



Strengthening Africa in World Trade



Greening Trade or Raising Barriers?

**EU Sustainability Regulations and their implications for
Agricultural Value Chains in EAC and SADC under the
Post-Cotonou EU-Africa Partnership**



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Executive Summary

Sustainability considerations are rapidly reshaping global trade governance, with the European Union (EU) at the forefront of integrating environmental and social standards into market access requirements under the European Green Deal. Key regulatory instruments such as the EU Deforestation Regulation and the Corporate Sustainability Due Diligence Directive translate sustainability objectives into legally binding obligations for exporters.

While these frameworks respond to urgent global challenges, including climate change, biodiversity loss, and supply chain accountability, their implementation is unfolding within a highly unequal global trading system. This study finds that, rather than operating on a level playing field, these regulations risk disproportionately shifting the burden of compliance onto producers in the African countries, particularly smallholder farmers who have limited capacity to absorb additional costs.

In the East African Community (EAC) and the Southern African Development Community (SADC), agriculture remains central to livelihoods, employment, and economic stability. Export-oriented value chains, especially in coffee, tea, cocoa, and horticulture, are predominantly smallholder-based. However, compliance with EU requirements such as traceability, geolocation, and environmental verification introduces significant operational and financial challenges. These include the need for digital monitoring systems, improved record-keeping, and coordination across fragmented supply chains.

Evidence from the region highlights uneven preparedness. More integrated sectors, such as Kenya's horticulture industry, have made progress in meeting stringent standards, while dispersed smallholder systems such as coffee production in Uganda and Tanzania face more substantial constraints. Without adequate support, these disparities risk deepening existing inequalities and excluding vulnerable producers from high-value export markets.

At the same time, sustainability regulations present potential opportunities for upgrading value chains, improving environmental practices, and enhancing transparency. However, these benefits are not automatic. They depend on the availability of targeted support, including access to finance, technical assistance, and institutional strengthening. In the absence of such measures, sustainability transitions may reinforce structural imbalances rather than contribute to inclusive development.

The Samoa Agreement provides an important platform for addressing these challenges within EU–Africa cooperation. It offers a pathway to align sustainability objectives with development priorities and to mobilise resources for building compliance capacity in partner countries. Its effectiveness, however, will depend on whether it is used to address underlying asymmetries in global trade or simply to facilitate regulatory compliance.

This study argues that achieving a just and inclusive green transition requires a shift from compliance-driven approaches toward more cooperative and development-oriented models of sustainability governance. This includes recognising differentiated capacities across countries

and sectors, redistributing compliance costs more equitably along value chains, and ensuring that smallholder farmers are supported as central actors in the transition.

Ultimately, the challenge of greening global trade is not only environmental but also structural and political. Without deliberate efforts to embed equity and fairness, sustainability regulations risk marginalising those least equipped to comply, undermining both development outcomes and the legitimacy of the global sustainability agenda.

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1. Introduction and Context

1.1 Rising Sustainability Regulations in Global Trade

Sustainability considerations are increasingly shaping the rules and governance structures of international trade. Over the past decade, environmental protection, climate change mitigation, biodiversity conservation, and responsible supply chain governance have become central elements in the trade and regulatory strategies of major global markets. The European Union (EU) has emerged as a leading actor in promoting sustainability-oriented regulatory frameworks aimed at ensuring that products entering its market comply with higher environmental and social standards (European Commission, 2023; OECD, 2023).

A major driver of this regulatory shift is the EU's broader policy agenda under the European Green Deal, which seeks to transform the EU into a climate-neutral and environmentally sustainable economy (EU, 2019). The EU has adopted a growing number of regulatory instruments to address concerns related to deforestation, biodiversity loss, climate change, and human rights within global supply chains. Measures such as the EU Deforestation Regulation (EUDR) and the Corporate Sustainability Due Diligence Directive (CSDDD) introduce new requirements related to supply chain traceability, environmental verification, and corporate accountability for environmental and social risks across production networks.

These regulatory developments extend beyond the internal governance of EU markets. Increasingly, sustainability standards are being externalised through trade-related regulatory mechanisms that shape the conditions under which products can enter European markets. Exporters seeking access to the EU must therefore demonstrate compliance with evolving sustainability requirements, including the traceability of commodities, geolocation of production sites, and verification that production practices do not contribute to environmental degradation. As a result, sustainability considerations are becoming embedded within the architecture of global trade governance, influencing how agricultural commodities are produced, monitored, and traded across international supply chains.

While sustainability regulations aim to promote responsible production and environmental stewardship, their implementation also raises important questions regarding equity and distributional impacts across global value chains. Producers operating in the African countries frequently face different institutional, financial, and technological conditions compared to those in advanced economies. For many agricultural systems in Africa, production remains predominantly organised through smallholder farming systems characterised by fragmented landholdings, limited digital infrastructure, and constrained access to financial and technical resources (FAO, 2023; World Bank, 2022).

These structural characteristics are particularly relevant in the context of the East African Community (EAC) and the Southern African Development Community (SADC). Across many countries within these regional blocs, agricultural production is dominated by smallholder farmers who supply commodities such as coffee, cocoa, tea, and horticultural products.

These farmers represent the principal rights holders within agricultural value chains, yet they often possess the least capacity to absorb the administrative and financial costs associated with emerging sustainability compliance systems.

As sustainability standards increasingly influence market access conditions, the implications of these regulations extend far beyond exporting firms or international traders. Compliance requirements frequently cascade along supply chains and ultimately affect producers at the farm level. Smallholder farmers may be required to provide farm-level geolocation data, participate in traceability systems, maintain production records, and comply with certification or environmental monitoring requirements. In many rural contexts where institutional support and digital infrastructure remain limited, adapting to such regulatory demands can present significant practical challenges.

The EU sustainability standards have been developed within a broader context of evolving trade relationships between African economies and major international markets. Agricultural exports remain a critical source of employment, rural income, and foreign exchange earnings across many countries in the EAC and SADC regions. Consequently, regulatory changes that affect market access conditions for agricultural commodities have the potential to influence not only trade flows but also the livelihoods of rural communities whose economic security depends on participation in global value chains.

The introduction of sustainability-related trade regulations therefore raises an important analytical question: do these emerging regulatory frameworks represent a pathway towards greener and more responsible global trade, or do they risk creating new forms of regulatory asymmetry that disproportionately affect producers in the African countries? Addressing this question requires careful examination of how sustainability regulations interact with the structural characteristics of agricultural value chains, the institutional capacities of exporting countries, and the distribution of compliance costs across different actors within global supply chains.

1.2 EU-Africa Agricultural Trade at a Turning Point

Agricultural trade between Africa and the EU has long been characterised by deep economic interdependence and historically embedded trade relationships. The EU remains one of the most significant markets for African agricultural exports. Across many countries within the EAC and the SADC, agriculture continues to play a central role in employment, rural development, and national economic stability. In several countries within these regions, agriculture accounts for a substantial share of employment and remains one of the primary sources of income for rural populations. Unlike many agricultural systems in advanced economies, production in these regions is predominantly carried out by smallholder farmers cultivating relatively small plots of land within fragmented and labour-intensive farming systems. These smallholder farmers represent the principal rights holders within agricultural value chains, as they provide the primary labour, land stewardship, and production inputs that sustain export-oriented agricultural sectors. Moreover, smallholder farmers frequently operate under conditions characterised by limited access to financial services, digital technologies, agricultural extension services, and formal market infrastructure, hindering their competitiveness and compliance with additional market access requirements.

The integration of African agricultural commodities into global value chains typically involves multiple layers of intermediation linking smallholder farmers to international buyers. Producers often sell commodities to local traders or cooperatives, which then supply processors, exporters, and international trading companies responsible for delivering products to global markets. While these value chain structures facilitate the aggregation and export of commodities produced by dispersed smallholder farmers, they also introduce complexity when traceability and documentation requirements become more stringent.

In recent years, sustainability-related regulations in major importing markets have begun to reshape the terms under which these value chains operate. Market access conditions are increasingly influenced not only by tariffs and traditional quality standards (Dubey & Yogita, 2024) but also by regulatory requirements related to environmental protection, land-use practices, and supply chain transparency as evidenced by the EU measures. These developments are particularly significant for agricultural sectors in the EAC and SADC, where a large share of export production originates from smallholder-based farming systems.

As sustainability standards become embedded within trade governance, exporters and value chain actors must increasingly demonstrate the origin and environmental integrity of agricultural commodities entering international markets. Requirements such as farm-level geolocation mapping, traceability documentation, and sustainability verification may require new forms of data collection, monitoring systems, and institutional coordination across supply chains.

While these measures are designed to promote responsible production and environmental protection, they also introduce new layers of regulatory complexity that may disproportionately affect developing economies. Producers and exporters in regions with limited institutional capacity and technological infrastructure may face greater challenges in establishing the digital traceability systems, farm registries, and compliance verification mechanisms required by emerging sustainability frameworks.

For many smallholder farmers, the costs associated with adapting to such systems may extend beyond financial expenditures. Participation in traceability and certification programmes often requires training, documentation of production practices, and coordination with cooperative structures or exporters responsible for managing compliance systems. Without adequate institutional support, such requirements may risk excluding producers who lack the resources necessary to participate fully in evolving compliance frameworks.

These developments therefore place EU-Africa agricultural trade at an important turning point. On the one hand, sustainability standards may encourage improvements in environmental management, supply chain transparency, and agricultural production practices. On the other hand, the uneven distribution of regulatory capacity between major importing markets and exporting regions raises important questions regarding the fairness and inclusiveness of emerging sustainability regimes in global trade.

