,218	46,567	57,106	28,519	33,970
Cattle hides and skins	Tons	22,635	23,484	30,714	33,533	30,157
Vegetables	Tons	3,720	7,356	8,059	12,085	11,993
Vanilla	Tons	135	106	82	46	47
Live animals	'000	148	297	576	245	594
Soybeans	Tons	1,579	2,613	1,938	1,388	4,233
Fruits	Tons	3,682	1,439	2,123	2,483	7,957
Pepper	Tons	314	397	405	196	446
Bananas	Tons	761	760	650	3,070	4,673
Groundnuts	Tons	299	2,810	3,541	808	5,356
Sorghum	Tons	1,016	13,978	55,224	61,453	61,525

Source: UBOS, Statistical Abstract, 2016

³⁶ Uganda Bureau of Statistics, 2015 Statistical Abstract.

³⁷ Uganda: Agriculture Sector Performance, A Review for the Country Economic Memorandum. Kampala: World Bank – 2006.

³⁸ Statistical Abstract, UBOS 2009.

Agriculture is the top foreign currency earner

The agricultural sector provides a large proportion of the raw materials for industry and manufacturing in and outside Uganda. Although the share of agricultural exports has declined in recent years, it still accounts for the largest share of Uganda's foreign exchange earnings, with coffee sales alone bring in 19% of the country's export earnings.

Coffee, tea, cotton and tobacco are Uganda's traditional cash crops. Uganda produces two kinds of coffee – Arabica and Robusta. Robusta coffee is produced in much larger quantities than Arabica. Exports of non-traditional products, including hides, skins, vanilla, vegetables, fruits, cut flowers and fish, are growing, while traditional exports such as cotton, tea and tobacco continue to be mainstays. Floriculture is the fastest-growing industry in the agricultural sector, largely due to the suitability of the climate for growing chrysanthemums, which are considered to be profitable.

In 2015, the export volume of traditional crops, excluding tea, increased. Uganda exported more than 216,000 tons of coffee in 2015, a 4.5% rise over the previous year. In addition, 15,440 tons of cotton, 27,665 tons of tobacco and 53,458 tons of tea were exported (Table 8).³⁹

Uganda's agriculture development and export policies

Major challenges to Uganda's agricultural sector include low commercial agricultural levels, lack of linkage between research and farmers, low use of fertilizers, low coverage of irrigation, land fragmentation, low level of value addition, high cost of finance, lack of agricultural machinery, vectors and diseases, and a poor transport network.⁴⁰

Factors such as the lack of high-quality packaging, inadequate storage facilities, high freight costs, insufficient road infrastructure in rural areas, a complicated and inefficient land tenure system and a lack of specialized skills hinder investments in the sector.⁴¹ Producers often find it difficult to meet sanitary and phytosanitary standards required when exporting goods to Europe and the United States.

The sector has also benefited from recent government efforts to strengthening the country's competitive advantage in agricultural production.⁴² The Government of Uganda has pursued agricultural development policies and strategies such as the Plan for Modernization of Agriculture – a multisectoral framework that was implemented between 2001 and 2009 in a bid to transform subsistence farming to commercial agriculture. After the plan was implemented, Uganda made significant progress in only two of its seven investments pillars: agricultural research and agricultural advisory services.

The five-year Agricultural Sector Development Strategy and Investment Plan (DSIP) 2010/11–2014/15 identified and addressed the modernization plan's weaknesses, in line with the agricultural priorities of the National Development Plan. The DSIP, designed to raise rural households' incomes and to improve all Ugandans' food and nutrition security, aimed to address constraints in the agriculture sector through four investment programmes:

- Increasing agricultural production and productivity;
- Improving access to markets and value addition;
- Creating an enabling environment for the private sector in agriculture;
- Strengthening agricultural institutions at the centre and in local governments.

Through these programmes, the government committed to pursue a private sector-led strategy to address key constraints slowing investment in agriculture.⁴³

³⁹ UBOS, Statistical Abstract, 2016.

⁴⁰ <http://www.statehouse.go.ug/media/news/2016/06/21/president-names-10-challenges-agriculture-uganda> (last accessed on 01 December 2017).

⁴¹ Doing Business in Uganda: 2016 Country Commercial Guide for U.S. Companies.

⁴² Price Water House Cooper, <http://www.pwc.com/ug/en/industries/agriculture.html> (last accessed 10 November 2017).

⁴³ Agricultural Sector Development Strategy and Investment Plan 2010/11 – 2014/15: Ministry of Agriculture, Animal Industry and Fisheries, Uganda.

Companies affected by burdensome NTMs

Many agricultural exporters are affected by burdensome NTMs and related obstacles. The NTM Survey interviewed 291 exporters of agricultural products, of which 42% report difficulties. Most of these are small-scale companies.

Uganda's agriculture sector comprises two subsectors: fresh food and raw agro-based products, and processed food and agro-based products. Burdensome NTMs affect more than half of the exporters of 'processed food and agro-based' goods (55%) and 38% of 'fresh food and raw agro' products exporters.

Small-scale enterprises are proportionally more affected by conformity assessment obstacles than large companies. Conformity assessment is linked to 43% of the NTMs that SMEs face, compared with 33% for large agricultural exporters. This is consistent with NTM Survey results in other countries and with the stylized facts that SMEs lack the knowledge and the resources necessary to comply with burdensome regulations and measures.

In contrast, rules of origin are more onerous for big agricultural exporters, reported in 21% of the NTM cases, compared with 13% of SMEs' reported NTMs cases.

Exporters' difficulties with foreign regulations

Ugandan exporters identify 119 cases of burdensome NTMs applied by partner or transit countries. Three-quarters of the reported NTMs concern technical measures (technical requirements and related conformity assessment). Mandatory technical regulations include product characteristics, technical specification or production processes, post-production treatment (e.g. fumigation) and applicable provisions, including sanitary and phytosanitary measures aimed at protecting human, animal and plant life and health. On the other hand, conformity assessment covers measures aimed at establishing whether a product or process complies with these mandatory technical requirements. Examples of conformity assessment include control and approval procedures such as inspection, testing, certification and traceability designed to safeguard consumer health and safety.

Around 36% of the burdensome NTMs involve technical requirements while 39% are related to conformity assessment. Most of these measures stem from European countries' technical regulations (Table 9). More than 75% of the reported technical requirements and 35% of conformity assessments are regulations of European countries. Almost 24% of the conformity assessment difficulties are related to exports to EAC countries and 20% to the United States.

Coffee exporters report the largest number of burdensome NTMs in the sector (17%), followed by exporters of fruit and nuts (14%), spices (14%), 'oilseeds and oleaginous fruits' (10%) and fisheries (8%) (Table 9).

Difficulties with rules of origin or the process of obtaining certificates of origin make up 14% of the cases – half of which pertain to exports to the regional EAC market. This shows that further efforts are needed to resolve NTM issues with strategic trade partners in the region to gain full free market access in line with the free trade protocols enshrined in the EAC Customs Union Agreement and COMESA.

While Uganda's main export destinations in Asia recorded a relatively small proportion (16%) of the reported cases, European markets were involved in more than 44% of all NTMs.

Table 9 Types of burdensome NTMs affecting exporters of agricultural goods

Product	Export value in 2015 (in \$000)	Share in %	Technical requirements	Conformity assessment	Pre-shipment inspection and entry formalities	Quantity control measures	Rules / certificate of origin	Subtotal
Live animals other than animals of division 03	2,019	0.1		1				1
Meat of bovine animals, fresh, chilled or frozen	61	0.0			4			4
Milk and cream and milk products other than butter or cheese	36,516	2.6		2				2
Butter and other fats and oils derived from milk	4,016	0.3		2				2
Cheese and curd	18	0.0		1				1
Fish, fresh (live or dead), chilled or frozen	80,938	5.8		7				7
Fish, dried, salted or in brine; smoked fish; flours, meals and pellets of fish, fit for human consumption	36,651	2.6		3				3
Rice	24,187	1.7		2		2	2	6
Other cereal meals and flours	25,619	1.8	1	1				2
Vegetables, fresh, chilled, frozen or simply preserved (including dried leguminous vegetables); roots, tubers and other edible vegetable products, n.e.s., fresh or dried	79,800	5.7	2	2			1	5
Fruit and nuts (not including oil nuts), fresh or dried	3,876	0.3	10	6	1			17
Fruit, preserved, and fruit preparations (excluding fruit juices)	230	0.0	1					1
Sugars, molasses and honey	65,798	4.7			1			1
Coffee and coffee substitutes	402,669	28.8	8	6	3		3	20
Cocoa	56,689	4.1	3					3
Tea and mate	70,326	5.0			1			1
Spices	4,785	0.3	11	5				16
Edible products and preparations, n.e.s.	6,352	0.5		1				1
Non-alcoholic beverages, n.e.s.	13,485	1.0		.			1	1
Alcoholic beverages	17,014	1.2	1	3				4
Oilseeds and oleaginous fruits	67,847	4.9	5	1			6	12
Crude vegetable materials, n.e.s.	53,604	3.8		1	1			2
Fixed vegetable fats and oils	40,146	2.8		1			2	3
Animal or vegetable fats and oils, processed; waxes; inedible mixtures or preparations of animal or vegetable fats or oils, n.e.s.	36,129	2.6					2	2
Essential oils, perfume and flavour materials	462	0.0		1				1
Others	270,140	19.3						0
Total	1,399,377		42	46	11	2	17	118

Source: ITC NTM Business Survey in Uganda, 2016

Technical requirements

Exporters of ‘agri-food’ products report 42 cases of burdensome technical requirements. Exporters of spices (11 NTM cases), fruit and nuts (10 cases) and coffee (eight cases) report the most NTMs. Technical requirements are especially a major concern for agriculture exporters when exporting to the EU as it has very strict quality standards on imported food products. Most of the difficulties with technical requirements relate to food-safety issues such as product characteristics and quality, tolerance limits for residues or contamination by certain substances.

