

**COMMON MARKET FOR EASTERN AND
SOUTHERN AFRICA**



MARCHE COMMUN

السوق المشتركة للشرق والجنوب
الأفريقي

**THE GREAT LAKES TRADE FACILITATION PROJECT: TRADE INFORMATION
DESKS REPORT**

April – June 2018

Reporting Officer: Serge Musana, Regional TIDO Coordinator

I. Background

The recruitment process for Goli, in Uganda, was completed in January 2018 and the two recruited TIDOs for Goli project site reported to work in March 2018.

For now, COMESA Secretariat through the Great Lakes Trade Facilitation Project has got the complete number of 20 Trade Information Desk Officers, deployed on the entire GLTFP borders as well as the Regional TIDO Coordinator, based in Rubavu, Rwanda.

This report describes the activities carried out by all 20 Trade Information Desk Officers (TIDOs) from April to June 2018 with the inclusion of Goli TID officers who started their intervention within the coverage period of this report.

During the last three months, the Trade Information Desk officers have made important achievements in the facilitation of small scale traders. The accomplished interventions include among other the following:

- Provide the small cross border traders with information on trade, taxes, non-tariff barriers, procedures of the Simplified Trade Regime (STR), among other such information;
- Resolve cross border conflicts at the border posts within the Great Lakes Region;
- Receive and resolve traders' complaints and improve relationships between traders and service providers; as well as build relations across the borders.

In addition, after the launch of STR for agricultural product between DRC and Rwanda in September 2017 and between DRC and Uganda in March 2018, the role of TIDOs extended to include data collection to capture the movement of traders benefiting from the STR for agriculture products. It is further expected that the scope of work of TIDOs will be soon extended when DRC and its COMESA neighboring States start implementing COMESA simplified Trade Regime (STR) for finished products. TIDOs will be assisting small scale traders in clearing services as well.

Furthermore, the Regional Trade Information desk office has been also facilitating bilateral meetings between DRC and Rwanda and DRC and Uganda to remove the NTBs within the GLTFP countries, raising awareness on the STR, and the COMESA Regulations on Minimum Standards for the Treatment of Small-Scale Cross Border Traders through sensitization activities, support and monitor implementation of the COMESA Regulations on Minimum Standards for the Treatment of Small-Scale Cross Border Traders, Regional training activities with COMESA secretariat support and in coordination with project countries.

II. ACTIVITIES CARRIED OUT BY THE TRADE INFORMATION DESK OFFICERS ON EACH PROJECT SITE

II.1. BUKAVU

From January to March 2018, TIDOs of Bukavu offered various facilitations in the movement of small-scale traders across the borders of Bukavu and Rusizi¹. Among their activities 'achievement, we can indicate the following:

The collection of complaints and suggestions on STR implementation improvement, border crossing procedures and any other relevant issues relating to cross-border trade.

In relation to the above, the small cross-border traders of Bukavu visited the Trade Information Desk Office to solicit the possibility that COMESA could establish an additional Trade Information Desk Office at Ruzizi border², given the importance of increasing trade transactions on that site. It has also been reported that Ruzizi² border suffers from a lack of cross-border market infrastructure, public lighting and sanitary facilities.

Other complaints received were related to the mistreatment of small scale traders by certain border agents operating outside the customs service and identified as people attached to invisible services at the border. Most of the victims are small scale cross border traders selling fish, flours and other products.

TIDOs also kept intervening on behalf of small scale cross border traders when they are victims of confiscation of their property. Therefore, TIDOs intervened at the customs services to address the issue of tax applicable to small trade which had been lowered in the text but the application of which was not respected.

In this regards, TIDOs played the role of raising the voices of small traders to the provincial customs authority. Several direct negotiations took place between the small traders and the provincial customs authorities until when a two-day strike was observed by small traders as a means of pressure. As a result, the tax lowering from USD 100 to USD 60 per pick-up/truck and per month had been entered into effect.