For policymakers, development partners, and regional organisations across the EAC and SADC, the central challenge lies in ensuring that sustainability transitions within global markets do not inadvertently marginalise the smallholder farmers whose livelihoods depend on continued

participation in international agricultural value chains.

1.3 From the EU Green Deal to Trade Regulations

The European Green Deal represents the European Union's overarching policy framework for achieving climate neutrality and promoting environmentally sustainable economic development. Since its introduction, the Green Deal has expanded beyond domestic environmental policy and increasingly influences the EU's approach to global trade and supply chain governance (Leonard et al., 2021). A central feature of this policy shift is the growing integration of sustainability objectives into the regulatory conditions governing access to the European market. Consequently, the EU has introduced a series of legislative and regulatory initiatives designed to address environmental degradation, biodiversity loss, deforestation, and human rights risks associated with global production networks. These initiatives reflect a broader effort to ensure that products consumed within the EU are produced in ways that align with environmental sustainability and responsible business practices.

Among the most prominent regulatory developments is the EU Deforestation Regulation (EUDR), which seeks to ensure that commodities entering the EU market are not linked to deforestation or forest degradation. The regulation applies to several globally traded agricultural commodities, including coffee, cocoa, soy, palm oil, cattle, rubber, and wood products. Under the EUDR, companies placing these commodities on the EU market are required to demonstrate that products originate from land that has not been subject to deforestation after a specified cut-off date. This requirement, now amended to apply from 30 December 2026, introduces new obligations related to supply chain traceability, including the collection of farm-level geolocation data, verification of production locations, and documentation demonstrating compliance with environmental criteria (Stares, 2026).

The EU has also advanced regulatory initiatives aimed at strengthening corporate accountability within global value chains. The Corporate Sustainability Due Diligence Directive (CSDDD) requires companies to identify, assess, and address environmental and human rights risks throughout their supply chains (EU, 2024a). Under this framework, firms are expected to implement due diligence processes that extend beyond direct suppliers to include upstream production activities, including agricultural production systems located in exporting countries. The EUDR and CSDDD regulatory initiatives represent a significant evolution in how sustainability considerations are embedded within global trade governance. Historically, market access conditions were largely shaped by tariffs, quotas, and sanitary or phytosanitary standards (Matsushita et al., 2015). In contrast, emerging sustainability regulations increasingly regulate how commodities are produced, rather than merely the characteristics of final products entering international markets.

For agricultural exporters in the African countries, this shift introduces a new regulatory dimension that directly affects production systems and supply chain organisation. Exporters supplying the EU market must now establish systems capable of demonstrating the environmental integrity and traceability of commodities throughout complex global value chains. This may involve mapping production sites, registering farms, documenting land-use practices, and establishing monitoring mechanisms capable of verifying compliance with regulatory requirements.

These regulatory obligations do not operate solely at the level of exporting firms or multinational companies. Rather, they extend across entire value chains and often reach producers located at the earliest stages of agricultural production. In regions such as the EAC and SADC, where agricultural production is largely undertaken by smallholder farmers, compliance with such requirements may require substantial adjustments to existing production and marketing systems. Smallholder farmers in the EAC and SADC region frequently cultivate crops on small plots of land and participate in export-oriented value chains through networks of traders, cooperatives, and exporters. In such systems, establishing farm-level geolocation data, maintaining traceability records, and participating in sustainability verification processes can require new forms of technical support, digital infrastructure, and institutional coordination. Without adequate support mechanisms, these regulatory requirements may introduce additional burdens for these producers who already operate within resource-constrained environments.

The sustainability regulations may create incentives for improvements in supply chain transparency and environmental management. It is argued that strengthened traceability systems may enable exporters and producer organisations to gain better oversight of production networks and improve monitoring of land-use practices (EU, 2024a).

However, these regulatory developments are not being implemented within a neutral global landscape. Rather, they are embedded within a global political economy characterised by asymmetries in institutional capacity, technological infrastructure, and regulatory influence (Akokpari, 2017). As sustainability standards become increasingly tied to market access, there is a growing risk that compliance burdens will be disproportionately transferred to the African countries. African producers, particularly smallholder farmers who possess the least capacity to absorb them. This raises critical questions regarding whether emerging sustainability frameworks will contribute to a more equitable global trading system or reinforce existing structural inequalities.





2. Implications for African Agricultural Exporters

The evolving landscape of sustainability regulations in global trade is introducing new operational realities for agricultural exporters seeking access to the European Union (EU) market. While sustainability standards are not entirely new to international agricultural trade, recent regulatory developments linked to the EU's broader sustainability agenda have significantly expanded both the scope and enforceability of compliance requirements. These changes increasingly affect not only large exporting firms but also the wider network of actors involved in agricultural value chains, including cooperatives, traders, processors, certification bodies, and producers.

The implications of these regulatory shifts are particularly significant for agricultural sectors in the EAC and the SADC) where export-oriented value chains frequently rely on dispersed smallholder production systems. In these contexts, agricultural commodities are often sourced from large numbers of smallholder farmers and aggregated through networks of traders, cooperatives, and exporters before entering international markets. As sustainability regulations introduce more stringent requirements related to traceability, environmental verification, and supply chain due diligence, the capacity of these value chains to adapt becomes an increasingly important factor shaping continued market access.

A central element of these regulatory shifts is the growing emphasis on traceability and supply chain transparency. Under frameworks such as the EUDR, companies placing certain commodities on the EU market must demonstrate that products are not associated with deforestation or environmental degradation. Meeting these requirements requires exporters to establish systems capable of identifying the origin of commodities, verifying production practices, and maintaining documentation that allows products to be traced back to specific

production sites.

While such systems may already exist in certain export-oriented sectors with well-developed certification structures, many agricultural value chains across Africa remain characterised by fragmented production systems and limited digital infrastructure. In such contexts, the introduction of new regulatory requirements can require substantial investments in data collection systems, farm registries, geolocation mapping technologies, and supply chain monitoring mechanisms (FAO, 2023; OECD, 2023).

These compliance requirements ultimately extend beyond exporters themselves and frequently reach producers at the earliest stages of agricultural production. In smallholder-dominated systems, the responsibility for generating farm-level data, documenting production practices, and participating in traceability systems may fall upon farmers who possess limited financial and technological capacity to meet such obligations. As a result, sustainability regulations introduced in major importing markets increasingly shape how agricultural production systems operate within exporting regions.

2.1 New Market Entry Requirements

One of the most immediate effects of emerging sustainability regulations is the introduction of new market entry requirements that extend beyond traditional quality and safety standards. Under regulatory frameworks such as the EUDR, exporters placing certain commodities on the EU market must now demonstrate that their products comply with specific environmental criteria related to land use, deforestation risk, and supply chain transparency.

A central component of these requirements is the establishment of robust traceability systems capable of identifying the origin of agricultural commodities throughout the supply chain. Exporters are increasingly required to maintain documentation that enables products to be traced back to specific production sites. In practical terms, this often involves the collection of geolocation coordinates for individual farms, the registration of producers within digital traceability systems, and the establishment of monitoring procedures that ensure products entering export channels originate from compliant production areas.

For agricultural exporters operating in the East African Community (EAC) and the Southern African Development Community (SADC), implementing such traceability systems can present significant organisational and technological challenges. Many export commodities – such as coffee, cocoa, tea, and certain horticultural products – are produced by large numbers of smallholder farmers whose farms are dispersed across rural landscapes. Commodities are frequently aggregated through networks of traders, cooperatives, and processors before reaching export markets. As a result, ensuring full traceability from farm to export shipment requires new forms of coordination and data collection across multiple actors within agricultural value chains.

These developments place increasing emphasis on the role of producer organisations, cooperatives, and exporters in coordinating compliance systems. Cooperatives may be required to register farmers, collect geolocation data, organise sustainability training programmes, and maintain records documenting production practices. Exporters, in turn, must develop internal

monitoring systems capable of verifying that suppliers comply with regulatory requirements established in importing markets.

However, the practical implementation of these systems often depends on the participation of smallholder farmers, who represent the primary producers within many agricultural value chains in EAC and SADC countries. Farmers may be required to provide information on farm boundaries, document land-use practices, and participate in traceability or certification programmes designed to demonstrate compliance with environmental standards. For producers operating in rural areas where access to digital technologies, extension services, and financial resources remains limited, meeting these requirements can present significant challenges (FAO, 2023; World Bank, 2022).

In addition to traceability obligations, exporters may also be required to provide documentation demonstrating that production practices comply with environmental regulations related to deforestation, biodiversity protection, and land-use management. This may involve verifying that agricultural production has not taken place on land subject to recent deforestation or environmental degradation. Such verification processes frequently rely on geospatial monitoring tools, satellite data, and digital mapping systems capable of linking production sites to environmental risk assessments.

While these measures are designed to strengthen environmental accountability within global supply chains, they also represent a significant shift in market access conditions. Rather than focusing solely on product quality or safety standards, sustainability regulations increasingly regulate how commodities are produced and monitored throughout the supply chain. For exporters and producers in African countries, adapting to this evolving regulatory environment requires new institutional arrangements, technological infrastructure, and forms of coordination among value chain actors.

For many agricultural sectors across the EAC and SADC, the ability to establish reliable traceability and monitoring systems will therefore play a critical role in determining whether producers can continue to access EU markets under emerging sustainability governance frameworks.