The costs involved in the fumigation process are too high and there is a standard price for fumigation irrespective of how much produce you’re exporting.

Exporter of wood and handcrafts

There is a lack of sufficient inspection facilities and trained staffs at the airport in Uganda to conduct reliable inspection. Sometimes there is only one person, and they have to inspect products of 20 companies.

Exporter of hot pepper

For example, an exporter of hot pepper to Switzerland expressed concern about the lack of sufficient inspection capacity and trained staff in Uganda to detect any harmful substance in the product. As a result, the exporter’s consignments were destroyed when harmful substances were detected in the foreign market.

Many respondents note that some measures or requirements are too strict to be met and that compliance is costly. These measures include fumigation or inspection of products or production premises. Most respondents said the burden was mainly related to the procedures to implement the measure. Exporters noted that Rwanda, an EAC member, applies strict labelling requirements. An exporter of maize complained that Rwandan authorities might reject the whole consignment if there is more than a one-month duration between production and export dates, even if the export date precedes the expiry date.

Conformity assessment

Conformity assessment entails application of standard measures that seek to determine whether a product or process complies with the mandatory technical requirements imposed by the importing country for health and safety reasons. This NTM presents the biggest burden to exporters. Testing, products certification and inspection requirements are the most common types of reported conformity assessment. Most of these measures appear to be problematic due to various POs, including delays and high fees.

The Ministry of Agriculture, Animal Industries and Fisheries in Uganda requires any export of farm products to obtain a phytosanitary certificate. This certificate is only issued at the ministry in Entebbe. To export cows, they have to be transported to Entebbe to be physically inspected – this is very expensive.

Live animal exporter

Exporters of food and agro-based goods report 46 cases across a broad range of products. Exporters of fisheries products report the largest number of conformity assessment-related cases (10 cases) followed by coffee (six cases) and ‘fruit and nuts’ (six cases).

For instance, an exporter of fish to Rwanda complained that testing there involves long delays that could cause foods to rot, and that fees are also high.

Most of these cases occurred when exporting to EAC and COMESA countries, highlighting the need for trade partners to harmonize standards to ensure smooth free movement of goods within the region.

Ugandan companies find it difficult to meet foreign product standards, such as SPS and TBT requirements including labelling, product characteristics and fumigation, among others. For instance, an exporter of meat reported that Kenyan authorities reinspect exports entering

There are no refrigeration services to keep the goods while waiting for the testing process.

Fish exporter

the country to ensure their quality. Therefore, the whole consignment can be rejected, as the standards are not the same in both importing and exporting countries.

Procedural obstacles experienced when complying with requirements, such as costs for testing and certification, are also burdensome, exporters say.

Rules of origin and related certificate of origin

A rules of origin certificate is typically proof or evidence that the export or a minimum percentage of the product originates in Uganda. This certificate, if obtained, usually exempts the exporter from tariffs and similar charges. In the survey, companies report encountering 17 cases of burdensome rules of origin requirements when exporting food and agri-based products to nine different countries. Exporters of products such as oil and fats (animal or vegetable), coffee, oilseeds, rice and non-alcoholic beverages report difficulties with this NTM.

The most common onerous NTMs reported by agricultural exporters relate to the process of obtaining the relevant certificate of origin from the Ministry of Trade and Industry. The most frequent complaint relates to the time required to process the request, the lack of facilities and the cost of the certificate.

For instance, an exporter of processed food to Kenya complained that obtaining the certificate of origin from the Uganda Exports Promotion Board, under the Ministry of Trade, Industry and Cooperatives, is time-consuming (generally more than three days) due to the lack of facilities and the absence of trained employees.

It takes seven days to obtain a certificate of origin from the Ministry of Trade.

Wood exporter

While countries harmonize their HS classification up to the 6-digit level, each has its own classifications at eight and 10 digits to suit its needs. As such, the HS code for exporting and receiving countries may differ, which leads to confusion in filling out the form. While the instructions clearly state that the HS of the importing country should be used, incomplete or wrong codes on the form is common among agricultural exporters, which suggests a lack of understanding among exporters.

The Uganda Exports Promotion Board, under the Ministry of Trade, Industry and Cooperatives, was responsible for issuing preferential certificates of origin for more than 25 years. However, the process was not automated, which led to delays for business. As a result, Uganda's Ministry of Finance issued a directive instructing the Uganda Revenue Authority to assume this responsibility as of 1 July 2016.⁴⁴ This move aimed to reduce the bureaucracy that was delaying goods exports.

URA, through its creation of a one-stop point for issuing certificates of origin, can process the paperwork for exporters within hours, thereby making business more efficient. This new process, along with a fully implemented electronic single window, is expected to save businesses more than \$500,000 annually.⁴⁵

The electronic single window reduces the paperwork required of traders during import and export by integrating the different institutions and agencies that need such documentation into a single e-portal where traders submit documents simultaneously. These documents include import and export permits, trading invoices and certificates of origin. An operational electronic single window will lower transaction costs and time by 30%.⁴⁶ Uganda has signed several multilateral trade agreements where it can benefit from preferential treatment.

⁴⁴ The Finance (Amendment) of 2016 and URA, 29 July 2016 Indirect Tax Alert.

⁴⁵ Ibid.

⁴⁶ Ibid.

Other non-tariff measures applied by partner countries

Exporters of food and agri-based products also face NTMs during pre-shipment inspections and other entry formalities, as well as quantity-control measures (e.g. non-automatic licences, quotas, prohibitions). These totalled 13 cases, accounting for 11% of the cases reported.

Export tax clearance is a very long process and sometimes you can fail to clear in one day because you may get the papers after 5 pm, yet banks close before 5 pm. The fish products are perishable and cooling facilities are very limited.

Fresh fish exporter

Exporting to Qatar is time-consuming and costly. For instance, a coffee exporter reported that he had to submit several documents, including an SPS certificate, to the Qatari embassy in Kenya to get an attestation prior to export.

Table 10 Export of agriculture products – NTMs and why they are burdensome

Number of NTM cases reported for each type of measure and the reason they are burdensome				POs impeding the measures and where they occur			
NTM (Chapter)	Measure too strict or difficult	Due to related POs	Both	Type of PO	Uganda	Partner or transit	Subtotal
Technical requirements	17	13	12	High fees and charges	10	4	14
				Limited/inappropriate facilities	11	0	11
				Delay related to reported regulation		1	1
Conformity assessment	5	30	11	Delay related to reported regulation	19	4	23
				High fees and charges	3	14	17
				Limited/inappropriate facilities	10	3	13
				Arbitrary behaviour of officials		4	4
Pre-shipment inspection and border clearance		9	2	Problems with international recognition		1	1
				Delay related to reported regulation		9	9
				Informal payment		4	4
Quantity control measures		2		High fees and charges	1	2	3
				Large number of different documents		1	1
Rules/Certificate of origin	3	5	10	Arbitrary behaviour of officials		2	2
				Delay related to reported regulation	6	3	9
				Arbitrary behaviour of officials		5	5
				Problems with international recognition		4	4
				Large number of different documents	1	2	3
				Other limited/inappropriate facilities	2	0	2
Export-related measures	3	44	20	High fees and charges	1	0	1
				Delay related to reported regulation	51	0	51
				Limited/inappropriate facilities	17	0	17
				Informal payment	16	0	16
				Large number of different documents	8	0	8
				Other procedural obstacles	2	0	2
Grand Total	28	103	55		161	63	224

Source: ITC NTM Business Survey in Uganda, 2016.

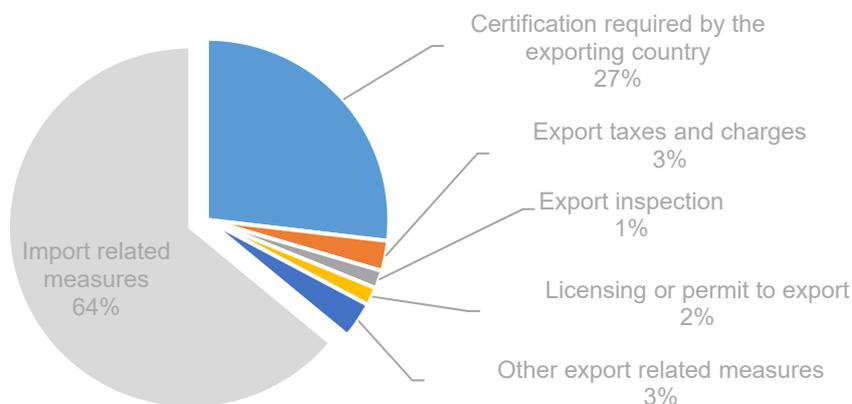
Ugandan NTMs affecting food and agri-based product exports

In the agricultural sector, exporters report 67 cases of restrictive Ugandan NTMs. These issues are mostly related to export certification and export licences, as well as taxes and charges.

Fifty reported cases (75%) of difficulties with Ugandan regulations involve export certification and other technical measures. Exporters of coffee, fruits and maize faced these difficulties. For instance, a coffee exporter reported difficulties with the Ugandan Bureau of Standards to get SPS certification as the process is costly and time-consuming (three weeks). Five other reported cases (7%) of problems with

Ugandan regulations relate to export taxes and charges. Exporters of cheese and fishery products faced these difficulties. Three reported cases involve difficulties due to export licences required by Ugandan authorities. These measures applied to crude oil and fishery products.

