



FEEDBACK OF THE EUROPEAN COMMISSION, DIRECTORATE GENERAL FOR TRADE, TO

THE RECOMMENDATIONS OF THE EVENT REPORT OF

**THE HIGH LEVEL CIVIL SOCIETY FORUM
HELD ON 16 OCTOBER 2017
IN SANDTON, SOUTH AFRICA**

The Directorate General for TRADE of the European Commission (hereinafter DG TRADE) would like to thank all civil society organisations (CSOs) for their participation in the SADC-EU EPA High Level Civil Society Forum ("the Forum"). DG TRADE highly appreciates the CSOs' work on the EPA and their support in and recommendations on monitoring the operation and impact of the EPA. DG TRADE regards this Forum as a building block hopefully leading to the creation of a more structured platform for dialogue among CSOs from both the SADC EPA States and the EU.

DG TRADE takes note both of the key recommendations by the whole Forum and the recommendations by the breakaway discussion groups that were included in the event report of this Forum. DG TRADE has understood the recommendations in the way they are phrased below, and is glad to provide the below feedback.

DG TRADE remains committed to addressing these recommendations, where relevant, in the National EPA Implementation Plans that each SADC EPA State has or is about to set up with a view to identifying the needs stemming from the implementation of the EPA and to channelling the existing policy dialogues and available development co-operation funds towards meeting these needs.

**DG TRADE feedback
on the key recommendations by the Forum's plenary**

Key recommendation 1: Outreach on the SADC-EU EPA should include regular engagement with civil society, as well as easily accessible infor-

mation (e.g. via a smart phone app and webinars) on rules of origin, opportunities for SMEs, export procedures, SPS measures and access to supply chains.

DG TRADE feedback: In line with Article 4 of the EPA, each Party is committed to enhance regular engagement of CSOs from its own jurisdiction on policy regarding the SADC-EU EPA at both national and regional level, with the due involvement of the SADC Secretariat when needed.

DG TRADE appreciates that more efforts should be devoted to make information on the EPA more easily and in a more user-friendly manner accessible to all stakeholders, and specifically to vulnerable groups. DG TRADE will assess with the other SADC EPA States and the SADC Secretariat how existing tools already available can be improved and explore how information could be more easily disseminated. This should, however, not replace the responsibility that CSOs have in gathering the needed information on the EPA and make it accessible to all their members.

DG TRADE would like to draw the attention of CSOs to the following web-links where information on the EPA is already available:

- General information on the EU-SADC EPA is available at:
<http://ec.europa.eu/trade/policy/countries-and-regions/regions/sadc/>
- The full text of the EPA can be found at:
http://trade.ec.europa.eu/doclib/docs/2015/october/tradoc_153915.pdf
- Provisions on Rules of Origin are included in Protocol 1 of the EPA (pp. 1924ff of the EPA text). A guide to this Protocol is available at:
[https://ec.europa.eu/taxation_customs/sites/taxation/files/taxud_325341_5_17 - guidance on sadc-eu epa.pdf](https://ec.europa.eu/taxation_customs/sites/taxation/files/taxud_325341_5_17_-_guidance_on_sadc-eu_epa.pdf)
- Information on export opportunities to the EU (for enterprises of any size), i.e. the applicable tariffs, rules on exporting to the EU and rules of origin are available by typing in the product origin, the destination EU Member State and the product into the website of the EU Trade Helpdesk at:
<http://trade.ec.europa.eu/tradehelp/>
- Information on SPS requirements in the EU is available at:
https://ec.europa.eu/food/safety/international_affairs_en

Furthermore, DG TRADE recalls that the European Commission, together with the SADC Secretariat and the SADC EPA States, is already working on the following initiatives concerning civil society engagement and information availability:

- **Across the region:**
 - Through a new EU-funded programme called "Regional Dialogue Facility", outreach activities involving CSOs will be accommodated to facilitate peer-to-peer activities.
- **In South Africa:**
 - The EU-funded the SADC-EU EPA Outreach South Africa project (September 2016 to February 2018). Its objective is to increase positive impact through participation in and awareness of the EU-SADC EPA implementation process. The specific aim is to contribute to the effective implementation of the EPA in South Africa through technical assistance, capacity building and information initiatives aimed at a wide range of economic, political and social actors. Information regarding the activities and deliverables of the SADC-EU EPA Outreach South Africa project are available at <https://sadc-epa-outreach.com/>.
 - The EU's Dialogue Facility funds dialogue projects. One project that was approved under the last call was presented by DTI/SARS and is named "EU-SADC EPA rules of origin within SADC EPA framework". It provides support both to engage in meaningful dialogue about Protocol 1 of the Agreement on Rules of Origin and to build capacity. It is to be finalised before end of 2018.

