



IMPROVED TRADE REGULATORY ENVIRONMENT

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Portfolio Evaluation

Final Evaluation Report

Deliverable 2

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List of acronyms

Acronym	Definition
AEO	Authorized Economic Operator
AfT	Aid-for-Trade
AfCFTA	African Continental Free Trade Agreement
AU	African Union
CA	Contribution Analysis
CB	Capacity Building
CBM	Coordinated Border Management
CBT	Cross-Border Trade
CCTTFA	Central Corridor Transit Transport Facilitation Agency
CMP	Common Market Protocol
CoC	Chambers of Commerce
COMESA	The Common Market for Eastern and Southern Africa
CSO	Civil Society Organizations
DAC	Development Assistance Committee
DANIDA	Danish International Development Agency
DRC	Democratic Republic of Congo
e-COO	Electronic Certificate of Origin
EA	Evaluation Assessment
EAC	East African Community
EAMS	East African Monitoring System
EAP	Economic Partnership Agreement
EM	Evaluation Matrix
ET	Evaluation Team
EPZA	Export Processing Zone Authority
EQ	Evaluation Question
EQA	Evaluation Quality Assessment
ESW	Electronic Single Window



Acronym	Definition
FCDO	Foreign, Commonwealth & Development Office
FGD	Focus Group Discussion
FTA	Free Trade Agreement
FPEAK	The Fresh Produce Exporters Association of Kenya
FYDP	Five Year Development Plan
GAC	Global Affairs Canada
GBV	Gender-Based Violence
GDP	Gross Domestic Product
GIZ	German Agency for International Cooperation
GMO	Genetically Modified Organism
GTI	Guided Trade Initiative
HQ	Headquarters
HS	Harmonized System
IBM	Integrated Border Management
ICMS	Integrated Customs Management System
ICT	Information and Communications Technology
IFC	International Finance Corporation
IGAD	The Intergovernmental Authority on Development
ITC	International Trade Centre
IO	Intermediate Outcome
IR	Inception Report
JBOC	Joint Border Operations Committee
KAM	Kenya Association of Manufacturers
KenTrade	Kenya Trade Network Agency
KEQ	Key Evaluation Question
KETRA	Kenya Trade Remedies Agency
KIFWA	Kenya International Freight and Warehousing Association
KII	Key Informant Interview
MDA	Market Development Assistance
MEAC	The Ministry of East African Community
M&E	Monitoring and Evaluation
MEL	Monitoring, Evaluation and Learning



Acronym	Definition
MINICOM	Ministry of Trade and Industry of Rwanda.
NCTF	National Committee on Trade Facilitation
NCM	Non-Conforming Measures
NDEPS	National Export Development and Promotion Strategy
NGO	Non-Governmental Organization
NES	National Export Strategy
NMC	National Monitoring Committee
NOC	National Oversight Committee
NRSE-NTB	National Response Strategy on Elimination of the NTBs
NST	National Strategy for Transformation
NTB	Non-tariff Barrier
NTFC	National Trade Facilitation Committee
NTM	Non-Tariff Measure
OECD	Organization for Economic Co-operation Development
OSBP	One-stop border post
PCC	Programme Coordination Committee
PIR	Per-Inception Report
PMC	Project Cycle Management
PMT	Performance Measurement Tool
PPD	Public-Private Dialogue
PSF	Private Sector Federation
RBM	Results-based Management
RDB	Rwanda Development Board
REC	Regional Economic Community
RECTS	Regional Electronic Cargo Tracking System
RF	Results Framework
RICA	Rwanda Institute for Conservation Agriculture
RMC	Regional Monitoring Committee
RoO	Rules of Origin
RRA	Rwanda Revenue Authority
S2	TMA Strategy 2 Programme
S3	TMA Strategy 3 Programme



Acronym	Definition
SACU	The Southern African Customs Union
SADC	The Southern African Development Community
SCT	Single Customs Territory
SME	Small and Medium Enterprise
SMS	Short Message Service
SOP	Standard Operating Procedures
SPS	Sanitary and Phytosanitary
STR	Simplified Trade Regime
TAFFA	Tanzania Freight Forwarders Association
TANCIS	Tanzania Customs Integrated System
TBS	Tanzania Bureau of Standards
TBT	Technical Barriers to Trade
TCCIA	Tanzania Chamber of Commerce, Industry and Agriculture
TEPP	TMA East African Community (EAC) Partnership Programme
TEU	Twenty-Foot Equivalent
TFA	Trade Facilitation Agreement
TFSP	Trade Facilitation Support Programme
TFTA	Tripartite Free Trade Agreement
TIC	Tanzania Investment Centre
TLC	Trade Logistics Clusters
TMA	TradeMark Africa
TMEA	TradeMark East Africa
TMX	Tanzania Mercantile Exchange
ToC	Theory of Change
ToR	Terms of Reference
TP	Trade Policy
TPA	Tanzania Ports Authority
TPHPA	Tanzania Plant Health and Pesticides Authority
TPSF	Tanzania Private Sector Foundation
TRA	Tanzania Revenue Authority
TTIP	Tanzania Trade Information Portal
TWCC	Tanzania Women Chamber of Commerce



Acronym	Definition
UNCTAD	UN Trade and Development
UNECA	United Nations Economic Commission for Africa
UWEAL	Uganda Women Entrepreneurs Association Limited
VfM	Value for Money
WB	World Bank
WTO	World Trade Organization
YP	Young Professionals
YPP	Young Professionals Programme
ZNCCIA	Zanzibar National Chamber of Commerce, Industry and Agriculture
ZNBC	Zanzibar National Business Council



Executive Summary

a) Project Overview

TradeMark Africa (TMA) is a leading Aid-for-Trade organization established in 2010 to promote inclusive and sustainable trade-led growth across Africa. Supported by 12 bilateral donors and the Gates and the Mastercard Foundations, TMA operates across East and Southern Africa and works closely with national governments, regional economic communities, civil society organizations, and the private sector.

This evaluation covers TMA's Strategy 2 (S2) Programme, implemented between 2017 and 2023, with some projects extending into 2024. It focuses specifically on the Improved Trade Regulatory Environment Portfolio under Intermediate Outcome 1.4 (IO1.4), which comprises 16 evaluable projects. These projects mainly provided "technical assistance and support to national governments in the areas of trade policy and export strategy" and were designed to address specific components such as regulatory harmonization, policy reform, and operational improvements that collectively reduce trade barriers and improve business competitiveness.

b) Objectives of the Evaluation

The evaluation was designed to:

- Assess the portfolio's contribution to reducing key trade barriers;
- Test the validity of the Theory of Change (ToC) assumptions;
- Identify broader impacts, including inclusion-related outcomes; and
- Generate recommendations for enhancing portfolio effectiveness.

c) Methodology

The evaluation employed a theory-based mixed-methods approach, integrating qualitative and quantitative data collection and analysis. Key elements included:

- Document and literature reviews;
- A ToC validation workshop;
- Over 160 stakeholder consultations through 64 key informant interviews (KIIs) and 10 focus group discussions (FGDs);
- Site visits in Kenya, Rwanda, Tanzania, and Uganda, with virtual engagement for other countries.

Analytical methods included contribution analysis, process tracing, and contextual analysis to unpack how TMA-supported interventions influenced trade policy reforms and regulatory environments across different political and economic contexts.

The evaluation assessed all six OECD-DAC criteria—relevance, effectiveness, coherence, efficiency, impact, and sustainability—and included a focus on cross-cutting themes such as gender, inclusion, and environmental sustainability.



d) Key Findings

Relevance

Finding#1: The Trade Regulatory Environment Portfolio was relevant to the needs and priorities of stakeholders at international, regional and national levels.

Between 2017 and 2023, it supported the implementation of the East African Community (EAC)'s Single Customs Territory and Integrated Border Management systems—initiatives central to regional integration and aligned with global commitments such as the World Trade Organization (WTO) Trade Facilitation Agreement. The portfolio also contributed to broader continental goals, including the Tripartite Free Trade Agreement and the African Continental Free Trade Agreement (AfCFTA).

At the national level, the portfolio's relevance was reinforced by its alignment with trade policy frameworks and cycles in Kenya, Rwanda, Tanzania, and Uganda. TMA's support improved trade facilitation, export diversification, and regional integration.

Private sector engagement was strong, with support provided to organizations such as the Private Sector Federation in Rwanda, the Private Sector Foundation Uganda, the Uganda Women Entrepreneurs Association. These partners received assistance in Non-tariff Barrier (NTB) advocacy, Small and Medium Enterprise (SME) capacity building, and participation in regional trade consultations and negotiations.

The portfolio followed a demand-driven approach: projects were initiated by partner states and coordinated by the EAC Secretariat. While the demand-driven model ensured context-specific responsiveness, some stakeholders—particularly in Uganda—noted concerns about unequal distribution of national projects.

Effectiveness

Finding#2: TMA contributed meaningfully to expected short-term and intermediate outcomes, and was broadly recognized as an effective implementing organization.

Between 2017 and 2020, TMA demonstrated strong coordination with national governments, border agencies, and the EAC Secretariat. This enabled the evolution of Integrated Border Management workstreams from infrastructure development to regulatory cooperation. Although the Covid-19 pandemic and donor funding cuts temporarily disrupted this momentum, TMA adapted by launching its Safe Trade Approach to support trade continuity and pandemic resilience.

Despite these challenges, progress was evident. For instance, at portfolio level, 80% of high-priority restrictions requiring legislative alignment were addressed. Implementation of WTO TFA measures advanced in countries like Rwanda, Uganda, and Tanzania. Technical tools—including the One-stop border post (OSBP) Performance Measurement Tool, digital trade portals, and automation of the Authorized Economic Operator (AEO) programme—helped simplify trade procedures, reduce costs, and support cross-border trade efficiency.

Finding#3: TMA provided significant support to partner countries in developing or updating trade and export strategies, including in Rwanda, Kenya, Tanzania, and Uganda. These strategies were generally well received, developed through collaborative and consultative processes. However, delays emerged due to Covid-19 disruptions and difficulties in recruiting qualified consultants. In some instances, documents were not fully implemented or became outdated due to shifts in government priorities.



While TMA's outsourcing model allowed for greater flexibility and reach, stakeholders expressed concerns over potential losses of institutional knowledge.

Finding#4: TMA significantly contributed to reducing non-tariff barriers (NTBs) across the region by supporting national and regional platforms such as National Trade Facilitation Committees (NTFCs), joint border committees, and the Tripartite NTB mechanism. For instance, in the EAC region, in 2020, 77% of the reported NTBs had been resolved compared to only 43% in 2016, and by 2023, above 90% of the reported NTBs were being resolved. In Tanzania reduced checkpoints along the Dar es Salaam–Tunduma corridor from 17 to 3, cutting average transit times by over 40%.

Despite these advances, persistent and politically sensitive NTBs remain a challenge. Private sector stakeholders highlighted delays in enforcement, limited feedback from NTB reporting platforms, and unresolved issues such as inconsistent excise duties, labelling standards, and long-standing sectoral disputes.

Nevertheless, many private sector representatives reported benefits from joint cross-border or "cluster" committees, which also helped improve security for women traders and contributed to NTB reduction at the micro level. Improvements in infrastructure, institutional coordination, and capacity-building—such as simplified documentation and warehouse-based inspections—further enhanced cross-border trade and regulatory efficiency.

Efficiency / Internal and External Coherence

Finding#5: Most of the planned outputs under the portfolio were delivered in a timely and economical manner, although some delays occurred. From the data collected during field missions, the majority of portfolio outputs were achieved as intended. However, a full assessment of efficiency was constrained by limited availability of disaggregated financial data and challenges in linking expenditures to intangible results. Stakeholders in all four countries visited generally perceived the portfolio as efficient, citing strong collaboration between TMA national and regional teams and government counterparts. The coordinated use of consultants—whose fees represented over 25% of the total budget—was viewed by many as an efficient approach, particularly for strategic policy support, alongside TMA's reputation for effective service delivery.

Funding and disbursement processes were considered broadly sound, though some stakeholders questioned the rigidity of TMA's financing modalities, particularly around travel and accommodation arrangements for regional activities. Staff turnover and budget cuts, particularly during the latter stages of S2, impacted decision-making fluidity and institutional memory. Despite these challenges, and broader funding constraints exacerbated by the COVID-19 pandemic, TMA demonstrated flexibility and adaptive management.

Finding#6: Projects within the trade regulatory environment portfolio were generally coherent with one another, with strong alignment observed between policy support, NTB elimination, and export development efforts.

In addition, TMA's trade regulatory efforts were often complementary to other projects outside the portfolio under review. These included infrastructure investments, standards harmonization, and Sanitary and Phytosanitary (SPS) Measures-related support implemented under separate programs.

The overall design of TMA's programming allowed for upstream policy work to inform downstream implementation, with cross-cutting capacity building fostering institutional coherence. Nonetheless, a few respondents reported coordination gaps between country and regional teams, occasionally affecting alignment.



Finding#7: TMA’s work was generally well aligned with non-TMA initiatives, avoiding duplication and fostering complementarity. By focusing on regulatory and policy support, TMA complemented the infrastructure and trade facilitation efforts of partners like GIZ, the World Bank, United Nations Economic Commission for Africa, UNCTAD, and the IFC for instance.

Collaboration with national institutions and donors—such as on NTFCs, trade information portals, and AfCFTA strategies—enhanced synergies and efficiency. In Kenya, Tanzania, and Uganda, TMA worked through private sector platforms and regular coordination to align efforts and share responsibilities.

Trade information portals improved transparency and reduced trade costs where implemented, while IFC-supported scorecards helped track EAC Partner States’ compliance with regional trade commitments.

Finding#8: TMA’s Monitoring, Evaluation and Learning (MEL) strategy was well conceived but faced challenges in implementation, limiting its effectiveness for strategic decision-making. TMA’s MEL strategy emphasized outcome measurement, theory of change alignment, and tools like econometric modelling and value-for-money analysis to inform strategic decision-making.

However, implementation of the MEL strategy faced financial and operational constraints. Planned monitoring of key trade indicators and short-term outcomes was not fully carried out, and Results Framework (RF) data coverage remained incomplete beyond 2020. While evaluations were used effectively to assess intermediate outcomes, routine monitoring and reporting tools provided only partial visibility along the results chain—particularly for IO1.4.

