



# False Codling Moth (FCM) Compliance in East Africa

## Lessons For Programming



# HIGHLIGHTS

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- ▶ TradeMark Africa's (TMA) interventions on EU regulatory compliance by East African flower exporters around the False Codling Moth (FCM), designated as a quarantine pest, have bore impactful outcomes.
- ▶ Following the interventions, Kenya went through a successful EU DG Sante Audit in October 2025. The audit is an official control carried out by the European Commission's Directorate-General for Health and Food Safety to verify that EU legislation on food and feed safety, animal health and welfare, and plant health is properly implemented and enforced
- ▶ Sustained market access to the EU has now boosted exports which are expected to hit \$1 billion for the first time in 2025. Ethiopia's horticultural exports have also increased to over half a billion dollars in 2025. Because of this sustained production and exports, over 500,000 and 200,000 jobs have been sustained in Kenya and Ethiopia respectively.
- ▶ Results highlight the effectiveness of national system-wide approaches and the need to prioritise early investment in surveillance, certification, and digital traceability systems including ePhyto, electronic Certificate of Inspection, and Transport and Logistics Information Platform (TLIP)-style digital corridors to reduce interception risks, strengthen compliance, and protect export-dependent livelihoods.



# PREFACE

In 2024, the European Union issued regulation 2024/2004, to protect its territory against designated quarantine pests including the False Codling Moth (FCM) which afflicts flowers grown in Africa and exported to the EU. This regulation came into effect in April 2025, introducing stringent export inspections and increased sampling rates of shipments. This has posed market access threat to horticulture players in affected countries and necessitated agile remedial measures to sustain market access to the EU. Within East Africa, Ethiopia, Kenya and Rwanda were most affected and hence the need for quick action to forestall losses.

This brief outlines interventions supported by TMA in Ethiopia, Kenya and Rwanda, and resultant benefits in retention of market access, jobs and livelihoods.

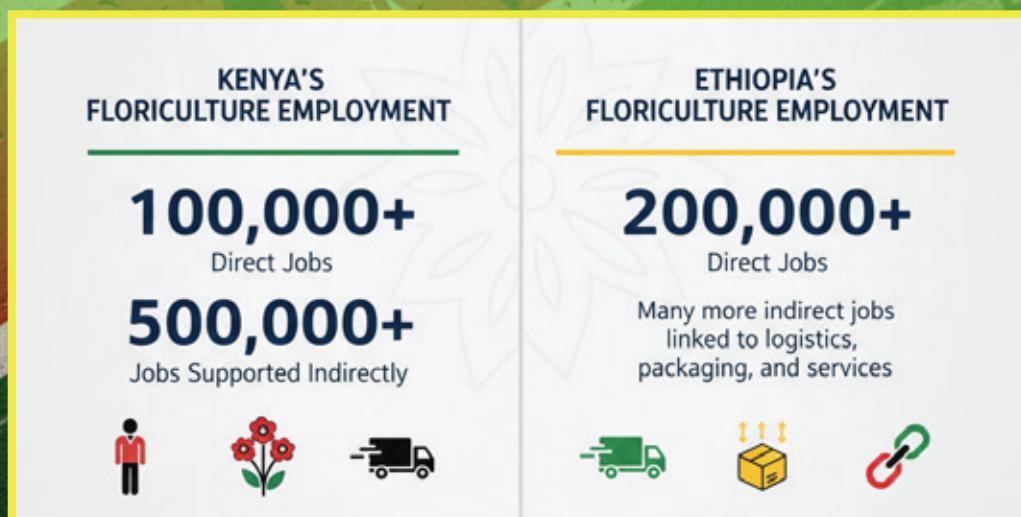
## The Challenge

The European Union classifies the FCM as a high-risk pest, and the introduction of EU Regulation 2024/2004 tightened import controls for flowers and horticultural products originating from Eastern Africa where Kenya and Ethiopia are notable global exporters. The two countries are ranked fourth and fifth globally with flower exports worth \$660m and \$231m respectively in 2023.

The floriculture sector in Kenya directly employs more than 100,000 people with another 500,000 jobs supported by the sector. In Ethiopia, the sector directly employs more than 200,000 people, with many more depending indirectly on logistics, packaging, and services linked to the value chain. Noncompliance would therefore have resulted in partial or full export suspensions, and with supply chain disruptions, reputational risks, -potential diversification of importers to alternate markets, and loss of jobs and livelihoods. Given these risks, strengthening Sanitary and Phytosanitary (SPS) systems, surveillance capacity, digital traceability, and regulatory readiness became essential for safeguarding export continuity and protecting livelihoods across East Africa.