Key recommendation 2: Existing CSO umbrella groupings in SADC should **establish a SADC civil society platform** under the EPA to monitor it, similar to the European Economic and Social Committee (EESC).

DG TRADE feedback: DG TRADE acknowledges the crucial role that CSOs should play in monitoring the implementation of the EPA in line with Article 4 of the EPA.

DG TRADE welcomes the initiative by SADC CSOs to establish a platform under their own responsibility and remains committed to facilitate its creation through financial and non-financial forms. DG TRADE believes that such a platform of dialogue should gather at least on an annual basis CSOs from both the SADC EPA countries and the EU and should be set up and managed by the CSOs themselves with the assistance and support by the Parties.

Key recommendation 3: As articles 4 and 10 of the EPA provide for **civil society's role in monitoring** of the EPA, a SADC civil society platform should develop a set of indicators that draw on the experience of the EESC and monitoring mechanisms already established in SADC.

DG TRADE feedback: DG TRADE reiterates the essential role of CSOs in monitoring the EPA. Since all the EPA Parties are already engaged in an exercise aimed at developing indicators for monitoring the operation of the EPA and its impact, DG TRADE welcomes the Forum's initiative, encourages the Forum to provide inputs to the ongoing process and is committed to provide regular feedback on the progress of this work. More specifically, the German Development Agency, GIZ, has been commissioned by the SADC Secretariat to produce a study, which is ongoing and itself includes consultation with CSOs from the SADC region, in order to provide the Parties with expertise to complete this process as quickly as possible.

Key recommendation 4: The EU should continue to support sustainable development and EPA implementation activities in SADC EPA countries, share more information on relevant initiatives with civil society and achieve greater level of co-operation between national and regional programmes.

DG TRADE feedback: DG TRADE acknowledges the importance and relevance of this recommendation and stresses that transparency of relevant programmes and enhanced synergy between the national and regional programmes is a shared responsibility of all Parties, regardless of the source of the funding.

DG TRADE acknowledges that, in this respect, it is of paramount importance – by duly involving civil society in each country and at regional level – to finalise as quickly as possible the National EPA Implementation Plans at the level of each SADC EPA country as well as at regional level, which would enable to prioritise and mainstream development co-operation funding to address identified needs and challenges.

DG TRADE underlines that the European Commission, together with the SADC Secretariat and individual SADC EPA States, is already working on the following sustainable development and EPA implementation initiatives:

- **Across the region:**
 - Under the new EU-funded Regional Trade Facilitation Programme, technical assistance will be provided to facilitate the implementation of the EPA at national and regional level.
 - SADC Member States, the SADC Secretariat and the EU have embarked on the implementation of the EU's Trade-related Facility Programme. Its priority is to address the key challenges to the implementation of the EPA and the SADC Free Trade Area.
 - Through the EU's assistance to the SADC Secretariat, the latter has supported the EPA negotiations and the drafting of Regional EPA Implementation Plans.
- **In Botswana:**

- Botswana and EU are currently designing a programme focusing on economic diversification. Support to develop the beef value chain in the country is one of the priorities in order to fully benefit from the EPA. Vocational training is also planned in this programme.
- **In Mozambique:**
 - Given that Mozambique has finalised its National EPA Implementation Plan in 2017, the EU Delegation is currently identifying a project to support EPA implementation.
- **In Namibia:**
 - The EU Delegation is currently supporting the government in defining a National EPA Implementation Plan for Namibia and to define a trade and business agenda and an all-inclusive institutional set-up that aims at improving the ease of doing business and incentivising investments for local, regional and European companies.
 - The EU Delegation is also supporting the Namibian government in improving the performance of the livestock sector from both the supply and demand side, and to promote the resilience of local farmers, with specific focus on increased access to domestic, regional and international markets, by promoting local capacity for animal slaughtering and meat processing (municipal abattoirs, etc.), food safety awareness campaigns and food hygiene inspection services, animal auctions, access to market information, improved management of pre-slaughter quarantine facilities and exploring both new local and export markets.
- **In South Africa:**
 - A new multiannual programme to support EPA implementation in South Africa – likely to begin in 2018 – will, inter alia, assist:
 - Productive sectors and supply chains relevant to the EPA.
 - Building capacity and quality infrastructure with regard to SPS and TBT matters, which is key for South Africa to reap benefits from the tariff liberalisation provided to their products.
 - Improving legislation and the regulatory environment to enhance the business climate, including fiscal and customs reforms, best practices exchanges, etc.
 - Establishment of monitoring mechanisms and indicators and enhancement of participation by stakeholders in the monitoring of the impact the EPA has on sustainable development.
 - A programme to support the wines and spirits sector is also under preparation in South Africa. Part of the amount is foreseen to support the restructuring of the South African wines and spirit sector, notably related to the overall transformation agenda to promote black owned businesses. The remaining amount is foreseen primarily for marketing and distribution of South African wines and spirits, notably black owned brands.
 - While the above-mentioned programmes are EPA-specific, other EU funded activities may also become relevant (such as the