Cross-cutting indicators on gender and climate change were included in the framework, but lacked data. The annual reviews and results framework focused mainly on achieved outcomes, limiting traceability and reducing the ability to assess alignment between activities, outputs, and outcomes. As a result, stakeholders lacked a comprehensive view of progress, and learning was constrained by gaps in data coverage and reporting depth.

Finding#9: TMA was viewed by many stakeholders as a learning organization. Learning was promoted through annual reviews, which integrated a value-for-money lens to inform portfolio-level decisions, and through regular programmatic review sessions. The 2020 MEL strategy emphasized learning as central to strategic decision-making, proposing mechanisms such as quarterly reviews, partnerships, and communities of practice.

However, not all learning initiatives materialized due to funding and competing priorities. Despite this, TMA staff reported that lessons from Strategy 1 (S1) were integrated into S2, though not always systematically.

TMA’s adaptive programming was evident in its response to COVID-19 and in mechanisms like embedded advisors and multi-stakeholder engagement. However, in some contexts, TMA underestimated the complexity of political economy dynamics, which affected implementation.

Impact

Finding#10: TMA’s portfolio contributed to improved trade outcomes across the EAC region, though attribution remains complex. EAC data shows reductions in trade transportation time and costs, with reported impacts including increased trade volume and value, enhanced competitiveness, expanded market access, and job creation—particularly for SMEs and women traders. While these impacts cannot be attributed to TMA alone, its trade regulatory interventions were seen as key contributors.



Border crossing and clearance times were reduced significantly across countries. In EAC region, NTB resolution time dropped from 524 to 77 days, and clearance time at OSBPs was cut by up to 30%. In Uganda, systems like the Electronic Single Window and Regional Electronic Cargo Tracking System (RECTS) halved clearance times and saved millions in trade costs. Kenya's policy reforms under National Export Development and Promotion Strategy (NDEPS) and Guided Trade Initiative (GTI) supported export diversification and improved trade competitiveness. Rwanda's earlier gains in customs efficiency predated S2, but regional benefits from the portfolio were also noted.

TMA's support to NTB resolution, regulatory reforms, and trade facilitation contributed to easing cross-border processes, increasing predictability, and improving institutional capacity. However, challenges in measuring the direct impact of trade policy support and gaps in data availability—particularly at the regional and gender-disaggregated levels—limited full impact assessment.

Sustainability

Finding#11: Some results achieved under TMA's trade regulatory environment portfolio show signs of sustainability, particularly those embedded in government systems—such as the Electronic Single Window, RECT, and risk-based customs procedures. Digitization efforts and institutional collaboration also continue to sustain reforms through day-to-day operations, even in the absence of ongoing TMA support.

However, the overall sustainability outlook is mixed. Many respondents noted that several mechanisms—such as NTFCs, joint cross-border committees, and regional monitoring structures—risk losing momentum without dedicated funding or coordination support.

TMA partnered with appropriate institutions and built capacity at regional and national levels, which has strengthened institutional resilience. Initiatives like Rwanda's Young Professionals Programme were cited as promising for long-term impact. Yet, risks to sustainability persist, particularly due to uncertainties in TMA's own funding base following the exit of key donors. While new trade facilitation investments by the EU in Uganda and ongoing UNCTAD-AfDB initiatives offer continuity, gaps remain in other countries.

Cross-Cutting themes

Finding#12: Cross-cutting themes were minimally integrated into the portfolio's design and implementation. While gender, inclusion, poverty, and environmental benefits were reported, limited data made outcomes difficult to measure.

Gender and inclusion were supported through targeted training, infrastructure upgrades, and partnerships with women's organizations across the four countries. These helped formalize cross-border trade for women and improve their participation.

Poverty reduction effects were largely indirect, with lower trade costs and better market access benefiting some communities. However, gains were not always equitably distributed, and competition policy was not integrated.

Environmental impacts were modest but positive—stemming from reduced delays, digitalization, and lower emissions—but the theme remained underdeveloped.

The portfolio also contributed to regional cooperation and stability by supporting joint border mechanisms and expanding intra-EAC trade.



e) Conclusions

Relevance

The portfolio was strongly aligned with regional frameworks (EAC, AfCFTA, WTO) and national priorities in Kenya, Uganda, Tanzania, and Rwanda. TMA's embedded country presence and demand-driven approach allowed it to respond effectively to evolving partner needs. However, the limited engagement in trade in services—despite its strategic importance in regional agreements—highlighted a missed opportunity to further support regional competitiveness.

Effectiveness

The portfolio achieved notable results in reducing trade barriers, modernizing border systems, and supporting the development of national trade strategies. It also contributed to regional alignment with AfCFTA and TFTA frameworks, while empowering private sector actors through NTFCs and policy dialogue. These achievements reflect TMA's strong effectiveness across multiple levels. However, delivery was affected by COVID-19, consultant sourcing challenges, and political turnover, and NTB resolution processes continue to face enforcement and follow-up limitations.

Efficiency

TMA delivered most planned outputs economically, with field data confirming strong coordination and a pragmatic, consultant-supported delivery model. Nonetheless, fragmented financial and results data limited the assessment of cost-effectiveness. Recent staff turnover and internal restructuring introduced short-term inefficiencies, particularly in project follow-up and decision-making toward the end of S2.

Coherence

Internal coherence was strong, particularly where trade policy support aligned with infrastructure investments, standards harmonization, and institutional capacity-building. In some cases, however, coordination between regional and country teams was suboptimal, and linkages with private sector development (Outcome 2) remained limited. External coherence with development partners was generally high, though sustainability gaps emerged in some countries where digital tools were not maintained.

M&E

TMA's MEL strategy for S2 was technically sound and aligned with international best practices, incorporating tools like the George Wolf Model and Value for Money frameworks. It emphasized results-based management and was designed to support strategic learning and decision-making. However, limited resources constrained its full implementation. Gaps in output and short-term outcome data, limited tracking of cross-cutting themes, and outdated trade indicators reduced its utility for monitoring progress and assessing impact in real time.

Impact

The portfolio contributed to improved trade outcomes across the region, including reduced trade costs and delays, increased export volumes, and enhanced competitiveness—especially for SMEs and women traders. However, limited availability of disaggregated and recent data constrained the ability to fully assess impact or attribute results directly to TMA interventions.

Sustainability

Key reforms—such as the Electronic Single Window and RECTS—have been institutionalized within



government systems and continue to deliver benefits. However, collaborative platforms like NTFCs and cross-border committees remain reliant on external funding. Institutional turnover, budget constraints, and political transitions pose ongoing risks. TMA's own financial sustainability, following key donor withdrawals, is also a concern for continued engagement and follow-up.

Cross-Cutting Issues

Gender inclusion was addressed through targeted support to women traders, partnerships with women's organizations, and policy dialogue. Environmental and poverty reduction impacts were more indirect and less systematically integrated. The absence of disaggregated indicators limited the visibility of these outcomes, pointing to the need for stronger data systems and more intentional mainstreaming in future programming.

f) Lessons Learned

- **Importance of Stakeholder Engagement:** Involving local communities, businesses, and government agencies throughout the project lifecycle enhanced the relevance, ownership, and sustainability of interventions.
- **Need for Tailored Approaches:** A one-size-fits-all model proved ineffective across the EAC. Tailored interventions for specific sectors and groups (e.g., women entrepreneurs, youth) delivered stronger results.
- **Public-Private Partnership Model:** Structures like the National Monitoring Committees (NMCs) demonstrated the value of inclusive, co-chaired platforms in building trust and facilitating collaborative problem-solving.
- **Digital Innovation and Accessibility:** Blending digital tools—such as SMS-based NTB reporting—with traditional consultation improved accessibility, responsiveness, and user participation.
- **Regional Integration and Coordination:** Participation in regional platforms enhanced committee effectiveness and contributed to broader EAC integration objectives.

g) Recommendations

Based on the findings and conclusions, the evaluation makes the following strategic recommendations:

Relevance

- **R1:** Introduce a more transparent and balanced mechanism for country-level project allocation, including clearer selection criteria and communication strategies.
- **R2:** Strengthen the integration of continuous political economy analysis to anticipate tensions between regional commitments and national realities. Expand support to trade in services and competition policy to address gaps and improve inclusiveness.

Effectiveness

- **R3:** Upgrade NTB reporting and resolution mechanisms with real-time tracking, clearer resolution timelines, and greater private sector visibility.



- **R4:** To mitigate delays caused by political transitions or unforeseen disruptions (e.g., pandemics), TMA should embed flexibility into trade policy processes through adaptive planning, modular strategy development, and regular mid-term reviews.

Efficiency

- **R5:** Strengthen knowledge management systems to address institutional memory gaps caused by staff turnover, including onboarding protocols, handover notes, and knowledge-sharing incentives.

Coherence

- **R6:** Improve strategic integration across outcomes by embedding private sector perspectives more consistently in regulatory planning, and enhancing coordination between trade policy and private sector development efforts.
- **R7:** Leverage donor synergies more strategically by co-creating initiatives and aligning with partners' comparative advantages, particularly in high-impact areas like AfCFTA and NTB reform.

M&E

- **R8:** Ensure the Results Framework (RF) includes all outputs, short-term outcomes, and cross-cutting results, and is consistently aligned with the ToC. Use milestone-based tracking and integrate perception-based indicators to strengthen learning and accountability.

Impact

- **R9:** Conduct targeted, periodic impact evaluations using mixed methods and longitudinal tracking, where feasible, to better capture both direct and indirect portfolio outcomes.

Sustainability

- **R10:** Develop sustainability strategies for digital tools and institutional platforms, including costed action plans and formal integration into national systems and budgets.

Cross-Cutting Issues

- **R11:** Institutionalize inclusive engagement mechanisms for informal traders, youth, and climate-vulnerable groups to ensure policies reflect diverse lived experiences.
- **R12:** Advocate for the integration of competition policy and pro-poor trade frameworks into national strategies to improve the distributional impacts of trade reforms.



1. Introduction and background

a) Introduction

TradeMark Africa (TMA), which used to be called TradeMark East Africa (TMEA), was established in 2010 as an Aid-for-Trade (AfT) organization to support trade growth, poverty reduction and economic prosperity in Africa. The mission of TMA is to increase sustainable and inclusive intra-African trade and exports to the rest of the world. TMA is funded by 12 bilateral donors (i.e. Belgium, Canada, Denmark, EU, Finland, France, Ireland, the Netherlands, Norway, Sweden, UK and USA) and one philanthropic development partner (i.e. the Bill and Melinda Gates Foundation). In the last 15 years, TMA has been working closely with regional intergovernmental organisations (i.e. African Union (AU), African Continental Free Trade Agreement (AfCFTA), East African Community (EAC), Intergovernmental Authority on Development (IGAD), Common Market for Eastern and Southern Africa (COMESA), Economic Community of Western African States (ECOWAS)), national governments, the private sector and civil society organisations (CSOs) in the region to design and implement many project activities to strengthen the trade-related capacity of relevant government and private sector institutions. The headquarters of TMA are based in Nairobi, Kenya. Other operational offices are in the EAC Secretariat, Arusha, Tanzania, as well as in Benin, Burundi, Cote d'Ivoire, the Democratic Republic of Congo, Djibouti, Ethiopia, Ghana, Malawi, Mozambique, Rwanda, Somaliland, South Sudan, Tanzania, Togo, Uganda, Zambia and Zimbabwe.

TMA has finalised the implementation of its Strategy 2 Programme (herein also referred to as simply Strategy 2 or S2) which ran from 2017/18 to 2023/24. As for the whole of the TMA mission, S2 aimed to increase intra-African and global trade in the countries and regions where TMA has been operating. Through the reduction of trade barriers and improvement of business competitiveness, Strategy 2 contributed to the high-level outcomes indicated in the theory of change (ToC) of various project portfolios under TMA. After seven-year implementation of the S2, TMA called for an independent evaluation of the Improved Trade Regulatory Environment Portfolio (herein also referred to as the portfolio), which is directly linked to the Intermediate Outcome IO1.4. To conduct the independent evaluation, the TMA team conducted an Evaluation Assessment (EA) of TMA's Trade Policy portfolio and concluded that 16 of 27 projects under the portfolio were deemed "evaluable".

The results of the evaluation will promote learning and greater accountability so that TMA can share the outcomes and achievements with donors and provide more opportunities to attract additional funding for follow-up and/or new project activities under TMA.

b) Programme background

The portfolio evaluation assessed the 16 pre-selected projects under TMA Strategy 2's IO 1.4. These projects mainly provided "technical assistance and support to national governments in the areas of trade policy and export strategy". Through the TMA East African Community (EAC) Partnership Programme (TEPP), TMA also provided capacity building to the EAC Secretariat and national governments so that they could become more effective in developing, coordinating, and overseeing legislation, policies and programmes. In addition, the EAC Secretariat received support from TMA so that its members could harmonize their external trade policies, which are strategically coherent with their commitments to the World Trade Organization (WTO), AfCFTA and other regional and bilateral trade agreements.



As demonstrated in Figure 1 further below, which depicts the ToC¹ behind the Intermediary Outcome (IO 1.4) “improved trade regulatory environment”, the portfolio of projects was to lead to reduced trade barriers and enhanced business competitiveness in the region, illustrated by the two higher level outcomes in yellow in the figure.

In March 2018, the African Continental Free Trade Agreement (AfCFTA) was created with 43 original parties and other additional 11 signatories, making it the largest free trade area by number of member states and by geographic size, spanning 1.3 billion people across the African continent. The AfCFTA implementation officially commenced on 1 January 2021. AfCFTA negotiations and implementation are overseen by a permanent secretariat based in Accra, Ghana. Under the AfCFTA, the members are committed to eliminating tariffs and non-tariff barriers (NTB) on most of goods and services over a period of 5, 10 and 13 years. The AfCFTA aims to create a single and integrated market in Africa, to reduce barriers to capital and labour flows, to facilitate investment, to develop regional infrastructure and to finally establish an African continental customs union. The overall objective of AfCFTA is to increase socioeconomic development, reduce poverty, and make Africa more competitive in the global economy. Today, 48 countries have ratified the AfCFTA, and 54 out of 55 African Union member states have signed it. In 2035, trillions of U.S. dollars in purchasing power parity should be leveraged through the agreement². After the establishment and operationalization of the AfCFTA, TMA started to contribute to the implementation of the AfCFTA commitments through various projects and activities under S2. As a result, the evaluation of the portfolio will also cover the support of TMA on the AfCFTA implementation in the last three years.

