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Sustainability impact assessment in support of the negotiations to deepen the EU- Eastern and Southern Africa (ESA) Economic Partnership Agreement

Phase II (Ex-Post Evaluation, 3 SIA Deliverables, 2 Case Studies)

CSD, March 23, 2021



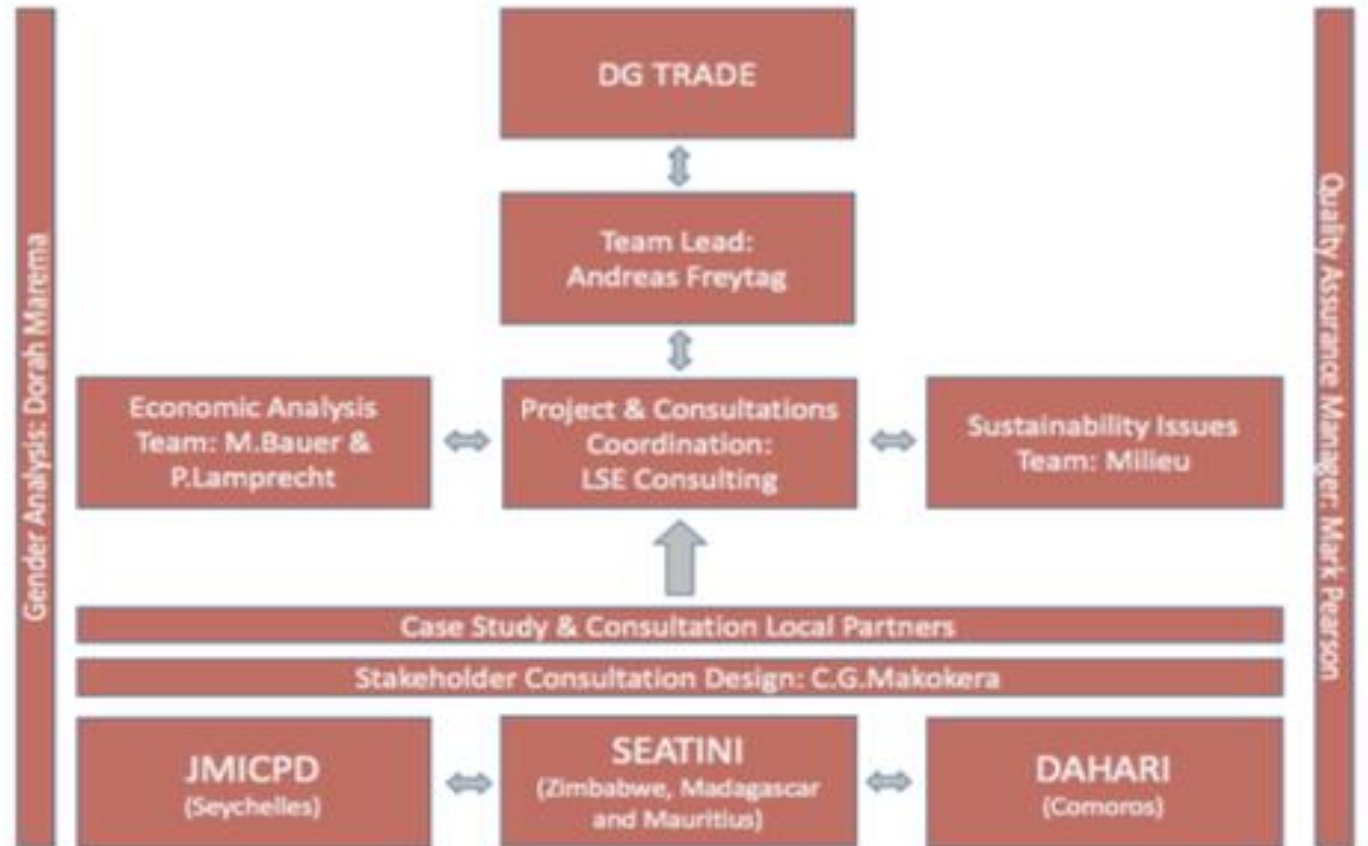
Meet the team!