SMMEs support programme, SWITCH Africa on sustainable agriculture and consumption, etc.).

- **In Swaziland:**

- The cooperation between Swaziland and the EU is investing in the development of value chains that are key for Swaziland's sustainable development and for Swaziland's people to reap the benefits of EPA implementation in terms of income and jobs. This cooperation in particular supports smallholder farmers' production and access to markets, it develops the entrepreneurship skills of farmers, youth and women, and it brings investments in sustainable development of rural communities.

See specific information about on-going programmes by topic in the Annex.

ANNEX

DG TRADE feedback on the specific recommendations by the Forum's breakaway discussion groups

Group number	Recommendation number	Recommendation	DG TRADE feedback by the Parties
1	1.1	<p><u>Capacity building</u> is needed to assist exporters in SADC EPA countries to comply with EU health and safety regulations.</p>	<p>For an overview, see DG TRADE feedback on key recommendation 1 above.</p> <p>DG TRADE invites CSOs to specify more precisely on which products and sectors capacity building is needed.</p> <p>Specific capacity building needs should be included in the National EPA Implementation Plans and duly funded by development cooperation programmes in place or to be designed.</p> <p>DG TRADE recalls that the EPA Parties have the following capacity building measure on health and safety regulations already in place:</p> <ul style="list-style-type: none"> • In Botswana: Entrepreneurship training for livestock farmers and business development for MSMEs is planned in the EU's future national programme. • In Swaziland: Under the Swaziland-EU cooperation programme for High Value Crops and Horticulture (EU support: 14 million EUR), at least 1000 smallholder farmers are being capacitated to increase their income by increasing their access to international markets, for instance by receiving new

	1.2	<p><u>Support regarding water availability</u> for the agriculture sector in SADC EPA countries is required to capitalise on the potential of the export opportunities to the EU offered by the EPA.</p>	<p>marketing information on www.amis.co.sz.</p> <p>DG TRADE acknowledges that each SADC EPA Party is responsible to decide whether to include its own water management measures in its own National EPA Implementation Plan and to execute them with the support provided by funding under existing and future development co-operation programmes, such as:</p> <ul style="list-style-type: none"> • In Swaziland: Several on-going cooperation programmes between Swaziland and EU develop significant new capacities for irrigation and sustainable water use (total EU support: 53 million EUR). One programme will develop at least 750 Ha for smallholders' farming of vegetables under irrigation, a second programme will build 40 new small dams, and a third programme is developing at least 2000 Ha for smallholders' sugar production, increasing the incomes and creating jobs in rural areas of Swaziland. Further programmes are in preparation for 2018-2020. For a listing of the programmes see https://eeas.europa.eu/delegations/swaziland/1980/swaziland-and-eu_en#Development+aid. • More in general, there is need for water diplomacy to encourage using existing infrastructure for water distribution in the region; to discuss historic water rights vis à vis the principle of equitable water distribution proportional to size of population served; to research the right to wheel water from one country to another, through a third country, and measures to accelerate water efficiency as one solution for more equitable water distribution in the region. • It is recommended to liaise with ORASECOM for harmonising water management measures in each of the countries,
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			see also http://www.orasecom.org/ and http://wis.orasecom.org/
1.3	There should be <u>better access to information</u> on the EPA for small farmers in SADC EPA countries.		See DG TRADE feedback on key recommendation 1 above.
1.4	<u>Alien invasive vegetation</u> in SADC EPA countries should be removed.		DG TRADE notes this important issue, but stresses that it is not directly covered by the EPA. Should the SADC EPA Parties consider that addressing this aspect is important to grasp the benefits of the EPA, they can include it in the National EPA Implementation Plans.
1.5	The EPA should support the <u>transfer of knowledge</u> on environmental issues.		<p>DG TRADE asks CSOs to please specify on which issues exactly knowledge transfer is needed.</p> <p>DG TRADE stresses that each SADC EPA Party is responsible to draft its own National EPA Implementation Plan with its own knowledge transfer activities. DG TRADE stresses the crucial role of CSOs in knowledge transfer via their transnational networks.</p> <p>The EU is supporting the following project in this regard:</p> <ul style="list-style-type: none"> • In Botswana: The principle to develop a circular economy in the context of the development of value chains is taken into consideration in the EU Delegation's planning. • In Swaziland: After the 2015/16 severe drought, stakeholders working to develop the agriculture value chains in Swaziland – especially the Swaziland Cane Growers Association (http://www.scga.co.sz/about.html) – expressed the need to develop their capacity to adapt to climate change. The EU is supporting the development of an agriculture water use as-