2.2 New Compliance Responsibilities for Exporters

Beyond the introduction of new market entry requirements, emerging sustainability regulations are also reshaping the ongoing compliance responsibilities of companies involved in agricultural export value chains. Exporters supplying the European Union (EU) market are increasingly required to establish monitoring systems capable of demonstrating that their sourcing practices comply with environmental and social standards established under evolving regulatory frameworks.

Under initiatives such as the Corporate Sustainability Due Diligence Directive (CSDDD), companies are expected to identify, assess, and address environmental and human rights risks within their supply chains. This obligation extends beyond direct suppliers and increasingly encompasses upstream production activities, including agricultural production systems located in exporting countries. Firms are therefore required to implement due diligence processes

designed to ensure that commodities sourced from international suppliers comply with regulatory requirements related to environmental protection, labour standards, and responsible land use.

For exporters operating in the East African Community (EAC) and the Southern African Development Community (SADC), these responsibilities will involve the development of new systems for supplier monitoring, risk assessment, and documentation of production practices.

Export companies must increasingly maintain detailed records of supplier networks, verify the origin of commodities, and demonstrate that production areas meet defined environmental criteria. These processes may require exporters to invest in digital monitoring platforms, traceability databases, and internal compliance management systems capable of responding to regulatory scrutiny from importing markets.

In many agricultural value chains, exporters rely on networks of intermediaries - including traders, collection centres, and producer cooperatives - to aggregate commodities from large numbers of smallholder farmers. As sustainability regulations introduce more stringent compliance requirements, exporters must therefore work closely with these intermediaries to ensure that supply chain actors adhere to regulatory standards. This often involves providing training programmes on sustainability practices, supporting the collection of farm-level data, and implementing verification procedures designed to reduce compliance risks.

These developments highlight the increasingly important role of cooperatives and producer organisations in facilitating regulatory compliance. In many contexts, cooperatives act as intermediaries between smallholder farmers and exporters by organising production, coordinating certification processes, and maintaining records required for traceability systems. Strengthening these institutions can therefore play a critical role in enabling smallholder-based agricultural systems to adapt to evolving sustainability requirements.

Nevertheless, the practical implementation of due diligence frameworks can place significant pressure on exporters and value chain actors operating in resource-constrained environments. Monitoring large networks of smallholder producers, collecting farm-level geolocation data, and maintaining documentation systems capable of demonstrating compliance with environmental standards can involve substantial administrative and financial costs (OECD, 2023; UNCTAD, 2023).

Compliance costs in agricultural value chains are often unevenly distributed, with formal responsibility placed on exporters but much of the practical burden falling on smallholder farmers and local intermediaries. These farmers would be required to provide geolocation data, maintain detailed production records, and participate in certification schemes to demonstrate environmental compliance. In the EAC and SADC, where agriculture is largely dominated by smallholders with limited access to capital, technology, and market infrastructure (Nyambo et al., 2022), these requirements can impose a significant financial and operational burden. Consequently, regulatory pressures driven by the EU sustainability standards would shift downward along the value chain, disproportionately impacting African producers who are already resource-constrained.

2.3 Regulatory Timelines and Preparedness Gaps

An additional dimension of emerging sustainability regulations concerns the timelines for regulatory implementation and the preparedness of exporting countries to meet new compliance requirements. Several of the regulatory frameworks introduced under the EU's sustainability agenda include clearly defined implementation deadlines, after which products that fail to meet established standards may no longer be eligible for placement on the EU market.

For agricultural exporters operating in the African countries, adapting to these regulatory timelines can present significant challenges. Establishing traceability systems, collecting farm-level geolocation data, registering producers, and implementing monitoring mechanisms are complex processes that often require sustained investments in infrastructure, digital technologies, and institutional coordination. These processes are particularly demanding in agricultural sectors where production is organised through dispersed smallholder farming systems.

Across the EAC and the SADC, levels of preparedness for these regulatory transitions vary considerably. In certain export sectors - particularly those that have long supplied European Retail markets - elements of traceability and certification systems are already in place. For example, segments of the horticulture industry in countries such as Kenya have developed relatively sophisticated compliance systems through decades of engagement with European supermarket supply chains.

However, many other agricultural value chains across the region remain characterised by fragmented production structures, limited digital infrastructure, and constrained institutional capacity. Commodities such as coffee, cocoa, and certain staple export crops are frequently produced by large numbers of smallholder farmers operating on relatively small plots of land. In these contexts, establishing reliable traceability systems requires coordinated efforts among farmers, cooperatives, exporters, and government institutions.

The collection of farm-level geolocation data alone can involve significant logistical challenges, particularly in rural areas where land registration systems may be incomplete and access to digital mapping technologies remains limited. Similarly, the establishment of national farm registries or digital traceability platforms often requires technical expertise, financial resources, and administrative coordination that may not yet be fully developed within many exporting countries.

These preparedness gaps raise concerns about the ability of smallholder-based agricultural value chains to adapt to rapidly evolving regulatory requirements within relatively short timeframes. When compliance deadlines are introduced without corresponding investments in capacity-building and institutional support, producers and exporters may face difficulties maintaining access to key international markets.

Smallholder farmers are particularly vulnerable in this context. Because they represent the

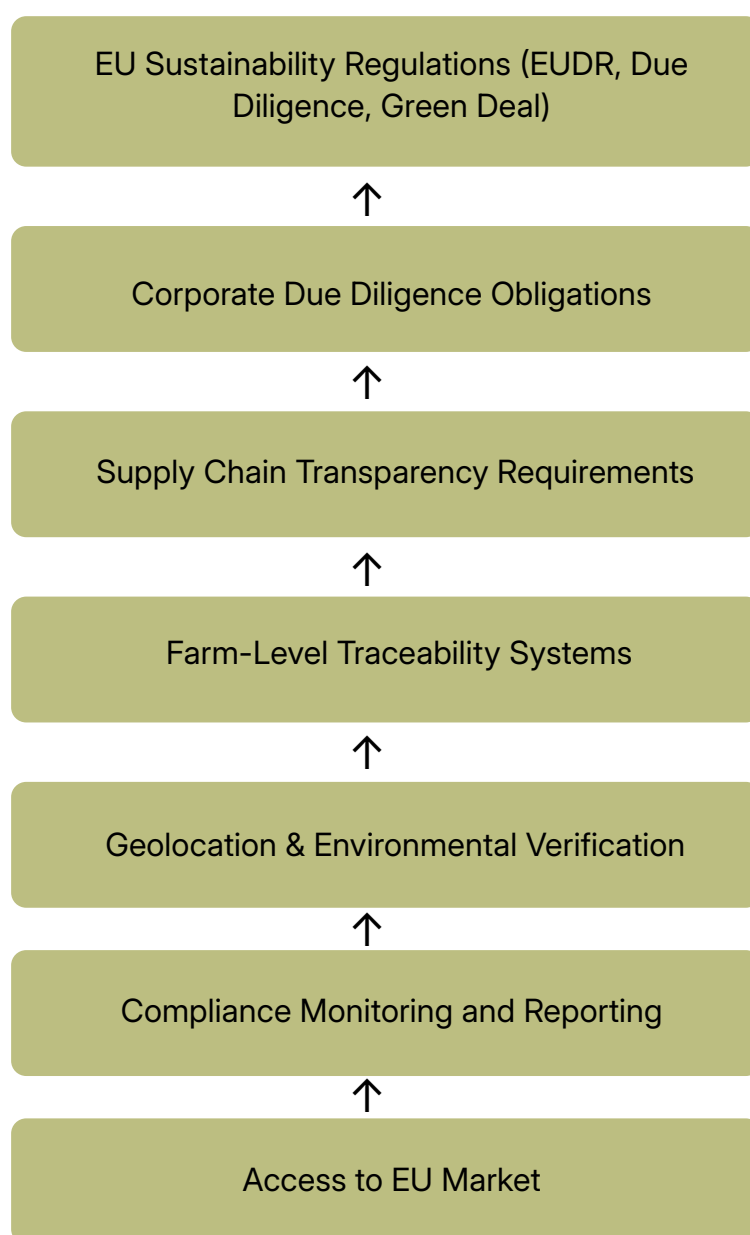
primary producers within many export-oriented value chains, their participation is essential for maintaining supply chain continuity. Yet they are also the actors who often possess the least capacity to absorb the costs associated with regulatory adaptation. Requirements related to geolocation mapping, record keeping, and participation in traceability systems may therefore create additional administrative and financial burdens for producers who already operate within resource-constrained environments (FAO, 2023; World Bank, 2022).

At the same time, preparedness gaps are not solely a question of farm-level capacity. They also reflect broader institutional challenges related to agricultural governance, digital infrastructure, and policy coordination across exporting countries. Governments may need to develop national traceability systems, strengthen regulatory agencies responsible for monitoring compliance, and support producer organisations that facilitate coordination between farmers and exporters. Addressing these challenges will therefore require coordinated efforts involving governments, regional institutions, exporters, development partners, and farmer organisations. Without such support mechanisms, the introduction of new sustainability regulations may risk creating



barriers that disproportionately affect smallholder-based agricultural systems in the EAC and SADC regions, potentially reshaping participation in global agricultural trade.

1. *The evolving architecture of sustainability compliance requirements associated with EU*



market access is illustrated in Figure.