Figure 19 Burdensome NTMs applied by Ugandan authorities on agri-food exports



Source: ITC NTM Business Survey in Uganda, 2016

POs and inefficiencies in the trade-related business environment affecting exports

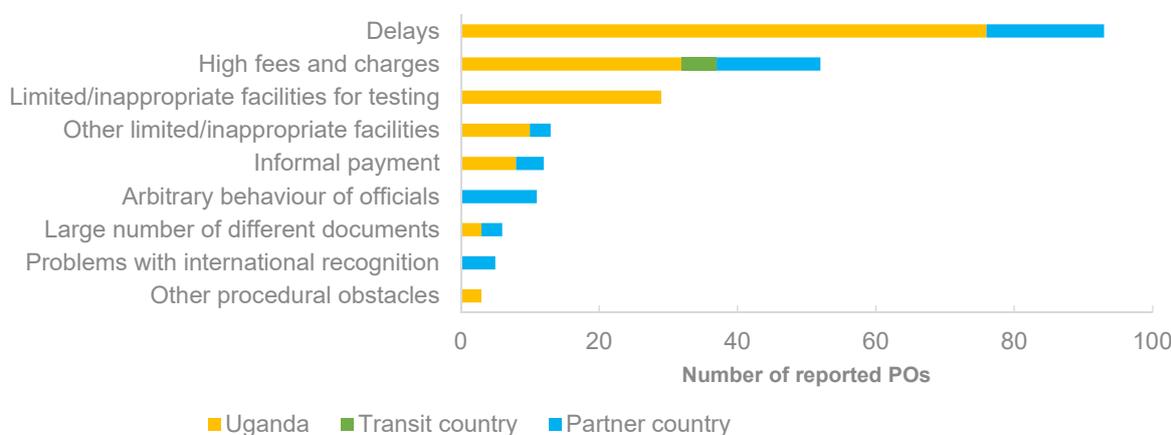
Exporters often face difficulties with a given regulation not only because compliance is difficult, but also because of related procedural obstacles. POs play a major role in hindering agricultural exports and had at least some part in 85% of the reported NTM cases where export of agri-food products was difficult. Of the 224 reported incidents of POs, 72% occur in Uganda and the rest in destination or transit countries. Most POs in destination or transit countries were reported in the EU (20 cases) and China (10 cases).

We need to obtain the certificate of conformity to ensure that goods are safe for human consumption. The process to obtain it is very expensive and time consuming. Long delays can lead to product damages.

Sugar exporter

Delays in processing is the most common PO in the agri-food export business, accounting for 42% of the reported NTMs. High fees and charges (23%) and limited facilities for testing (13%) are other major POs (Figure 20).

Figure 20 Types and sources of procedural obstacles hindering agri-food exports



Source: ITC NTM Business Survey in Uganda, 2016

Manufacturing sector

The current state of the sector

Uganda exported manufactured products worth \$671 million in 2015. The manufacturing sector is characterized by limited value addition, which should be exploited during the current plan period. Processing of raw materials predominates in the sector, which has few capital goods industries and low utilization of manufacturing capacity – about 50% of installed capacity. This is manifested in the absence of manufactured products in the export basket.

Steps are being taken to diversify the sector. This process may have been hastened by falling prices for Uganda's main agricultural exports – coffee, cotton and tea. However, the bulk of this diversification has been into other peripheral primary products.

Over the next five years, the Government will focus on increasing manufactured exports as a percentage of total exports from 5.8 percent to 19 percent.⁴⁷

Government policies and strategies

As one of the key sectors of the Ugandan economy, manufacturing is seen as highly strategic. The Government of Uganda is promoting value addition, competitiveness and industrialization of the sector. It considers industrialization to be key to creating wealth and generating higher incomes from natural resources and raw material transformation.⁴⁸

Under Uganda's Vision 2040, manufactured goods will make up half of all exports by 2040. To achieve this, the Government's strategy is to accelerate industrialization by upgrading and diversifying to effectively harness the local resources, off shoring industries and developing industrial clusters along the value chain. The National Development Plan places industrialization under the primary growth sectors; the vision is to see Uganda change from small-scale farming to a modern, peaceful, prosperous and democratic country with educated citizens who have good jobs and good incomes. The key strategic objectives of the industrialization sector include

- Oversee development of micro, small and medium-sized enterprises
- Promote the development of value-added industries, especially the agro-industries
- Increase competitiveness of local industries
- Enhance the development and productivity of the informal manufacturing subsector
- Enhance applied research and technology development.⁴⁹

Non-tariff measures applied by partner countries

Thirty-five percent of manufacturing exporters struggle with burdensome NTMs. They report 71 cases of such measures, 54 of which are applied by partner markets. Similar to the situation of farm exports, technical requirements and rules of origin and related certificates of origin were the most frequently reported NTMs, with 23 and 15 cases (32% and 21%), respectively. Conformity assessment (eight cases) followed, along with pre-shipment inspection and other entry formalities and finance measures (three cases each).

Exporters of different sizes faced different types of problems. Difficulties with rules of origin and related certificates of origin are proportionally more common for SMEs (35% of the reported cases) than for large exporters (22%). Problems stemming from technical measures are also proportionally more frequent among SMEs (48% of the reported cases) than among large exporters (30%).

⁴⁷ Ibid.

⁴⁸ Ministry of Finance, Planning and Economic Development, 2014. Industrialisation Sector Annual Monitoring Report Financial Year 2013/14.

⁴⁹ Ibid.

Restrictive regulations affect only a small proportion of manufactured goods exports. Nonetheless, these NTM experiences and related POs and inefficiencies in the trade-related business environment are worth investigating to avoid the spread of such practices to other products.

Technical requirements

Technical requirements are specifications of a product or the production process, and post-production treatment with which exporters must comply. Such requirements are the single most frequently encountered NTM, accounting for 33% of the cases. Among the 23 reported difficulties with technical requirements, 52% of the cases are related to fumigation obligations, while 44% involve prohibitions and restrictions. Countries in the EAC and COMESA applied most of these regulations. Ugandan exporters must produce goods that conform to the technical requirements of destination markets.

Some Ugandan exporters find foreign product standards to be overly strict. For example, an exporter of handcrafts to EU countries said destination countries asked for fumigation certificates even when the product does not require fumigation.

Among the 23 reported difficulties with technical requirements, 13 cases were burdensome because the regulation themselves are too strict or difficult to fulfil and four were burdensome because of POs. The remaining six cases were onerous because of overly severe regulations and the related POs. High fees and time delays associated with the regulation were the most common POs that make it difficult to comply with the technical regulations.

Ugandan exporters faced challenges related to import prohibitions applied in destination countries. For instance, an exporter of automobiles reported that the Democratic Republic of the Congo applies import prohibitions by allowing imports of vehicles manufactured only from 2006 onward.

Rules of origin and related certificates of origin

Companies reported 15 cases of this NTM, representing 21% of all reported cases. These difficulties concern rules of origin or certificate of origin conditions of China (four), Democratic Republic of the Congo (three), Rwanda (six), India (one) and South Sudan (one). Exporters are required to produce evidence that their goods originate from Uganda.

Like exporters of agricultural goods, the most common burdensome NTMs reported by manufacturing exporters relate to the process of obtaining the relevant certificate of origin. The most common complaint relates to the time needed to process the request, the lack of laboratories and the cost of the certificate. Meanwhile, many exporters face difficulties due to the lack of recognition of Ugandan certificates in China.

Conformity assessment

Conformity assessment concerns measures to determine whether a product or a process complies with a technical regulation. Companies reported eight cases of this NTM, representing 11% of all reported cases. Among the reported difficulties with conformity assessment, six cases were burdensome because of POs and two were burdensome because of an overly strict regulation and the related POs. Companies exporting manufactured products said they faced challenging conformity assessments for their merchandise.

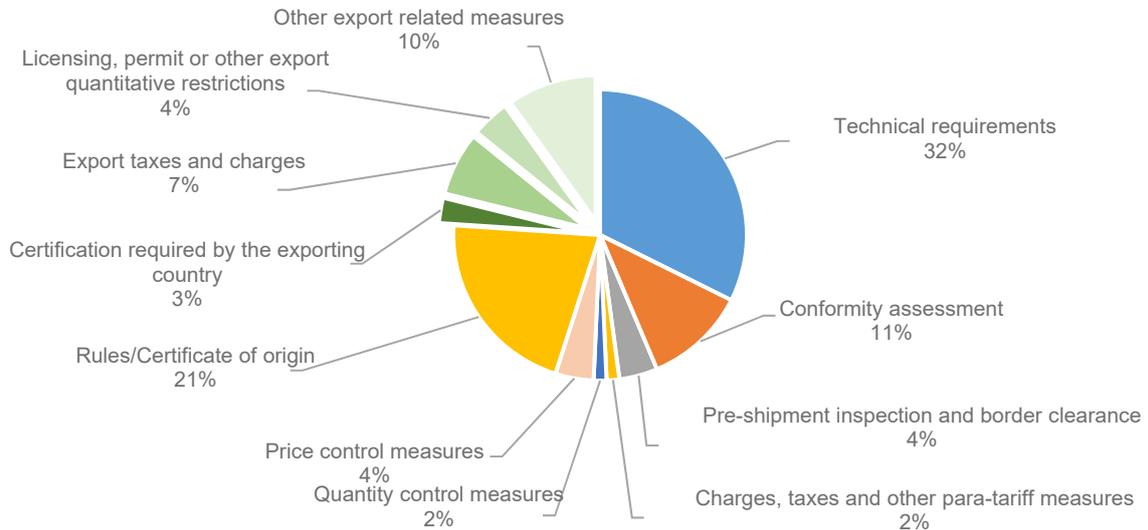
While the Ugandan Bureau of Standards suffers from lack of testing laboratories to issue quality assurance certificates, an exporter of marble to Rwanda complained that this certificate is required in the destination country, which forces exporters to pay high fees to get it from private companies.