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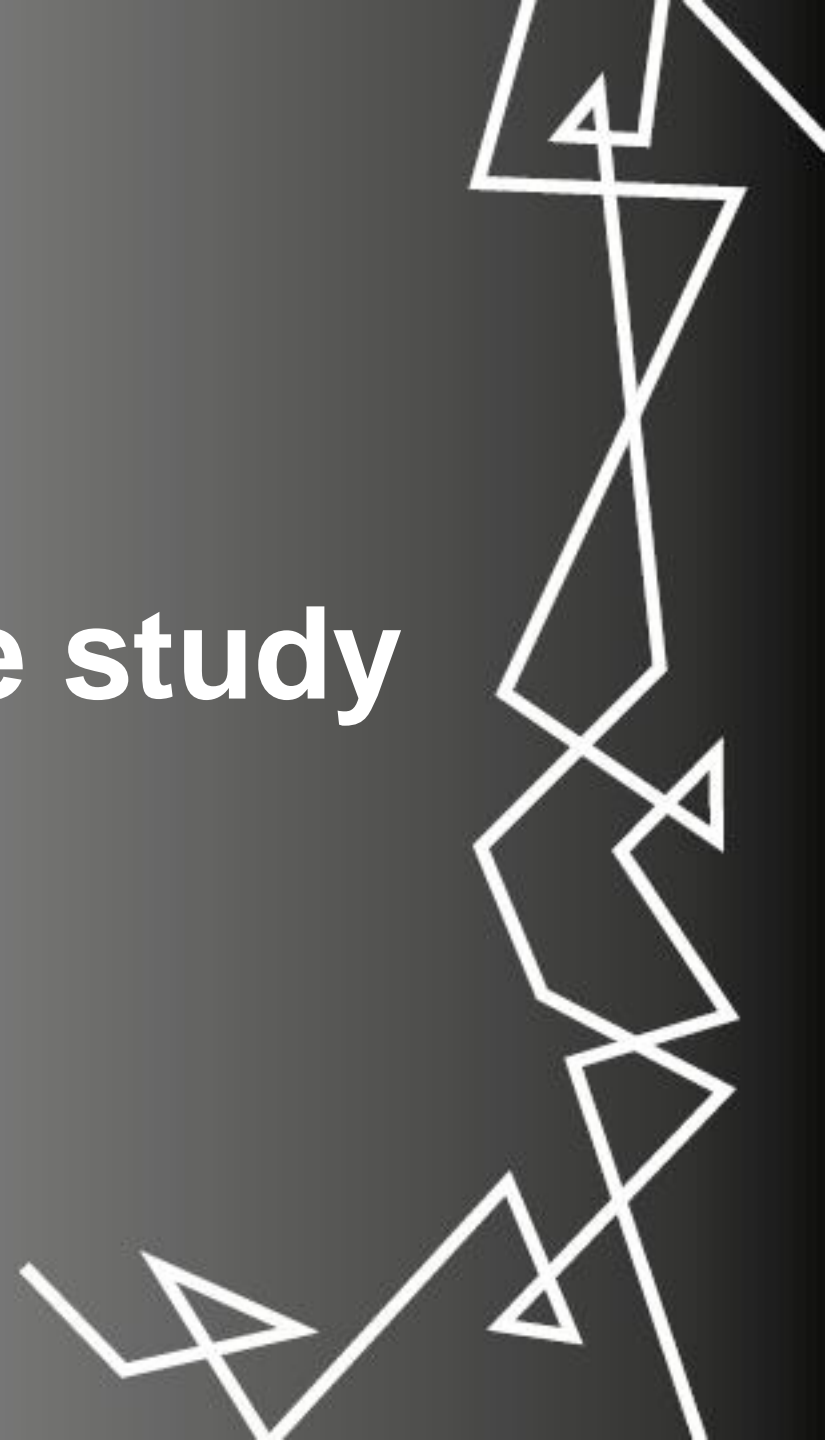
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Introduction to the study



Introduction

- In 2007, six states in the ESA region (Comoros, Madagascar, Mauritius, Seychelles, Zambia and Zimbabwe) concluded an interim EPA (iEPA) with the EU. Four countries (Comoros, Madagascar, Mauritius and Seychelles) are **groups of islands or an island** respectively, the fifth (Zimbabwe) is **landlocked**.
- The interim agreement sought to liberalize trade in goods between the ESA and the EU.
- The iEPA included a *rendezvous clause*, meant to facilitate further negotiations to expand the scope of the agreement to cover new trade-related areas and rules, including trade in services, public procurement, intellectual property rights, among others.
- The current negotiations between the ESA and the EU is thus to conclude a comprehensive EPA which takes into consideration:
 - The UN 2030 Agenda on the Sustainable Development Goals;
 - The Global Strategy for the EU's Foreign and Security Policy; and
 - Coherence with the European Consensus on Development



Aims & Objectives of the study

- The purpose of the study is to provide for a deep assessment of the potential economic, social, human rights and environmental effects of the anticipated new and comprehensive EPA.
- The study includes a **mini ex-post evaluation** to review impacts across all areas of the Agreement beginning at the start of the provisional applications (2012; 2019).
- Thereafter, the project will focus on a **forward-looking analysis** to implement the SIA, taking the findings of the mini ex-post into consideration.
- The findings of the SIA will aid in informing the negotiating teams.