			assessment model to facilitate planning for climate change and adapting irrigation approaches.
	1.6	<u>Information on EPA-related initiatives</u> should be disseminated to people on the ground by working through cooperatives.	See DG TRADE feedback on key recommendation 1 above.
	1.7	Small amounts of grant funding should be used for <u>capacity building in environmental development.</u>	<p>DG TRADE acknowledges the importance of this issue and invites CSOs to please specify what measures exactly are needed.</p> <p>DG TRADE stresses that each SADC EPA Party is responsible to decide how to include own environmental development measures in its own National EPA Implementation Plan and to execute them.</p> <p>The EU is supporting the following project in this regard:</p> <ul style="list-style-type: none"> • In Namibia: The EU Delegation is supporting CSOs to improve sectoral coordination, governance and public service delivery. The EU Delegation provides support to farmers and value chain operators in the agricultural sector to strengthen their capacities.
	1.8	There is a need for <u>national level advisory groups and a regional voice.</u>	<p>DG TRADE welcomes this initiative by CSOs in SADC EPA countries to establish such platforms for themselves.</p> <p>See also DG TRADE feedback on key recommendation 2 above.</p>
2	2.1	There needs to be <u>more awareness on the EPA</u> among people on the ground in EPA countries and meaningful dialogue with them.	See DG TRADE feedback on key recommendations 1 and 2 above.

2.2	A transparent regional joint <u>monitoring mechanism</u> is required.	See DG TRADE feedback on key recommendation 3 above.
2.3	The EU should design a tool to <u>simplify the EPA</u> .	<p>DG TRADE is committed to accessibility and transparency of information concerning the EPA and its provisions, but stresses that changing the legal text of the agreement is not possible.</p> <p>Regarding making information accessible, see DG TRADE feedbacks on key recommendation 1 above.</p>
2.4	The EU should <u>educate consumers</u> about the EPA.	DG TRADE acknowledges the respective responsibilities of each SADC EPA State to educate its own citizens about the benefits of the EPA as consumers, such as cheaper products thanks to increased competition and a greater variety of products to choose from. DG TRADE asks CSOs to please specify on what topics exactly consumers should be educated.
2.5	The <u>varying development levels</u> among SADC EPA countries should be taken into account when implementing the EPA.	<p>DG TRADE acknowledges the importance of taking the varying development levels among SADC EPA countries into account, as the EPA does:</p> <ul style="list-style-type: none"> • The Preamble of the EPA acknowledges the varying development levels among SADC EPA countries. • Article 14 (3) of the EPA recognises that tariff reduction will particularly affect fiscal revenues of Lesotho (as Lesotho and Mozambique the only LDCs in the EPA) and the Parties agree to pay attention to this in both policy dialogue and development cooperation. • Article 20(2) of the EPA establishes the principle of asym-