Other NTMs

The other burdensome NTMs encountered by companies exporting manufactured products were pre-shipment inspection and other entry formalities and finance measures (three cases each) as well as trade remedies (antidumping, countervailing and safeguards) and charges, taxes and price control measures (one case each) – see Table 11.

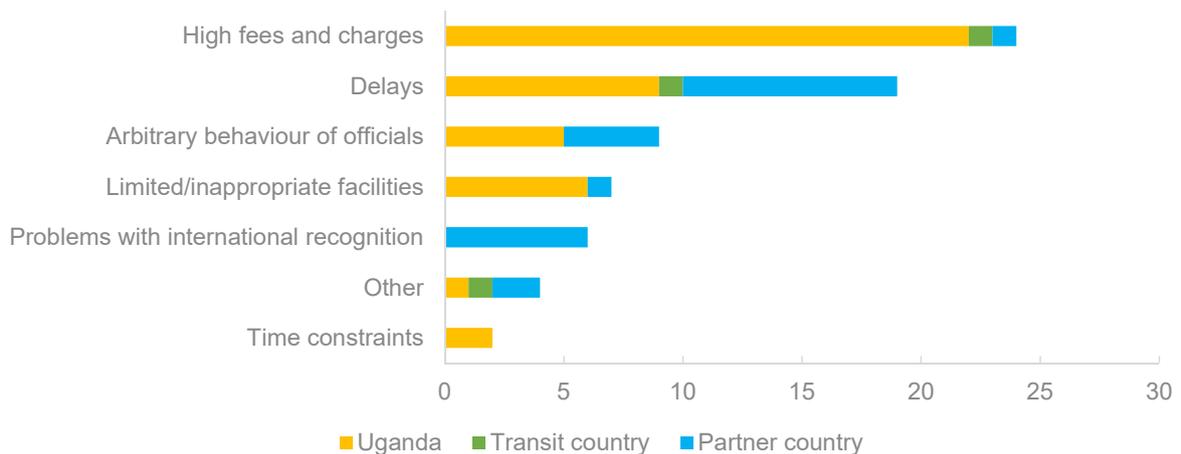
For instance, an exporter of leather shoes to the US reported that the customs clearance procedure is very long in the destination country. The authorities struggle to identify the exact HS code of the product because it includes many materials. Another footwear exporter faced the same problem when exporting to Rwanda.

Figure 21 Burdensome NTMs affecting Ugandan exports of manufactured goods



Source: ITC NTM Business Survey in Uganda, 2016.

Figure 22 Types of procedural obstacles hindering Ugandan manufacturing exports and where they occur



Source: ITC NTM Business Survey in Uganda, 2016.

Table 11 Export of manufactured products – NTMs faced and the reason making them burdensome

Number of NTM cases reported for each type of measure and the reason making them burdensome				POs making the measures difficult and the location where it occurs			
NTM (Chapter)	Measure too strict or difficult	Due to related Pos	Both	Type of PO	Uganda	Partner or transit	Subtotal
Technical requirements	13	4	6	High fees and charges	8	1	9
				Arbitrary behaviour of officials	4		4
				Information not adequately published and disseminated		1	1
Conformity assessment		6	2	Limited/inappropriate facilities	6	1	7
				Delays		1	1
Pre-shipment inspection and border clearance		3		Delays		2	2
				Arbitrary behaviour of officials		1	1
Charges, taxes and other para-tariff measures	1			N/A			
Quantity control measures		1		Arbitrary behaviour of officials		1	1
Price control measures	1		2	Delays		2	2
Rules/Certificate of origin		11	4	Delays	6	5	11
				Problems with international recognition		6	6
				High fees and charges	4	1	5
				Arbitrary behaviour of officials		3	3
Export-related measures		7	10	High fees and charges	10		10
				Delays	3		3
				Time constraints	2		2
				Arbitrary behaviour of officials	2		2
Grand Total	15	32	24		45	23	70

Source: ITC NTM Business Survey in Uganda, 2016

Uganda's Laboratory Recognition Scheme

To improve the testing capacity to ensure conformity of products to standards in Uganda, the Uganda National Bureau of Standards started a Laboratory Recognition Scheme in July 2016.

After a series of assessments, five laboratories were authorized to provide product testing services designed to ease doing business in Uganda. Only two have been accredited, however.

This implies that the laboratories are competent to carry out tests and issue results that UNBS may use in product certification and other regulatory activities to reduce the workload in the institution's laboratories, consequently making trade faster and smoother.

The move is in line with the Laboratory Recognition Scheme, which was established to ensure that privately owned laboratories or those outside UNBS's scope are recognized at the national level to test products.

It is also in keeping with the drive at the East African Community level, where other competent laboratories can test products and the accruing results are accepted as legitimate and authentic.

CHAPTER 4 RECOMMENDATIONS



Export product requirements and conformity: Compliance and cost

Expand testing laboratories according to international standards and seek accreditation

Adequate infrastructure must be in place domestically to facilitate compliance with international standards. Suitable laboratory infrastructure is essential to expedite testing requirements as well as research in the fields of product safety, quality and environmental sustainability, which are necessary to develop and implement standards.

Difficulties with product testing was a key issue identified from the NTM Survey. Ugandan traders identified insufficient local testing facilities for certain products, as well as the scarcity of internationally accredited testing laboratories in the country, as an NTM. Only two of the five UNBS laboratories are accredited.

The Uganda National Bureau of Standards started a Laboratory Recognition Scheme in July 2016 to expand the testing capacity. It aims to ensure that laboratories which are outside UNBS scope or privately owned are recognized at the national level to test products. After a series of assessments, five laboratories were recognized to provide product-testing services. This implies that the laboratories are competent to test products and issue results that UNBS may use in product certification and its other regulatory activities in a bid to reduce the workload of the institution's two laboratories and make trade faster and smoother.

This is in line with the drive at the East African Community level, where other competent laboratories can be used for product testing and the accruing results are recognized as legitimate and authentic. The recognized laboratories are Chemiphar Uganda, Uganda Industrial Research Institute (UIRI), SMAT Uganda Limited, Roofings (U) Ltd and RECO Industries. The remaining assignment is for these laboratories to seek international accreditation for recognition beyond the East African region.

Promote the harmonization and mutual recognition of technical requirements

Ugandan companies face challenges meeting the foreign product standards such as SPS and TBT requirements including labelling, product characteristics and fumigation, among others.

The Government must harmonize national standards to regional and international standards and promote equivalence and mutual recognition of the conformity assessment schemes by trading partners.

UNBS is trying to ensure the adoption of international product standards as agreed by the EAC Standards Committee.⁵⁰ These regional East African standards are important to facilitate Uganda's trade with its biggest and most important trading partners in the EAC. Major effort are under way in standards harmonization at the EAC, COMESA, African Organisation for Standardisation (ARSO) and the tripartite (EAC, COMESA and the Southern African Development Community), but there is still a need to support the process and ensure that standards for the most commonly traded goods in these regions are harmonized.

Furthermore, the institutions mandated to conduct SPS-related testing and certification require support and better staffing to be more effective. The Ministry of Agriculture, Animal Industry and Fisheries and the Entebbe handling services – both of which offer some testing services for fresh and agricultural products – require more staffing and training to ensure better services.

Import clearance and border control: Transparency and cleanup

Strengthen inspection and certification processes at key government ministries, departments and agencies

Respondents say border clearance controls are another major challenge to trade. Complaints of informal payments, lack of knowledge or information about procedures, or inconsistency in border procedures, as well as the delays that result, all drive up the cost of trade for importers and exporters alike.

The creation of a one-stop point for the issuance of electronic certificates of origin has reduced the time it takes for exporters to obtain these certificates. Similarly, the operation of ASYUDA World by the URA has led to an immediate drop in the number of key export bottlenecks such as payment of fees for certificates of origin and registration, tracking consignments, etc.

However, other government agencies involved in conformity assessment, such as MAAIF and UNBS, must also adopt online platforms to ensure that their requirements and processes are easily accessible. This would facilitate cross-border trade and ensure transparency in procedures and payments, thereby cutting down on the number of informal payment cases that raise the cost of trade for business people.

The Government must also adopt mechanisms to inspect and certify export products at farm/packhouse level, verify inspected export products at points of exit, issue a phytosanitary certificate upon verification, strengthen verification teams at points of exit and ensure that verification points are manned 24 hours a day, seven days a week.

The Uganda National Monitoring Committee for non-tariff barriers

Uganda established a multisectoral National Monitoring Committee⁵¹ in 2012 to effectively monitor non-tariff barriers in the EAC region, with an eye to removing these barriers and ensuring that new ones are not established. The committee meets quarterly to consider requests from the business community regarding trade obstacles.

In addition, an online NTB monitoring tool that was launched in 2015 enables the business community to report any new or persisting barriers and assists the monitoring committee, though it only addresses

⁵⁰ EAC Standards Committee, a body responsible for the harmonizing standards at the East African Community level.

⁵¹ With the support of TradeMark East Africa.

issues at the EAC and COMESA regional markets. The capacity for monitoring and advocacy for eliminating NTBs still needs to be enhanced at national and regional level.

Strengthen the quality infrastructure regulatory framework

The legislative framework under which several government agencies – including UNBS – operate is still weak, with outdated laws and regulations that cannot meet regulatory challenges such as a rise in counterfeits. This poses a major obstacle to trade.

The proposed Anti-Counterfeit Goods law has remained a bill since 2010, while the business community struggles with the consequences of counterfeiting. The proposed law seeks to prohibit trade in fake goods that infringe upon protected intellectual property rights; to require intellectual property rights to cover only copyright and trademarks; and to prohibit the release of counterfeit goods into the channels of commerce.