These preparedness gaps highlight broader structural challenges associated with the implementation of sustainability regulations in smallholder-dominated agricultural systems. Where compliance requires significant investments in digital infrastructure, institutional coordination, and technical capacity, producers operating within resource-constrained environments may face increasing difficulties in maintaining market access. This raises important concerns regarding whether the emerging sustainability regulatory framework is sufficiently aligned with the developmental realities of exporting countries or whether it risks reinforcing existing asymmetries within global agricultural trade.



3. How African Agricultural Value Chains Are Affected

The introduction of more stringent sustainability regulations in global markets is beginning to reshape the structure and functioning of agricultural value chains connected to the European Union (EU). While these regulations are primarily aimed at promoting environmentally responsible production and improving supply chain accountability, their implementation is generating a range of operational, financial, and institutional adjustments across exporting regions. Across the East African Community (EAC) and the Southern African Development Community (SADC), agricultural value chains are typically organised through complex networks linking smallholder farmers, traders, cooperatives, processors, exporters, and international buyers. Smallholder farmers frequently cultivate crops on relatively small plots of land and supply commodities through local aggregation systems before these products enter export channels. As a result, regulatory changes introduced in major importing markets often have cascading effects throughout the entire value chain. While these changes are framed as efforts to promote environmental sustainability and accountability, their implementation may also redistribute costs and responsibilities across value chain actors in uneven ways, with particularly significant implications for smallholder farmers operating at the production end of these systems.

Across the East African Community (EAC) and the Southern African Development Community (SADC), agricultural value chains are typically organised through complex networks linking smallholder farmers, traders, cooperatives, processors, exporters, and international buyers. Smallholder farmers frequently cultivate crops on relatively small plots of land and supply commodities through local aggregation systems before these products enter export channels.

As a result, regulatory changes introduced in major importing markets often have cascading effects throughout the entire value chain.

Importantly, both the EAC and SADC encompass highly heterogeneous agricultural systems. Differences in production structures, export orientations, and institutional capacities exist not only between the two regional blocs but also among the countries within them. Even within individual commodity sectors, agricultural systems exhibit substantial variation across national contexts. For example, coffee production in Ethiopia and Uganda – two major producers supplying international markets – operates under distinct institutional and market structures. Ethiopia's coffee sector combines export-oriented production with a large domestic consumption market and a rapidly expanding specialty coffee segment, whereas Uganda's coffee industry is more strongly integrated into international commodity markets and is largely dominated by smallholder robusta production linked to trader-based supply chains. These differences illustrate that sustainability regulations may interact with national agricultural systems in distinct ways, generating differentiated compliance challenges across countries and value chains.

As sustainability regulations introduce new forms of traceability, monitoring, and verification, actors throughout agricultural value chains must adapt their operational practices. Exporters may need to establish supplier monitoring systems, cooperatives may be required to collect detailed farm-level data, and regulatory authorities may need to strengthen oversight mechanisms capable of verifying compliance with international standards. These adjustments can alter how value chains are organised and may increasingly favour more formalised and vertically coordinated supply systems.

At the same time, sustainability compliance is becoming embedded in the commercial relationships linking producers to international buyers. Importers supplying EU markets may introduce stricter procurement conditions, require sustainability certification or auditing systems, and prioritise suppliers capable of demonstrating compliance with environmental and social standards. These developments can reshape incentives across value chains, influencing how producers organise production and how exporters manage sourcing networks.

Crucially, while regulatory obligations are often directed at importing firms or exporting companies, the practical requirements associated with traceability, documentation, and sustainability verification frequently extend to producers at the earliest stages of agricultural production. In many cases, smallholder farmers – who represent the primary rights holders within agricultural production systems – are required to adapt their production practices and participate in compliance systems despite having limited access to financial, technological, and institutional resources (FAO, 2023; World Bank, 2022).

Understanding how these regulatory requirements affect different actors within agricultural value chains is therefore essential for assessing their broader development implications. The following subsections examine how compliance burdens are distributed across value chains, how smallholder farmers are affected by emerging regulatory requirements, and how these developments may influence the competitiveness of agricultural exports from the EAC and SADC regions.

3.1 Compliance Burdens Along the Value Chain

The introduction of sustainability regulations in major international markets is reshaping how agricultural value chains are organised and governed. While these regulations aim to strengthen environmental accountability and responsible production practices, they also introduce new compliance obligations that must be managed by actors throughout the value chain.

Meeting regulatory requirements associated with sustainability frameworks - such as traceability systems, environmental verification, and supply chain due diligence - often requires the development of new data collection mechanisms, monitoring systems, and certification procedures (EU, 2019). Exporters seeking access to markets governed by sustainability regulations must increasingly demonstrate that commodities can be traced back to compliant production areas and that production practices meet defined environmental criteria.

In practical terms, these requirements translate into a series of operational adjustments across agricultural value chains. Export companies may need to develop digital traceability platforms capable of tracking commodities from farm-level production through aggregation points to export markets. Such systems often rely on farm registries, geolocation data, and digital databases capable of linking individual producers to specific supply chain transactions. Establishing these systems frequently requires investments in software infrastructure, training programmes, and data management capabilities (OECD, 2023; UNCTAD, 2023).

Producer cooperatives and farmer organisations frequently play a central role in facilitating these processes. In many export-oriented agricultural sectors, cooperatives serve as intermediaries between smallholder farmers and exporters by organising production, aggregating commodities, and maintaining records required for certification or traceability systems. Under emerging sustainability regulations, these organisations may be responsible for registering farmers, collecting geolocation data, organising training programmes, and maintaining documentation necessary for regulatory compliance.

The implementation of such compliance systems also introduces new costs along the value chain. Certification procedures, auditing mechanisms, and monitoring activities often involve administrative and financial expenses that must be absorbed by exporters, cooperatives, and producers. For value chains involving thousands of dispersed smallholder farmers, the administrative complexity of maintaining accurate documentation can be considerable.

In many cases, these compliance costs are not evenly distributed across value chain actors. While exporters may be responsible for establishing compliance systems, many of the practical requirements ultimately depend on the participation of producers and local intermediaries. Smallholder farmers may therefore be required to provide geolocation information, maintain records of land use or production practices, and participate in certification schemes designed to demonstrate environmental compliance.

Across many countries within the EAC and SADC regions, agricultural production remains dominated by smallholder farming systems characterised by limited access to capital, technology, and formal market infrastructure. As a result, the costs associated with regulatory

compliance can represent a significant burden for producers operating within resource-constrained environments (FAO, 2023; World Bank, 2022).

3.2 Implications for Smallholder Farmers

Smallholder farmers occupy a central position in many African agricultural value chains. Across the EAC and SADC regions, a large share of agricultural commodities exported to international markets is produced by farmers cultivating relatively small plots of land and relying primarily on family labour. These producers represent the primary rights holders within agricultural production systems, as their labour, land stewardship, and production practices form the foundation of export-oriented agricultural sectors.

Despite their central role in production, smallholder farmers frequently operate within agricultural systems characterised by limited access to financial services, digital technologies, agricultural extension support, and formal land registration systems. These structural constraints significantly influence their ability to adapt to evolving regulatory requirements in international markets.

The introduction of sustainability regulations - particularly those requiring detailed traceability and environmental verification - can therefore present significant challenges for these producers. Compliance with such frameworks may require farmers to provide geolocation information for individual farms, maintain records of production practices, and participate in certification or sustainability verification programmes associated with export markets.

For producers operating within fragmented supply systems, these requirements may represent a substantial administrative and technical burden. Many farmers do not possess access to digital mapping tools or the technical capacity required to participate in geolocation-based traceability systems. In addition, incomplete land registration systems in some rural areas may complicate efforts to establish accurate records of farm boundaries and production locations.

Under such conditions, there is a risk that producers who are unable to meet emerging compliance requirements could become marginalised within export-oriented value chains. Buyers seeking to reduce regulatory risk may increasingly prioritise suppliers who can demonstrate reliable traceability and documentation systems. In some cases, this may lead to sourcing shifts toward larger farms or more formally organised production systems that are easier to monitor and verify.

However, sustainability initiatives can also create opportunities for strengthening smallholder production systems when adequate support mechanisms are in place. Investments in farmer training programmes, cooperative strengthening initiatives, and digital traceability infrastructure can help producers adapt to evolving regulatory environments while improving agricultural productivity and environmental management practices (FAO, 2023; OECD, 2023).

Ensuring that smallholder farmers remain integrated into export-oriented value chains will therefore require targeted support from governments, exporters, development partners, and producer organisations.

3.3 Market Competitiveness Challenges

The evolving sustainability regulatory landscape may also influence the competitiveness of agricultural exporters operating within the EAC and SADC regions. Compliance with emerging environmental and due diligence requirements often entails additional operational costs, including investments in traceability infrastructure, digital monitoring systems, certification schemes, and administrative reporting processes.

For exporters operating within highly competitive global commodity markets, these additional compliance costs can affect price competitiveness and market positioning. Agricultural commodities such as coffee, cocoa, tea, and horticultural products are frequently traded in markets where profit margins are relatively narrow. In such contexts, even modest increases in compliance costs may influence sourcing decisions by international buyers.

The uneven distribution of compliance capacity across global agricultural producers may also influence patterns of competition within international markets. Producers operating in regions with more advanced technological infrastructure and institutional coordination may find it easier to demonstrate compliance with sustainability regulations. By contrast, producers in regions where digital infrastructure, certification systems, and regulatory institutions remain underdeveloped may face greater challenges in adapting to evolving regulatory frameworks (UNCTAD, 2023).