Theory of Change

TMA’s 2020 Monitoring, Evaluation and Learning (MEL) Strategy³ developed the ToCs for each of the S2 IOs. The ToCs include the underlying assumptions for the achievements of the expected outcomes.

The ToC for IO 1.4, which is the objective of the current evaluation, is presented in Figure 1 below. As mentioned in the MEL strategy as well as in the EA for the evaluation, the short terms results are as follows:

- Improved **public and private sector coordination** in addressing the binding constraints to trade policy making.
- Improved **alignment** of national trade policies to regional and continental commitments.
- Improved **institutional capacity** to effectively formulate and implement national/regional trade agreements and commitments.
- Enhanced **availability of evidence** to support sustainable and inclusive trade policy.
- Coordinated public/private actions taken to **reduce non-tariff barriers (NTBs)** among EAC partner states.
- Improved **awareness of the cost** of NTBs and their root causes.
- Strengthened **legal mechanism** for elimination of NTBs.
- Improved **awareness of the NTB Act**.

These short-term outcomes linked to trade policy, trade framework harmonization, institutional strengthening, trade research and NTBs, among other elements, are expected to contribute to improvements

¹ TMA, 2018. Monitoring, Evaluation and Learning Strategy. P. 21

² <https://www.brookings.edu/articles/the-african-continental-free-trade-area-is-game-changer-for-both-african-and-global-economies/>

³ Ibid.



in the trade regulatory environment (IO1.4). Ultimately, these improvements are expected to contribute to reductions in barriers to trade and improvements in business competitiveness (outcomes).

Figure 1 also points to the activities leading to the seven outputs, through which TMA works to deliver on the expected outcomes.

Numerous assumptions contextualizing the causal horizontal and vertical links between different results in the ToC were summarized in the Evaluability Assessment (EA). These assumptions are listed below:

Table 1: Causal link assumptions

Causal link assumptions	
Short term outcomes, intermediate outcome and outcomes	
	<ul style="list-style-type: none"> • Policies are implemented in the way intended • Sufficient technical capacity is available in the Regional Economic Communities (RECs) which negotiate regional and continental trade agreements to ensure harmonisation • No new NTBs arise to replace those that are eliminated, or those that do are more limited and less costly • Partner states are willing to collaborate on resolution of NTBs • National policies are complementary rather than conflicting • There is political will to support trade agreements • The change process is institutionalised • Reliable data and evidence are used to inform trade policy making • NTBs can be quantified and root causes understood • Partner states are willing to develop a legal mechanism • Effective dissemination of the NTB Act provisions
Output	
	<ul style="list-style-type: none"> • TMA support to trade policy and strategy is of high quality and effective • TMA can influence trade agreement implementation • TMA capacity building support is effective • TMA can find the right skills to produce high quality trade research • Partner states are willing to improve trade policy regulatory frameworks

TMA's MEL Strategy and the ToC highlights the risks inherent in trying to influence policy or regulatory reforms at the national, regional and continental level.

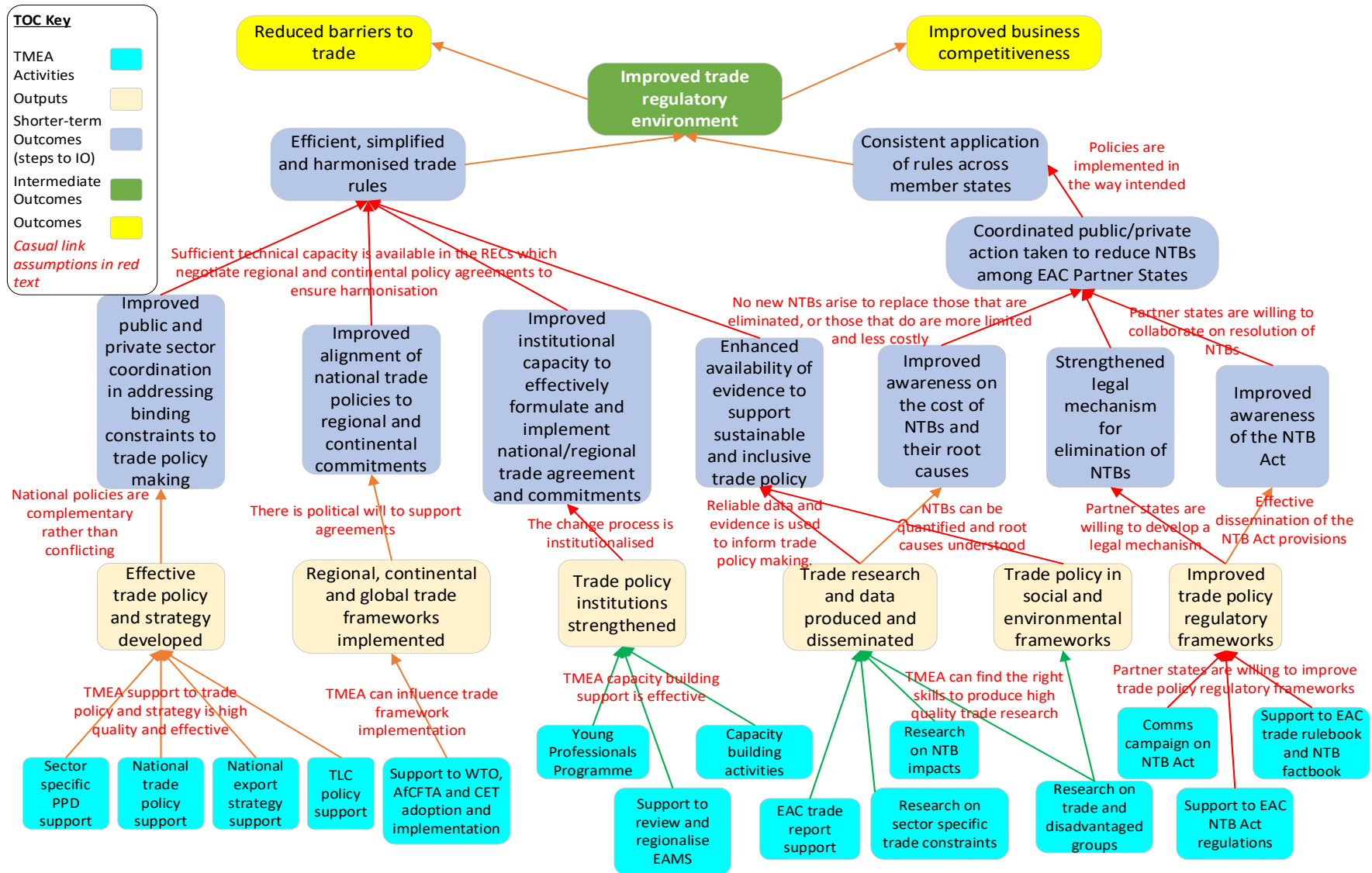
The evaluation team (ET) assessed in more detail IO 1.4's ToC based on a deeper review of the available documents, including project-level reports and the results of a ToC workshop that was held on February 25, 2025, bringing together the ET and TMA teams. The objective of the workshop was to ensure the alignment between both teams' understanding of the ToC, and for TMA to confirm if and how some assumptions and risks materialized or not, and how this affected the actual implementation. It also allowed to map the projects within the different outcomes of the ToC and determine with more precision the extent to which each element of the ToC was evaluable. Thus, in addition to providing an overview of the 16 selected projects, the ET was able to link them with the ToC (see figure 1 below). The workshop did not lead to any actual changes in the ToC. However, all workshop participants, after having interactively mapped the portfolio projects within the



ToC, agreed that the left side of the theory, linked to trade policy (TP), had more projects in terms of absolute number, compared to the right side of the ToC, linked to NTBs and evidence dissemination on their negative effects, which has fewer projects. Nevertheless, it was afterwards brought to the ET's attention that although there were less projects on the right side, the budgets and impacts of these NTB-oriented projects counterbalanced the mapping, making all elements of the ToC equally evaluable. Thus, the ET did not differentiate its approach for any of the ToC elements. Nonetheless, throughout the evaluative process, the ToC workshop-related results remained as an analytical reference which the ET considered to determine whether the portfolio was balanced within the ToC.



Figure 1: Intermediate outcome 1.4 ToC





Project-level details

Building on the overarching ToC, Annex 8 presents the project-level details to demonstrate how TMA’s strategic vision is operationalized through targeted interventions. Each project is designed to address specific components of the ToC—such as regulatory harmonization, policy reform, and operational improvements—that collectively reduce trade barriers and improve business competitiveness. The projects listed include information regarding their objectives, key activities, budgets and timelines, among other descriptives. These initiatives—from trade policy reform to enhanced border management—serve as the operational pillars supporting the short-term outcomes, ultimately contributing to improved business competitiveness and sustainable trade outcomes across the region. Please see table 2, below, where the IO1.4 projects under review are listed and aligned under each of the short-term outcomes they contribute to.

Table 2 Project Portfolio Mapping (Workshop Result)

Short-term outcome 1.4.1. Improved public and private sector coordination in addressing binding constraints to trade policy making.
<ul style="list-style-type: none"> • Project 2802: Elimination of National Trade Barriers Trade Policy • Project 3554: Trade Policy Kenya • Project 3734: Trade Policy Project • Project 3733: WTO Agreements • Project 3735: Cross Border Trade • Project 3833: Trade Policy and Cross Border Trade Rwanda
Short-term outcome 1.4.2. Improved alignment of national trade policies to regional and continental commitments.
<ul style="list-style-type: none"> • Project 2810: WTO Agreements • Project 2902: Single Customs Territory (EAC) • Project 2908: EAC external trade policy • Project 3554: Trade Policy Kenya • Project 3615: Trade policy ratification Uganda • Project 3734: Trade Policy Project • Project 3735: Cross Border Trade • Project 3833: Trade Policy and Cross Border Trade Rwanda
Short-term outcome 1.4.3. Improved institutional capacity to effectively formulate and implement national/regional trade agreement and commitments.
<ul style="list-style-type: none"> • Project 2805: Coordinated border management (OSBP:IBM) • Project 2810: WTO Agreements • Project 2902: Single Customs Territory (EAC) • Project 2904: Common Market Protocol (CMP) Implementation Monitoring EAC • Project 3554: Trade Policy Kenya • Project 3555: Moyale IBM – Kenya • Project 3704: Tunduma IBM Phase 2 • Project 3733: WTO Agreements • Project 3734: Tanzania Trade Policy • Project 3735: Cross Border Trade • Project 3833: Trade Policy and Cross Border Trade Rwanda
Short-term outcome 1.4.4. Enhanced availability of evidence to support sustainable and inclusive trade policy.



<ul style="list-style-type: none"> • Project 2802: Elimination of National Trade Barriers Trade Policy • Project 3733: WTO Agreements
Short-term outcome 1.4.5. Improved awareness on the cost of NTBs and their root causes.
<ul style="list-style-type: none"> • Project 2802: Elimination of National Trade Barriers Trade Policy • Project 3713: NTB Programme • Project 3815: NTBs Elimination Rwanda
Short-term outcome 1.4.6. Strengthened legal mechanism for elimination of NTBs.
<ul style="list-style-type: none"> • Project 2802: Elimination of National Trade Barriers Trade Policy
Short-term outcome 1.4.7. Improved awareness of the NTB Act.
<ul style="list-style-type: none"> • Project 2802: Elimination of National Trade Barriers Trade Policy

2. Scope and Objectives of the Evaluation

a) Evaluation Objectives

As mentioned in the ToRs, the main objectives of this portfolio evaluation are:

- To assess the extent to which the Trade Policy portfolio has contributed to the reduction of key trade barriers;
- To test the assumptions laid out in the ToC, whether they held or not, and to provide the requisite underlying evidence therein;
- To evaluate further reaching outcomes and impacts on themes such as inclusion, resulting from the implementation of these trade policies and regulations; and
- To provide recommendations for enhancing the portfolio's effectiveness in promoting trade.

b) Scope

Project timeframe

The evaluation covered the entire S2, from 2017/18 to 2023/24, as well as IO 1.4 projects that went beyond 2023, up to the start of the data collection process of the evaluation.

Evaluation criteria

In line with the ToRs, the evaluation reviewed the portfolio through the lens of the six evaluation criteria established by the Development Assistance Committee (DAC) of the Organization for Economic Co-operation and Development (OECD), by assessing its relevance, effectiveness, coherence, efficiency, impact and sustainability to answer the key evaluation questions.

- **Relevance:** The extent to which the objectives of the portfolio as laid out in the TMA S2 and TOCs were consistent with recipients' requirements, country needs, global priorities and partners' policies.
- **Effectiveness:** The degree to which the portfolio has contributed to reducing regulatory related trade barriers and improving business competitiveness.



- **Coherence:** The degree to which the portfolio is internally (e.g., with other projects and with the content of S2) and externally (with projects implemented by other agencies, organizations and institutions) coherent.
- **Efficiency:** How economically resources/inputs (funds, expertise, time, equipment, etc.) were converted into the results.
- **Impact:** Positive and negative, primary and secondary, long-term effects produced by the portfolio, whether directly or indirectly, intended or unintended. Specifically, the portfolio's impact on trade outcomes, such as increased trade volumes/value, expanded market access, and enhanced trade competitiveness. In addition, and to the extent possible, assess the broader economic, social, and environmental impacts resulting from reduced trade barriers, including economic growth and job creation, particularly for women, youth and other disadvantaged groups.
- **Sustainability:** The continuation of benefits from the portfolio after TMA support ends. The extent to which the supported interventions would be both environmentally and financially sustainable will also be assessed.

The evaluation criteria guided the formulation of the evaluation questions (EQs), which was carried out collaboratively with TMA. Please see Annex 13.