It also seeks to create offences related to trade in counterfeit goods, empower the commissioner general to seize and detain suspected fake goods, allow inspectors appointed by the Uganda National Bureau of Standards to seize and detain suspected counterfeit goods, and to provide for incidental (related) matters.

Enhance enterprise competitiveness and sector development

Diversify export portfolio and trading partners, and encourage value addition

Diversifying the economy and broadening the export base towards high-growth sectors are critical for future development and poverty alleviation. Uganda should diversify its export portfolio and export markets to better integrate with international markets and global value chains. This can reduce its vulnerability to external shocks. This will require addressing supply-side constraints including access to finance, weak physical infrastructure, inefficient ports and high transport costs, shortage of skilled workers, technological bottlenecks, lack of entrepreneurship and management skills, information gap and other factors contributing to high costs of doing business.

Develop export strategies through e-commerce

The public sector and legal environment for improved structures and policy must be reviewed to support the development of e-commerce in Uganda.

Strategies must be developed to create e-commerce-related businesses that offer entrepreneurial opportunities to youth, women and underprivileged communities by building partnerships with local institutions and private sector partners. Training and support to entrepreneurs on marketing promotions and developing business through e-commerce should be provided.

Improve transparency in trade and trade facilitation

Access to trade and market intelligence is critical to export success. Ugandan SMEs often lack the resources and skills to acquire and process trade-related information, which places them at a disadvantage compared with competitors in other economies. Policymakers rarely obtain the information they need to make decisions, including in relevant WTO processes, notably the SPS and TBT Committees. Uganda needs reliable data for economic operators, institutions and policymakers to make better-informed trade decisions.

Train entrepreneurs on SPS/TBT notification alert mechanism

Uganda should implement a mechanism whereby SMEs can subscribe to receive alerts (e.g. by e-mail or SMS) with information updates for markets and products of their interest, including WTO notifications on future changes in SPS and TBT measures. This involves building a customized local interface to a new global notifications alert system. In addition to notifying entrepreneurs on new SPS/TBT regulations, this mechanism would allow them to send feedback on the proposed regulations back to the WTO via the

national focal point. Workshop should be organized to train SMEs, business associations and national institutions on how to best use this tool.

Develop business process guide for the trade information portal

Administrative procedures related to compliance with NTMs (e.g. certification of origin, export and import registration) for different products should be documented, along with other necessary details such as cost, waiting time, etc. Based on this information, an online business process guide should be developed and integrated with the trade information portal. This tool should give necessary guidance to exporters that are not familiar with the process involved, especially newer companies.

Build capacity of enterprises to facilitate and expand trade

Ugandan enterprises must be made aware of trade regulations and procedures. Workshops should include training sessions, such as identifying new markets, understanding market-access conditions, marketing strategies, supply-chain management and advocacy. Equally important is the need for capacity-building government staff to ensure effective and efficient services.

Below are the recommendations that were made at the workshop in Kampala in August 2016.

Table 12 Summary of the recommendations discussed at Kampala workshop

Types of burdensome NTMs	Obstacles	Products, agencies and markets affected	Recommendations / Policy options
<p>1. Product requirements and conformity: Compliance and cost</p> <p>How to improve the conformity of exported products? How to overcome the lack of recognition of Ugandan certificates in international markets? How to make local conformity assessment procedures more efficient and less expensive? How to ensure businesses have better access to product standards and conformity assessment procedures?</p>			
<p>Technical requirements (SPS- and TBT-related standards) by partner countries</p> <p>Conformity assessments (product certification and testing) by partner countries</p>	<p>High costs and delays for testing and certification requirements for both agri-food (SPS) and manufacturing (TBTs)</p> <p>MAAIF, UNBS and Entebbe Handling Services are understaffed, leading to long delays in acquiring testing and conformity assessments</p> <p>Labelling and fumigation requirements difficult and expensive for agri-food exporters</p> <p>Import prohibition and authorization for SPS/TBT reasons</p>	<p>Mainly agri-food exports usually for EAC, COMESA and EU markets</p> <p>Agri-food – UNBS, MAAIF and Entebbe Handling Services</p> <p>Manufacturing – UNBS, NEMA</p>	<p>Introduce more testing centres with both the UNBS and MAAIF to avoid delays with conformity assessments.</p> <p>Improve facilities at the Entebbe Handling Centre and increase technical staff to reduce delays incurred by exporters that also affect the quality of the perishable products.</p> <p>Provide adequate facilities and technical staff in government testing and certification offices.</p> <p>Offer technical assistance to train extension workers to help agri-food producers meet technical requirements in production processes.</p> <p>Simplify and make transparent technical authorization procedures such as conformity assessments and testing as well as the acquisition of SPS and TBT certificates.</p>
<p>2. Port clearance and border control: Transparency and cleanup</p> <p>How to improve the transparency of border inspection procedures? How to streamline border clearance and control procedures? What are the roles and responsibilities of each institution involved in issuing of trade documents (licences, permits, certificates of origin)? How to simplify the procedures for granting these documents? How to improve transparency on regulations governing such procedures including the eligibility criteria for companies, costs and time?</p>			
<p>Transit requirements (transport and storage fees)</p> <p>Import / Export charges and taxes (customs valuations, services charges for inspection and storage fees, internal taxes)</p> <p>Import/export clearance (pre-shipment inspection, certification and entry / exit formalities)</p> <p>Rules of origin (RoO) by partner countries</p>	<p>URA involved in most domestic POs, including delays and high fees for import and export clearance</p> <p>Very high costs related to clearance procedures</p> <p>Customs valuation subject to improper assessments.</p> <p>Transit procedures, especially for land transportation, and arbitrary behaviour of officials cause delays and higher costs of trade</p> <p>Lack of recognition of RoO certificates in some countries.</p>	<p>Cross-cutting, concern all products and markets (EAC, COMESA, EU and Asia)</p> <p>Some agri-food goods and low and medium-sized manufacturing sectors – RoO</p> <p>URA, UNBS, Entebbe Handling Services</p> <p>Agency formerly the MTIC, now the URA, for insurance of RoO certificates.</p>	<p>Decentralize payment of duties and charges to other intermediaries to cut down on delays.</p> <p>Increase transparency of costs and inspection procedures at transit and at the borders to reduce rent-seeking behaviour.</p> <p>Clear guidelines are needed on product valuation to reduce ambiguity and misuse of authority by field officials during imports.</p> <p>Customs and clearance processes should be fully automated to allow for speedy processing of goods in transit. Full implementation of the single window and one-stop border posts to ease the movement of goods further.</p> <p>Initiate negotiations with countries that do not recognize Uganda's RoO certificate and implement mutual recognition agreements including for quality certification.</p> <p>Provide an online / semi- automated platform for the application and acquisition of RoO certificates to cut down on delays.</p>

APPENDICES

Appendix I Non-tariff measures surveys: global methodology

Non-tariff measure surveys

Since 2010,⁵² ITC has completed large-scale company-level surveys on burdensome non-tariff measures and related trade obstacles (NTM Surveys hereafter) in over 35 developing and least-developed countries on all continents.⁵³ The main objective of the NTM Surveys is to capture how businesses perceive burdensome NTMs and other obstacles to trade at a detailed level – by product and partner country.

All surveys are based on a global methodology consisting of a core part and a country-specific part. The core part of the NTM Survey methodology described in this appendix is identical in all survey countries, which enables cross-country analyses and comparison. The country-specific part of the survey allows flexibility in addressing the requirements and needs of each participating country. The country-specific aspects and the particularities of the survey implementation in Uganda are covered in Chapter 2 of this report.

The growing role of non-tariff measures in trade

Over several decades, trade liberalization has been used as a development tool based on evidence that benefits accrue to countries actively engaged in world trade. Multilateral, regional and bilateral trade negotiations as well as non-reciprocal concessions have led to a remarkable reduction in global, average tariff protection. With favourable market access conditions, international trade has soared to previously unseen levels, raising overall welfare and standards of living.

The misuse of NTMs may undermine the impact of falling tariffs. The sound use of NTMs to ensure consumer health, protect the environment and safeguard national security is legitimate. However, evidence suggests that countries are resorting to NTMs as alternative mechanisms to protect domestic industries. NTMs have been negotiated within the General Agreement on Tariffs and Trade and at the World Trade Organization (WTO) since the Tokyo Round (1973–1979) and are increasingly dealt with in regional and bilateral trade agreements. Many practitioners consider they have surpassed tariffs in their trade-impeding effect.

NTMs particularly impact exporters and importers in developing and least developed countries (LDCs) that struggle with complex requirements. Firms in these countries often have inadequate domestic trade-related infrastructure and face administrative

obstacles. NTMs that would not normally be considered very restrictive can represent major burdens in LDCs. In addition, the lack of export support services and insufficient access to information on NTMs impede the international competitiveness of firms. As a result, both NTMs applied by partner countries as well as domestic burdens have an impact on market access and keep firms from seizing the trade opportunities created by globalization.

An overview of previous research and evaluation

In the literature, different methods have been used to evaluate the effects of NTMs. An early approach employed a concept of incidence with NTM coverage ratios. Such studies rely on extensive databases mapping NTMs per product and applying country. The largest database of official government-reported NTMs used to be the Trade Analysis and Information System published by the United Nations Conference on Trade and Development (UNCTAD), but data has been incomplete and updates irregularly.

In a multi-agency effort, ITC, UNCTAD and the World Bank are collecting data for a global NTM database with a focus on technical barriers to trade and sanitary and phytosanitary standards. The ITC Market Access Map features information on NTMs. However, as complete as the database may be, it reveals little about the impact of NTMs on the business sector nor does it provide information about related POs.