## The Response

TMA mounted a rapid, coordinated, and systems-driven response to mitigate market access risks in the three countries. In March 2025, guided by the EU-funded Business Environment and Export Enhancement Programme Steering Committee, TMA adopted a regional strategy designed to safeguard Kenya, Ethiopia and Rwanda's horticulture and floriculture exports—sectors central to employment, foreign exchange earnings, and rural livelihoods.



A first line of action focused on technical coordination and knowledge sharing. TMA developed a comprehensive technical paper that outlined the regulatory threats posed by FCM and clarified the Systems Approach standards expected under the new EU regime. To ensure harmonised understanding across the region, TMA convened a high-level technical webinar that brought together National Plant Protection Organisations, private sector exporters, and specialised technical partners. This platform enabled countries to review the most recent DG SANTE audit findings, compare experiences, and consolidate readiness plans to minimise the risk of interceptions or trade disruptions. This also ensured readiness for EU audits.

The second intervention area centred on strengthening country-level audit preparedness for DG SANTE missions. In Kenya, TMA worked through Agriconsulting Europe (AES) to support the Kenya Plant Health Inspectorate Service (KEPHIS) by improving systems documentation, reinforcing pest surveillance, and enhancing inspection protocols. These efforts contributed directly to Kenya's successful October 2025 DG SANTE audit outcome, which validated the country's Systems Approach for FCM risk management. In Ethiopia, TMA partnered with the Centre for Agriculture and Bioscience International (CABI) under EU/AFD funding to support the Ethiopian Agricultural Authority (EAA) in preparing for its scheduled 16 November 2025 audit.



Assistance focused on upgrading surveillance systems, strengthening documentation, and ensuring that inspection procedures met EU expectations for high-risk commodities.

A third pillar of TMA's response emphasised long-term SPS capacity building, with Rwanda as a priority country under the VIBE Programme. Working with Rwanda Inspectorate, Competition and Consumer Protection Authority, Rwanda Standards Board, and National Agricultural Export Development Board TMA's support is helping to establish comprehensive SPS systems across horticulture, dairy, and meat sectors. Interventions included improvements in pest

and disease surveillance, enhanced inspection procedures, and the development of digital traceability systems aligned with EU standards. These reforms directly address the gaps that led to Rwanda missing its 2025 compliance deadline, particularly in the absence of an adequate national traceability framework.

Overall, TMA's systems-based and country-led approach is reinforcing the resilience of East Africa's agrifood export sectors, protecting market access, and positioning partner countries to comply with evolving EU phytosanitary requirements.

# THE RESULTS

Exports are expected to grow to **\$1.1B** in 2025, from the **\$835M** exports in 2024.



Anticipated to rise from **\$390M** to over **\$450M** for 2025.



Regain compliance with **EU Standards** after missing 2025 deadline.