Methodological Approach

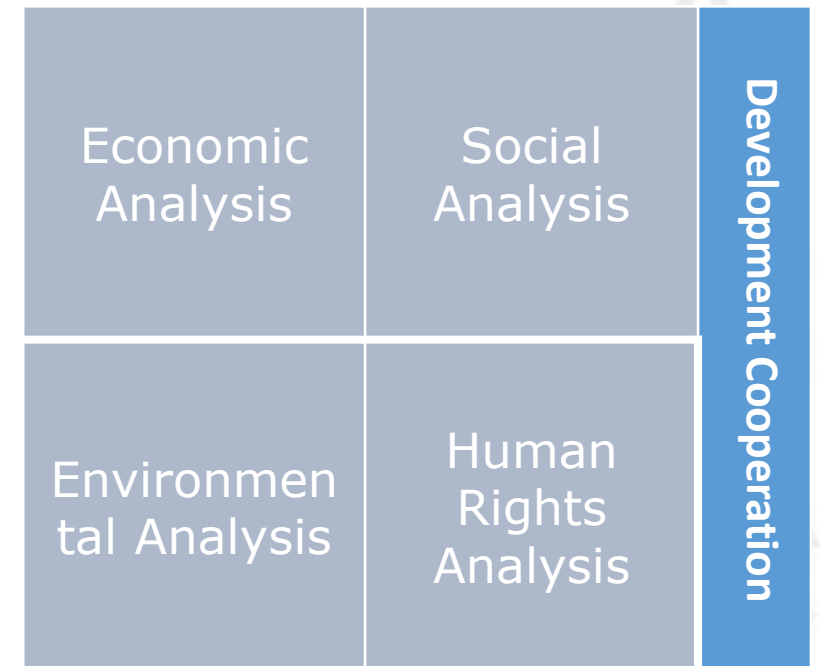
The assessment considers five key areas and is broken down into four phases

1. **Inception Phase (Tasks 1-5):** developing a factual introduction to the study, and conducting a preliminary screening of economic, social, human rights, environmental and development cooperation impacts

2. **Ex-post and forward looking analysis (Tasks 6-11):** carrying out the ex-post evaluation of the current interim EPA and tasks 6-11 for the SIA on trade in goods, trade in services, digital trade and investment, trade and sustainable development; includes one round of stakeholders' consultation and two case studies, related to the SIA elements

3. **Forward Looking Analysis (Tasks 12-17):** covering tasks 12-17 for the SIA on public procurement and competition, Intellectual Property Rights and dispute avoidance and settlement; includes a second round of stakeholders' consultation and three case studies, related to the SIA elements

4. **Presentation of Findings**



Tasks

To implement the four phases of the project, the team will undertake 17 specific tasks:

Task 1: Develop a factual introduction to the study	Task 10: Results and impact of trade-related development assistance to ESA5
Task 2: Analyze existing studies and reports	Task 11: Conclusions for ex-post assessment
Task 3: Preliminary screening of impacts	Task 12: SIA economic analysis
Task 4: Methodology and Consultation Strategy	Task 13: SIA social analysis
Task 5: Develop a detailed work plan for the project	Task 14: SIA human rights analysis
Task 6: Determining the implementation, obstacles, and awareness of iEPA	Task 15: SIA environmental analysis
Task 7: Rules of origin	Task 16: Development Cooperation
Task 8: Analysis of trade flows	Task 17: Proposals for policy recommendations
Task 9: Impact Evaluation	



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Ex-Post Evaluation



Implementation

- The Agreement has three key **Principles**: 1) Building on the acquis of the Cotonou Agreement; 2) Strengthening regional integration in the ESA region and 3) Asymmetry, SDT and variable geometry
- Almost all exported goods from Madagascar and Mauritius enter the EU market free of duty. About 97% of exported goods from Seychelles and 96% from Zimbabwe enter the EU market free of duties.
- Utilisation Rates for EU goods entering the markets of Madagascar, Mauritius, Seychelles and Zimbabwe are currently low.
- The stakeholder consultation shows that civil society in Madagascar and Seychelles has low levels of awareness of the interim EPA whereas in Mauritius and Zimbabwe it has high levels of awareness.
 - Respondent's submissions point to a range of sources of information – such as the print and digital media, academic writing, capacity building programmes, including meetings – which have helped stakeholders learn more about EPAs and the processes involved.
 - The ESA5 private sector companies, including SMEs, find it difficult to take advantage of opportunities presented through the EPA because of the comprehensive rules.
- Challenges and opportunities include RoR and values chains, compliance, development issues, and preferential market access.