These dynamics raise concerns that sustainability regulations could unintentionally reinforce existing structural asymmetries within global agricultural trade. If exporters in the African countries encounter greater difficulties meeting regulatory requirements, there is a risk that market access could become increasingly concentrated among producers who possess the technological and institutional capacity to demonstrate compliance.

Maintaining competitiveness within evolving global markets will therefore depend heavily on the ability of governments, exporters, and producer organisations across the EAC and SADC regions to strengthen compliance infrastructure while ensuring that smallholder farmers remain integrated into export-oriented value chains.

Taken together, these dynamics suggest that sustainability regulations are not only reshaping operational practices within agricultural value chains but also influencing the distribution of risks, costs, and opportunities across different actors. In contexts characterised by structural inequalities in capacity and resources, these shifts may undermine participation in global markets, raising questions about whether emerging sustainability frameworks are reinforcing or mitigating existing disparities within international trade systems.



4. Sector Snapshots

While emerging sustainability regulations affect a wide range of agricultural commodities, their practical implications differ significantly across value chains such as coffee, cocoa, and fresh horticultural products, each of which plays a critical role in linking African producers to European markets. These sectors are characterised by distinct production systems, levels of supply chain coordination, and degrees of integration into international trade, shaping how regulatory requirements related to traceability, environmental compliance, and due diligence are implemented in practice. Across the EAC and SADC, all three value chains rely heavily on smallholder farmers cultivating relatively small plots and supplying commodities through other value chain actors such as traders, cooperatives, processors, and exporters. Although farmers are central to production, they often operate within fragmented systems and resource-constrained environments, limiting their capacity to meet increasingly stringent compliance requirements (FAO, 2023; World Bank, 2022). In addition, significant heterogeneity exists both across and within these sectors. For example, differences in certification systems in horticulture, varying degrees of market formalisation in coffee, and diverse institutional arrangements in cocoa mean that sustainability regulations (Grabs et al., 2016) introduced by major importing markets are unlikely to have uniform effects. Examining coffee, cocoa, and horticulture value chains, therefore, provides important insight into how these regulatory shifts translate into sector-specific challenges and adaptation pathways for producers, exporters, and other actors across the EAC and SADC regions.

4.1 Coffee Value Chains

Coffee remains one of the most important agricultural commodities linking African producers to international markets. Several countries within East Africa, including Uganda, Ethiopia, and Kenya, are major coffee exporters supplying European and global markets. Across much of the region, coffee production is dominated by smallholder farmers cultivating relatively small plots of land and supplying beans through networks of traders, cooperatives, processors, and exporters before reaching international buyers (FAO, 2023; World Bank, 2022). The labour, land stewardship, and agricultural knowledge of smallholder farmers therefore form the foundation of export-oriented coffee value chains. However, the position of smallholder farmers within the coffee value chain is often characterised by limited bargaining power, fragmented market access, and restricted access to financial and technological resources (Borrella et al., 2015). As sustainability regulations introduce more stringent traceability and monitoring requirements, these structural characteristics influence how coffee sectors may adapt to evolving regulatory environments.



Under the EU EUDR, coffee has been identified as one of the commodities subject to enhanced traceability and environmental verification requirements. Companies placing coffee on the EU market must demonstrate that the product has not been produced on land associated with deforestation after the regulation's specified cut-off date (European Commission, 2023). Compliance with these requirements involves collecting farm-level geolocation data, maintaining traceability documentation, and verifying the environmental integrity of production areas.

The structure of coffee production varies significantly across countries within the region. Even among major producers supplying international markets, coffee sectors exhibit distinct institutional arrangements and market orientations. Ethiopia, for example, combines export-oriented production with a substantial domestic consumption market and an expanding specialty coffee segment supported by auction-based trading systems. Uganda's coffee sector, by contrast, is more strongly integrated into international commodity markets and is largely dominated by smallholder robusta production linked to trader-based marketing networks. These differences illustrate that sustainability regulations may interact with national coffee sectors in different ways, generating differentiated compliance challenges across producing countries.

For coffee-producing regions characterised by dispersed smallholder farming systems, implementing sustainability requirements presents significant organisational and institutional challenges. Due to the high levels of informality, producers often cultivate coffee on small plots that are not formally registered within national land administration systems. Supply chains frequently involve multiple intermediaries who aggregate coffee from large numbers of farmers before it reaches export

channels. Establishing reliable traceability systems within such contexts, therefore, requires substantial investments in digital mapping technologies, producer registries, and supply chain monitoring mechanisms (OECD, 2023).

Parts of the coffee sector already operate within sustainability certification frameworks related to organic production, fair trade, and responsible sourcing. These existing institutional arrangements may provide an important foundation for strengthening traceability systems required under emerging sustainability regulations. Cooperative-based structures, in particular, can facilitate farmer registration, training programmes, and data collection processes that support regulatory compliance.

The ability of coffee value chains to implement certification systems, however, varies significantly across countries and regions. In contexts where cooperative institutions remain weak or where coffee marketing is dominated by informal trader networks like in Uganda, maintaining consistent traceability across dispersed producers can be particularly difficult. Without targeted support mechanisms, sustainability regulations may therefore create additional barriers for smallholder farmers seeking to maintain participation in export-oriented coffee markets.

4.2 Cocoa Value Chains

Cocoa represents another globally significant agricultural commodity increasingly subject to sustainability-related regulatory scrutiny within international markets. Although the majority of global cocoa production is concentrated in West Africa, the sector provides an instructive example of how sustainability regulations may affect agricultural value chains characterised by large numbers of smallholder producers and complex supply chain structures.

Like coffee, cocoa production is predominantly undertaken by smallholder farmers cultivating relatively small plots of land. These producers form the backbone of cocoa supply chains that connect rural agricultural communities with global confectionery and food industries. Cocoa beans typically pass through multiple intermediaries - including traders, cooperatives, processors, and exporters - before reaching international markets.



The fragmented nature of cocoa production systems has historically presented challenges for supply chain transparency and traceability (Renier et al., 2023). Beans sourced from thousands of smallholder farms are often aggregated at various points along the value chain before entering export channels. While these aggregation systems facilitate market participation for dispersed rural producers, they also complicate efforts to maintain clear records of production origins and land-use practices.

Under the EUDR, cocoa has been identified as a commodity requiring enhanced traceability and environmental verification. Companies placing

cocoa on the EU market must demonstrate that production areas are not associated with deforestation after the regulation's specified cut-off date (European Commission, 2023). Meeting these requirements requires the development of farm-level geolocation systems, farmer registration databases, and supply chain monitoring mechanisms capable of linking exported cocoa to specific production sites.

In response to these emerging regulatory requirements, several cocoa-producing countries have begun implementing digital traceability initiatives and farmer registration systems aimed at improving supply chain transparency. These initiatives seek to strengthen environmental governance while enabling exporters to demonstrate compliance with sustainability standards. Nevertheless, scaling such systems across entire cocoa sectors remains a complex undertaking. Millions of smallholder farmers participate in cocoa production, often within rural areas where access to digital technologies and institutional support remains limited. Establishing comprehensive traceability systems, therefore, requires substantial investments in technological infrastructure, institutional capacity, and farmer training programmes (UNCTAD, 2023).

These challenges illustrate how sustainability regulations may simultaneously generate pressures and opportunities within smallholder-based agricultural sectors. While improved traceability systems may strengthen environmental governance, the technological and administrative requirements associated with compliance may create barriers for producers lacking access to the resources necessary to participate in emerging monitoring systems.

4.3 Fresh Horticulture

Fresh horticultural exports - including fruits, vegetables, and cut flowers - represent a dynamic segment of agricultural trade linking African producers with European markets (Gemählich, 2022). Several countries within the EAC and SADC regions have developed significant horticultural export industries supplying European supermarkets and wholesale markets. These sectors often generate substantial employment opportunities while contributing to foreign exchange earnings and rural development. Compared with commodities such as coffee and cocoa, horticultural value chains frequently involve more diversified production structures (Gabellini & Scaramuzzi, 2022). Exports may originate from a combination of large commercial farms, medium-sized enterprises, and networks of smallholder farmers participating through contract farming arrangements. Export companies often play a central role in coordinating production, processing, packaging, and logistics, enabling products to meet the strict quality and safety standards required by European retailers.



Horticultural sectors supplying EU markets have historically operated under stringent regulatory frameworks related to food safety, product quality, and labour conditions. Certification schemes and retailer-driven standards have already introduced monitoring systems designed to track production practices and ensure compliance with sanitary and phytosanitary requirements. As a result, certain horticultural export sectors have developed relatively sophisticated compliance infrastructures compared with other agricultural value chains.

However, emerging sustainability regulations linked to environmental governance and supply chain due diligence may introduce additional compliance considerations for horticultural exporters. Companies may need to demonstrate greater transparency regarding sourcing practices, environmental management, and labour conditions across production networks.

Participation in horticultural export systems often depends on the institutional support provided by exporters and producer organisations. Export companies may provide farmers with technical training, inputs, and guidance on production practices that meet international standards. In return, farmers supply produce through structured marketing arrangements that enable exporters to maintain oversight of production conditions.

While such systems can facilitate smallholder participation in regulated export markets, they may also create barriers for producers lacking access to irrigation, inputs, or training. As sustainability requirements become more complex, ensuring that smallholder farmers remain integrated within horticultural value chains will require continued support from governments, exporters, and development partners.

More broadly, the horticultural sector illustrates how agricultural value chains with stronger coordination mechanisms and established compliance infrastructures may be better positioned to adapt to evolving sustainability regulations. At the same time, maintaining the participation of smallholder producers will remain essential for ensuring that sustainability transitions in global agricultural trade remain inclusive rather than exclusionary.