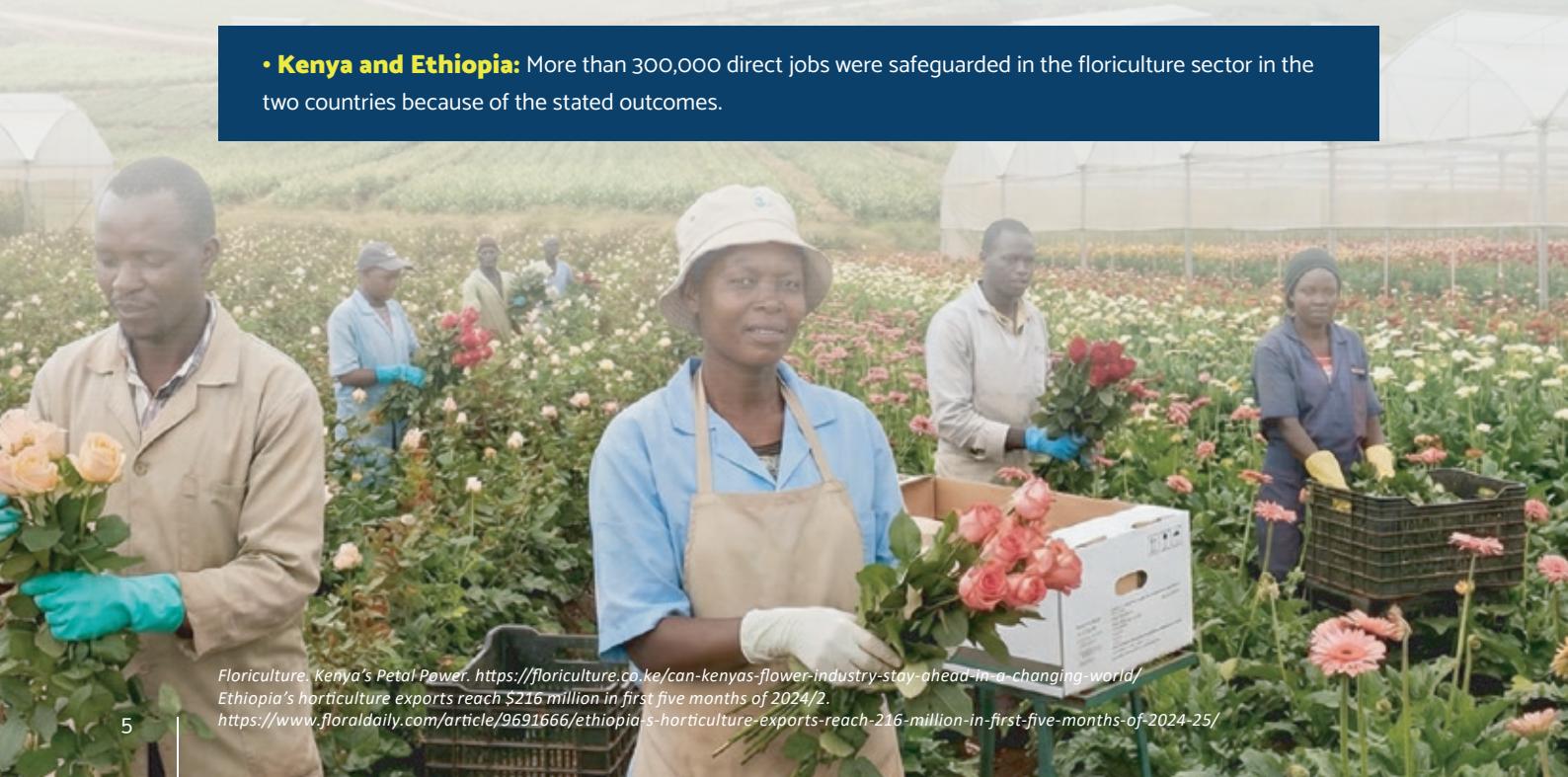
**TMA's targeted support has generated results across the region, with clear evidence of strengthened systems, protected jobs, and secured export markets.**

- Kenya:** Flower exports are expected to grow to **\$1.1 billion** in 2025, an uptick from the **\$835 million** exports in 2024. Moreover, the strengthened surveillance, inspection, and documentation systems now in place provide Kenya with a resilient platform for long-term phytosanitary compliance.

- Ethiopia:** Flower exports are anticipated to rise from **\$390** to over **450 million** for 2025 based on growth in exports reported in the first five months of 2025. TMA's technical assistance also bolstered national readiness ahead of the November 2025 DG SANTE audit. Enhancements to surveillance systems, inspection procedures, and documentation have significantly reduced the risk of export disruption for one of the country's most dynamic horticultural industries. Thousands of jobs and vital foreign exchange earnings are better protected as Ethiopia demonstrates more robust implementation of a Systems Approach in line with EU expectations.

- Rwanda:** The country is progressing steadily through comprehensive SPS modernisation under the Mastercard Foundation-funded VIBE Programme. Working through Filatec, TMA is enabling national agencies to strengthen SPS systems across horticulture, dairy, and meat sectors. Investments in digital traceability, improved inspection procedures, and upgraded surveillance capacity are positioning Rwanda to regain compliance with EU standards after missing its earlier 2025 deadline.

**Kenya and Ethiopia:** More than 300,000 direct jobs were safeguarded in the floriculture sector in the two countries because of the stated outcomes.



Floriculture, Kenya's Petal Power. <https://floriculture.co.ke/can-kenyas-flower-industry-stay-ahead-in-a-changing-world/>  
 Ethiopia's horticulture exports reach \$216 million in first five months of 2024/2. <https://www.floraldaily.com/article/9691666/ethiopia-s-horticulture-exports-reach-216-million-in-first-five-months-of-2024-25/>