Rules of Origin

- The ESA EPA Rules of Origin (RoO) are modelled on the Cotonou Partnership Agreement Rules of Origin in that they are product specific and based on either wholly obtained criteria or substantive transformation criteria, with substantive transformation being determined by value addition, change of tariff classification or specific process criteria.
- Preferential RoO should promote trade between the members of the preferential (or free) trade agreement while avoiding, to the extent possible, trade diversion by imposing restrictions.
- EPA eligible exports from Madagascar (almost 100%), Mauritius (almost 100%), Seychelles (about 97%) and Zimbabwe (about 96%) make significant use of the EPA preferences given to them by the EU.
- The ESA EPA countries are phasing in their preferential market access and will also maintain a list of sensitive products. To take full advantage of the EPA, the ESA EPA countries must:
 - take a less defensive position on RoO and to ere towards "liberalising" RoO to promote trade between the EU and the ESA EPA.
 - Take full advantage of the provisions of cumulation – this would also encourage deeper regional integration as well as encourage FDI into the ESA EPA countries.
 - Institutionalise the participation of the private sector in renegotiating RoO.
 - Promoting a deeper understanding of RoO and use them as part of strengthening ESA EPA industry participation into global value chains.
 - Support the simplification of the RoO by, supporting implementation of a registered exporter scheme.

Trade Flow Analysis

- Diverging trends in the period that followed the elimination of import tariffs by the EU in 2012.
- Annual growth rates of goods exports: Madagascar +8.6%, Seychelles +2%, Mauritius: -2.8%, Zimbabwe -1.3
- Madagascar was the largest ESA4 exporter to the EU in 2019 (989 million EUR), followed by Mauritius (613 million EUR), Zimbabwe (359 million EUR) and the Seychelles (182 million EUR)
- ESA4 countries' exports to the EU generally highly concentrated among the top 20 export commodities and generally characterised by generally lower value added
- Increased specialisation: concentration of exports within the top 20 export commodities increased for Madagascar, Mauritius and Zimbabwe after 2012 while remaining unchanged for the Seychelles
- EU exports to ESA countries generally much more diversified and characterised by higher value added
- ESA4 countries' total services exports to the EU generally increased from 2012 to 2018, amounting to 322 million EUR for Madagascar in 2018, 2 billion EUR for Mauritius, 567 million EUR for the Seychelles, and 207 million EUR for Zimbabwe.
- For Mauritius and the Seychelles, services exports to the EU are significantly higher than goods exports, driven by these countries' strong tourism services exports
- ESA4 countries' businesses deepened their international trade relationships with the rest of the world and also contributed to the deepening of regional (intra-African) trade integration

Economic Impacts

EU exports to ESA

- As concerns total EU exports in absence of the EPA, the biggest gains are estimated for Madagascar and Mauritius, but moderate gains in exports from the EU are also estimated for Zimbabwe.
- In absence of the EPA, EU total exports to Madagascar are estimated to be 30% lower, exports to Mauritius are estimated to be 32% lower and exports to Zimbabwe are estimated to be 8% lower
- EU manufacturing sectors are estimated to benefit most from tariff reductions on the side of ESA countries

ESA exports to EU:

- Mauritius and Zimbabwe are estimated to gain most from the EPA, with Mauritius benefiting most from preferential market access to the EU in terms of ESA countries' total exports to the EU
- ESA countries' agricultural and less knowledge-intensive (and less skill-intensive) manufacturing sectors are estimated to benefit most from tariff reductions that go beyond preceding preferential tariffs (Madagascar, Zimbabwe) and MFN tariffs (Mauritius) respectively

Additional impacts:

- LDCs' goods and services exports to the EU are hardly affected by the EPA
- The impacts of the "goods only" EPA are estimated to be relatively low, often negligible for most sectors of the economy when considering domestic sector output (overall production by domestic industries) in the EU and ESA countries

Environmental, social, gender and human rights impacts (1/2)