In terms of facilitating the movement of small scale traders across borders, TIDOs have resolved some cases of conflict between Bukavu city council and the Association of Butcher Small Traders of Bukavu. Indeed, a decision of the city council had forbidden small butchers to buy and resell meat from Rwanda without any valid reason. After resorting to the hierarchy of the Bukavu city council for these small traders, instructions have been given to facilitate cross-border trade in meat between Bukavu and Rusizi (Rwanda). Currently, meat is imported without hindrance.

Apart from the facilitation of the trade through the continued interventions carried out by TIDOs of Bukavu, sensitization sessions were also conducted for the small traders. Particularly, 45 members of associations of small traders were registered at the Trade Information Office during in May 2018 and awareness creation on STR was made for those identified associations of small scale cross border traders.

From April to June 2018, TIDOs also joined the International ALERT TushirikiWote Project to train representatives of small scale cross-border traders of Bukavu on STR and gender related issues at borders. The opportunity was also given to TIDOs to communicate to small traders the status of recommendations meant to removing NTBs.

Similarly, TIDOs in collaboration with the GLTFP South Kivu office facilitated the training of 38 representatives of small traders' associations on customs procedures. The 38 representatives of small traders also learned how to use the new border infrastructure. In addition, a sensitization was made to small traders aiming at raising awareness of the benefit of saving and creating a mutual fund to develop business projects.

After the lessons learned, the representatives of small cross-border traders pledged to create a mutual fund that will be funded by a contribution of all small traders identified in Bukavu. A scenario involving a monthly contribution of one US dollar per month per small cross-border trader, out of a total number of eight thousand small cross-border traders registered in Bukavu, made it possible to estimate a sum of eight thousand US dollars to be generated per month and ninety thousand US dollars a year.

Such an initiative could enable small cross-border traders to build the mobilize capital to easily finance their activities and to formalize themselves.

Finally, TIDOs of Bukavu advocated for the Poultry traders' Association to get legal statutes with. As result, the office of GLTFP in Bukavu, recommended that all associations already registered by TIDOs will be supported without constraints to obtain legal personality.

Recommendation:

- Training for TIDOs in the area of customs declaration and procedures, sanitary and phytosanitary standards of products to be exported / imported,
- Training for TIDOs and Leaders of Traders Associations in Management of associations of small traders and cooperatives.

The training would allow TIDOs to be able not only to assist small traders in calculating taxes before import / export, but also to carry out tax negotiations for small cross-border traders where appropriate.

II.2. BUNAGANA RDC

From April to June 2018, TIDOs of Bunagana DRC intervened in several issues related to trade facilitation of small scale cross border traders, in particular the following cases:

The TIDOs pleaded with the heads of migration services of Bunagana DRC border so that the small scale cross-border traders do not experience any harassment during their trading activities. The TIDOs, in collaboration with the small traders, managed to identify the authors of non-tariff barriers at the border of Bunagana whose right to work at the border has been removed.

This intervention has facilitated the movement of small traders across borders without major obstacles. However, some special cases still require the assistance of TIDOs. As a result, in May 2018, TIDOs assisted 25 women traders and 7 men small cross-border traders to cross the border of Bunagana with their goods without any hassle.

In addition, the non-tariff barriers tend to disappear thanks to the implementation of STR even though it is still a partial STR implementation, i.e for only agriculture products. Thus, in Bunagana, the small traders are satisfied with the exemption of customs duty on raw products as per the common list between the DRC and Uganda.

However, the small traders deplore the non-respect of the implementation of the STR on the side of Bunagana Uganda because the customs duties on the products appearing on the common list were still perceived during the period covered by this report.

Recommendations:

- COMESA and Project countries to advocate for the launch of STR implementation for finished products,
- GLTFP to provide the construction of health facility at the border.

II.3. KASINDI

From April to June 2018, TIDOs provided various assistances to traders, including facilitating the movement of small traders across borders. The number of small traders assisted to cross the border in May was 284 people including 177 women and 107 men. During the month of June 2018, this figure was 370 people among them 225 women and 145 men.