Primary Data Collection Target (Stakeholder Mapping)

The Evaluation Team (ET) identified key stakeholders and informants for the final evaluation of the TMA project portfolio, encompassing five main groups:

1. TMA operational teams managing project implementation
2. National government agencies involved in project design and execution
3. Private sector entities, business associations and non-governmental organizations (NGOs) affected by or engaged in the projects
4. Relevant regional and global trade institutions
5. Private foundation.

These stakeholders were pinpointed through document reviews and consultations with TMA and are listed in Annex 9. Baastel collaborated with TMA to identify specific individuals from these groups to participate in key informant interviews (KIIs) and focus group discussions (FGDs). TMA operational teams and country offices supplied names and contact details of relevant stakeholders and informants, with Baastel experts coordinating closely with TMA offices in Tanzania, Kenya, Rwanda, and Uganda to identify individuals for interviews or focus group discussions (FGDs) during field visits. For stakeholders located in other countries, the Baastel team organized virtual interviews or group discussions to gather insights on the performance, progress, results, and impacts of the portfolio projects.



3. Evaluation Methodology

The evaluation methodology is here summarized. Some details have been annexed; others were left out. If additional information is requested, the ET will comply and bring it back into the report.

a) Evaluation Approach

The ET used a **mixed-methods approach**, i.e., a combination of data sources, collection methods, and analysis techniques, both quantitative and qualitative, to support its findings. This array of integrated data, which reflected various sources of information and perspectives, provided the basis for data triangulation. The methods used were: 1) desk and document review, 2) ToC review, 3) semi-structured qualitative individual (or group) interviews, 4) focus groups discussions, 5) site visits and direct observations.

A **clear and relevant methodological framework** was the common thread throughout the evaluation process. The methodological framework, based on the evaluation matrix (EM - see Annex 1), conditioned the implementation of the evaluation activities to ensure the evaluators met the requirements of the assignment. The methodological tools, particularly in terms of data collection (e.g., EM, interview protocols, etc.) were developed to answer the evaluation questions and sub-questions.

To ensure a clear and shared understanding of the ToC, the evaluation adopted a **collaborative and inclusive approach** that went beyond data collection. It aimed to engage stakeholders in reviewing the ToC within their specific country contexts, including consideration of underlying risks and assumptions. By involving as many stakeholders as possible during the ToC review and data collection phases, the ET created space for diverse perspectives to be heard and incorporated into the evaluation process

The ET employed a combination of complementary approaches to ensure a comprehensive and context-sensitive analysis. Grounded in the Strategy 2 ToC, the **theory-based approach** enabled the ET to assess the causal links between project activities and outcomes. The contribution analysis approach provided a structured framework to develop and test a "contribution story," examining how TMA's support aimed to influence trade policy (TP) alignment with AfCFTA, while accounting for complex, multi-level political and economic environments. The evaluation also incorporated strong context analysis, acknowledging external influences and assumptions. To deepen understanding of causality, particularly in policy change, **process tracing** was selectively used to explore alternative explanations for observed outcomes and compare TMA's contributions with those of other key implementers such as UN Trade and Development (UNCTAD), the International Trade Centre (ITC), and WTO, especially in the varied political settings of Kenya, Tanzania, Rwanda, and Uganda.

b) Data collection

Desk and document review

At the start of the evaluation, the ET received strategic and project-level documents from TMA, these supplemented over time by relevant materials from the East African Community (EAC), targeted national governments, implementing partners, and donors. The documentation included standard programme resources such as workplans, annual performance reports, risk reports, and project summaries, as well as more detailed M&E data, national statistical trade databases, and national and EAC trade policy documents. To



deepen contextual understanding, the team also reviewed the African Continental Free Trade Area (AfCFTA) framework, examined TMA's response to the COVID-19 pandemic, and analysed national trade and services policy reviews conducted by the WTO and UNCTAD, in part to identify any connections to TMA's support. This comprehensive document review informed the evaluation's design, including the matrix, stakeholder mapping, sampling, and data collection protocols, and provided a foundation for data triangulation throughout the evaluation process.

In-depth interviews and Key Informant Interviews (KII)

The ET conducted both remote and in-person semi-structured interviews with key institutional stakeholders at international, regional, and national levels, including TMA staff, donors (such as the Foreign, Commonwealth & Development Office (FCDO), Danish International Development Agency (DANIDA), the Netherlands, and Global Affairs Canada), implementing partners, EAC officials, national trade ministries, trade policy experts, UN agencies (UNCTAD, the International Finance Corporation-IFC, WTO), private sector actors, and target populations. Interview tools were tailored to different stakeholder groups while maintaining consistent core questions to support data triangulation. The stakeholder list was developed using a mapping and sampling strategy, in collaboration with TMA's Evaluation Committee and project managers, to ensure representation across levels and themes. Standardized tools were applied by different team members to reduce bias and ensure comparability across interviews.

Focus Group Discussion (FGD)

FGDs were a valuable method for engaging participants in reflective dialogue on pre-determined topics. Organized with support from TMA teams, FGDs included private sector representatives mainly and other target populations at selected sites or virtually. TMA provided contact details for project focal points, enabling outreach to relevant stakeholders (see Annex 5). In coordination with TMA, the ET also included Strategy 1 stakeholders—who work closely with some of the same private sector actors involved in S2—in the data collection process. FGDs with customs officials and cross-border traders were also conducted to explore trade facilitation issues. This approach enabled analysis of differing perspectives and promoted a rich exchange of views (see Annex 2 for the KIIs protocols and FGD guides).

c) Sampling strategy

As key stakeholders and informants from agencies and institutions were being identified and given the limited time and resource for the portfolio evaluation, the ET proposed and implemented a sampling strategy to select the most relevant individuals and groups to consult via KIIs and FGDs, please see Annex 12. The sampling strategy followed the three-step process that can be consulted in Annex 10. The sampling strategy covered all 16 evaluable projects. The final selection of stakeholders was agreed with TMA operational teams and the country coordinators. Table 11 in the annexes, shows the final sampling of key stakeholders/informants selected for interviews. The ET carefully the field missions' itineraries (please see Annex 6 for a template of the field mission itineraries).

d) Methodological limitations

Considering the large number of stakeholders involved in the 16 projects, the evaluation sample was not fully *statistically* representative of all the different realities. To mitigate this risk, the ET used the sampling method



presented above, combined with a maximum variation approach, trying to ensure that the selected cases included typical and extreme (positive and negative) results. This allowed the inclusion of a broad range of results and scenarios in the analysis to better inform learning and future decision-making processes and to ensure that the data and information analysed and triangulated represents the general trends within the visions and opinions of those consulted. Furthermore, sampling was aimed at ensuring representation of the different types of stakeholders.

A second risk was the limited availability of some types of key informants, mainly from the “older” initiatives (e.g., those that ended in 2021), and those from specific groups of stakeholders, such as representatives from the private sector. To mitigate this risk, in addition to the outreach efforts to the private sector, the sample design remained flexible and allowed for replacement of key informants with others who shared similar characteristics, to the extent possible. In addition, the ET relied on TMA teams at headquarters as well as in country to help introduce sampled stakeholders and convince them to participate in the data collection process. Finally, TMA also decided to hire an additional consultant in Kenya to support the ET in reaching the private sector. This generated strong results for the evaluative process.

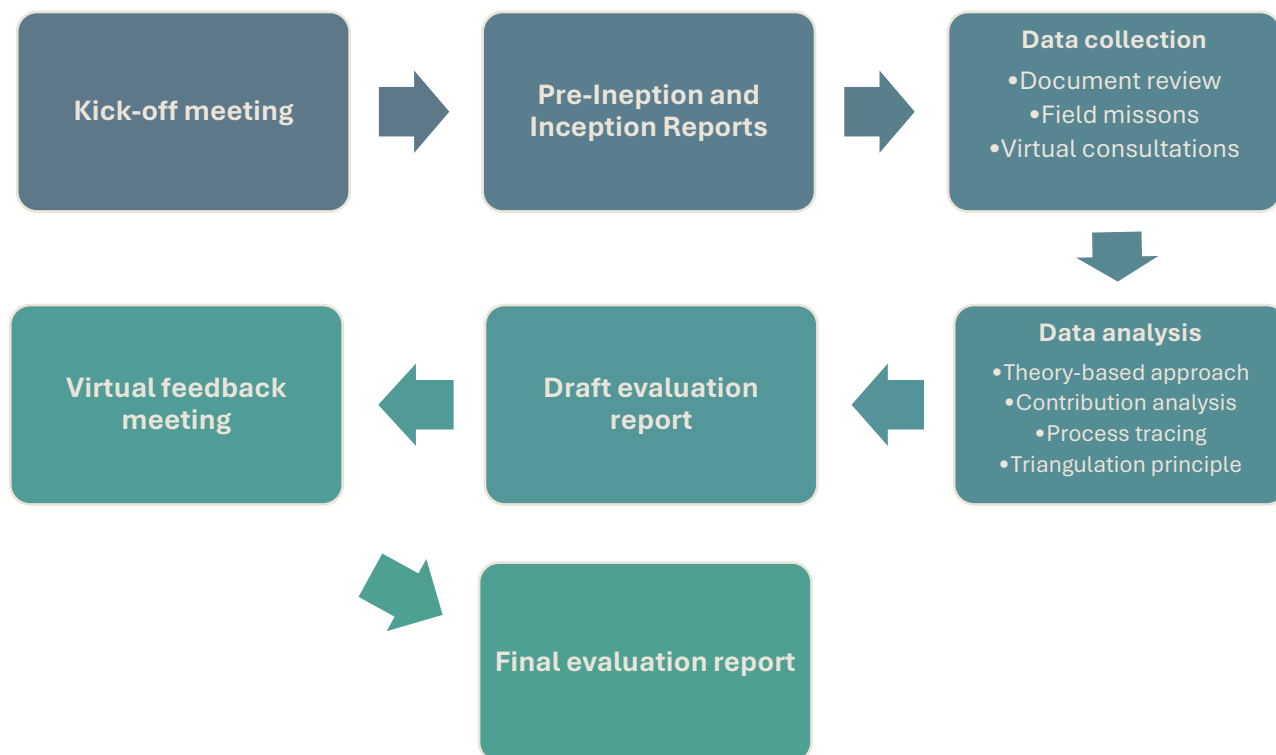
In terms of availability of documents, data and information, the EA showed that, the 16 projects were well covered. Nonetheless, what was mentioned in the EA turned to be accurate and some documents were missing. Thus, although many of the documents were transferred to the evaluators, there was an iterative process between the ET and TMA to ensure all documents were made available.



4. Evaluation plan

Figure 2, below, depicts the main stages of the evaluations process:

Figure 2: Evaluation process



A **virtual kick-off meeting** marked the commencement of the evaluation. It was held between the ET and TMA's Evaluation Committee to ensure a common understanding and agreement of the ToR deliverables, expectations, roles, responsibilities, evaluation approach and evaluation calendar. The ET carried out an initial document review and held preliminary consultations, resulting in the draft **Pre-Inception Report (PIR)** submitted on 24 January 2025. Following feedback received, an iterative refinement of EQs and the drafting of the **Inception Report (IR)** followed, the IR was submitted on 28 February 2025. During the Inception phase, the ET carried out an initial stakeholder mapping exercise, which evolved during the data collection phase as new KII opportunities arose.

As mentioned in section 4, the ET implemented a mixed-methods approach to **data collection**, combining desk review, KIIs and FGD. For the latter, a sampling strategy was implemented to ensure representativity, diversity and relevance of stakeholder insights. Data was collected both virtually and through in-country missions. The ET consulted 164 stakeholders through 64 KII and 10 FDG.

One week and a half **field missions** were organized in each targeted country to collect primary data and triangulate the information provided by the documentation and other data collection methods. In some instances, direct field observations complemented the primary information collection to identify aspects not mentioned in the interviews. In some instances, the evaluators were able to observe the different social



dynamics between key project actors. Site visits also allowed for informal contact with the stakeholders and informants. A brief summary of the field missions is presented below:

Kenya:

From May 5 to May 14, 2025, the ET conducted the data collection mission in Kenya. The mission included institutional interviews with key government bodies such as the State Department of Trade, the National Committee on NTBs, the National Committee on AfCFTA, the Kenya Trade Remedies Agency (KETRA) and the Kenya Trade Network Agency (KenTrade) among others. The team also interviewed private sector membership organizations such as the Kenya Association of Manufacturers (KAM), the Kenya International Freight and Warehousing Association (KIFWA) and the Fresh Produce Exporters Association of Kenya (FPEAK). Additionally, one FDG was organized bringing together private sector companies and focusing on NTBs and trade policy.

Rwanda:

From April 28 to May 7, 2025, the ET carried out a data collection mission in Rwanda, conducting 15 interviews, one focus group discussion, and field observation in a local market. The team engaged with 25 stakeholders, including representatives from five government agencies (the Ministry of Trade and Industry - MINICOM, the Rwanda Development Board - RDB, the Rwanda Institute for Conservation Agriculture - RICA, the Rwanda Revenue Authority RRA, and district-level offices), one private sector association (Pro Femmes) and cooperatives, as well as two independent experts. A dedicated meeting was also held with TMA. Meetings took place primarily in Kigali, with a site visit to Rubavu.

Tanzania:

From April 29 to May 30th, 2025, the ET conducted the data collection mission across Tanzania. The mission included institutional interviews with key government bodies such as the Ministry of Industry and Trade, the Ministry of Finance, and the Ministry of Foreign Affairs and East African Cooperation, as well as regulatory agencies like the Tanzania Revenue Authority (TRA) in Dar es Salaam and Tunduma, the Tanzania Bureau of Standards (TBS), the Tanzania Ports Authority (TPA), the Tanzania Mercantile Exchange (TMX), the Tanzania Investment Centre (TIC), and the Export Processing Zone Authority (EPZA). The team also engaged private sector actors through FDGs with organizations including the Tanzania Private Sector Foundation (TPSF), the Tanzania Women Chamber of Commerce (TWCC), and the Tanzania Chamber of Commerce, Industry, and Agriculture (TCCIA), alongside freight and export associations i.e. the Tanzania Freight Forwarders Association (TAFFA), and the Central Corridor Transit Transport Facilitation Agency (CCTTFA). A site visit was held at the Tunduma IBM border post (under TRA) to gather field-level insights from customs officials and cross-border traders. Focus group discussions were held in Dodoma (with members of the TWCC) and Dar Es Salaam (with members of the TPSF).