- The ex-post evaluation considers several channels through which the i-EPA can have environmental, social, gender and human rights impacts: 1) provisions related to trade and sustainable development (relatively few); 2) trade provisions; and 3) provisions on development cooperation.
- Overall, the **iEPA overall has not had major impacts on environmental, social conditions, gender and human rights conditions in ESA countries.**
 - The CGE modelling estimates that CO2 emissions have decreased slightly in Madagascar and Zimbabwe compared to a scenario without the Agreement; exports in several ESA sectors have increased according to the modelling, and these may have led to small improvements in employment and wages in these sectors as well as for the economy as a whole.
- **ESA5 countries have made some policy and institutional reforms, with some (uneven) improvements in governance.**
 - The EU has provided support through development cooperation. However, there is no evidence of strong links between national reforms, EU development cooperation, the Agreement itself and environmental, social and human rights conditions.
 - Positive examples include EU support for restructuring and innovation in the sugar sector in Mauritius. On the other hand, in Madagascar and Zimbabwe, it appears that political and economic instability has been a major factor shaping social and human rights conditions.

Environmental, social, gender and human rights impacts (2/2)

- **Environmental impacts appear linked to the scale of EU exports.**
 - The analysis has revealed a greater concentration of exports to the EU, rather than major structural effects linked to the diversification of exports (and thus potential reductions in environmental impacts per unit of exports).
 - The analysis did not find information on improvements in *environmental management techniques* or *governance* leading to reduced environmental impacts, though actions under the interim EPA as well as the SFPAs to better regulate fishing may lead to such results.
- **The analysis has identified important ongoing environmental, social, gender and human rights concerns in the major exporting sectors.** While these issues are not a direct result of trade with the EU, these issues are a concern for sectors exporting to the EU. Concerns include:
 - social conditions in **agricultural sectors** with major exports to the EU, including vanilla produced in Madagascar and tobacco in Zimbabwe, with reductions in employment, low salaries and instances of child labour and cases of disrespect of labour rights;
 - **manufacturing sectors**, such as the production of **textiles** in Madagascar, where *women* appear to be more adversely affected. Increased production in this sector can also increase water consumption and water pollution.
 - **mining** in Madagascar and Zimbabwe, with strong social, human rights and environmental problems.
- In sum, social, gender and human rights concerns have continued under the interim EPA. The evidence available is insufficient to draw a strong link between the iEPA itself and changes in these sectors. Moreover, EU development cooperation has sought to strengthen governance. The concerns nonetheless remain, indicating key areas where further policy action is needed.

Government and Business Environment

- Both governance and the business environment vary greatly across the five ESA countries.
 - International indicators give higher scores to the higher income countries.
 - For both areas, international indicators show some improvements in ESA countries since the negotiation of the interim EPA.
- While the influence of the interim EPA is difficult to discern, the agreement calls for development cooperation to support governance and the business environment in the ESA countries.
 - A review has shown that relevant development projects and programmes implemented since 2012, both at regional scale and for individual countries, have sought to strengthen aspects of governance and improve key areas of the business environment in the five ESA countries.
- Thus, EU action is clearly linked to *outputs* in the areas of governance and the business environment, and it is likely that it also has had an influence in terms of *outcomes* within the countries.

Development Cooperation

- We have analysed about 60 country specific and regional programmes under the 10th and 11th European Development Fund (EDF). They include from capacity building (infrastructure governance, civil society participation), education measures, sectoral support and regional programmes.
- The different projects and programmes have increased the ability of ESA5 countries to make sense of the interim EPA; at least they contribute to the two main objectives, namely enhanced competitiveness of ESA economies as well their structural adjustment.
- Problems are the lack of ownership in the ESA5 countries and deficits in the targeting of the measures on the EU's side and governance weaknesses on the side of the ESA5 governments, albeit to a different extent. Mauritius seems to be an exception that made very good use of the support.
- In sum, the EU assistance to ESA5 countries is coherent with the general objectives of the interim EPA between the European Union and the ESA5 partners.