In April 2018, following the launch of STR between Uganda and the DRC, several small traders visited the Trade Information Office to inquire about the eligibility criteria for the Simplified Trade Regime; and several other small traders were facilitated to cross their goods under STR. In particular, 93 women small traders and 21 men from Association of Small Scale Cross-Border Traders of Kasindi were able to import and export without paying customs duty as stipulated by STR.

The TIDOs collected and addressed complaints made by small traders about abusive treatment of cross-border traders, such as, cases of corruption, harassment and any form of non-tariff barriers. Most of the complaints were against the following services: Service de Quarantaine Animale et Végétale, "S.Q.A.V", Office Congolais de Contrôle "OCC" and the Border Police.

The effective implementation of STR, i.e. the implementation of the STR for manufactured products remains one of the ways to reduce or eliminate the visible and non-visible barriers that sometimes make cross-border trade difficult.

TIDOs also provided the first mediation support to conflicts that arose between small traders and staff of border agencies.

Indeed, Kasindi's TIDOs have received several complaints related to STR:

- The first complaint concerned the fees paid at the border for obtaining the Phytosanitary Certificate and Certificate of Origin for animals,
- The second complaint concerned the payment of fees for quarantine services (SQAV),
- The third complaint was about the dispute over the OCC tariff which was reduced from 5% to 1.5% but whose execution is still not applicable;
- Finally the last complaints concerned the deficiencies by the DGDA (DRC customs office) in the interpretation of the application of STR, in particular the frequency in terms of import / export with under STR.

TIDOs intervened together with all agencies operating at the borders to clarify the limits of STR. Indeed, it was clarified that the application of STR does not exclude the respect and payment of the fees required by the other border services. It was also clarified here

that the STR only concerns the exemption of customs duties and that the other charges required by other services, notably the OCC or the border hygiene services, remain normally applicable.

After analyzing and treating the above complaints, TIDOs noticed that awareness campaigns should continue to be conducted at the borders of the GLTFP to further inform DGDA staff and all other border services the criteria for applying STR.

Finally, the TIDOs proceeded with the distribution of documentation on the STR, the common list of approved products and the COMESA charter on minimum treatment for small cross-border traders.

II.4. MAHAGI

From April to June 2018, TIDOs of Mahagi facilitated the movement of small traders across borders. A total of 151,742 traders (including 141,562 women and 10,180 men) were assisted to cross the border, especially during market days. The assistance consisted of distribution of tokens (jeton) to small cross-border traders and was made by TIDOs jointly with the migration service.

TIDOs of Mahagi created awareness on STR for small cross-border traders especially during market days. More than 5000 small traders were reached during the awareness creation. The sensitization included distribution of documentations among others, the COMESA charter on minimum standards for treatment of small cross-border traders, the role of TIDOs, the popularization of the common list etc. TIDOs also had the opportunity to sensitize Mahagi border officials through interviews-discussion conducted with them from their workplaces.

With regard to STR, it can be noted that between May and June 2018, goods that crossed the border through STR were estimated at USD 55,304.44, including:

USD 45,148.55 USD for EXPORTS and;

USD 10,155.92 USD for IMPORTS.

Regarding the collection of complaints and suggestions on the improvement of border crossing procedures, TIDOs noted that Uganda Migration Service does not sometimes recognize the token (jeton) issued to small traders by the Congolese migration service.

TIDOs together with Mahagi Migration officers began discussions with the Goli migration authorities to agree on a single token system that can be accepted by both sides of the border. Both parties committed to improving trade facilitation finalizing the harmonization work of the single token system.

Recommendation

- The communication materials for small traders should be produced in the local language so that the transmitted message is captured by all,
- Need for a continuous awareness creation of border officials and dissemination of signed MoUs between project countries to update border officers on the measures already taken by countries to improve cross border trade among neighboring countries,
- Provide training for TIDOs on customs procedure and tax declaration.