The sectoral snapshots presented above illustrate how emerging sustainability regulations interact with agricultural value chains characterised by diverse production systems, institutional arrangements, and market structures. Across commodities such as coffee, cocoa, and horticultural products, regulatory requirements related to traceability, environmental verification, and supply chain due diligence are increasingly shaping how producers, cooperatives, exporters, and international buyers organise agricultural production and trade. At the same time, these examples highlight the uneven capacities of different value chains to adapt to evolving regulatory expectations. While some sectors possess relatively advanced certification systems and institutional coordination mechanisms, many others remain dominated by dispersed smallholder production networks operating within resource-constrained environments. These dynamics raise broader questions regarding the distribution of compliance burdens and the potential implications of sustainability regulations for the inclusiveness of global agricultural trade. Understanding these wider political economy dynamics is therefore essential for assessing whether the global transition toward greener trade practices risks generating uneven outcomes across regions and producers.



5. Risks of an Unequal Green Transition in Global Trade

The growing integration of environmental considerations into global trade governance reflects an urgent and necessary response to interconnected crises of climate change, biodiversity loss, and ecological degradation. However, the manner in which sustainability regulations are currently designed and implemented within global markets raises fundamental questions about equity, justice, and the distribution of responsibility within the international trading system. In particular, regulatory frameworks advanced by major markets such as the EU risk reproducing and, in some cases, deepening existing structural asymmetries between developed and developing economies.

Across the EAC and the SADC, agricultural production systems remain predominantly smallholder-based, characterised by fragmented landholdings, limited access to digital infrastructure, and constrained institutional support (FAO, 2023; World Bank, 2022). These smallholder farmers constitute the primary rights holders within agricultural value chains, providing the labour, land stewardship, and production inputs upon which export-oriented agriculture depends. Yet, paradoxically, they are also the actors least equipped to absorb the financial, technological, and administrative burdens associated with emerging sustainability compliance frameworks.

The expansion of regulatory requirements - particularly those related to traceability, geolocation mapping, environmental verification, and corporate due diligence - represents a significant shift in the governance of global trade. These frameworks increasingly regulate not only the characteristics of traded commodities but also the conditions under which they are produced. While such measures are framed as necessary instruments for promoting environmental

sustainability, they simultaneously function to externalise the costs of compliance onto producers operating within global supply chains, particularly those located in the African countries (OECD, 2023; UNCTAD, 2023).

This externalisation of regulatory responsibility reflects broader patterns of power within global trade governance, where standards developed within highly institutionalised economies are imposed across diverse production contexts without commensurate consideration of structural differences in capacity. As a result, sustainability regulations risk transforming environmental governance into a mechanism through which compliance burdens are disproportionately transferred to producers operating within resource-constrained environments.

Both the EAC and SADC blocs encompass highly heterogeneous agricultural systems, with significant variation in institutional capacity, technological infrastructure, and market integration across countries. While certain sectors – such as export-oriented horticulture in Kenya – have developed relatively advanced compliance systems through long-standing engagement with European markets, many other value chains, including dispersed smallholder coffee and staple crop systems in countries such as Uganda, Tanzania, and Malawi, remain far less equipped to meet complex regulatory requirements. These differences underscore the need to move beyond generalised assumptions about “developing country capacity” and instead recognise the differentiated impacts of sustainability regulations across specific national and sectoral contexts.

5.1 Regulatory Asymmetry Between the EU and African Producers

A central feature of emerging sustainability governance is the pronounced asymmetry in regulatory capacity between major importing markets and exporting regions. The European Union possesses extensive institutional infrastructure, advanced technological systems, and significant financial resources that enable the design, implementation, and enforcement of complex regulatory frameworks governing global supply chains (European Commission, 2023).

By contrast, many agricultural sectors across the EAC and SADC operate within institutional environments where traceability systems, digital monitoring platforms, and regulatory enforcement mechanisms remain underdeveloped. Establishing the systems required to comply with sustainability regulations – such as farm-level geolocation mapping, digital registries, and integrated supply chain monitoring platforms—requires substantial investments in infrastructure, technical expertise, and institutional coordination (OECD, 2023; UNCTAD, 2023).

Crucially, this asymmetry is not merely technical but structural. It reflects deeper inequalities in the distribution of economic resources, technological capabilities, and institutional power within the global trading system. While EU-based firms and regulatory institutions are able to define and enforce compliance standards, producers in exporting countries are expected to adapt to these standards without equivalent influence over their design or implementation.

Within this context, smallholder farmers – who represent the primary rights holders within

agricultural production systems - are required to participate in compliance systems that are often technologically complex and administratively demanding. The requirement to provide geolocation data, maintain production records, and participate in traceability systems introduces new forms of labour and cost that are rarely compensated within existing value chain structures. As a result, the burden of ensuring sustainability compliance is effectively shifted downward along the value chain, reinforcing existing inequalities between actors.

These dynamics raise important questions regarding the fairness of sustainability governance frameworks that impose uniform regulatory expectations across highly unequal production systems. Without mechanisms to address these structural asymmetries, sustainability regulations risk entrenching patterns of exclusion that limit the participation of smallholder farmers in global markets.

5.2 Risk of Green Protectionism

The increasing integration of sustainability standards into global trade governance has intensified debates regarding the potential for such measures to function as de facto non-tariff barriers. While environmental protection and responsible production are widely recognised as legitimate policy objectives, the design and implementation of regulatory frameworks play a critical role in determining whether these objectives are pursued equitably.

In practice, sustainability regulations that rely on complex traceability systems, digital monitoring technologies, and extensive documentation requirements may disproportionately advantage producers operating within capital-intensive and technologically advanced agricultural systems (UNCTAD, 2023). Producers in the African countries - particularly those operating within smallholder-based production systems - often lack access to the infrastructure and institutional support necessary to comply with such requirements.

As regulatory risks associated with non-compliance increase, buyers and multinational firms may seek to reduce exposure by shifting sourcing strategies toward suppliers who can more easily demonstrate compliance. This can result in the gradual reconfiguration of global supply chains in ways that favour larger, more formalised production systems while marginalising smallholder producers who are less able to meet regulatory requirements.

In this sense, sustainability regulations may function as mechanisms of indirect market exclusion, not through explicit trade barriers but through compliance systems that systematically disadvantage certain categories of producers. The concern regarding “green protectionism” therefore lies not in the environmental objectives of these policies, but in the structural conditions under which they are implemented.

These dynamics echo earlier critiques associated with the Washington Consensus (WCs) and the policy conditionalities promoted by Bretton Woods Institutions (BWIs), where policy frameworks developed within advanced economies shaped development trajectories in ways that often overlooked local contexts. While contemporary sustainability regulations pursue environmental objectives rather than macroeconomic reform, they similarly raise questions regarding the extent

to which global governance frameworks reflect asymmetries in power and influence. Ensuring that sustainability regulations do not evolve into instruments of exclusion requires deliberate policy interventions aimed at recognising differences in capacity, supporting compliance in the African countries, and maintaining inclusive access to global markets.

5.3 Development Implications for EAC and SADC

The development implications of sustainability regulations extend far beyond compliance challenges faced by individual exporters. Across the EAC and SADC regions, agricultural exports are deeply embedded within rural economies, providing income, employment, and livelihood security for millions of smallholder farmers (World Bank, 2022).

When regulatory frameworks alter the conditions under which agricultural commodities can access international markets, the resulting impacts are transmitted across entire value chains and rural communities. Increased compliance costs, combined with the risk of exclusion from export markets, may undermine the economic viability of smallholder-based production systems and reduce opportunities for participation in global trade.

These risks are particularly pronounced in contexts where agricultural production systems are already characterised by structural vulnerabilities, including limited access to finance, weak institutional support, and fragmented market integration. Without targeted interventions, sustainability regulations may contribute to the consolidation of export supply chains among producers and firms that possess the capacity to comply with complex regulatory requirements, thereby reinforcing existing inequalities within rural economies.

The impacts of sustainability governance are shaped by the differences in agricultural systems across the EAC and SADC regions. Differences in production structures, institutional capacities, and levels of integration into global markets mean that the effects of regulatory changes will vary across countries and sectors. Recognising this diversity is essential for designing policy responses that address the specific challenges faced by different agricultural systems. While sustainability regulations have the potential to improve environmental management and supply chain transparency, these outcomes are not guaranteed. Their realisation depends on whether regulatory frameworks are accompanied by adequate financial support, technical assistance, and institutional capacity-building measures that enable smallholder farmers to participate effectively in evolving compliance systems (FAO, 2023; OECD, 2023). Ensuring that the transition toward sustainable global trade does not come at the expense of the very producers whose livelihoods depend on continued access to international markets remains a challenge. A genuinely equitable green transition must therefore prioritise the inclusion of smallholder farmers as central actors within sustainability governance, rather than treating them as peripheral participants expected to absorb the costs of regulatory transformation.



6. Opportunities for Sustainable Value Chain Upgrading

While emerging sustainability regulations in global trade are often presented as pathways toward more responsible and environmentally sustainable production systems, their potential to generate meaningful benefits for agricultural value chains in the East African Community (EAC) and the Southern African Development Community (SADC) remains highly contingent. Opportunities for value chain upgrading do exist, but they are neither automatic nor evenly distributed. Rather, they depend on the extent to which sustainability governance is accompanied by deliberate efforts to address structural inequalities within global agricultural systems.