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Sustainability Impact Assessment (SIA)

3 Documents:

- Trade in goods,
- Trade in Services,
- TSD Chapter



SIA Report on Trade in Goods – Economic Impacts

- A **major economic impact** is considered to originate from potential **rules of origin provisions**. Based on favourable rules of origin, the agreement could provide duty free quota free access for ESA5 countries to the EU market.
- Also provisions regarding **technical barriers to trade** are expected to have **major economic impacts** in all economic sectors.
- Also **SPS measures** are an area where **major economic impacts** are expected, in particular in sectors such as food products as well as livestock and live animals, and pesticides. ESA5 countries will likely upgrade their standards as they will face more competition from other regions, which can also lead to increase export diversification, increased competitiveness and export standards. Potential **customs procedures provisions** are likely to facilitate increased trade activity and lead to cost saving for ESA5 countries. These **economic impacts can be regarded as minor**.
- Also potential **registration and import/export licensing regulations** are expected to have a **minor economic impact**, mainly indirectly through better implementation.
- Regarding **fisheries and agriculture**, extensive market opening in key agricultural products like dairy and beef, poultry, vegetables could represent a **potential danger for local farmers in ESA5 countries**, and, for example, the fisheries sector in Comoros.

SIA Report on Trade in Goods – Environmental Impacts

- Potential **reduction of pests and diseases in agriculture** due to the implementation of SPS measures could help to improve animal welfare through promotion of OIE standards.
- A **potential negative environmental effect of increased SPS provisions** could be that it encourages the livestock sector in ESA5 countries to develop for export (particularly the larger ones, Madagascar and Zimbabwe), which could cause land use change, increased emissions and potentially deforestation damaging to biodiversity.
- Under **TBT measures**, greater adherence to international standards could **improve consumer safety** also for goods produced for domestic ESA markets.
- **Customs procedures and import and export licensing** could strengthen **controls on the illegal trade in endangered species**. This is particularly relevant given the ESA5 states' rich biodiversity.
- **Provisions to promote trade for the repair and manufacture of goods** could facilitate the development of circular economy practices between Parties.
- **Development cooperation** to aid the implementation of provisions could have positive impacts on the environment.

SIA Report on Trade in Goods – Social Impacts

- Potential growth of exports from ESA5 countries to the EU, combined with lower import costs, could **enhance possibilities to move from lower to higher added-value products**, which is expected to support economic growth and, in turn, have **positive impacts on occupation, salaries and working conditions**.
- Positive impacts could reduce progressively over time, and even disappear, as other ACP and third countries sign EPAs with the EU and adhere to EU standards and procedures, increasing competition for EU markets.
- **Positive impacts of increased exports are not likely to manifest in the same way for all ESA5 countries**. Low-income countries may be less likely to increase their exports towards the EU in the short term, but domestic sectors would be exposed to increased EU imports.
- **Development cooperation and technical assistance** on standards, customs procedures and licensing regulations are necessary for the positive impacts of increased exports towards the EU to occur.

SIA Report on Trade in Goods – Policy Recommendations

- Regarding **implementation**, the private sector and potential new investors should be involved more closely in the trade negotiations.
- ESA5 countries need **better coordination of capacity building activities** as they need to improve the visibility and flow of information.
- With respect to market opening in ESA5 countries, **liberalization commitments should be pegged to clear development thresholds or benchmarks**. In addition, negotiations should ensure the **mitigation of negative aspects of the EPA**. The two main negative potential impacts of EPAs will be on tariff revenue loss and possibly loss of business for domestic producers.
- As reciprocal trade with the EU affects issues such as poverty as well as food security, the negotiating partners should consider **adaptation mechanisms under the EPA** and that a number of sensitive products are excluded in the agreement, at least in the medium run.
- There should also be a **closer alignment of the development and trade components of the EPA**.
- Regarding **regional aspects of the EPA**, negotiators should take into account the relations between different regional integration areas with the need to align different RoOs. In addition, negotiations should take into account the situation of the EU's outermost regions (OR) in the context of the EPA.

SIA Report on Trade in Services – Economic Impacts

- **Major economic impacts** expected to originate from all services sectors covered by the negotiations: existing restrictions in **telecommunications** and **financial services**, anti-competitive regulations in **postal and courier services**, and new commitments on **legal aspects critical** for the facilitation of **digital and ICT enabled trade**.
- **Major economic impacts** expected from the elimination of **remaining investment barriers** e.g. unreasonable capital requirements and discriminatory joint venture requirements.
- Positive impacts from **improved competition in domestic markets**, improving the quality of supply, lowering prices paid by consumers (B2B and final consumers).
- **Positive impacts** expected for ESA economies **across sectors**: services and restrictions covered by the negotiations are important inputs to production in a broad range of other sectors of the economy.
- **Improvement of domestic regulatory frameworks** for services and investment expected to **increase the quality of governmental institutions** in the medium- to long-term.
- **Positive impact on the state of rule of law**: updated agreement would lock-in legal constraints on the creation of arbitrary and disproportionate future barriers to trade by ESA5 governments, thus improving the state of the rule of law in ESA countries.