Scope and coverage of the non-tariff measure (NTM) surveys

The objective of the NTM surveys require a representative sample allowing for the extrapolation of the survey result to the country level. To achieve this objective, the NTM survey covers at least 90% of the total export value of each participating country (excluding minerals and arms). The economy is divided into 13 sectors, and all sectors with more than a 2% share in total exports are included in the survey.

The NTM Survey sectors are defined as follows:

1. Fresh food and raw agro-based products
2. Processed food and agro-based products
3. Wood, wood products and paper
4. Yarn, fabrics and textiles
5. Chemicals

and developing). This provides a complete picture of NTMs as official regulations serve as a baseline for the analysis, and the surveys identify the impact of the measures on enterprises and consequently on international trade.

⁵³Pilot NTM Surveys were carried out in cooperation with UNCTAD in 2008–2009 in Brazil, Chile, India, the Philippines, Thailand, Tunisia and Uganda. The pilot surveys provided a wealth of materials allowing for the significant improvement to both the NTMs classification and the NTM survey methodology. Since then, ITC has implemented NTM Surveys based on the new methodology in 35 developing and least developed countries.

⁵²The work started in 2006, when the Secretary-General of the United Nations Conference on Trade and Development (UNCTAD) established the Group of Eminent Persons on Non-Tariff Barriers. The main purpose of the group was to discuss the definition, classification, collection and quantification of non-tariff barriers – to identify data requirements, and consequently advance understanding of NTMs and their impact on trade. To carry out the technical work of the group, a Multi-Agency Support Team (MAST) was set up. Since then, ITC is advancing the work on NTMs in three directions. First, ITC has contributed to the international classification of non-tariff measures (NTM classification) that was finalized in November 2009 and updated in 2012. Second, ITC undertakes NTM Surveys in developing countries using the NTM classification. Third, ITC, UNCTAD and the World Bank jointly collect and catalogue official regulations on NTMs applied by importing markets (developed

6. Leather
7. Metal and other basic manufacturing
8. Non-electric machinery
9. Computers, telecommunications and consumer electronics
10. Electronic components
11. Transport equipment
12. Clothing
13. Miscellaneous manufacturing

Companies trading arms and minerals are excluded. The export of minerals is generally not subject to trade barriers due to a high demand and the specificities of trade undertaken by large multinational companies. The export of arms is outside of the scope of ITC activities.

The NTM Surveys cover companies exporting and importing goods. Companies trading services are excluded, as a survey on NTMs in services would require a different approach and methodology. The NTM Survey includes companies specialized in the export-import process and services, such as agents, brokers, and forwarding companies (referred to collectively as 'trading agents'). These companies can be viewed as service companies because they provide trade logistics services. The answers provided by trading agents are in most cases analysed separately from the answers of the companies that export their own products.

The NTM Surveys cover legally registered companies of all sizes and types of ownership. Depending on country size and geography, one to four geographic regions with high concentrations of economic activities (high number of firms) are included in the sample.

Two-step approach

The representatives of the surveyed companies, generally export/import specialists or senior-level managers, are asked to report trade-related problems experienced by their companies in the preceding year that represent a serious impediment for their operations. To identify companies that experience burdensome NTMs, the survey process consists of telephone interviews with all companies in the sample (Step 1) and face-to-face interviews undertaken with the companies that reported difficulties with NTMs during the telephone interviews (Step 2).

Step 1: Telephone interviews

The first step includes short telephone interviews. Interviewers asked respondents to identify the main sector of activity of their companies and the direction of trade (export or import). The respondents are then asked whether their companies have experienced burdensome NTMs. If a company does not report any issues with NTMs, the interview is terminated. Companies that report difficulties with NTMs are invited to participate in an in-depth face-to-face interview.

Step 2: Face-to-face interviews

The second-step interviews are required to obtain all the details of burdensome NTMs and other obstacles at the product and partner country level. These interviews are conducted face-to-face due to the complexity of the issues related to NTMs. Face-to-face interactions with experienced interviewers helps to ensure that respondents from companies correctly understand the purpose and the coverage of the survey, and accurately classify their responses in accordance with predefined categories.

The questionnaire used to structure face-to-face interviews consists of three main parts. The first part covers the characteristics of the companies: number of employees, turnover and share of exports in total sales, whether the company exports its own products or represents a trading agent providing export services to domestic producers.

The second part is dedicated to exporting and importing activities of the company, with all trade products and partner countries recorded. During this process, the interviewer also identifies all products affected by burdensome regulations and countries applying these regulations.

During the third part of the interview, each problem is recorded in detail. A trained interviewer helps respondents identify the relevant government-imposed regulations, affected products, the partner country exporting or importing these products, and the country applying the regulation (partner, transit or home country).

Each burdensome measure (regulation) is classified according to the NTM classification, an international taxonomy of NTMs, consisting of over 200 specific measures grouped into 16 categories (see Appendix II). The NTM classification is the core of the survey, making it possible to apply a uniform and systematic approach to recording and analysing burdensome NTMs in countries with idiosyncratic trade policies and approaches to NTMs.

The face-to-face questionnaire captures the type of burdensome NTMs and the nature of the problem (so-called POs explaining why the measures represent an impediment), the place where each obstacle takes place, and the agencies involved, if any. For example, an importing country can require the fumigation of containers (NTM applied by the partner country), but fumigation facilities are expensive in the exporting country, resulting in a significant increase in export costs for the company (POs located in the home country). The companies can also report generic problems unrelated to any regulation, but affecting their exports or imports, such as corruption and lack of or inadequate export infrastructure. These issues are referred to as problems related to business environment (see Appendix III).

Partnering with a local survey company

A local partner selected through a competitive bidding procedure carries out the telephone interviews and face-to-face interviews. The partner is usually a company specializing in surveys. Generally, the NTM Surveys are undertaken in local languages. The telephone interviews are recorded either by a Computer Assisted Telephone Interview system, computer spread sheets or on paper. The face-to-face interviews are initially captured using paper-based interviewer-led questionnaires that are then digitalized by the partner company using a spread sheet-based system developed by ITC.

Open-ended discussions

During the surveys of companies and preparation of the report, open-ended discussions are held with national experts and stakeholders, for example trade support institutions and sector/export associations. These discussions provide further insights, quality checks and validation of the NTM Survey results. The participants review the main findings of the NTM Survey and help to explain the reasons for the prevalence of the issues and propose possible solutions.

Confidentiality

The NTM Survey is confidential. Confidentiality of the data is paramount to ensure the greatest degree of participation, integrity and confidence in the quality of the data. The paper-based and electronically captured data is transmitted to ITC at the end of the survey.

Sampling technique

The selection of companies for the phone screen interviews of the NTM Survey is based on the stratified random sampling. In a stratified random sample, all population units are first clustered into homogeneous groups ('strata'), according to predefined characteristics, chosen to be related to the major variables being studied. In the NTM Surveys, companies are stratified by sector, as the type and incidence of NTMs are often product-specific. Then simple random samples are selected within each sector.

The NTM Surveys aim to be representative at the country level. A sufficiently large number of enterprises should be interviewed within each export sector to ensure that the share of enterprises experiencing burdensome NTMs is estimated correctly and can be extrapolated to the entire sector. To achieve this objective, a sample size for the telephone interviews with exporting companies is determined independently for each *export sector*.⁵⁴

For importing companies, the sample size is defined at the country level. The sample size for importing companies can be smaller than the sample size for exporters, mainly for two reasons. First, the interviewed exporting companies are often import intermediaries and provide reports on their experiences with NTMs as both exporters and importers. Second, problems experienced by importing companies are generally linked to domestic regulations required by their home country. Even with a small sample size for importing companies, the effort is made to obtain a representative sample by import sectors and the size of the companies.

Exporting companies have difficulties with both domestic regulations and regulations applied by partner countries that import their products. Although the sample size is not stratified by company export destinations, a large sample size permits a good selection of reports related to various export markets (regulations applied by partner countries). By design, large trading partners are mentioned more often during the survey because it is more likely that the randomly selected company would be exporting to one of the major importing countries.

The sample size for face-to-face interviews depends on the results of the telephone interviews.

⁵⁴The sample size depends on the number of exporting companies per sector and on the assumptions regarding the share of exporting companies that are affected by NTMs in the actual population of this sector. The calculation of a sample size will be based on the equation below (developed by Cochran, 1963) to yield a representative sample for proportions in large populations (based on the assumption of normal distribution).

$$n_o = \frac{t^2 * p(1-p)}{d^2}$$

Where

n_o : Sample size for large populations

t: t-value for selected margin of error (d). In the case of the NTM Survey 95% confidence interval is accepted, so t-value is 1.96.

Average sample size

The number of successfully completed telephone interviews can range from 150 to 1,000, with subsequent 150 to 300 face-to-face interviews with exporting and importing companies. The number of telephone interviews is mainly driven by the size and the structure of the economy, availability and quality of the business register and the response rate. The sample size for the face-to-face interviews depends on the number of affected companies and their willingness to participate.

Survey data analysis

The analysis of the survey data consists of constructing frequency and coverage statistics along several dimensions, including product and sector, NTMs and their main NTM categories (for example, technical measures, quantity control measures), and various characteristics of the surveyed companies (for example, size and degree of foreign ownership).

The frequency and coverage statistics are based on 'cases'. A case is the most disaggregated data unit of the NTM Survey. By construction, each company participating in a face-to-face interview reports at least one case of burdensome NTMs, and, if relevant, related POs and problems with the trade-related business environment.

Each case of each company consists of one NTM (a government-mandated regulation, for example a sanitary and phytosanitary certificate), one product affected by this NTM, and partner country applying the reported NTM. For example, if there are three products affected by the same NTM applied by the same partner country and reported by one company, the results would include three cases. If two different companies report the same problem, it would be counted as two cases.