Across many agricultural sectors in the EAC and SADC regions, smallholder farmers constitute the primary rights holders within production systems. Their labour, land stewardship, and local ecological knowledge underpin the production of export commodities such as coffee, cocoa, tea, and horticultural products. However, these producers typically operate within fragmented and resource-constrained environments characterised by limited access to finance, digital technologies, extension services, and formal market infrastructure (FAO, 2023; World Bank, 2022). In the absence of targeted support mechanisms, sustainability regulations risk reinforcing these structural constraints rather than alleviating them.

One of the most frequently cited opportunities associated with sustainability governance lies in the development of enhanced traceability systems. Regulatory frameworks such as the EU EUDR are accelerating the adoption of digital monitoring tools, farm registries, and supply chain tracking mechanisms. When implemented inclusively, such systems have the potential to improve transparency, strengthen environmental oversight, and enhance the credibility of agricultural

exports in international markets (OECD, 2023).

However, the benefits of traceability systems are not inherently equitable. Without careful design, these systems may privilege producers and value chains that already possess the organisational capacity and technological infrastructure required to comply with digital monitoring requirements. In smallholder-dominated systems, where production is dispersed across large numbers of farmers with limited access to digital tools, the costs of establishing and maintaining traceability systems can be significant. In such contexts, traceability initiatives risk becoming mechanisms of exclusion rather than instruments of upgrading.

Similarly, sustainability standards may create opportunities for improving environmental management practices within agricultural production systems. Compliance with environmental requirements can encourage more sustainable land-use practices, improved soil management, and greater awareness of ecological risks. When supported by effective extension services and farmer training programmes, these developments may contribute to more resilient and sustainable agricultural systems (FAO, 2023).

Yet, these potential benefits must be understood within the broader political economy of agricultural value chains. Improvements in production practices do not automatically translate into improved livelihoods for smallholder farmers. In many GVCs, price-setting power remains concentrated among downstream actors, including exporters, traders, and international buyers. Without mechanisms to ensure that the costs and benefits of sustainability transitions are equitably distributed, there is a risk that smallholder farmers will bear the costs of compliance without receiving commensurate economic returns.

Importantly, the scope for value chain upgrading varies significantly across sectors and countries within the EAC and SADC regions. Agricultural systems within these blocs are highly heterogeneous, with differences in institutional capacity, production structures, and levels of integration into global markets. For example, horticultural export sectors in Kenya have developed relatively advanced compliance infrastructures through long-standing engagement with European retail markets. In contrast, many coffee and staple crop systems in countries such as Uganda, Tanzania, and Malawi remain dominated by dispersed smallholder production networks with more limited institutional coordination. These differences mean that sustainability-driven upgrading is likely to occur unevenly across regions and sectors, potentially reinforcing existing disparities within global agricultural trade.

For sustainability transitions to generate inclusive development outcomes, strong institutional support mechanisms are essential. Producer cooperatives, farmer organisations, and agricultural extension systems play a critical role in enabling smallholder participation in compliance processes, facilitating access to certification schemes, and supporting the adoption of sustainable agricultural practices. Strengthening these institutions can help mitigate the risk of exclusion by providing collective platforms through which farmers can engage with evolving regulatory frameworks.

Governments and regional institutions across the EAC and SADC must play a more proactive and strategic role in shaping how sustainability transitions unfold within agricultural sectors. This

includes prioritising investments in digital agricultural infrastructure, national traceability systems, and farmer registration platforms that can facilitate compliance while improving sector governance and market transparency (UNCTAD, 2023). Further, strengthening institutional coordination, particularly between agricultural ministries, regulatory authorities, and producer organisations, is essential to ensure that compliance systems are both functional and accessible to smallholder-based value chains. However, these reforms require significant financial resources, technical expertise, and long-term political commitment, which remain unevenly distributed across countries in the region, potentially widening existing capacity gaps if not carefully addressed.

The extent to which sustainability regulations translate into meaningful development gains, therefore, depends heavily on the availability of external support and the design of inclusive policy frameworks. Targeted financial assistance, technical cooperation, and capacity-building initiatives from development partners are critical to enabling smallholder farmers and local institutions to meet emerging regulatory requirements. Cooperation frameworks such as the Samoa Agreement provide important platforms for aligning sustainability objectives with broader development priorities. Without such support, there is a risk that sustainability governance will reinforce existing inequalities by favouring producers and firms with greater compliance capacity.

Conversely, when embedded within broader strategies aimed at addressing structural constraints, sustainability regulations can support value chain upgrading, enhance resilience, and promote more equitable participation in global trade. The key challenge, therefore, lies in ensuring that these transitions are inclusive—so that smallholder farmers, who underpin agricultural production in the EAC and SADC, are not marginalised but instead positioned to benefit from evolving market opportunities.





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7. Leveraging the Samoa Agreement

The Samoa Agreement constitutes the central institutional framework governing relations between the EU and the Organisation of African, Caribbean and Pacific States (OACPS). Signed in November 2023 as the successor to the Cotonou Agreement, it establishes a comprehensive platform for cooperation spanning sustainable development, trade, climate action, and political dialogue (EU, 2024b). In the context of rapidly evolving sustainability regulations shaping global trade, the Agreement assumes particular significance, positioning itself at the intersection of environmental governance and development policy while providing a structured basis for aligning regulatory objectives with the development priorities of partner countries.

However, the significance of the Samoa Agreement extends beyond its formal commitments. It must be understood as a site of negotiation within an asymmetrical global political economy, where regulatory frameworks developed within advanced economies increasingly shape the conditions of production and trade in the African countries. As sustainability standards become embedded within market access requirements, the agreement provides one of the few institutional arenas through which African countries can engage with the EU on the developmental implications of these regulatory transformations.

the Samoa Agreement presents both an opportunity and a limitation. While it offers a framework for dialogue and cooperation, it does not in itself guarantee that sustainability governance will be implemented in a manner that is equitable or development- oriented. The effectiveness of the agreement therefore, depends on how it is operationalised in practice and whether it is used to address or merely accommodate existing structural asymmetries within EU-Africa trade relations.

7.1 Sustainability Commitments in EU-Africa Cooperation

Sustainability occupies a central place within the normative framework of the Samoa Agreement. Both the European Union and its partner countries have committed to advancing climate action, protecting biodiversity, promoting sustainable resource management, and strengthening environmental governance. These commitments align with broader international agendas, including the Paris Agreement and the Sustainable Development Goals, and reflect a shared recognition of the urgency of addressing global environmental challenges.

In principle, such commitments provide a foundation for aligning environmental objectives with development priorities. Within agricultural sectors, improved environmental governance has the potential to contribute to long-term sustainability, enhance resilience to climate change, and protect natural resources upon which rural livelihoods depend.

However, the translation of these commitments into practice raises important questions regarding distributional impacts and policy coherence. Sustainability objectives embedded within EU regulatory frameworks are increasingly operationalised through market-based compliance systems that impose specific requirements on exporting countries. These include traceability obligations, geolocation mapping, due diligence procedures, and environmental verification systems that directly shape how agricultural production is organised in partner countries. While these measures are framed as necessary for promoting responsible production, they also reflect the externalisation of regulatory authority beyond the territorial boundaries of the EU. In this sense, sustainability governance under the Samoa Agreement is not merely cooperative but also regulatory, raising questions about whose standards are being implemented and under what conditions.

For smallholder farmers across the EAC and SADC regions, the implications are particularly significant. As primary rights holders within agricultural production systems, they are required to adapt to regulatory frameworks over which they have limited influence. Ensuring that sustainability commitments translate into equitable outcomes therefore requires mechanisms that go beyond normative alignment and address the structural conditions under which compliance takes place.

7.2 Gaps Between Regulatory Ambition and Development Support

A critical tension within the current sustainability governance framework lies in the gap between regulatory ambition and the level of development support available to exporting countries. While sustainability regulations are increasingly detailed, enforceable, and time-bound, the financial and institutional resources required to implement them are often unevenly distributed.

Many of the systems required for compliance – such as digital traceability platforms, farm-level geolocation mapping, and integrated supply chain monitoring – are developed within highly institutionalised environments characterised by advanced technological infrastructure and administrative capacity (OECD, 2023; UNCTAD, 2023). Exporting countries operating within different development contexts may therefore face significant challenges in establishing comparable systems within relatively short timeframes.

For smallholder-based agricultural systems, these challenges are particularly acute. Compliance often depends on the participation of large numbers of dispersed producers who lack access to digital tools, formal land registration systems, and institutional support mechanisms. The costs associated with establishing compliance systems - including data collection, certification, auditing, and monitoring - can therefore be substantial, particularly when distributed across fragmented value chains.

In the absence of adequate support, these dynamics risk transforming sustainability governance into a system where regulatory obligations are imposed without corresponding investments in capacity-building. This creates a structural imbalance in which exporting countries are expected to meet increasingly complex standards while lacking the resources necessary to do so effectively. Importantly, these challenges are not uniform across countries within the EAC and SADC regions. Differences in institutional capacity, sectoral organisation, and levels of integration into global markets mean that some countries are better positioned to adapt to regulatory changes than others. For example, relatively well-coordinated horticultural sectors in countries such as Kenya may be able to build on existing compliance infrastructures, while dispersed smallholder systems in countries such as Uganda, Tanzania, and Malawi face more significant constraints.

Addressing these gaps requires moving beyond a narrow focus on compliance and toward a more integrated approach that links sustainability governance with development cooperation. Without such an approach, there is a risk that sustainability regulations will reinforce existing inequalities rather than contribute to inclusive development.