SIA Report on Trade in Services – Policy Recommendations

- Negotiators from the EU and individual ESA countries should aim for **ambitious provisions on investment liberalisation** for all sectors of the economy, except those that should remain closed because of a legitimate national or European public interest, e.g. public health and security and national defence.
- Each ESA5 country could develop a **National EPA Committee** which could develop the trade and development components of the National EPA Plan, based on the commitments made in the comprehensive EPA, and monitor implementation on a continuous basis.
- ESA5 countries are in need of **improved coordination of capacity building activities**.
 - The EU can support the capacity building process in all ESA5 countries by identifying weakness and using its own institutional experiences in the liberalisation of trade in services and investment, as well as the enforcement of implementation measures.
 - Part of the EU's development budget could be spent on accompanying measures related to the facilitation of investment and of trade in services in all ESA5 countries.

TSD Chapter - Measures

Provisions identified to have the greatest potential impacts in the ESA countries:

- **Better implementation of multilateral environmental agreements (MEAs).** ESA5 countries have ratified a broad range of MEAs, but their implementation varies. This provision – if supported by policy development and capacity building – **could strengthen efforts to address illegal trade in endangered species**, especially in Madagascar and Zimbabwe, which are particularly rich in biodiversity. **Implementation could also further protect forests, develop new forms of renewable energy to address climate change, and strengthen climate adaptation actions.**
- **Multilateral labour standards and agreements.** ESA5 countries have ratified many ILO treaties, but further efforts are needed for their implementation. This provision – if accompanied by policy development and by capacity building for inspectorates, unions and civil society and enterprises – **could help to address key concerns such as child labour** (in particular in lower-income ESA countries) and improve working conditions.
- The proposed Article on **the promotion of gender equality** could lead to strengthening the legal and policy frameworks in ESA countries and thus to improving wage equality, women's participation in the formal workforce and women's conditions of work.
- **Promotion of responsible supply chain management could lead to ESA legislation** promoting corporate social responsibility (CSR) and responsible business conduct (RBC), **which in turn could help improve the practices of ESA businesses as well as foreign investors.** EU traders and investors could play greater attention to their supply chains in ESA countries. Consequently, this provision could support the other provisions in the TSD Chapter.
- **Greater transparency and greater civil society participation**, together with strong monitoring requirements, would support awareness of the EPA and facilitate its implementation by strengthening information actions taken for the other sustainability provisions, as well as the results achieved.

TSD Chapter – Recommendations (1/2)

Reinforcing environmental provisions

- Include marine pollution (SDG 14.1) in the text of **Art. X.8** on marine biological resources, strengthen wording in **Art. X.5** concerning cooperation on promotion of low-carbon technologies in the context of fighting climate change to highlight the transfer of technology from EU to ESA5 countries on favourable terms (SDG 17.7)
- Scheduling regular **round-table discussions** dedicated to specific topics (e.g. climate, biodiversity), define key indicators, to be regularly reviewed by the monitoring committees in order to assess implementation of MEAs.
- Development of **country action plans** with implementation steps and environmental targets.
- Inclusion of **access to ‘environmental justice**.

Reinforcing social, gender and human rights provisions

- On **labour issues**, Art X.3 could: a) explicitly refer to the ratification of the ILO governance conventions, b) mention the goal of eliminating the worst forms of child labour as a priority c) mention attention to vulnerable groups such as migrants and temporary workers, d) specify that multilateral labour standards and agreements apply equally in export processing zones.
- On **gender equality**, refer to actions to ensure participation of women in political and economic decision making, in line with the UN CEDAW.
- On **human rights**, cite international agreements that explicitly address this sphere (e.g. the Cotonou Agreement), and explicitly refer to the right to health

Strengthening links to CSR/RBC

- Consider implementation and results of CSR and RBC actions in monitoring and in civil society mechanisms.

Strengthening transparency, participation and monitoring

- Text to include more details on civil society mechanisms, even beyond other recent EU Agreement
- Add further details on monitoring mechanisms, and define a pathway for civil society to bring major issues to the attention of the DRM.