			<p>metry for the timing and commitments under the EPA to account for SADC countries' capacity constraints.</p> <ul style="list-style-type: none"> • Annex I of the EPA established different levels of access to the EU market for exporters from BLMNS countries and South Africa, respectively. • The EPA also provides different levels of access for exporters from the EU to the markets of South Africa and BLNS markets (Annex II) than to the market of Mozambique (Annex III). • Article 26(2) of the EPA allows BLMNS to impose temporary export duties for food security reasons. • Article 37 of the EPA allows BLNS to impose a safeguard to protect industries that are seriously threatened by imports for a transitional period of 12 years. • Article 38 of the EPA allows BLMNS to impose infant industry protection safeguards.
2.6	There should be discussions on how to meet the <u>standards</u> required in the EU market.	See DG TRADE feedback on key recommendation 1 above, and on the specific recommendation 1.1 in this table.	With regard to industrial standards, DG TRADE invites CSOs to please specify more precisely on which products and sectors capacity building is needed.
2.7	<u>Funding sources for civil society</u> participation in the ongoing imple-	DG TRADE welcomes the work of CSOs on the EPA and is committed to support it financially through the existing development co-	

		<p>mentation and monitoring of the EPA should be identified.</p>	<p>operation programmes.</p> <p>The EU is already active in this regard:</p> <ul style="list-style-type: none"> • In South Africa: To ensure a wide participation in this very SADC-EU EPA High Level Civil Society Forum, logistical support was provided under the European Instrument for Democracy and Human Rights (2014-2020), which was established by this EU Regulation: http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2014:077:0085:0094:EN:PDF.
2.8		<p>The EU should offer a <u>credit facility for SMMEs</u> to make the EPA more inclusive.</p>	<p>DG TRADE underlines that SMMEs are the economies' backbone and that trade must be for all. DG TRADE stresses that each Party is responsible to draft its own National EPA Implementation Plan with its own support activities for SMMEs in its jurisdiction.</p> <p>The EU is already funding the following initiatives for SMMEs:</p> <ul style="list-style-type: none"> • In South Africa: The Employment Promotion through SMMEs Support Programme for South Africa (€52 million) is scheduled to become effective in 2018. Through this programme, the EU will support the improvement of the regulatory and administrative environment for SMMEs in South Africa through measures such as support for red tape reduction, development of a national SMME data base, SMME-related research, and capacity building. This should also

			<p>help SMMEs to access EU markets. A substantial amount has been earmarked for the South African Department of Agriculture, Forestry and Fisheries (DAFF), e.g. to address SMME-specific bottlenecks in accessing international markets.</p> <ul style="list-style-type: none"> • In Swaziland: Cooperation programs between Swaziland and EU focus on agriculture value chains and particularly provides training for entrepreneurship and business development for SMMEs (see an example of the benefits of such trainings at: https://ec.europa.eu/europeaid/case-studies/illiterate-widow-successfully-re-opens-grocery-store-after-business-training_en).
	2.9	One SADC-wide <u>civil society platform</u> should be created.	See DG TRADE feedback on key recommendation 2 above.
3	3.1	The necessary <u>capacity in government</u> departments in SADC EPA countries should be put in place.	See DG TRADE feedback on key recommendations 1 (information availability), 4 (sustainable development measures) above, and specific recommendation 1.1 (capacity building).
	3.2	As the EPA is likely to disproportionately benefit big business, the Parties should <u>assist vulnerable target groups</u> to participate in production.	DG TRADE stresses that before the first evaluation of the EPA is carried out, it is too early to judge whether the EPA disproportionately benefits big business. This notwithstanding, DG TRADE underlines its commitment to inclusive trade and growth, and the importance of assisting vulnerable target groups to participate in the production process. DG TRADE calls on CSOs to ensure governments include the needed measures in their development plans, including, if relevant, in their National EPA Implementation Plans.

			<p>The following projects start to be realised:</p> <ul style="list-style-type: none"> • In Swaziland: The EU launched a call for proposals to non-state actors in Swaziland in 2017-2018 focusing on encouraging youth entrepreneurship in sustainable agriculture value chains and creating new opportunities for vulnerable people. One of the projects already funded in this context is creating income for 100 households in rural communities through developing the honey value chain.
3.3	Communication about the EPA should be designed to be easily understandable by vulnerable groups. It should be assessed what information they would benefit from.	See DG TRADE feedback on key recommendation 1 above.	In particular, DG TRADE asks CSOs – many of whom represent vulnerable groups – to please specify who exactly should be informed on which particular standards (e.g. on which food and product categories).
3.4	Sustainable development measures should ensure decent work .	DG TRADE encourages CSOs to hold SADC EPA States to their commitments under ILO conventions (Article 8 of the EPA) by monitoring working conditions of their own citizens.	
3.5	The Parties should conduct skills development to allow enterprises to move up the value chain.	DG TRADE calls CSOs to ensure their governments include this in their National EPA Implementation Plans and to hold them to fulfilling it.	<p>The following projects start to be realised:</p> <ul style="list-style-type: none"> • In Botswana: Technical & vocational education & training (TVET) activities are planned in the Economic Diversification

