



19 October 2013

Response to feedback from TradeMark Southern Africa on tralac Hot Seat Comment 'Challenges at Chirundu One-Stop Border Post'

Following the publication of the Hot Seat Comment entitled 'Challenges at Chirundu One-Stop Border Post' on 26 September 2013, tralac received a letter from Mark Pearson, Programme Director of TradeMark Southern Africa (TMSA), claiming that the tralac note "contains serious factual errors and misrepresentations, some which are based on outdated or incomplete information and all which result in a completely inaccurate interpretation of operations at Chirundu OSBP". He also submitted a detailed list of the "errors", "misrepresentations" and "omissions" contained in the tralac note. Both the letter and the accompanying list can be found alongside the original note on tralac's website.

tralac welcomes feedback on its work and we, as the authors of the note in question, would be more than happy to incorporate TMSA's data and insights where these reflect the most accurate and up-to-date information on the issue being discussed. Having reviewed TMSA's feedback, we would like to respond to TMSA's feedback by noting that:

1. The description of an OSBP to which TMSA took objection is derived almost verbatim from a TMSA source, and the description of the 'one-stop' formalities which TMSA stated was incorrect conveys exactly the same information as TMSA's 'corrected' version;
2. we did not feel comfortable trying to "be exact on the issue" of post-OSBP transit times, as the sources we consulted gave differing estimates;
3. the incident referred to in the tralac note did actually occur in July, and was one of a series of such incidents to have occurred over the past nine months;
4. we do not concur that "the parties involved are dealing with this risk proactively", as these parties only called a meeting to develop a response strategy to sudden rises in traffic *in response to a sudden rise in traffic*;
5. the note does not suggest that any of the faults it highlights are "permanent" or "irreparable" faults;
6. the note does not say that *all challenges* facing Chirundu stem from design faults or that "the delays of that specific event were due to the fact that Chirundu was not designed as a OSBP", but rather that "regardless of how big a role increased traffic and insufficient opening hours have played in recent delays at Chirundu... the smooth functioning of the border post faces *additional challenges*", and that these *additional challenges* "stem largely from the fact that the Chirundu border post was not originally designed as an OSBP";
7. the note does not give a full description of the background to the incidents highlighted as it is not meant to provide a comprehensive study of Chirundu OSBP, but rather to stimulate discussion and debate on a topical issue;

8. for the same reason, we felt it sufficient to simply note that Chirundu's operating hours are shorter than those of other border posts in the region;
9. the note does not deny that there has been an increase in traffic at Chirundu in recent years, but does argue that it is somewhat disingenuous to blame increased traffic flows for 3 or 4 specific incidents, when traffic increases represent a four year trend;
10. anecdotal data referred to in the tralac note pertains to information obtained from sources on the ground, including the Shipping and Forwarding Agents Association of Zimbabwe (SFAAZ);
11. we do not concur that congestion at Chirundu is "totally unrelated" to infrastructural problems, especially as our sources indicated that, among other things, the infrastructural set-up at Chirundu, including the traffic flow design and positioning of scanners, does not facilitate the smooth movement of trucks, and the main bottleneck in traffic flow is caused by the positioning of the ZIMRA truck release desk immediately after the bridge on the Zambian side;
12. challenges relating to a lack of ICT connectivity are still relevant and the point that the fast track lane at Chirundu is not yet fully operational is not "outdated information";
13. prior to the publication of the note, a SFAAZ representative indicated to us that both a lack of adequate office facilities and a lack of appropriate signage were important factors hampering the smooth functioning of Chirundu OSBP; and
14. the note does not make the claim that "Chirundu would not be a good model for other OSBPs", but rather that *if Chirundu is to serve as a model for other OSBPs*, it is imperative that design faults and other challenges facing Chirundu are made explicit, so that whatever mistakes have been made are not repeated elsewhere

We hope that the above points clarify the meaning and content of the original note. For a more detailed response to TMSA's concerns, please see the attached point-by-point treatment of TMSA's feedback.

Sincerely,

Sean Woolfrey and Elisha Tshuma