The scenario where several partner countries apply the same type of measure is recorded as several cases. The details of each case (e.g. the name of the government regulations and its strictness) can vary, as regulations mandated by different countries are likely to differ. However, if the home country of the interviewed companies applies an NTM to a product exported by a company to several countries, the scenario will be recorded as a single NTM case. When an interviewed company both exports and imports, and reports cases related to both activities, it is included in the analysis twice – once for the analysis of exports and once for the analysis of imports. The distinction is summarized in the Table below.

Dimensions of an NTM case

- p: The estimated proportion of an attribute that is present in the population. In the case of the NTM Survey, it is a proportion of companies that experience burdensome NTMs. As this proportion is not known prior to the survey, the most conservative estimate leading to a large sample size is employed, that is $p=0.5$.
- d: Acceptable margin of error for the proportion being estimated. In other words, a margin of error that the researcher is willing to accept. In the case of NTM Survey $d=0.1$.

Source: Cochran, W. G. 1963. *Sampling Techniques*, 2nd Ed., New York: John Wiley and Sons, Inc.

Dimensions	Country applying	
	Home country (where survey is conducted)	Partner countries (where goods are exported to or imported from) and transit countries
Reporting company	X	X
Affected product (HS 6-digit code or national tariff line)	X	X
Applied NTM (measure-level code from the NTM classification)	X	X
Trade flow (export or import)	X	X
Partner country applying the measure		X

Cases of POs and problems with the business environment are counted in the same way as NTM cases. The statistics are provided separately from NTMs, even though in certain instances they are closely related. For example, delays can be caused by the pre-shipment inspection requirements. As many of the POs and problems with the business environment are not product specific, the statistics are constructed along two dimensions: type of obstacles and country where they occur, as well as agencies involved.

Enhancing local capacities

The NTM Surveys enhance national capacities by transmitting skills and knowledge to a local partner company. ITC guides and supports the local survey company and experts on NTM Survey implementation.

Before the start of the NTM Survey, the local partner company, including project managers and interviewers are fully trained on the different aspects of the NTMs, the international NTM classification and the ITC NTM Survey methodology. ITC representatives stay in the country for the launch of the survey and initial interviews, and remain in contact with the local partner during the entire duration of the survey, usually around six months, to ensure a high quality of survey implementation. ITC experts closely follow the work of the partner company and provide regular feedback on the quality of the captured data (including classification of NTMs) and the general development of the survey, which helps the local partner to overcome any possible problems.

ITC also helps to construct a business register (list of exporting and importing companies with contact details), which remains at the disposal of the survey company and national stakeholders. The business register is a critical part of any company-level survey, but unfortunately it is often unavailable, even in the advanced developing countries.

ITC invests much time, effort and resources into constructing a national business register of exporting and importing companies.

The initial information is obtained with the help of national authorities and other stakeholders (for example, sectoral associations). In cases where it is not available from government sources or a sectoral association, ITC purchases information from third companies, and in certain cases digitalizes it from paper sources. The information from various sources is then processed and merged into a comprehensive list of exporting and importing companies.

Upon completion of the NTM Survey, the local partner company is fully capable of independently implementing a follow-up survey or other company-level surveys as it is equipped with the business register and trained on the survey methodology as well as trade and NTM-related issues.

Caveats

The utmost effort is made to ensure the representativeness and the high quality of the NTM Survey results, yet several caveats must be kept in mind.

First, the NTM Surveys generate perception data, as the respondents are asked to report burdensome regulations representing a serious impediment to their exports or imports. The respondents may have different scales for judging what constitutes an impediment. The differences may further intensify when the results of the surveys are compared across countries, stemming from cultural, political, social, economic and linguistic differences. Some inconsistency may be possible among interviewers. For example, these are related to matching reported measures against the codes of the NTM classification due to the complex and idiosyncratic nature of NTMs.

Second, in many countries a systematic business register covering all sectors is not available or incomplete. As a result, it may be difficult to ensure random sampling within each sector and a sufficient rate of participation in smaller sectors. Whenever this is the case, the NTM Survey limitations are explicitly provided in the corresponding report.

Finally, certain NTM issues are not likely to be known by the exporting and importing companies. For example, exporters may not know the demand-side constraints behind the borders. An example is 'buy domestic' campaigns. The scope of the NTM Survey is limited to legally operating companies and does not include unrecorded trade, for example shuttle traders.

Following up on the ITC Non-Tariff Measure Survey

The findings of each ITC NTM Survey are presented and discussed at a stakeholder workshop. The workshop brings together government officials, experts, companies, donors, non-governmental organizations (NGOs) and academics. It fosters a dialogue on NTM issues and helps identify possible solutions to the problems experienced by exporting and importing companies.

The NTM Survey results serve as a diagnostic tool for identifying and solving predominant problems. These problems can be addressed at the national or international level. The NTM Survey findings can also serve as a basis for designing projects to address the challenges identified and for supporting fundraising activities.

Appendix II Non-tariff measures classification

Importing countries are very idiosyncratic in the ways they apply non-tariff measures (NTMs). This called for an international taxonomy of NTMs, which was prepared by the Multi-Agency Support Team, a group of technical experts from eight international organizations, including the Food and Agricultural Organization of the United Nations, the International Monetary Fund, ITC, the Organisation for Economic Co-operation and Development, the United Nations Conference on Trade and Development, the United Nations Industrial Development Organization, the World Bank and WTO. It was finalized in November 2009 and updated in 2012. It is used to collect, classify, analyse and disseminate information on NTMs received from official sources such as government regulations. For the purpose of the large-scale company surveys on NTMs, ITC uses a simplified version of this international classification.

The NTM classification for surveys differentiates measures according to 16 chapters (denoted by alphabetical letters, see below), each comprising subchapters (denoted by two letters) and the individual measures (denoted by two letters and a number). The following sketches the content of each of the 16 chapters.

Chapter A, on technical regulations, refers to product-related requirements. They are legally binding and set by the importing country. They define the product characteristics, technical specifications of a product or the production process and post-production treatment and comprise the applicable administrative provisions, with which compliance is mandatory. Technical requirements include sanitary and phytosanitary measures, which are generally implemented to protect human, animal and plant life, and health.

Chapter B, on conformity assessment, refers to measures determining whether a product or a process complies with the technical requirements specified under Chapter A. Conformity assessments include control, inspection and approval procedures – such as testing, inspection, certification and traceability – which confirm and control that a product fulfils the technical requirements and mandatory standards imposed by the importing country, for example to safeguard the health and safety of consumers.

Chapter C, on pre-shipment inspection and other formalities, refers to the practice of checking, consigning, monitoring and controlling the shipment of goods before or at entry into the destination country.

Chapter D, on charges, taxes and other para-tariff measures, refers to measures other than tariffs that increase the cost of imports in a similar manner, i.e. by a fixed percentage or by a fixed amount. They are also known as para-tariff measures. Customs surcharges and general sales taxes are examples.

Chapter E, on licences, quotas, prohibitions and other quantity control measures, includes measures that restrain the quantity of goods that can be imported, regardless of whether they come from different sources or from one specific supplier. These measures can take the form of

restrictive licensing, fixing of a predetermined quota or through prohibitions.

Chapter F, on finance measures, refers to measures that are intended to regulate the access to and cost of foreign exchange for imports and define the terms of payment. They may increase import costs in the same manner as tariff measures.

Chapter G, on price control measures, includes measures implemented to control the prices of imported articles in order to: support the domestic price of certain products when the import price of these goods is lower; establish the domestic price of certain products because of price fluctuation in domestic markets, or price instability in a foreign market; and counteract the damage resulting from the occurrence of 'unfair' foreign trade practices.

Chapter H, on anti-competitive measures, refers to measures that are intended to grant exclusive or special preferences or privileges to one or more limited groups of economic operators.

Chapter I, on trade-related investment measures, refers to measures that restrict investment by requesting local content, or requesting that investment be related to export to balance imports.

Chapter J, on distribution restrictions, refers to restrictive measures related to the internal distribution of imported products.

Chapter K, on restrictions on post-sales services, refers to measures restricting the provision of post-sales services in the importing country by producers of exported goods.

Chapter L, on subsidies, includes measures related to financial contributions by a government or government body to a production structure, be it a particular industry or company, such as direct or potential transfer of funds (e.g. grants, loans, equity infusions), payments to a funding mechanism and income or price support.

Chapter M, on government procurement restrictions, refers to measures controlling the purchase of goods by government agencies, generally by preferring national providers.

Chapter N, on intellectual property, refers to measures related to intellectual property rights in trade. Intellectual property legislation covers patents, trademarks, industrial designs, layout designs of integrated circuits, copyright, geographical indications and trade secrets.

Chapter O, on rules of origin, covers laws, regulations and administrative determinations of general application applied by the governments of importing countries to determine the country of origin of goods.

Chapter P, on export-related measures, encompasses all measures that countries apply to their exports. It includes export taxes, export quotas or export prohibitions, among others.

The structure of the NTM classification for ITC surveys

A to O. Import related measures

Measures imposed by the country importing the goods. From the perspective of an exporter, these are the measures applied by the destination country of your product. From the perspective of an importer, these are the measures applied by your own country on the goods that you import.

Technical measures	A. Technical requirements	
	B. Conformity assessment	
Non-technical measures	C. Pre-shipment inspection and other entry formalities	
	D. Charges, taxes and other para-tariff measures	
	E. Quantity control measures (e.g. licences, quotas, prohibitions)	
	F. Finance measures	
	G. Price control measures	
	H. Anti-competitive measures	L. Subsidies
	I. Trade-related investment measures	M. Government procurement restrictions
	J. Distribution restrictions	N. Intellectual property
K. Restriction on post-sales services	O. Rules of origin and related certificate of origin	

P. Export related measures

Measures imposed by the country exporting the goods. From the perspective of an exporter, these are the measures imposed by your own country on the goods you export from your country. From the perspective of an importer, these measures are imposed by the country of origin on the goods you import from this country.