II.5. GOMA

As part of the facilitation of small traders, TIDOs of Goma intervened several times to advocate for small traders whose goods were confiscated unjustly by the border police. In the course of April 2018, 24 small traders including 17 women were assisted to cross border for trading. In addition, TIDOs sensitized 134 small traders from different associations on the use of STR. 124 booklets of common list for STR in Swahili language and 25 copies of COMESA charter in French and English were distributed to small traders. However, TIDOs would like to have the later communication materials in Swahili language as well, since there are none so far.

Thanks to the continued assistance of TIDOs in facilitating cross border trade at Goma, some improvements are remarkable from the migration service of Goma in delivering “jetons” to small traders, despite a persistence of verbal or physical brutality and harassment over the small traders.

However, the persistence of some services that are not formally recognized at the borders that carry out the excessive searches is regrettable. This situation often increases the time it takes to cross the border. Several reports have been made on this issue to the Provincial Directorate of Migration without any change.

To solve this situation in a sustainable way; it is expected that the temporary infrastructure erected at the Goma border should be operational so that the order can be established and the list of services recognized to operate at Goma border is strictly determined.

The major constraints or challenges identified at Goma border can be summarized as being the non-compliance with the application of border management laws (decree establishing the service to operate at the border). In fact, the harassment (physical and moral one) experienced by the small traders result from it.

Facilitating small traders across borders is a permanent activity for TIDOs done every day. However, in May 2018, particular assistance was provided with small traders. For instance, 56 small traders including 37 women and 19 men were facilitated to cross Goma border with their goods. Besides, 14 small traders had been detained by the border police for accidental loss of their “jeton”. Thanks to the intervention of TIDOs, the seized small traders were released and obtained new “jeton”.

20 other small traders were victims of arbitrary confiscation of their goods. The intervention of TIDOs also allowed these small traders to recover their property and preceded with their trade activities. It is thus, suggested that the sensitization campaign organized on the minimum standards of treatment of small cross-border traders may continue by the COMESA experts for border officials should keep going on. This continued sensitization is necessary to awaken trader’s awareness of their rights and, to ensure that border service providers can improve the treatment of small traders. Indeed, it was found that the customs services keep fraudulently collecting customs duty on local products during the morning hours between 6:00 am and 7:00 am before the arrival of TIDOs on the site, and moreover, the migration service sometimes charge traders money to get “jeton.”

In the course of June 2018, 44 small cross-border traders including 8 men were facilitated to cross Goma border. The latter were victims of goods confiscation. Thanks to the intervention of TIDOs, all cases of non-compliance with the application of STR have been treated in favor of small traders.

II.6. RUSIZI

From April to June 2018, TIDOS of Rusizi assisted 31 small traders (23 women and 8 men) to cross the border for trading activities. The assistance involved intervention with border police to release the goods transported by traders without respecting hygiene conditions. TIDOS also took the opportunity to educate small traders on the standards to be observed when dealing with perishable products.

During the same period, TIDOS assisted KOABIMU and DUTERIMEBERE cooperatives of Rwanda to obtain the official registration documents at district and BDF level.

In addition, three other Rusizi cooperatives of 40, 40 and 20 members respectively, invited TIDOS to present to them the conditions of eligibility for STR and the minimum standards for the treatment of small scale cross-border traders.

TIDOS were also requested by International Alert to facilitate the small traders of Bukavu and those of Rwanda to create a PLATFORM that can regroup all cooperatives

/Cross-border associations of small traders to benefit from trade facilitation. TIDOs participated actively to the training session by explaining STR concept, The COMESA Charter and the common list of products for STR.

With regard to conflict mediation, TIDOs managed to resolve a dispute between women traders' cooperative for fish and Rusizi district authorities. In fact, the district officials had required the cooperative to vacate where fish traders were operating. Thanks to TIDOs, a rapprochement between the district and the cooperative was made possible and fish traders were given additional time to sell their products before obtaining another place to operate from.