Uganda:

From April 28 to May 8, 2025, the ET visited Uganda, meeting with a broad range of government agencies, private sector actors, and border stakeholders. Consultations were held in Kampala with institutions including the Ministry of Trade, Industry and Cooperatives, Uganda Revenue Authority, Ministry of EAC Affairs, and Ministry of Finance, as well as private sector representatives like the Uganda National Chamber of Commerce, Women Entrepreneurs Association, and the Private Sector Foundation Uganda. The mission also included a site visit to the Busia One Stop Border Post (OSBP), where FDGs were conducted with customs officials, the Uganda Joint Border Committee, and cross-border traders. Additional interviews with freight forwarders and standards agencies rounded out data collection in the country.



As primary and secondary data was collected, a thorough **data analysis** process was implemented using the approaches described in section 4.a). Careful review and triangulation ensured that conclusions were based on valid and reliable evidence and any gaps identified were addressed by **follow-up data collection**. The ET ensured that the cross-cutting dimensions of gender equality and environmental concern were also considered throughout the evaluation.

The approach to analysis was qualitative and quantitative. For Qualitative information from KIIs and FGDs was quantified using a benchmark scale:

- "All respondents said" = 100%
- "A majority of respondents said" = >75%
- "Many respondents said" = >50%
- "Some respondents said" = 25–50%
- "A few respondents said" = <25% but >1 person

Following the analysis, the ET is hereby submitting the **draft report of the evaluation** for evaluation quality assessment (EQA).

Baastel proposes a **virtual feedback meeting** with the Evaluation Committee, which will provide an opportunity for oral and written comments. Following the first review, the team will submit the **final evaluation report** incorporating, if deemed relevant, the feedback received. The team will present the **final evaluation report** in a virtual presentation session.



5. Project Management and Ways of Working

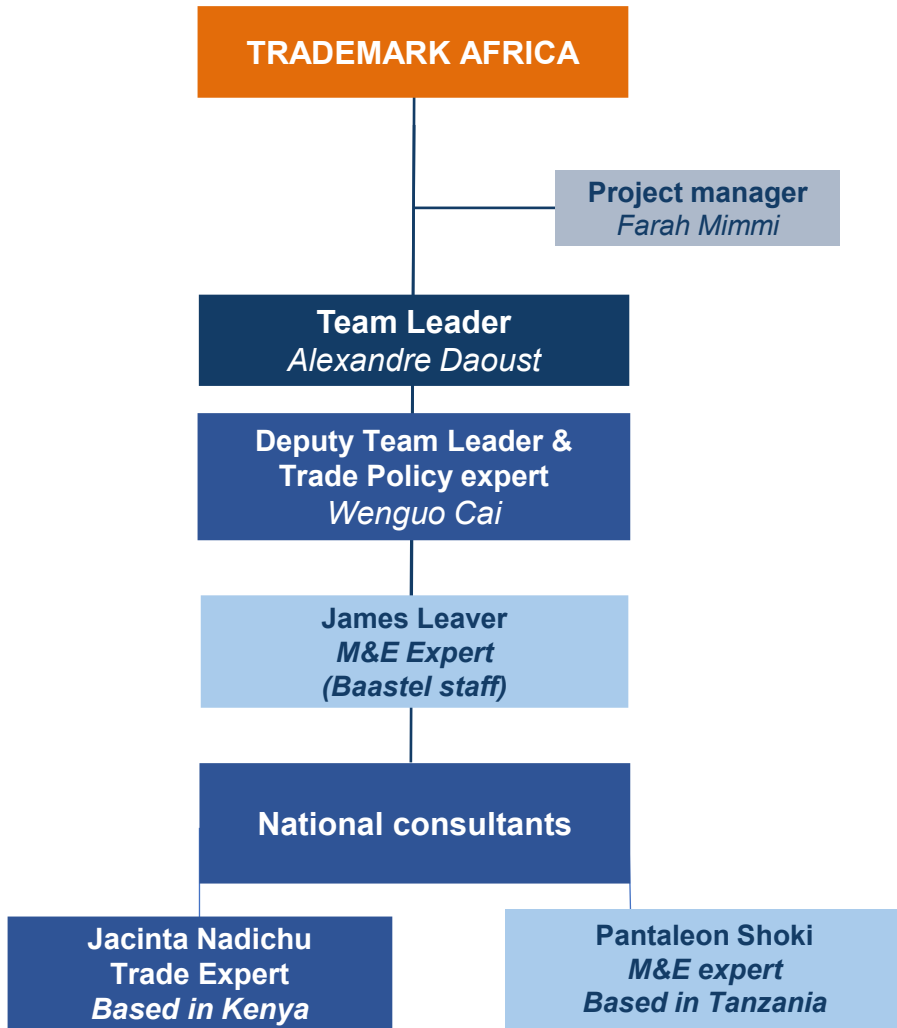
The ET benefited from Baastel's management and administrative staff to organize and manage all the administrative and organizational tasks of this evaluation. The aim was to promote good working relationships, maximize efficiency and enforce quality through well-organized and professionally managed systems.

Coordination and regular communication between TMA's Evaluation Committee and the team was done through the appointed **Team Leader** (Alexandre Daoust) for all technical aspects of this evaluation, with administrative aspects being coordinated by the appointed **Project Manager** (Farah Mimmi).

The Team Leader, supported by the **Deputy Team Leader & Trade Policy expert** (Wenguo Cai), oversaw the coordination of the team's activities, and actively participated in data collection, report drafting, and all meetings. Both leaders undertook field missions, with the Team Leader visiting **Rwanda** and the Deputy Team Leader & Trade Policy expert heading to **Uganda**. They collaborated continuously with an experienced **M&E expert** (James Leaver) throughout the mandate, excluding field missions, which involved **two regional experts**: another **Trade Policy expert** based in **Kenya** (Jacinta Ndichu) and another **M&E expert in Tanzania** (Pantaleon Shoki). With their involvement, this evaluation encompassed four countries, providing a comprehensive overview of the situation.



Figure 3: Evaluation Management





6. Key Findings

a) Relevance

TMA Strategy 2, Outcome 1.4 portfolio's objectives and ToC, and their consistency with recipients' requirements, country needs, and global and regional priorities and partners' policies

Between 2017 and 2023, TMA and its Trade Regulatory Environment Portfolio played a catalytic role in supporting the implementation of EAC's **Single Customs Territory (SCT) linked to the EAC Customs Union protocol) and Integrated Border Management (IBM) systems in East Africa**, dealing for example with non-infrastructure aspects of the OSBPs, among many other elements. These initiatives were firmly rooted in the EAC's regional integration agenda and aligned with global commitments such as the WTO's Trade Facilitation Agreement (TFA). As reflected in TMA's S2 and its ToC, the overarching objective was to reduce trade costs and enhance business competitiveness—particularly for landlocked member states—by harmonising customs procedures and strengthening border coordination/cooperation. "Border crossing points—in particular land borders—have been identified as major chocking points constraining cross border trade and trade competitiveness. The EAC OSBP Act (2016) and the WTO TFA which entered into force by February 2017 provide a bilateral and multilateral opportunity to improve border crossing speed and efficiency⁴."

At Regional Level

The design and delivery of the portfolio's trade facilitation projects closely mirrored the **needs and policy frameworks of both the EAC Secretariat** (through the programme coordination committee [PCC⁵]) **and national governments**. The SCT and IBM were not externally imposed but emerged from strong regional demand, reflecting a shared vision to streamline trade corridors and enhance intra-regional commerce. Programme coordination was sustained through **a joint committee between TMA and the EAC Secretariat**—an institutional anchor that ensured equitable implementation across member states.

During the implementation of the portfolio, the EAC partner countries, along with COMESA and SADC members, were negotiating and implementing **the Tripartite Free Trade Agreement (TFTA)**, which grouped 29 tripartite partner countries. These 29 tripartite members/partners represented a combined population of 800 million with more than 60% of continental Gross Domestic Product (GDP - \$1.88 trillion)⁶. The TFTA, which entered into force in July 2024, was intended to enhance the framework of the AfCFTA which has the vision of bringing all 55 member states of the African Union into one single market. The TFTA aimed at boosting trade within Africa, increasing industrial development, and achieving balanced and sustainable economic growth in Africa. The TFTA was considered as an important step forward in Africa's regional and continental integration and provided the members with an additional platform to increase trade and investment and raise the living standards of their citizens through the increased economic and trade opportunities. Despite its great potential, the TFTA faced some challenges. **These included the need for harmonization of trade policies** among those diverse economies, addressing the infrastructure deficits and ensuring political commitment from all the member states to gradually remove trade barriers among these countries and to

4 Trade Mark Africa. (2018). Project Appraisal Report: Smart Borders East Africa - IBM Border Programme II. (Internal document, Trade Mark Africa)

5 This committee serves as a governance mechanism, representing the EAC partner states in programme planning with TMA.

6 <https://www.eac.int/press-releases/157-trade/3141-comesa-eac-sadc-tripartite-trade-area-to-come-into-force-25th-july,-2024>



increase business competitiveness in the region and in the African Continent. The **TMA portfolio, as described above in chapter 1.b and with results and impacts described in chapters 6.b and 6.d respectively) attempted to bring solutions to these challenges** and was relevant to the goals of the TFTA and AfCFTA.

At International Level

At the international level, many respondents indicated that the portfolio focused on the urgent needs of the implementation of **the WTO TFA**⁷, which TMA-targeted countries had ratified. For example, it accelerated East African countries' commitments under the WTO TFA by addressing **key institutional gaps**, including inadequate technical expertise in trade negotiations, and weak inter-agency coordination. The ET document review similarly pointed to this alignment: "Member States of the World Trade Organization are obliged under Article 8 of the Trade Facilitation Agreement, to ensure that their authorities and agencies responsible for border controls and procedures for the import, export, and transit of goods cooperate with one another and coordinate their activities to facilitate trade and that cooperation and coordination should include the establishment of OSBPs⁸."

In addition, as the implementation period for the portfolio coincided with the momentum of AfCFTA framework phased negotiations, it also advanced regional obligations under the EAC and AfCFTA by providing technical support for trade agreement negotiations and implementation and promoting regional market integration—particularly through the **elimination of NTBs**, a key component of the portfolio, as indicated in the ToC above. Although "the quantification of the impact of identified NTBs [...] remains a challenge in the region⁹", in 2018, it was clear that "despite past and current initiatives involving partner states and the private sector, NTBs persisted and were on the rise¹⁰."

In parallel, through coordination with Outcome 2 projects, the Outcome 1.4 projects supported export readiness of priority value chains private sector actors, and a number of market analysis studies were conducted to map export potential in eight sectors that could be supported to participate in the AfCFTA Guided Trade Initiative (GTI).

Technical assistance provided under the EAC level activities, notably through the policy papers on EAC FTA negotiations with the 3rd parties, **contributed to Partner States readiness** for negotiating and entering bilateral trade agreements (e.g., the Kenya-UK Economic Partnership Agreement - EAP). These include:

- the Legal opinions and Compliance of the EAC laws,
- the Legal opinions on the Compliance of the Kenya-UK trade arrangement,
- the Implication of Kenya-UK EAP for customs Union, Implication of Brexit on UK market access for EAC Partner States, and
- Comprehensive review of EAC common external tariff.

Trade Policy Support

In Kenya, Rwanda, Tanzania and Uganda, countries visited by the ET, and elsewhere in the region, the whole portfolio and specifically, the trade policy projects, were considered by the majority of respondents as very

⁷ https://www.wto.org/english/tratop_e/tradfa_e/tradfa_e.htm

⁸ EAC Secretariat. (2019). *One-Stop Border Post Sustainability Strategy (Draft)*. (Internal document, EAC Secretariat)

⁹ Maureen Wanyonyi. (2024). *Elimination of Non-Tariff Barriers End of Project Report*. (Internal document, Trade Mark Africa).

¹⁰ Trade Mark Africa. (2018). *Project Appraisal Report: Elimination of Non-Tariff Barriers to Trade PAR II*.



relevant as their **trade policies had either expired¹¹ or were starting** when S2's implementation started. This rendered TMA's support both timely and relevant. A similar situation has been found about the alignment of the portfolio with the countries' overall development strategy. In Rwanda for example, TMA's overall support, as well as the portfolio's support, was aligned with the content of the first **2017-2024 National Strategy for Transformation** (NST¹²). Indeed, the latter describes as a challenge to the economy the fact that: "Cross border trade was also affected by non-tariff barriers in countries like Democratic Republic of Congo (DRC) and Burundi." Hence, eliminating NTBs is aligned with the NST. TMA's NTB focus is also fully relevant at regional where the NTB agreement¹³ was signed.

In Uganda, many stakeholders confirmed that the TMA portfolio aligned with the country's trade policy frameworks well. The TMA S2 emphasized improving trade facilitation, enhancing market access and promoting export diversification which were key components of **Uganda's National Trade Policy¹⁴ and National Development Plan¹⁵**. These documents emphasized the importance of the increased participation of Uganda in international and regional trade.

In Kenya, portfolio implementation commenced just as the country was getting ready to implement its National Trade Policy 2017¹⁶, presenting a timely opportunity for TMA to contribute meaningfully to the strengthening of the trade regulation environment. Portfolio activities were implemented using a dual prong approach: enhancing the trade policy environment and **strengthening Kenya's manufacturing and agro-production sectors** to boost international competitiveness.

This approach was particularly relevant in addressing Kenya's trade context, which was largely dominated by **export of primary products and a small manufacturing sector** owing to a limited value addition capacity particularly in the agricultural sector. There was a clear need to support manufacturing in the export-oriented sectors focusing on value addition, product quality, and diversification.

In Tanzania, TMA's trade policy support was also regarded as both **timely and relevant**, as its expired previous trade policy created clear policy gaps. TMA's engagement helped fill them by supporting the development of a **new National Trade Policy** and aligning with national economic priorities under Tanzania's **Second Five-Year Development Plan (FYDP II: 2016/17–2020/21)** and subsequent FYDP III. These plans emphasized the importance of industrialization, trade facilitation, and deeper regional integration. TMA supported the review and drafting process of the new trade policy framework to ensure it addressed key issues such as export diversification, reduction of NTBs, and improved private sector competitiveness.