Source: International Trade Centre, NTM classification adapted for ITC surveys, January 2012 (unpublished document).

Appendix III Procedural obstacles

Following is a list of POs related to compliance with non-tariff measures and to an inefficient trade-related business environment and infrastructure.

A	Administrative burdens related to regulations	<p>A1. Large number of different documents</p> <p>A2. Documentation is difficult to fill out</p> <p>A3. Difficulties with translation of documents from or into other languages</p> <p>A4. Numerous administrative windows/organizations involved, redundant documents</p>
B	Information/transparency issues	<p>B1. Information on selected regulation is not adequately published and disseminated</p> <p>B2. No due notice for changes in selected regulation and related procedures</p> <p>B3. Selected regulation changes frequently</p> <p>B4. Requirements and processes differ from information published</p>
C	Discriminating behaviour of officials	<p>C1. Arbitrary behaviour of officials regarding classification and valuation of the reported product</p> <p>C2. Arbitrary behaviour of officials with regards to the reported regulation</p>
D	Time constraints	<p>D1. Delay related to reported regulation</p> <p>D2. Deadlines set for completion of requirements are too short</p>
E	Informal or unusually high payment	<p>E1. Unusually high fees and charges for reported certificate/regulation</p> <p>E2. Informal payment, e.g. bribes for reported certificate/regulation</p>
F	Lack of sector-specific facilities	<p>F1. Limited/inappropriate facilities for testing</p> <p>F2. Limited/inappropriate facilities for sector-specific transport and storage, e.g. cold storage, refrigerated trucks</p> <p>F3. Other limited/inappropriate facilities, related to reported certificate/regulation</p>
G	Lack of recognition/accreditations	<p>G1. Facilities lacking international accreditation/recognition</p> <p>G2. Other problems with international recognition, e.g. lack of recognition of national certificates</p>
H	Other	<p>H1. Other procedural obstacles, please specify</p>

Appendix IV Stakeholder meeting agenda

Kampala, Uganda. 26 October, 2016

NATIONAL ROUNDTABLE ON NON TARIFF MEASURES

The roundtable on non-tariff measures (NTMs) follows on from the business survey of the International Trade Centre (ITC) conducted in 2015-2016 with the collaboration of the Ministry of Trade Industry and Cooperatives (MTIC) to identify the main barriers to trade faced by the private sector in Uganda. This meeting aims at presenting the findings of this survey and defining the solutions to overcome the identified obstacles. Particular attention will be paid to national barriers to regional and international exports.

- 08:30 Registration**
- 09:00 Welcome and opening remarks**
- Mr. Raymond Agaba, Commissioner, Internal Trade Department (MTIC)
 - Mr. Mathieu Loridan, Market analyst at International Trade Centre (ITC)
- Session 1 Background and overview of results**
- The ITC will outline the survey implementation and key findings. It will present the companies' perceptions of NTMs and the challenges they represent to trade.
- **Session** chairman: Ms. Elizabeth Tamale, EIF Coordinator
- 09:30 The ITC Programme on NTMs and the implementation of its survey in Uganda**
- Mr. Mathieu Loridan, ITC
 - Prof. E.O. Ochieng, Team Leader, International Development Consultants Ltd
- 10:00 General results of the survey: companies' perception of NTMs**
- Mr. Mathieu Loridan, ITC
- 11:00 Main trade barriers affecting Uganda's exports and imports**
- Ms. Jacqueline Pimer, ITC expert in Uganda
 - Ms. Claude Manguila, ITC
- Discussants:**
- Ms. Patricia Ejalu, Uganda National Bureau of Standards
 - Mr. Kateshumba Collins Dickson, Commissioner Customs URA
- Floor Discussions**
- Summary by Session Chair
- Session 2 Thematic round tables**
- Participants will be invited to share their views and experiences on NTM-related barriers and policy options to address them in the three selected themes. Each focus group will establish a roadmap with priority actions to overcome the identified obstacles.
- 13:00 Round table 1: Product requirements and conformity assessment**
- How to improve the conformity of exported products? How to overcome the lack of recognition of Uganda's certificates in international markets? How to make local conformity assessment procedures more efficient and less expensive? How to ensure businesses have better access to product standards and conformity assessment procedures?
- Moderator: Mr. George Opiyo, Senior Information Officer, UNBS

Round table 2: Import clearance and border control

How to improve the transparency of border inspection procedures? How to streamline border clearance and control procedures? What are the roles and responsibilities of each institution involved in issuing of trade documents (licenses, permits, certificates of origin)? How to simplify the procedures for granting these documents? How to improve transparency on regulations governing such procedures including the eligibility criteria for companies, costs and time?

- Moderator: Mr. Moses Owai, Director, Private Sector Foundation Uganda (PSFU)

Session 3 Recommendations and conclusion

The rapporteurs of the round tables will present the main findings and recommendations defined in each theme. The presentations will be complemented by ITC's view on overcoming non-tariff obstacles and followed by an open discussion with key institutions in order to validate a roadmap.

- **Session chairman:** Mr Nimrod Waniala, Chairperson, Uganda Export Promotion Board

15:30 Summary of round table discussions

- Speakers: Moderators from the Roundtables

16.00 Overcoming challenges related to NTMs

- Mr. Kigozi Ibrahim, Executive Director, Uganda Manufacturers Association
- Mr. Emmanuel Atwine, Senior Commercial Officer, MTIC
- Mr. Mathieu Loridan, ITC

Floor Discussions:

- Summary by Session Chair

17:00 Concluding Remarks and Closing

- Mr. Mathieu Loridan, International Trade Centre (ITC)
- Mr. Fred Ogene, Undersecretary, MTIC
- Closing Remarks by Hon. Amelia Kyambadde, Minister of Trade Industry and Cooperatives

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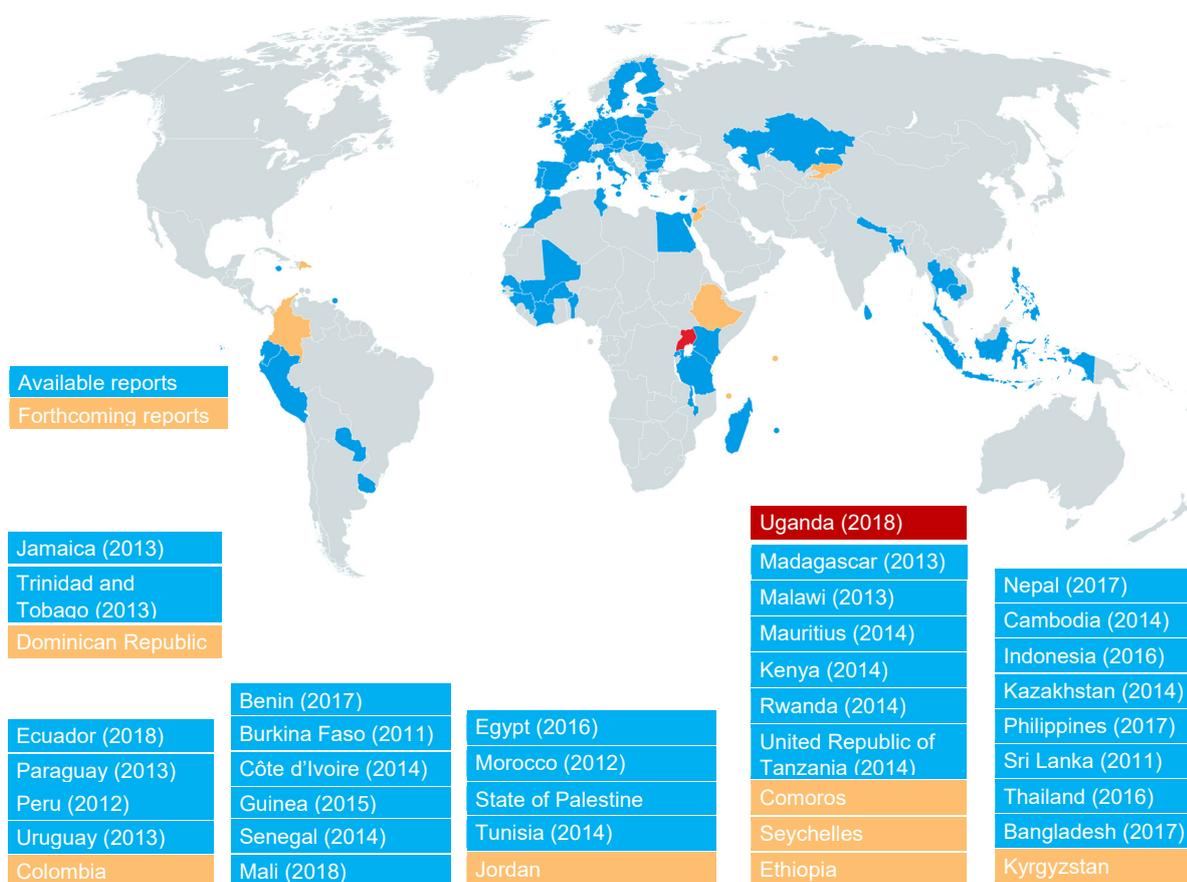
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ITC SERIES ON NON-TARIFF MEASURES

Available reports

- Navigating Non-Tariff Measures: Insights from a Business Survey in the European Union (2016)
- Making regional integration work – Company perspectives on non-tariff measures in Arab States (2015)
- How businesses experience non-tariff measures: Survey-based evidence from developing countries (2015)
- Non-Tariff Measures and the fight against malaria: Obstacles to trade in anti-malaria commodities (2011)

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