Finally, TIDOs also carried out the extension activities of the project's achievements. In fact, TIDOs have made available to small traders documentation on STR and the COMESA charter on the standards of minimum treatment for small scale cross-border traders. However, small scale cross border traders wished to get all the communication materials translated into Kinyarwanda.

RECOMMENDATIONS:

Capacity building for Rusizi TIDOs in the following area:

- Calculation of basic taxes related to cross-border trade;
- Capacity building in the migration procedures;
- Capacity building in regulations and laws applicable at borders (ministerial decrees, decree etc.).

II. 7. RUBAVU

From April to June 2018, TIDOs of Rubavu provided various facilitations in the movement of small-scale traders across borders. Among the accomplishment of activities, we can indicate the following ones:

Facilitation in the movement of small-scale traders across borders: 11 traders were assisted by TIDOs to cross their products (sorghum and soybean) into Rwanda as the goods were confiscated because of the lack of simplified declaration document. It was noticed that traders still lack full information on the elements of STR and how can one benefit from it.

At least 82 women small traders were given STR materials and sensitized on requirements to benefit from STR.

Collection of complaints by traders: Incidences of illegal and or unfair treatment of cross border traders such as cases of corruption, harassment and any forms of non-tariff barriers;

In May the TIDOs intervened to solve an issue reported by cross border traders. The issue consisted of an existence of unidentified individuals who were operating at “petite barriere” border on Rwanda side as fraud investigators. These individuals were pointed out by traders as involved in bribes. After the TIDOs got evidences of their implication in bribes the case was taken to the border manager for disciplinary actions. This TIDOs intervention contributed to more transparency at the border and trust in border officers.

II.8. BUNAGANA UGANDA

Facilitation in the movement of small-scale traders across borders:

From April to June April 2018, a total number of 110 small traders (72 were females and 38 males) were facilitated to clear the tax issues and get their goods crossing the border. Apart from traders who need assistance, TIDOs were also presented cases of traders involved in smuggling. These traders were taken through communication on border crossing procedures, market information and STR related information. The TIDOs also explained their situation to the tax enforcement officer who released their good without applying fine to their goods.

During April 2018, the following were reported:

- Most traders are smuggling due to high tariffs and the ban of beverages and fish,
- Items that are highly smuggled include; rice, materials, sugar, and wines into Uganda and fish, beverages to DRC,
- We observe that the implementation of STR will solve the challenge if the common list is harmonized to include a variety of goods.

In Bunagana, issues of smugglings were becoming frequent. Traders are being confiscated goods by customs due to smuggling and failure to pay taxes.

Every time the cases are reported to TIDOs, traders are sensitized about the risk they face when involving in tax fraud.

The TIDOs keep advising them to use formal road.

In Bunagana Uganda, traders still want to use informal routes due to fear of high taxes imposed on some goods.

II.9. MPONDWE

Facilitation in the movement of small-scale traders across borders: Small scale cross border traders were facilitated very well in April 2018. All manufactured goods, processed goods, packed goods, liver stock, agricultural goods, and animals were crossing well. 48 small scale cross border traders were helped, given information and directed on customs and border crossing procedures, standards guidance for both agricultural and processed goods from DRC.

In April 2018, TIDOs assisted two traders who deal with grown rice from DR Congo and crossing to Uganda. These traders had nowhere to start as far as clearing and customs procedures are concerned.

TIDOs directed new traders of palm oil to clear taxes as they did not know the process of clearing and the applicable import duty. TIDOs also assisted a trader who wanted to start plantain banana business getting it from DR Congo to Kampala in terms of border crossing procedures, customs procedures and supply price.

The TIDOs continued making sensitization about simplified trade regime. Concerning simplified trade regime has been got from different social media like the radios, television, newspapers, posters books and many others sources. Information patterning goods on the common list has been hugged to the customs office, trade information desk office, immigration and many others around the community.

Since the time the ministers for Uganda and DRC launched STR on both parties of the two countries, border procedures for small scale cross border traders have been improved, small government sub-agents that used to grab traders' goods have reduced, harassments is trying to reduce.