			Programme currently being designed by the EU Delegation together with the government.
	3.6	The <u>goals regarding sustainable development should be clearly identified</u> to guide actions towards them. Civil society should facilitate this process.	DG TRADE recalls that, in the context of its trade relations with the SADC EPA States, such goals are identified in Chapter II of the EPA dedicated to trade and sustainable development. CSOs are called to monitor the implementation of the relevant provisions and inform the Parties of any challenge stemming from them. Needed actions to address these shortcomings can be included in the National EPA Implementation Plans and addressed through available the development co-operation programmes available.
	3.7	CSOs should both work on the national level and engage with inclusive <u>civil society forums on the regional level.</u>	See DG TRADE feedback on key recommendation 3 above.
4	4.1	The implementation of the EPA <u>should not challenge regional integration,</u> as currently not all SADC countries are participating in the same EPA.	DG TRADE recalls that Article 1 of the EPA defines promoting regional integration as a key objective of the agreement, which should be seen as a dynamic process built on existing agreements justified by historical and political circumstances and potentially leading to broader processes of regional integration. First of all, the current membership of the SADC EPA supports the SACU regional integration and its relations with Mozambique. Secondly, from an economic perspective, cross-country value chains are fostered through Article 4 (diagonal cumulation of rules of origin) of Protocol 1 of the EPA, which, by allowing cumulation of

			materials originating in different countries benefiting from an EPA, still grant to the final product exported from a SADC EPA State preferential access to the EU market.
4.2	The <u>cumulation mechanism</u> under the EPA <u>needs to be finalised</u> and then industry should be sensitised about its mechanics.		DG TRADE remains committed to finalise the procedural steps needed in order to enable diagonal cumulation of origin. At the same time, as indicated under the key recommendation 1 above, a guide to the implementation of the relevant provisions is publicly available and a workshop including different stakeholders has recently taken place on 24-25 January 2018. DG TRADE endeavours to continue its efforts in disseminating needed information and provide appropriate training to stakeholders concerned.
4.3	Awareness in civil society on the EPAs should be raised before a monitoring system is developed. A <u>simplified document on the EPA</u> for the use by civil society should be developed.		See DG TRADE feedbacks on key recommendation 1 above.
4.4	There should be an audit of the issues involved in the EPA. There should be <u>civil society portals</u> at the regional, national and sub-national levels.		DG TRADE is committed to establish a monitoring mechanism that audits the operation and impact of the EPA – for which DG TRADE considers CSO's inputs to be highly valuable. Also see DG TRADE feedback on key recommendation 3 above. Regarding civil society portals, see DG TRADE feedback on key recommendation 2 above.
4.5	SADC EPA countries should already themselves take stock of how they		DG TRADE stresses that every Party of the EPA is responsible for its own commitments under the relevant agreements to which they

		perform against the <u>commitments made in the SADC Protocols</u> . Civil society should hold governments to account for commitments.	are Parties. DG TRADE acknowledges the essential role of CSOs to follow up on the Parties' commitments.
5	5.1	Existing formal civil society structures should be interrogated. A <u>formal CSO engagement platform</u> – independent from governments and big business – should be created.	See DG TRADE feedback on key recommendation 2.
	5.2	The access of citizens to information should be facilitated. Consultations on the EPA implementation should take place. <u>Domestic consultation processes should be strengthened</u> in some countries.	See DG TRADE feedbacks on key recommendation 1. DG TRADE underlines the importance of transparency and stress that national consultations should be further developed and used extensively.
	5.3	<u>Capacity building</u> should be conducted to allow small enterprises and farmers in different areas with varying development levels in SADC countries to benefit from the EPA.	Regarding capacity building, see DG TRADE feedbacks on key recommendation 1 and specific recommendation 1.1. Regarding consideration of different development levels, see DG TRADE feedback on specific recommendation 2.5.
	5.4	To mitigate the risks that came with the EPA, a <u>mechanism to monitor</u> the impact of the EPA should be established.	See DG TRADE feedback on key recommendation 3.