The Private Sector

The portfolio projects, as they were designed at the beginning, also addressed **the needs of the private sector**, as they *aimed* to link the trade agreement negotiations and implementation with the *practical* reduction of trade barriers and the facilitation of trade across the borders with the neighbouring countries. The majority of the private sector representatives consulted by the ET indicated that TMA's trade facilitation work provided logistical support that they required, including the simplification of the customs and border-

¹¹Rwanda: https://www.minicom.gov.rw/fileadmin/user_upload/Minicom/Publications/Policies/Trade_Policy_Rev_NPC_.pdf

Uganda: <https://www.enhancedif.org/system/files/uploads/nationaltradepolicy.pdf>

Tanzania: <http://www.tzonline.org/pdf/tradepolicyforacompetitiveeconomy.pdf>

¹² <https://faolex.fao.org/docs/pdf/rwa206814.pdf>

¹³ EAC Elimination of Non-Tariff Barriers Act of 2017 <https://www.eala.org/documents/view/eac-elimination-of-non-tariff-barriers-act-2017>

¹⁴ <https://www.enhancedif.org/system/files/uploads/nationaltradepolicy.pdf>

¹⁵ https://www.npa.go.ug/wp-content/uploads/2023/03/NDPIII-Finale_Compressed.pdf

¹⁶ <https://trade.go.ke/node/317>



crossing procedures. In many cases, TMA supported **second or third-level organizations**, such as the Private Sector Federation (PSF) in Rwanda¹⁷ representing around 50 000 members, the Private Sector Foundation Uganda (340 corporate members) or the Uganda Women Entrepreneurs Association (80,000 women members), the Kenya Association of Manufacturers (KAM, 1300 paid memberships) and agricultural value chain associations in Kenya. For example, for the PSF, before the Rwandan S2 activities started, staff were already working on elements such as trade advocacy for NTB removals. They had and still have membership fees—whether annual membership fees, events or trade mission fees¹⁸—, but they were facing difficulties because the **fees were not covering the expenses**. Thus, in this case and in others, TMA’s support, through **direct funding** to support their activities, was fully relevant to address their needs.

In Kenya, KAM membership received policy advocacy support, export readiness capacity building for SMEs and support for trade mission to Ethiopia, DRC and Ghana under the AfCFTA’s GTI. Private sector members benefited from the **sectoral opportunity mapping studies** helping them to tailor products for emerging opportunities in African markets. Members were in addition engaged to contribute to country position papers for AfCFTA and later Kenya-EU EPA and Kenya-US FTA negotiations. TMA support through the NTFC in the country, in the form of a forum and visit to EU countries, was also deemed relevant by many respondents in helping companies and cooperatives understand EU requirements and standards in agri-business, for example in the mango export sector.

In Tanzania, the portfolio also addressed the needs of the private sector by linking trade agreement implementation with the reduction of trade barriers and the facilitation of cross-border trade. Private sector stakeholders consulted by the ET confirmed that TMA’s trade facilitation interventions—particularly those aimed at simplifying customs procedures, improving border infrastructure, and operationalizing One-Stop Border Posts—had a direct and positive impact on their day-to-day logistics and market access. These impacts are described in chapter 6.d below. TMA provided support to second-tier private sector organizations such as the **Tanzania Private Sector Foundation (TPSF)**, **Tanzania Chamber of Commerce, Industry and Agriculture (TCCIA)**, and **Tanzania Women Chamber of Commerce (TWCC)**. These institutions were engaged in advocacy around the removal of NTBs (see 6.b and 6.d below for more details), capacity building for SME exporters, and support to promote women’s participation in trade. Similar to Rwanda’s PSF, TPSF and affiliated associations faced financial and operational challenges in delivering on their policy advocacy and trade-related services. TMA’s direct funding and technical assistance helped them sustain and expand their activities, including organizing private sector consultations, contributing to national trade policy development, and supporting trader sensitization on EAC protocols and AfCFTA opportunities. Furthermore, TMA supported Tanzanian business associations to engage in regional trade negotiations and to identify market opportunities within the AfCFTA, thereby ensuring that private sector voices were represented and their interests protected in evolving trade frameworks.

Demand-Driven Processes

One of the reasons why the portfolio was normally described as being relevant was because TMA has a **demand-driven approach to project design**. The different partner states and the EAC Secretariat jointly led the development of TMA’s trade projects. While the **countries drove the process**, the **EAC Secretariat played a key coordinating role**, trying to ensure harmonisation and consistent implementation across countries, to the extent possible. These projects were therefore **initiated and were usually owned by the member states**, with the EAC Secretariat providing support to align efforts and facilitate regional agreement. Landlocked countries had particularly strong interests in trade facilitation as they did not have access to ports.

¹⁷ <https://psf.org.rw/>

¹⁸ <https://businessportal.rw/payment>



As a result of the demand-driven approach, the ownership of the portfolio by the partner states was relatively high.

Many respondents, with different profiles, pointed to the fact that TMA's responsiveness **was however not purely reactive**. TMA's embedded presence across the region allowed for **nuanced dialogue** with national actors, including those **unaware of the regulatory constraints hindering trade**. For example, trade policy reform was often under-prioritised in national agenda due to its low visibility. In addition, some government officials perceived the integration of their economies in regional trade agreements, through trade policy review processes, as a loss of sovereignty for their governments. TMA's ability to **"make the invisible more visible"**, through institutional support and public-facing tools (e.g., trade portals) reflected a sophisticated understanding of both the technical and evolving political economy dimensions of trade facilitation. At the heart of TMA's strategy is **a balancing act** between what countries need, TMA own way to maximize impact and requests from the donors. This means TMA must be agile and politically astute, navigating complex national interests and priorities while ensuring interventions remain strategic and coherent.

Some stakeholders have expressed concerns regarding the **distribution of projects allocated to partner countries** under the portfolio. For instance, Ugandan stakeholders noted that while TMA implemented four to five country-specific projects in other EAC partner countries, Uganda received only one national project focused on trade facilitation. Although Uganda did benefit from several regional projects covering it and neighbouring countries, the perceived imbalance in country-level project allocation was highlighted.

TMA had to deal with different types and levels of demand. It has indeed been noted by some respondents that there were sometimes **tensions between donor requirements on the one hand and national demands on the other**. In other contexts, tensions appeared between the content of the international and regional trade agreements and the actual changing trade-related **political direction of national governments**. To tackle this challenge, while projects were agreed upon collectively by partner states, ensuring shared goals and outcomes—TMA's implementation approaches varied by country. Differences often arose in **prioritisation, pace of action**, or the **need for further stakeholder consultations so that TMA could adapt to different political contexts**.

The Project Appraisal Report (PAR) development process was considered well organized by many respondents. The PARs included the **project rationale, expected results, budget, and alignment with strategic goals**, were **peer reviewed**, and donors were consulted through ongoing council (using the national oversight committees (NOCs¹⁹). At both **programmatic and project levels**, results frameworks (RF) were developed, supported by **Project Cycle Management (PCM) guidelines** that aim to follow good practices.

Based on the above data and analysis, the Evaluation Team finds that:

Finding #1: The Trade Regulatory Environment Portfolio is relevant to the needs and priorities of partners, countries and the EAC region stakeholders at international, regional and national levels.

- **Although the portfolio is well aligned with international trade agreements, such as the AfCFTA or the WTO TFA, the direct links are even more salient with regional and national strategic documents, such as the EAC Treaty, the EAC Customs Union and Common Market Protocol and the national laws that enforce them.**

¹⁹ Donors providing more than 5 million dollars automatically have access to the NOCs.



b) Effectiveness

Assessment of TMA portfolio and support’s contribution to the intended short-term outcomes and the intermediate outcome in the ToC

From 2017 to 2020, TMA’s support was on an upward trajectory with **solid collaboration with national states and relevant ministries and the EAC Secretariat**, national revenue authorities, and border management committees, among many other stakeholders. The IBM workstreams evolved from early OSBP infrastructure to more sophisticated regulatory coordination, which is the focus of the current evaluation. However, **Covid-19** and subsequent funding cuts disrupted, to a certain extent, this momentum. In the Covid context, as many respondents mentioned, efforts quickly shifted **toward "safe trade"** and immediate recovery support, pulling resources away from long-term system building. TMA’s Safe Trade Approach was linked to, among other components:

- Development of Safe Trade Zones and Protocols
- Digital Solutions to Facilitate Trade
- Targeted Support to Vulnerable Groups²⁰

As demonstrated below, in Table 3 and beyond, despite these shocks, some strong results, to which TMA contributed, were visible. Investments in policy dialogue with actors like the EAC Secretariat, monitoring through tools like the **Common Market Scorecard**, and support to the Joint Border Committees enhanced the institutional landscape for trade governance in the region.

The Data

The final values of the outcome indicators and the milestones achieved and partially described in S2 IO1.4’s Results Framework (RF), which the ET analysed and aggregated in Table 3 below, indicate that TMA was effective in addressing high priority national restrictions in the movement of goods requiring legislative alignment (indicator 1.4a). With respect to rate of implementation of WTO TFA commitments by partner states (indicator 1.4b), data presented in Table 3 below shows that TMA was effective in Rwanda and Tanzania; no data was available for Kenya nor Uganda. Using available M&E data, the ET could not assess TMA effective influencing the time and cost to import or export goods from the elimination of EAC-prioritised NTBs of a regulatory nature (indicator 1.4c). However, from primary data collection processes, the team was able to aggregate some interesting data on these aspects, as presented below in the current chapter, as well as in chapter 6.d. Following the ToC’s logic, Table 4 shows the outputs that led to the outcomes. Please see Table 3, below.

Table 3: Outcome indicator performance

Result / Indicator	Portfolio/ Country	Status	Indicator milestone and progress data
1.4 Improved trade regulatory environment			
1.4.a. Proportion of high priority national restrictions in the movement of goods requiring	Portfolio	■	Milestone (2022): 25% of high priority restrictions addressed. Actual (2022): 80% of high priority national restrictions had been addressed.

²⁰ TradeMark Africa (2021). Safe Trade Emergency Facility – Mid-Term Report.



Result / Indicator	Portfolio/ Country	Status	Indicator milestone and progress data
legislative alignment fully addressed			The target for 2023 was 30% but no progress data was available.
	Kenya	■	<p>Milestone (2020): 1. Draft policy on harmonization of laws adopted by County Officials, high level adoption by the Ministry of East African Community (MEAC) and other stakeholders. 2. Review draft policy to identify key legislation priorities for alignment of 5 policy areas 3. Forum on establishing Kenya Country negotiating position on the CET held</p> <p>Actual (2020): 1. Achieved. Draft policy on harmonisation of laws adopted by County officials and other stakeholders. Awaiting cabinet approval. 2. Draft policy reviewed and key legislation priorities identified. A draft bill for legislation also drafted. 3. Forum on establishing Kenya Country negotiating position held and CET reviewed.</p> <p>The milestone for 2021 was Kenya country position on the CET submitted to the regional forum on CET but no progress data was available.</p>
	Rwanda	■	<p>Milestone (2022): 45% of high priority restrictions addressed.</p> <p>Actual (2022): 45% of high priority national restrictions had been addressed.</p> <p>The target for 2023 was 60% but not progress data was available</p>
	Tanzania	■	<p>Milestone (2022): 25% of high priority restrictions addressed.</p> <p>Actual (2022): NTBs resolution rate of 95%</p>
	Uganda	N/A	No interventions under this outcome.
1.4b Rate of implementation of WTO TFA commitments by partner states (disaggregated by country notifications made under Category A, B and C)	Portfolio	■	Milestone and progress data unavailable for all countries under review.
	Kenya	■	While no milestone were set notification of measures under Cat B & C to WTO were achieved. However at the time of the evaluation, implementation of activities related to the notification had not taken place.
	Rwanda	■	<p>Milestone (2022): Cat. A: 26.9%; Cat. B: 0.0%; Cat. C: 56.30%; Total: 83.2%</p> <p>Actual (2022): Cat. A: 26.9%; Cat. B: 0.00%; Cat. C: 56.30%; Total: 83.2%</p>
	Tanzania	■	No milestone set nor progress data available.
	Uganda	■	Milestone (2022): Cat. A: 8.4%; Cat. B: 22.70%; Cat. C: 0.00%; Total: 31.10%



Result / Indicator	Portfolio/ Country	Status	Indicator milestone and progress data
			Actual (2024²¹): Cat. A: 8.4%; Cat. B: 47.90%; Cat. C: 36.6%; Total: 92.9%
1.4c Change in time and cost to import/export goods from the elimination of EAC-prioritised NTBs of a regulatory nature		■	No data available at portfolio nor country level.

Explanatory note on status icons: ■ = no data available; ■ = indicator milestone/target achieved.

In terms of outputs which led to the outcomes described in Table 3 as well as in the below analysis, the below table 4 summarizes TMA performance:

In terms of outputs, the tables presented below summarizes TMA performance under S2. Outputs and output indicators are presented under the following shorter-term outcomes:

1. Efficient, simplified and harmonized trade rules.
2. Coordinated public/private action taken to reduce NTBs among EAC Partner States

Methodological note: Given that the majority of outputs are qualitative in nature and that progress is assessed mainly through the accomplishment of milestones, the ET established a progress metric based on the achievement of milestones. If, for example if any given output has four (4) milestones planned and all were accomplished, the progress value would be 100% or 4/4; for the same example, if only three (3) milestones were achieved, the progress value would be 75% or 3/4. Only the data submitted by TMA through the Results Framework (RF) was used in these calculations. Additionally, partial achievement of milestones was also considered, calculating a percentage of achievement based on the data available in the RF.

Table 4: TMA Output-Level Performance

Efficient, simplified and harmonised trade rules
<p>Portfolio output: EAC 1.4.1 OSBP/IBM instruments and frameworks developed and implemented; and WTO TFA measures identified and implemented</p> <p>Output indicator 1.4.1.a Progress towards implementation of OSBP/IBM instruments and frameworks S2 overall estimated progress: 99%</p> <p>The OSBP Performance Measurement Tool (PMT) was developed, piloted at four border posts, and training was conducted in four EAC Partner States. The OSBP sustainability strategy reached 45% implementation, including development of a maintenance framework. Training and sensitization programmes were conducted for border officials, and JBOCs were strengthened at key border points. Environmental and social safeguards, as well as a green investment plan, were developed to support sustainable OSBP operations.</p> <p>Output indicator 1.4.1.b Progress towards implementation of priority measures/reforms in the regional trade facilitation action plan S2 overall estimated progress: 92%</p>

²¹ The data regarding the rate of implementation of WTO TFA commitments for Uganda was taken directly from the Trade Facilitation Agreement Database from WTO and not from TMA's RF.