TSD Chapter – Recommendations (2/2)

Issue	Possible cooperation actions
Trade and environment	<ul style="list-style-type: none"> • Capacity building to strengthen: <ul style="list-style-type: none"> ○ awareness and enforcement of CITES rules, reducing illegal wildlife trade ○ domestic environmental legislation ○ government structures for environmental protection ○ approaches to support the needs of rural communities and promote more sustainable natural resource use • Support for investments, including for renewable energy and energy efficiency
Multilateral labour standards	<ul style="list-style-type: none"> • Capacity building to strengthen: <ul style="list-style-type: none"> ○ labour inspectorates ○ trade unions and other workers' representatives ○ occupational safety and health in enterprises
Promotion of gender equality	<ul style="list-style-type: none"> • Support for women's groups in ESA countries and for women in leadership positions, including entrepreneurs
Responsible supply chain management	<ul style="list-style-type: none"> • Strengthening government capacity to develop CSR/RBC legislation and policies; • Strengthening business capacity to put in place CSR/RBC policies through their supply chains • Promotion of sustainability labelling for export products
Transparency, participation and monitoring	<ul style="list-style-type: none"> • Strengthening civil society capacity in ESA countries for participation and for monitoring of trade impacts • Supporting regular, structured monitoring exercises of actions related to the TSD Chapter and of trade and investment impacts on sustainability



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2 Case Studies



Tuna Fisheries

- Tuna fish and fish products, mainly whole frozen, but also canned tuna, is the main ESA export to the EU.
- Because Comoros is included in the list of non-cooperating countries in the fight against IUU fishing, the EU does not have a fisheries bilateral agreement with Comoros. The SFPA with Madagascar has expired so there are no licensed EU registered fishing vessels operating in Madagascar's EEZ. Under the SFPA with Mauritius the EU provides a financial contribution which pays for access to an agreed tonnage of tuna plus targeted actions for the development of the fisheries sector and the development of the maritime policy and ocean economy. About 53% of the financial contribution from the EU to Seychelles under the SFPA is dedicated to the support of the Seychelles fisheries sector.
- In moving to a Comprehensive EPA Fisheries text it is suggested that:
 - Binding text relate to a development component specifically for Marine Fisheries is included, ideally in the format of the OECD's four main components of Aid for Trade.
 - The text of the ESA EPA could be more closely aligned to that of the UN Convention on the Law of the Sea (UNCLOS) and to other relevant international agreements and regional conservation and management measures.
 - The text on Fisheries Management and Conservation Issues and VMS and Post Harvest Arrangements should be linked to the agreements made under IOTC.
 - The ESA EPA text could be more closely aligned with the Agreement on Port State Measures to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing (PSMA).
 - TSD (human rights, labour rights, environmental sustainability, and economic sustainability) is a cross-cutting issue for Marine Fisheries and should include a comprehensive set of binding provisions, anchored in multilateral standards
 - The institutional structure of the Fisheries Chapter should be inclusive and allow civil society to play a monitoring and advisory role.

Mining

- The Mining Case Study focuses on Artisanal and Small-Scale Mining (ASM) in Madagascar and Zimbabwe.
- Both Madagascar and Zimbabwe face challenges in managing the ASM sector to ensure human rights are observed, the mining processes are managed to reduce the level of environmental degradation and the buying process is equitable and seen to be fair by all parties.
- In Zimbabwe the gold sector is compromised on many fronts. The centralised gold buying system underpays producers, a practice that encourages smuggling and erodes industrial mining profits, leading companies to close mines. Idle industrial mines become targets for intrusion by artisanal miners, often with the connivance of actors linked to the ruling elite. This feeds an elaborate patronage economy, found in many African resource-rich countries, which can give politicians an incentive to protect the status quo. There is little recourse to the legal system as artisanal miners have no collective rights and in case of disputes authorities often apply the law unevenly, failing to hold politically connected parties to account.
- In Madagascar, the challenges are more on the environmental degradation of protected areas especially and on the use of children, especially in the gemstone mining sector, to carry out what are often dangerous mining tasks.
- The comprehensive EPA could be used to help Zimbabwe and Madagascar address some of the challenges faced in their ASM sectors through strengthening the provisions of Article 43 of the ESA interim EPA and to establish a conducive environment for attracting investment in the sector; promote value addition and environmentally friendly technologies in the mining productive processes; and ensure participation of local communities.
- The Governments of Madagascar and Zimbabwe could take immediate measures to support the ASM sector by improving the gold buying system, establish a reporting system, give artisanal mining cooperatives and groupings legal standing, improve the legal framework to effectively reduce and eradicate child labour, strengthen extension and training programmes for the ASM sector, provide support to Civil Society, support the digital cadastre survey
- The Extractives Industries Transparency Initiative Principles and the Africa Mining Vision principles could be components of the Comprehensive ESA EPA Mining Chapter.



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Thank you!

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