7.3 Using the Samoa Framework for Cooperative Solutions

Despite these challenges, the Samoa Agreement provides a critical institutional platform through which more equitable approaches to sustainability governance can be pursued. Its effectiveness, however, depends on whether it is used to actively reshape the distribution of responsibilities and resources within global value chains rather than simply facilitating the implementation of existing regulatory frameworks.

One key area of potential lies in the development of inclusive traceability systems that are adapted to the realities of smallholder-based production. Investments in digital infrastructure, farm registration systems, and geospatial mapping technologies can support compliance while improving transparency within agricultural sectors. However, such systems must be designed in ways that reduce, rather than exacerbate, barriers to participation for smallholder farmers.

Strengthening producer organisations and cooperatives also represents a critical component of cooperative solutions. These institutions play a central role in organising smallholder participation in value chains, facilitating access to certification systems, and coordinating compliance activities. Supporting their development can help ensure that smallholder farmers are not excluded from evolving regulatory frameworks but are instead able to engage collectively in sustainability transitions.

Capacity-building initiatives aimed at strengthening national regulatory institutions, agricultural extension services, and digital infrastructure are equally important. Effective sustainability governance requires not only compliance with regulatory standards but also the institutional capacity to implement monitoring systems, provide training, and coordinate activities across value chains.

Crucially, these efforts must be supported by adequate financial resources and long-term commitments from development partners. Without sustained investment, the burden of compliance will continue to fall disproportionately on producers operating within resource-constrained environments.

Ultimately, the Samoa Agreement should be understood not simply as a framework for cooperation but as a mechanism through which more equitable forms of sustainability governance can be negotiated. Its potential lies in its ability to facilitate dialogue, mobilise resources, and support institutional development in ways that align environmental objectives with the realities of agricultural production systems in partner countries.

The central challenge, therefore, is to ensure that the agreement is used to address structural inequalities within global trade rather than to legitimise regulatory frameworks that risk reinforcing them. Achieving this requires a shift from a compliance-oriented approach to sustainability toward a more inclusive and development-oriented model that places smallholder farmers at the centre of sustainability governance.





8. Strategic Policy Actions

Ensuring that sustainability transitions in global agricultural trade are equitable and development-oriented requires more than incremental policy adjustments. It necessitates a reconfiguration of how responsibilities, costs, and benefits are distributed across global value chains. While sustainability regulations introduced by major markets aim to address urgent environmental challenges, their current design risks placing disproportionate compliance burdens on smallholder-based agricultural systems across the African countries.

Across the East African Community (EAC) and the Southern African Development Community (SADC), agricultural exports remain central to rural livelihoods, employment, and economic stability. Millions of smallholder farmers - who constitute the primary rights holders within these systems - depend on continued participation in export-oriented value chains. Policy responses must therefore prioritise not only compliance with sustainability standards but also the protection of livelihoods and the promotion of inclusive development outcomes.

At the same time, agricultural systems across the EAC and SADC are highly heterogeneous. Differences in institutional capacity, production structures, and levels of market integration exist not only between the two regional blocs but also among countries and sectors within them. Effective policy responses must therefore be differentiated, context-specific, and responsive to these variations rather than based on uniform assumptions about “developing country” conditions.

8.1 European Union

As the primary driver of many emerging sustainability regulations, the European Union bears a significant responsibility in ensuring that these frameworks are implemented in ways that do not reinforce structural inequalities within global trade. The following actions need to be considered by the EU.

1. Adopt differentiated and phased implementation timelines that reflect the varying capacities of exporting countries and sectors. Uniform compliance deadlines fail to account for the time and investment required to establish traceability systems, digital infrastructure, and institutional coordination mechanisms within smallholder-based production systems.
2. Accompany sustainability regulations with substantial financial and technical support aimed at strengthening compliance capacities in partner countries. This includes investments in digital traceability infrastructure, farm registration systems, geospatial mapping technologies, and institutional frameworks capable of supporting monitoring and verification processes.
3. Recognise and integrate existing sustainability initiatives within African agricultural sectors into regulatory frameworks. Many value chains already operate under certification schemes related to organic production, fair trade, and responsible sourcing. Failure to recognise these systems risks duplicating compliance requirements and increasing the burden on producers without delivering additional environmental benefits.
4. Institutionalise structured dialogue mechanisms with trading partners to assess the developmental implications of sustainability regulations. Such dialogue should not be limited to consultation but should enable meaningful influence over the design and implementation of regulatory frameworks.
5. Move beyond a compliance-driven approach toward a more cooperative model of sustainability governance. Such a model should acknowledge the EU's role in shaping global production systems and takes responsibility for ensuring that environmental objectives do not come at the expense of development outcomes.

8.2 African Governments

Governments across the EAC and SADC regions play a critical role in shaping the conditions under which agricultural sectors adapt to evolving sustainability requirements. However, policy responses must be carefully designed to reflect the diversity of agricultural systems within and across countries. African governments should therefore:

1. Develop national traceability systems that are adapted to the realities of smallholder-based production. Investments in digital farm registries, geolocation mapping systems, and commodity tracking platforms can support compliance while improving governance within agricultural sectors. However, these systems must be accessible to smallholder farmers and designed to minimise barriers to participation.

2. Strengthen producer cooperatives and farmer organisations as critical intermediaries linking smallholder farmers to export markets. This can facilitate compliance through collective action and help distribute compliance responsibilities more equitably across value chains.
3. Expand agricultural extension services focused on sustainable production practices and regulatory compliance. Training programmes can help farmers adapt to environmental requirements while improving productivity and resilience.
4. Differentiate policy responses across sectors and regions to address the disparities. For instance, the highly organised horticultural sectors may require different interventions compared to dispersed smallholder coffee or staple crop systems. Recognising these differences is essential for designing effective and inclusive policy frameworks.
5. Integrate sustainability transitions into broader development strategies, rather than treating them as isolated compliance challenges.

8.3 Regional and Continental Institutions

Regional and continental institutions namely the EAC, SADC and the AU have a critical role to play in coordinating responses to sustainability regulations and strengthening the collective position of African countries within global trade negotiations. The following strategic policy actions should be considered by regional and continental institutions.

1. Facilitate the development of common sustainability frameworks that reduce fragmentation across national approaches. Such coordination can help harmonise standards, streamline compliance processes, and strengthen the bargaining power of African exporters.
2. Support the development of shared digital infrastructure for traceability and monitoring at regional and continental levels. Collaborative initiatives aimed at establishing regional farm registries, geospatial mapping systems, and data platforms may reduce the costs associated with compliance for individual countries while improving efficiency across value chains.
3. Facilitate knowledge exchange and capacity-building. Countries with more advanced compliance systems can share best practices and technical expertise with those facing greater challenges in adapting to regulatory requirements.

8.4 Development Partners

Development partners such as international organisations, bilateral donors, and development finance institutions have a crucial role in supporting sustainability transitions within agricultural value chains across the EAC and SADC regions. Therefore, development partners should:

1. Mobilise financial resources to support investments in digital infrastructure, traceability systems, and institutional capacity-building. Without such investments, many agricultural

systems will struggle to meet the requirements imposed by sustainability regulations.

2. Prioritise support for farmer training programmes focused on sustainable agricultural practices, environmental management, and compliance with regulatory standards. These programmes are particularly important for smallholder farmers who often lack access to formal extension services.
3. Provide targeted support for strengthening certification systems and facilitating market access for sustainably produced commodities. By linking smallholder producers to buyers seeking responsible sourcing, development partners can help ensure that sustainability transitions generate tangible economic benefits.
4. Design development interventions that avoid reinforcing existing inequalities within value chains. This requires careful attention to how resources are allocated and ensuring that support reaches smallholder farmers rather than being concentrated among larger or more organised actors. The effectiveness of these policy actions ultimately depends on whether sustainability governance is approached as a shared responsibility rather than a unilateral regulatory process. Without such an approach, the transition toward greener trade risks reinforcing existing structural inequalities rather than contributing to inclusive and sustainable development.





9. Conclusion

The expansion of sustainability regulations in global trade reflects a decisive shift toward integrating environmental considerations into economic systems, with the EU playing a leading role in advancing requirements on deforestation, traceability, and corporate due diligence. While these measures aim to promote more sustainable production, their implications extend beyond environmental goals, unfolding within a global context marked by significant inequalities in capacity, resources, and institutional strength. As a result, their effects are unevenly distributed, particularly across countries in the EAC and SADC, where agricultural exports are vital to livelihoods and are largely driven by smallholder farmers.

The increasingly complex compliance requirements are often transmitted along the value chain, placing disproportionate pressure on smallholder producers who face structural constraints such as limited access to finance, technology, and infrastructure. Moreover, the diversity of agricultural systems across and within countries means that the impacts of sustainability regulations vary widely, requiring context-specific responses. While such regulations have the potential to enhance environmental management and supply chain transparency, without adequate capacity building, they risk reinforcing existing inequalities and excluding vulnerable producers, especially smallholder farmers, from international markets. The Samoa Agreement offers an important opportunity to align sustainability and development objectives, but its effectiveness will depend on whether it can facilitate meaningful capacity building and equitable burden-sharing. Ultimately, achieving a just transition to sustainable trade requires moving beyond compliance-driven approaches toward inclusive models that prioritise equity, recognise differentiated capacities, and ensure that smallholder farmers remain central participants in global agricultural systems.

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