Collecting complaints and suggestions about the STR, border crossing procedures:

Many complaints have been received at the trade information desk. For instance, most of the small scales cross border traders are experiencing lack of accurate information on tax compliance. Particularly, they are struggling to know which commodities are supposed to pay import duty, withholding taxes and import duty, value added tax, import duty and withholding tax, withholding tax, import duty and infrastructure levy etc.

Moreover, complains were also raised about why are border officials not wearing uniforms or ID badges that allow the identification of their respective agency.

Traders are complaining that some information on chart are in the languages they don't understand so they need all the information to be translated into the local language spoken at their border community.

RECOMMENDATIONS

- Making expansion on the infrastructure like the roads and the bridges to support the increased number of traders,
- Health and hygiene structures gender based oriented should be put in place to address women particular needs,
- Construction of market export zone and enough storage facilities so that traders dealing in perishable commodities can be assisted accordingly

II.10. GOLI

From April to June 2018, the TIDOs of Goli provided detailed information about the STR and assessed STR legibility of the goods carried by the traders. They did sensitization of small scale traders and border officials on the STR. The exercise was done with the help of copy of STR Common list of products booklet and COMESA Charter.

The TIDOs conducted this activity at the border officers 'work place, traders were met one by one in their shops and as they cross the border.

At Goli border, there is high understanding of the GLTFP and the benefits of the STR implementation in the business by the traders. However, officials from, police, army, customs etc. who practice the illegal fund collection from trades are to a lesser extent still a real challenge.

After the sensitization in the first two months of service (April & May 2018), TIDOs of Goli registered the general traders of total number 2017 on two different market days (Wednesday and Saturday).

Other accomplishments by Goli's TIDOs include reorganization of traders within Goli trading center. That was, from informal traders to formal traders and the result gave 119 well registered female traders and 92 male traders under Goli Cross Border Association and in addition, 1831 traders were sensitized and got formalized as well.

The conducted sensitization created an impact at the Goli's border as such, TIDOs are now consulted by Border officers in order to clearly know products that are eligible for STR before traders cross the border. Currently, no money is collected from small scale traders at Goli border post, in Uganda.

Since the launch of STR for agricultural products at Goli border, exports increased from USD 10,116.99 (19 May- 26 May, 2018 to USD 24,635.8 USD (06th June- 18 June, 2018). The total export reached the amount of USD 34,752.79.

The imports also got increased from USD 9568.22 (19th May – 26th May 2018) to USD 46365.4 (6th June – 18th June, 2018). The total imports reached the amount USD 55,933.62.

Products traded on STR shows increase in both volumes and values. However, the export value would be more if finished and semi-finished products were allowed to benefit from the STR.

In regards to NTBs, three illegal barriers were in existence before the arrival of TIDOs in Goli Customs i.e. two on DRC side; and one in Uganda. Traders who used those roads were still stopped by the officers/ persons set at the posts until their pay money asked from them.

Police and army officers at the barrier were the fund collectors at the customs' barrier. Thanks to TIDOs deployment at Goli border, necessary inquiries from both DRC and Uganda were made and reported to the respective offices and also reported to the customs officer in charge who later urged clearing agents to all have uniform and ID and stop the army and police from collecting money from small traders.

One illegal barrier on Uganda side (Goli trading centre) was removed from the effect of 24/ May, 2018) but those of DRC are still there. Traders are advised to use formal road when they cross for market purpose and they should not pay any money on the way without receipt and they must report to the TIDOs.

Time spent by traders using STR in crossing the border has also improved at Goli border. Indeed, since the distribution of the COMESA CHARTER to border officials (police and army), small traders are moving freely, and those carrying goods on motorcycle and bicycle are stopped at the barrier for the check of less than 5 minutes but the traders with finished or semi-finished products are stopped at the barrier by the security officers for checks which takes averagely 5 minutes.

With the official launch STR, there is a great improvement anticipated. However, despite such improvement, more sensitization on minimum standard treatment for small scale cross border traders is still need as in absence of the TIDOs at the border, for instance, on public holidays and Sunday, there is a still illegal fund collection.