Trade Facilitation national implementation plans were developed, and Category A, B, and C measures were notified by EAC Partner States. National Trade Facilitation Committees (NTFCs) were operationalized, and Trade Information Portals were deployed in, Rwanda, Uganda, and Tanzania, with mobile access and NTM tracking modules added. A regional Trade Facilitation Index was launched. The Authorized Economic Operator (AEO) programme was fully automated and expanded to include women and small enterprises. Over 120 NTFC members were trained, and regional sub-committees advanced simplification of trade procedures, saving time, reducing steps and documents, and cutting costs.

Portfolio output: EAC. 1.4.3. EAC Trade enabling frameworks implemented

Output indicator EAC 1.4.3.a Progress towards implementation of the EAC Trade Enabling Frameworks

S2 overall estimated progress: 93%

Nine SCT implementation instruments were developed or updated, including the SCT Procedure Manual, Incident Management System, and Regional Electronic Cargo Tracking System (RECTS) standard operating procedures (SOPs). The Transit and Indirect Export regimes were developed and partially rolled out under the SCT Centralized Platform. The CET review progressed, with 100% product mapping completed and a new 4-band structure agreed. The EAC External Trade Policy was validated, and the Common Market Scorecard (2019) was finalized. The AEO programme and AfCFTA Rules of Origin (RoO) processes were advanced, with over 500 stakeholders trained. The EAC RoO was aligned to the HS 2022, and a negotiation framework was developed. Technical integration of RECTS with Tanzania and Burundi systems was completed. Legal studies and a list of Common Market Protocol (CMP) non-compliant laws were also finalized and validated.

Portfolio output: EAC 1.4.4. Support to EAC Trade and Transport coordination mechanisms implemented.

Output indicator 1.4.4 a. Progress towards implementation of EAC Trade and Transport coordination mechanisms

S2 overall estimated progress: 100%

EAC Trade and Investment Reports for 2017, 2018, 2019, and 2020 were collated, validated, published, and disseminated. The Corridor Infrastructure Inventory Database and the EAC Transport/Infrastructure Database were developed. An annual joint corridor performance report and a Phase II OSBP progress report were produced. The Jua Kali/Nguvu Kazi MSMEs Trade Fair was successfully facilitated.

Rwanda output: RW 1.4.1. Framework for the review, formulation and implementation of a responsive National Trade Policy developed and implemented

Output indicator RW 1.4.1.a. Progress towards alignment of national policies to EAC Commitments

S2 overall estimated progress: 100%

The National Trade Policy was reviewed and validated by the Ministry of Trade and Industry (MINICOM) and shared with implementing partners. At the same time, the Cross-Border Trade Strategy and the Trade in Services Strategy were completed and validated by MINICOM in May 2020. The National Export Strategy III and the new Industrial Policy were also finalized and approved by key stakeholders.

Output indicator RW 1.4.1.b. Progress towards implementation of selected WTO TFA project components funded by TMEA (addressing Category C measures)

S2 overall estimated progress: 98%

Progress was made on the WTO Trade Facilitation Agreement (TFA). Over 30% of the Category C commitments funded by TMEA were completed. With all Category B measures implemented, Rwanda's overall implementation rate rose from 26.9% to 83.2%.

Three NTFC projects—Advance Ruling, Risk Management, and Enquiry Points—moved forward. In the area of Advance Ruling, a procedure manual was developed, two awareness campaigns were held, and a communication strategy was put in place. In Risk Management, ToRs were developed for the Risk Management Committee and its members were nominated. ToRs were also prepared for hiring a technical advisor to oversee Enquiry Point activities.



Output indicator RW 1.4.1.c. Number of Young Professionals (YPs) Graduates recruited and coached that are demonstrating improved readiness capability to support the mainstream functions of MINICOM and RDB - in the areas of trade and industry.

S2 overall estimated progress: 92%

Final indicator value: unclear. 7 YP reported to have been recruited in 2019 and the 2020 report states that "Recruitment process for additional YPs was concluded in May 2020".

The Young Professionals (YPs) recruitment was completed in May 2020. Work plans were created and integrated into the national absorption framework. Evaluations showed 85% of YPs in MINICOM and RDB had improved skills. Two YPs were retained by MINICOM, four were hired by RDB, and two more joined RDB's Export Department.

1.4.1.a milestones were achieved in 2020

Tanzania output: TZ 1.4.1. National trade regulatory framework supported.

Output indicator TZ 1.4.1.a. Progress towards review of policies governing trade in Tanzania.

S2 overall estimated progress: 94%

The Tanzania Trade Policy and its implementation strategy were completed and validated by stakeholders. A cabinet paper on the Trade Policy was developed and submitted to the Cabinet Secretariat. A Coordinated Border Management (CBM) scoping study and an NTB implementation strategy were completed. Three NMC meetings were held with progress recorded on NTB elimination. The Zanzibar regulatory review and Blueprint assessment were completed, and ICT systems for the Zanzibar National Business Council were upgraded. A Local Content Policy background paper was developed, and the Investment Policy review was initiated and validated in draft form.

Output indicator TZ 1.4.1.b. Progress towards development of Tanzania's Export Strategy

S2 overall estimated progress: 100%

The National Export Strategy was developed, approved by the Ministry's management, validated, and disseminated to key stakeholders. Implementation began, with 20% of action plans supported.

Output indicator TZ 1.4.1.c. Progress towards implementation of the Tanzania Investment Policy

S2 overall estimated progress: 100%

The Tanzania Investment Policy and its implementation strategy were completed, revised, and submitted to the Cabinet Secretariat. Twelve modules of the Investment Single Window System were developed and integrated. An investment database was created, and dialogue sessions on trade regulations and AfCFTA were conducted. A high-level investment forum was held with the Prime Minister. The Zanzibar Licensing System was assessed across 20 bodies, and Zanzibar's trade policy was adopted, with 20% of recommendations supported. A Local Content Policy draft and background paper were also developed.

Tanzania output TZ 1.4.2. WTO trade facilitation agreement implemented

Output indicator TZ 1.4.2.a. Progress towards implementation of WTO trade facilitation agreement

S2 overall estimated progress: 100%

The Trade Facilitation Agreement (TFA) was ratified. Category B and C measures were notified to the WTO with indicative implementation dates. A National Trade Facilitation Roadmap was developed and disseminated. A position paper on the AfCFTA was completed. Four National Trade Facilitation Committee (NCTF) meetings were held.

Tanzania output: TZ 1.4.3. Online systems for the Chambers of Commerce operational

Output indicator TZ 1.4.3.a. Number of SMS exchanged in the online NTB reporting systems.

S2 overall estimated progress: 80%

Final indicator value not available, no data on number of SMS exchanged.

The NTBs SMS reporting system was upgraded, integrated with Tanzania's customs and eCO systems, and supported by mobile operators. Two servers were installed at the National Data Centre. Stakeholder engagement for Phase 2 automation was completed. A total of 45 NTBs were reported in the system, with over 52% addressed.



The Zanzibar National Chamber of Commerce, Industry and Agriculture (ZNCCIA) and the Zanzibar National Business Council (ZNBC) were supported through development of strategic plans, operational manuals, and system enhancements.

Output indicator TZ 1.4.3.b. Number of certificates issued through Electronic Certificate of Origin

S2 overall estimated progress: 100%

Final indicator value: 84,000 certificates issued through TCCIA's electronic certificate of origin system.

The TCCIA electronic Certificate of Origin (e-COO) system was upgraded and integrated with Tanzania's Customs Integrated System (TANCIS). A cumulative total of 84,000 certificates were issued, and the time to issue certificates was reduced by 92%.

Uganda output: UG 1.4.1. Trade Policy Framework Implemented

Output indicator UG 1.4.1.a. Progress in the implementation of the Trade Policy Framework

S2 overall estimated progress: 83%

Uganda ratified the WTO Trade Facilitation Agreement (TFA), notified Category A, B, and C commitments to the WTO, and established a National Committee on Trade Facilitation (NCTF). A Trade Facilitation Action Plan and Work Plan were developed to implement the WTO TFA commitments. Uganda also ratified the Tripartite FTA, signed the AfCFTA, and contracted technical assistance for TFA implementation. Drafts of the WTO Implementation Bill, SPS Policy, External Trade Regulations, and the Accreditation Bill were developed and submitted to the Parliament for approval. More specifically, 45 Ugandan government and private institutions were supported by the project. Through the trade facilitation at the borders, more than 90% of tariff lines and 5,000 products were reduced to zero.

Kenya output: KE 1.4.1. Trade policy framework developed and implemented

Output indicator: KE 1.4.1.a. Progress towards implementation of TMEA supported trade policy measures

S2 overall estimated progress: 88%

Kenya's National Export Strategy (NES) was developed, adopted, and disseminated. Eleven TAs were procured to support its implementation. Value chain maps for 8 sectors and a Value Addition Strategy were completed. A draft competitiveness roadmap and investor profiles were developed. Kenya's AfCFTA strategy was finalized, with technical support provided. Participation in WTO MC12 and EAC summits was supported. Procurements for key trade facilitation and negotiation tools were completed, and the NTB online/SMS system was upgraded. A green economy transition grant was signed, and alignment of national procedures with regional trade protocols progressed.

Output indicator: KE 1.4.1.b. Progress towards strengthened institutional capacity to deliver on Trade Policy mandate

S2 overall estimated progress: 79%

Kenya's Public-Private Dialogue (PPD) frameworks, coalition strategies, and workplans were developed, and KEPSA-led PPDs reached the highest level of policy partnership. 60% of PPD roundtable recommendations and 60% of logistics sector proposals were adopted. Key trade policy dialogue forums were held, and evidence-based research informed national positions. The Kenya Trade Remedies Agency (KETRA) was operationalized, with strategic plans, regulations, and manuals finalized. Capacity-building support for young professionals and MDAs was launched. The business environment improved, marked by a notable reduction in NTBs.

Output indicator 1.4.1.c Progress towards implementation of WTO TFA

S2 overall estimated progress: 100%

Kenya notified WTO of its Category B and C Trade Facilitation Agreement (TFA) commitments. A needs assessment was completed and approved, and financing proposals for implementing TFA Articles 1–12 were developed. An M&E framework and sensitization plan were created, and two TFA workshops were held. A database for trade research and reporting was initiated at the Ministry of Trade.

Output indicator KE 1.4.1.d Progress towards implementation of Kenya National NTBs elimination framework

**S2 overall estimated progress: 60%**

Kenya's NTBs SMS/online reporting system was upgraded and rolled out, linked to EAC systems, and a capacity-building programme for NMC members and the business community was implemented. Over the period covered by the evaluation, 33 NTBs (58%) reported by Kenya were resolved in the EAC NTBs Matrix. A coalition strategy, PPD frameworks, and a draft NMC action plan were developed and validated.

Coordinated public/private action taken to reduce NTBs among EAC Partner States**Portfolio output: EAC 1.4.2 Regional NTBs elimination framework implemented****Output indicator 1.4.2.a Progress towards implementation of the regional NTBs elimination framework****S2 overall estimated progress: 71%**

The EAC NTBs Factbook and Toolkit were developed, translated into French and Swahili, and disseminated. The EAC-wide NTB short message service (SMS)/online reporting system and NTB Impact Study were completed. A dialogue platform for public-private NTB resolution was established, and the NTBs time-bound matrix was regularly updated. A model for estimating NTB impacts was developed and piloted, and National Monitoring Committees (NMCs) were supported to identify, report, and monitor NTBs across the region.

Rwanda output: RW 1.4.2. Evidence based elimination of NTBs advocacy designed and implemented**Output indicator RW 1.4.2.a. Number of relevant NTB research papers produced****S2 overall estimated progress: 100%****Final indicator value: 4 NTB research papers produced**

To support prioritization efforts, NTB selection criteria were developed in January 2020. That same month, the first research paper on priority NTBs was produced and shared with stakeholders. A second paper followed shortly after, and ultimately, three research papers were completed—exceeding the original target of one. These three research papers were on Quantification the impact of NTBs affecting Rwanda, Assessment of restrictions to Rwanda's Trade in Services as well as the Impact of COVID-19 on seamless trade and transport across Rwanda's borders were produced

Output indicator RW 1.4.2.b. Number of NTBs resolved**S2 overall estimated progress: 100%****Final indicator value: 5 priority NTBs eliminated**

The National Strategy and a Communication Strategy for prioritizing NTBs, both completed and validated in March 2020. These efforts supported the operational capacity of Rwanda's National Monitoring Committee (NMC). A lesson paper on NTB elimination was published in May 2020. Overall, three NTBs were eliminated in 2020, exceeding the annual target of one, and bringing the cumulative total to five.

Output indicator RW 1.4.2.c. Number of trade related complaints reported through the NTB reporting system and resolved.**S2 overall estimated progress: 100%****Final indicator value: Unavailable. The RF report states that 206 complaints were registered but no data on complaints resolved was included.**

The NTB reporting system was successfully upgraded and integrated into the NMC subdomain of the MINICOM website, validated by the Steering Committee in June 2020. As a result, 206 complaints—far surpassing the target of 50—and 86 NTBs were registered in the system, significantly exceeding expectations and enhancing Rwanda's capacity to track and address trade barriers.

Uganda output: UG 1.4.2 Upgrade of the NTB reporting system**Output indicator UG 1.4.2 Upgrade of the NTB reporting system****S2 overall estimated progress: Process halted during the 2020/21 period.**

System specifications for upgrading Uganda's NTB reporting system were completed, and a systems developer was contracted. Twelve billboards were erected nationwide to raise public awareness about the system. The system was handed over to the Ministry of Trade, Industry and Cooperatives.