## TMA'S SYSTEMS-BASED APPROACH: AGRIFOOD EXPORT IMPACT & FUTURE PATHWAYS



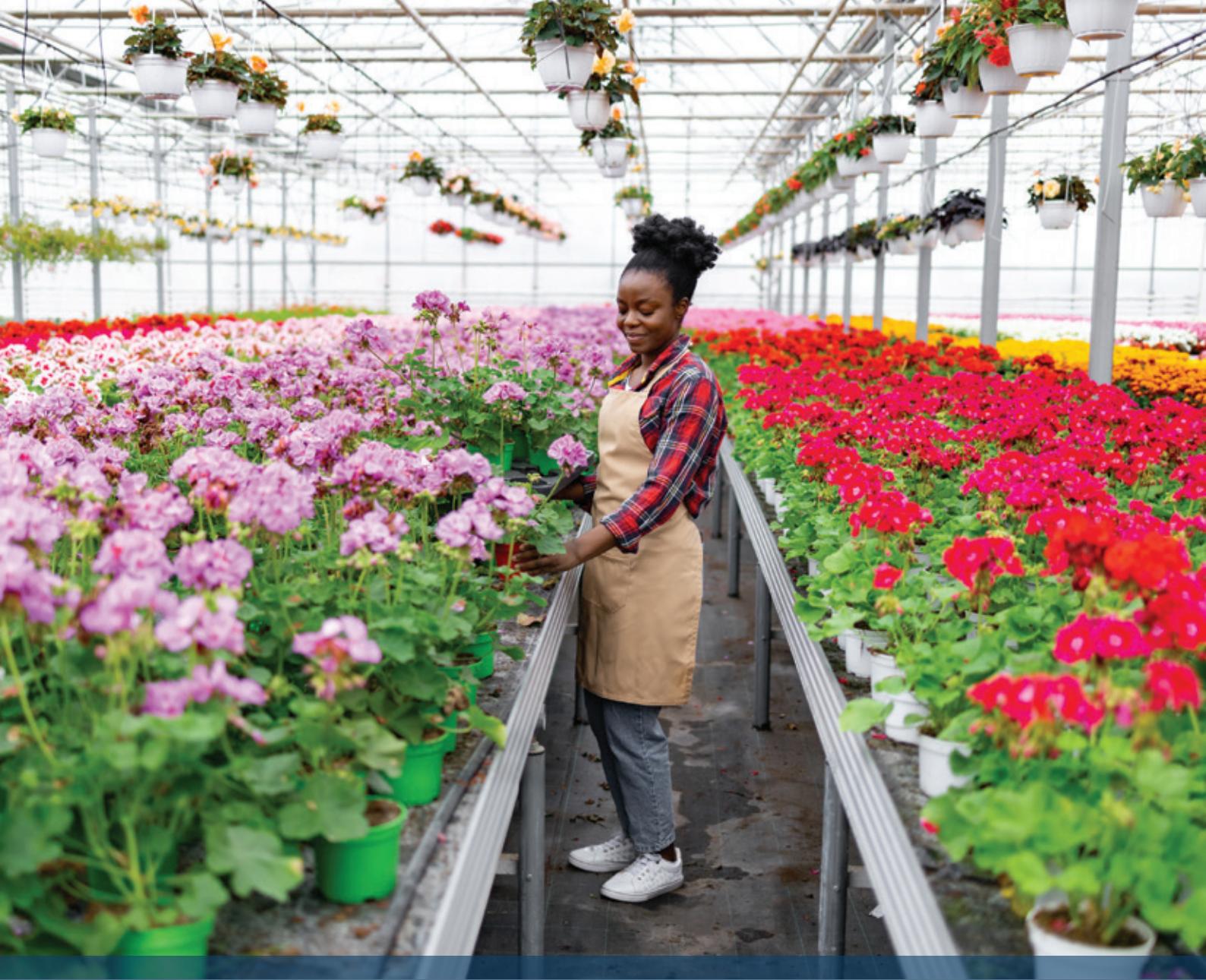
These emerging results highlight the effectiveness of TMA's systems-based approach in safeguarding livelihoods and enhancing the competitiveness of East Africa's high-value agrifood exports. They also point out to the way forward in institutionalising the lessons from these case study through prioritising early investment in surveillance, certification, and digital traceability systems—including ePhyto, electronic COI, and TLIP-style digital corridors—to reduce interception risks, strengthen compliance, and protect export-dependent livelihoods.

### Lessons from Implementation

1. Institutionalise the Systems Approach across partner countries as the primary mechanism for managing bottlenecks that threaten market access to high-value markets.
2. Enhance coordinated cross-portfolio prioritisation for early investment in surveillance, certification, and digital traceability systems—including ePhyto, electronic COI, and

digital corridors—to reduce interception risks, strengthen compliance, and protect export-dependent livelihoods.

3. Strengthen regional coordination and harmonisation of NPPO procedures, embedding cross-country learning, shared diagnostics, and the Africa Standards & SPS Scorecard into REC and AfCFTA implementation frameworks.
4. Embed SPS compliance as a central pillar of TMA's agrifood and trade programming, ensuring Country Directors integrate SPS upgrading within all value-chain and export competitiveness initiatives under AfCFTA.
5. Deepen long-term partnerships with technical agencies and scale proven systems-strengthening models (Kenya, Ethiopia, Rwanda) to new countries to build durable continental capacity and reinforce Africa's position in global agrifood trade.



*TradeMark Africa (TMA) drives, sustainable  
trade across Africa, boosting intra-African  
and global market participation.*