Time taken to clear goods and cross the border for STR goods is less than 5 minutes spent by the traders, since they don't pass through Uganda Revenue Authority or Immigration.

For goods above STR threshold and other goods; clearing at URA is fitting as in the below range:

- Exit: 3-5 minutes;

- Entry: 5 minutes. (Declaration must take place at this point that is why the process takes much longer).

Clearing of goods by clearing agents:

Exit: 10-30 minutes

Entry: nearly an hour.

At average, time taken to clear goods is 5 minutes.

From May to June 2018 the TIDOs of Goli offered various facilitations in the movement of small-scale traders across borders. A number of 9255 traders were registered and assisted on 5 market days and 1947 traders assisted on four non- market days.

From the total of 11,202 registered traders, 3922 were male traders and 7280 female traders.

RECOMMENDATIONS

- Penalty or punishment should be set in place for the personalities who will resist embracing the main aim of the STR,
- Recommend that another MOU is signed between Uganda and DRC for the semi-finished and finished products because we realize that over 1000 male small scale traders across Goli/ Mahagi border are doing business of such products. But they can't make reasonable profits because the 2,000 Ugsh and Ugsh5, 000 are still being collected from them basing on the type of the transport means they use,
- Recommend that the project through the Ministry of trade, Industry and Cooperatives advices the customs of both Uganda and DRC to closely monitor and control the un-official barriers on the informal routes which do exist both in Goli (Uganda) and DRC. Otherwise most of the motorists are transporting traders who would use formal road and follow customs procedures have diverted to those informal routes,
- Fast track formation and orientation of JBC.

III. RECOMMENDATIONS AND WAY FORWARD

	Challenge	Recommendation
1	Need to fast track the formation of JBC in all project countries. CBT issues are dealt with by politico-administrative authorities in bilateral meetings where only large traders are invited.	SPIU / Rwanda, PIU / Uganda, GLTFP / DRC and COMESA are recommended to expedite the operationalization of JBCs in a timely manner. COMESA and Project countries to advocate for the launch of STR implementation for finished products,
2	TIDOs'lack of knowledge in the area of customs procedures, in particular those related to simplified declarations for the implementation of STR	COMESA to organize a special for TIDOs on for tax declaration and procedures, sanitary and phytosanitary standards of products to be exported / imported. COMESA to organize Training for TIDOs and Leaders of Traders Associations in Management of associations of small traders and cooperatives.
3	Lackof sanitation and hygiene facilities, especially toilets and urinals to improve the health conditions of small traders at Goma, Bunagana Uganda amd DRC, Kasindi, Mpondwe, Mahagi, Goli	It is recommended that GLTFP/DRC and PIU Uganda review the problem and provide a timely solution. GLTFP to provide the construction of health facility at the border
4	Traders experience difficulties to read the communication materials written in French and English. should be produced in the local language so that the transmitted message is captured by all,	COMESA to produce communication materials in the local language so that the transmitted message is captured by all

5	TIDOs are now equipped with smart phone that can allow them to collect data on STR, for example the number and the overall and average value of transactions made through the use of STR, disaggregated by gender	It is recommended that COMESA organize refresh training on on how to use the smart phone for data collection.
6	DRC border officials do not respect the application of the presidential decree limiting the number of agencies working at the border at five	It is recommended that DRC's Directorate-General for Migration examine this case and provide a timely solution.
7	Unfair treatment to traders by border officials from DRC, Uganda and Rwanda (verbal abuse and in some cases physical abuse and gender based abuse)	<p>Enforcement of the implementation of COMESA Charter on the minimum standard for the treatment of small scale cross border traders.</p> <p>Need for a continuous awareness creation of border officials and dissemination of signed MoUs between project countries to update border officers on the measures already taken by countries to improve cross border trade among neighboring countries,</p>
8	Unjustified absence of TIDOs at their work place	Installation of GPS application on the TIDOs smart phone to improve their supervision at work