The two tables above reflect a clear and sequential pattern of progress across the pillars of regional integration in EAC, moving from legal reforms to tangible implementation outcomes. The first major step observed is the significant effort by Partner States to align their **national laws with the EAC Common Market Protocol**, particularly in the **area of goods**. By 2022, 80% of high-priority national restrictions in goods movement had been addressed, exceeding the initial milestone of 25%.

This legal alignment enabled the rollout of important operational frameworks, such as the OSBP instruments and the Regional Electronic Cargo Tracking System (RECTS). These tools, along with improvements to the Authorized Economic Operator (AEO) programme and the automation of trade procedures, have **simplified cross-border movement and enhanced transparency**. Trade facilitation efforts were further strengthened through the development of trade information portals and coordination mechanisms such as the NTFCs, which collectively contributed to more predictable and cost-effective trade.

Although non-conforming measures (NCMs) still exist, the establishment of NTB reporting systems and PPD platforms has enabled countries like Rwanda and Kenya to resolve a substantial number of trade barriers.

Overall, the results reflect a coherent narrative: policy reforms in trade lay the groundwork for trade facilitation; effective facilitation tools create momentum for liberalisation in services and capital; and the combination of these efforts drives greater regional integration. The EAC's achievements, with the support of TMA, especially in harmonising trade rules and resolving NTBs, **signal a shift from compliance-focused actions to a competitiveness-driven agenda**. This positions the region not only for internal market integration but also for effective participation in broader continental frameworks like the AfCFTA.

Based on the M& data described in the two above tables and its accompanying analysis, the ET finds that:

Finding #2: Where data is available, it shows that TMA's portfolio has indeed contributed to the intended short-term outcomes and the intermediate outcome. As shown in the tables above, TMA progress in delivering outputs and outcomes is satisfactory. As described below, many respondents appreciated TMA as an effective implementing organization of Aid-for-Trade projects in Africa. Overall, most of the evaluated projects under the portfolio were effectively implemented and achieved their expected results, thus contributing to the outcomes indicators presented above.

The analysis below breaks down the different types of results achieved.

Policy and regulatory environment's improvements and their effect on reduction in barriers to trade

Trade policy support

An important objective of TMA's support in this area of work was "Developing list of laws, regulations and administrative guidelines for each Partner states identified by the Scorecards as non-compliant with commitments under the CMP²²." TMA then proceeded, in some cases, in supporting the Partner states in reviewing or developing strategies and policies to fill gaps. In Rwanda, examples include among others: the Services in Trade Strategy, the Export Strategy, the Cross-border Trade Strategy, etc. Similar work was undertaken in other countries.

The **quality of these strategic documents**, reviewed or produced with the support of TMA, was considered as relatively good by many respondents. One of the reasons for the positive views was that these

²² Trade Mark Africa. (2023). Implementation Monitoring Annual Project Performance Report: Financial Year Progress Report Jul 2021-Jun 2022. (Internal document, Trade Mark Africa)



review/development processes were normally developed using a **collaborative approach**. In other words, many types of partners and stakeholders, including from the private sector, were consulted. In certain cases, there were many iterations and back-and-forth reviews and revisions to the documents to ensure they reached the required quality and standards. This, in turn, became one of the causes of the delays mentioned above in the finding. The delays, in other circumstances, came from challenges in **finding consultants** that had the necessary experience and background to lead the trade policy support related work. This was the case in Kenya, Rwanda, Tanzania and Uganda. In Kenya, due to this challenge, the National Trade Policy (NTP) facilitation work struggled to get the workplan developed. Nevertheless, as mentioned below in more details (see the effectiveness and sustainability sections), the fact that the perception of the quality of the strategic documents varied between and within countries affected their use. In certain cases, these documents were used to design relevant national projects. However, in other cases, they became obsolete and were not used in strategic decision making. Hence, the overall assessment generates mixed results. Among elements that rendered TMA effective, throughout the implementation of the portfolio, TMA has operated like a donor by **aggregating funds** and investing in projects aligned with its S2 **ToC**. It often then **outsourced implementation to contractors/consultants**, due to internal capacity constraints, in terms of available human resources as long-term employees. Using shorter term consultants and contractors allowed for flexibility and efficiency as once deliverables were finalized, contracts were closed, reducing expenses for TMA. While this model allowed scaling results, it posed a risk: **outsourcing too much led to some loss of institutional memory and knowledge** and over-reliance on external expertise. Many respondents pointed to an ongoing struggle to balance scale, effectiveness and efficiency in TMA management.

In terms of obstacles, **changes in governments and political priorities sometimes affected TMA's effectiveness**. For example, in one specific country, although a National Export Strategy (NES), developed with the support from TMA, was approved by a previous government, the newly elected one requested a new NES as political priorities had changed. At the time of the ET's data collection process, the TMA-supported NES had expired. Its impact analysis and review had also not been conducted two years after expiry. Despite this, the NES had initially been well received across trade stakeholder groups and continues to serve as a guide for the ongoing work, notably the value chain work that is being supported by TMA.

However, **the main cause of delays in TMA Trade Policy support** was the Covid-19 pandemic, as, in Rwanda for example, the consultants' team had to go back and work again on the strategies and policies to integrate solutions to the pandemic-generated problems. In-person meetings were cancelled and at the beginning of the pandemic, it took some time for TMA activities to be reoriented. As for the rest of the world, partners and stakeholders in the region had to get better acquainted with virtual delivery of services and support, including policy review and training workshops.

TMA's model of outsourcing technical work has allowed Tanzania to start updating its trade policy frameworks in line with evolving trade demands for quality services. That said, due to delays, **implementation of the revised frameworks remains ongoing**, and some stakeholders expressed concerns about limited follow-through in policy operationalization and insufficient monitoring and evaluation of the reforms' downstream effects. Nonetheless, TMA's support was widely seen as foundational in establishing a more coherent and responsive trade policy environment in Tanzania.

Based on the above analysis of the TMA Trade Policy support induced results, the ET finds that:

Finding # 3: The support under the portfolio has been appreciated by the majority of the respondents and has concretely led to the development of trade policies and strategies in the partner countries.



- **However, many consulted stakeholders pointed to the delays in the support provided for the review or development of trade policies and strategies. This was partly due to Covid-19 but also some challenges faced by TMA.**

NTB Related Work

The large majority of respondents from all profiles, in all countries, point to **high reduction of NTBs**, partly due to TMA's support. Indeed, 77% of NTBs reported between 2016 and 2020 were resolved by June 2020, a significant improvement from 43% in 2016²³. Although it was not possible to triangulate the data, some respondents mentioned that by 2023, the EAC was resolving 94.9% of reported NTBs, indicating a faster and more effective resolution process²⁴. Specific, and more recent examples include, in Uganda, the fact that NTB dispute resolution rate was of 87%. Solutions such as the tripartite NTB complaints' platform (linked to the EAC NTBs Mobile Application, for reporting, monitoring, and eliminating NTBs²⁵) and others at national levels were effective. For the latter, such as in Rwanda, TMA, in partnership with UNCTAD, helped develop the **online trade information portal** (linked to the NTFC website²⁶). Examples of NTBs removed include reduction in weighing stations on trade routes and administrative procedures in exporting and importing countries. Uganda has developed the National Response Strategy on Elimination of the NTBs (NRSE-NTBs)²⁷ to address the persistence of NTBs in the country and in the region.

Tanzania was also an active participant in the **Tripartite NTB Reporting, Monitoring and Elimination Mechanism**, which provided a regional platform for traders to lodge and resolve NTB complaints across COMESA, EAC, and SADC member states. At the national level, TMA supported targeted interventions that contributed to the removal of specific NTBs—such as the **reduction of mandatory checkpoints and weighbridges along key trade corridors** (e.g., Central Corridor), and the **simplification of documentation and clearance procedures at border posts** like Tunduma. A total of 14 checkpoints and weighbridges were removed along the Dar es Salaam - Tunduma corridor, reducing the number from 17 to just 3. This intervention directly contributed to cutting average transit times by over 40%, particularly benefiting cargo traffic. For example, cargo clearance time at the Tunduma OSBP dropped from over 30 hours to 21.1 hours inbound and 26.3 hours outbound, according to TRA site records. This reduction improved route predictability, reduced rent-seeking opportunities, and supported regulatory compliance. These measures helped reduce delays, lower transport costs, and improve predictability for traders.

While Tanzania does not yet have a stand-alone national NTB elimination strategy like Uganda, stakeholders confirmed that TMA-supported reforms and platforms contributed significantly to identifying and resolving persistent NTBs, both within the country and at regional borders.

Uganda also actively worked with other EAC partners to eliminate NTBs to facilitate regional trade and promote regional integration. Uganda participates in the EAC Time-Bound Programme for the elimination of identified/reported NTBs, which involves monitoring and reporting them at both national and regional levels. A notable example of NTB removal in Uganda involved resolving trade disputes with Kenya, particularly concerning agricultural products like poultry, dairy, and maize. These products faced NTB barriers such as **Kenyan excise duties and import bans**, hindering their access to the Kenyan market. Through

²³ World Bank & EAC. 2020. EAC Common Market Scorecard 2020

²⁴ An online article does confirm this: <https://www.zawya.com/en/economy/africa/eacs-invisible-walls-why-intra-trade-remains-stubbornly-at-15pc-s8mfrx83>

²⁵ <https://www.eac.int/press-releases/157-trade/3013-eac-embarks-on-use-of-mobile-app-to-eliminate-ntbs>

²⁶ <https://www.tradefacilitation.rw/>

²⁷

<https://www.mtic.go.ug/nrse-ntbs-project/#:~:text=The%20NRSE%2DNTBs%20is%20robust,reporting%2C%20responding%20and%20eliminating%20NTBs.>



concerted efforts within the EAC, Kenya's 25% excise duty on Ugandan table eggs, onions, potatoes, and potato crisps was removed. Kenya also lifted its ban on Ugandan powdered milk imports, which had been in place to protect its dairy sector. The removal of these NTBs have led to smoother trade relations and increased exports. Impacts from these elements are described in chapter 6.d below.

Perspective from the Private Sector

Although outputs from the TMA support were noticeable as described above, in other cases, some respondents from the private sector mentioned there were still important **challenges to the implementation of NTB resolution directives**. This is supported by 2024 literature: "Despite these established mechanisms, NTBs remain persistent and pervasive²⁸." Indeed, companies participating in FGDs shared a wide range of **persistent NTBs affecting cross-border trade** within the EAC. These NTBs included prolonged import permit approvals, redundant pre-market approvals, high and arbitrary excise duties, costly inspection requirements, and inconsistent labelling and packaging standards.

Another challenge reported by firms is linked to **the time** it took to **resolve reported issues**. For example, firms in the processed foods sectors highlighted long delays in resolving a specific challenge (in one case, more than ten years), linked to a set amount of national content that was required to be integrated in the exported goods for it to be cleared for import. Others cited ongoing tax asymmetries between countries, in contravention of Customs Union principles since 2017. These unresolved NTBs significantly disrupted supply chains, reduce competitiveness, and result in financial losses.

While **resolution directives have been successfully** issued including at regional summits, bilateral meetings, and through regional NTB committee, participants noted that actual implementation was either delayed, partially implemented or absent.

The NTB **online reporting mechanism** was described as not always effective. Some stakeholders stated that when an NTB was reported, the feedback process was not clear, there were no visible tracking of progress or structured engagement with national NTB focal points. Resolutions communicated at the political level often failed to translate into real changes on the ground, eroding private sector confidence in the mechanism.

Many respondents from the public agencies involved in the NTB resolution mechanisms, although quite positive about these tools, **acknowledged the need to review and strengthen the current framework**. The objective being to reduce delays and minimise the economic losses associated with the reflow or rejection of goods. They noted that in many cases, resolution is delayed because matters must **align with the convening schedules** of high-level regional organs, such as the EAC Sectoral Councils or Summit meetings, which are held periodically and not on demand. An additional source of delay arises from fiscal-related NTBs, which are often embedded in national budgetary policies. Since national budgets are reviewed on an annual cycle, any resolution linked to fiscal measures such as duties or taxes may take up to 12 months.

Focus group discussions revealed that although NTBs are increasingly being reported and logged, especially through bilateral EAC meetings and NTFC coordination, **enforcement and follow-through remain inconsistent**. The challenge of ensuring directives were removed was usually due to either **weak institutional coordination or lack of accountability among border agencies**. For instance, differences in operational procedures between Tanzanian and Zambian authorities at shared borders, such as at Tunduma-Nakonde, continues to create delays despite formal agreements. While formal frameworks such as the Tripartite NTB Mechanism exist, enforcement remains weak due to lack of binding dispute resolution or sanctions for non-compliance. Focus group discussion's feedback from border officials and traders confirmed that inconsistent

²⁸ Maureen Wanyonyi. (2024). Elimination of Non-Tariff Barriers End of Project Report.



implementation and limited follow-up by national and regional authorities especially between Tanzania and Zambia at Tunduma-Nakonde have undermined NTB removal efforts. TMA recommends formalizing joint cross-border enforcement teams under NTFC oversight to improve accountability.

Private sector actors also raised concerns about **manual documentation procedures**, such as the lack of digital access to the AfCFTA certificate of origin, which creates new administrative barriers that disproportionately affect small traders. Additionally, issues like **the misuse of the Authorized Economic Operator (AEO) system**, where unqualified actors gain privileges through opaque practices, undermine the integrity of trade facilitation tools and reinforce perceptions of unfairness. Several respondents from freight forwarding associations (e.g., TAFFA) pointed out that **unequal institutional access to port infrastructure—such as exclusion from One Stop Centres at the Tanzania Ports Authority (TPA)**—limits their ability to fully support NTB resolution and trade facilitation objectives.

These concerns indicate that while NTB frameworks and platforms exist and are broadly supported by TMA's portfolio, **implementation gaps, capacity constraints, and uneven regulatory enforcement** continue to weaken their effectiveness. Sustaining NTB reduction efforts will require not only stronger inter-agency coordination and digitization of key trade processes, but also **more transparent and inclusive participation** of key private sector actors in operational and decision-making spaces.

Notwithstanding these challenges, many of the private sector representatives told the ET that they benefitted from the **joint cross-border committees** (meetings of which were normally held quarterly), or cluster committees as some call them. In addition to increasing the security for **women traders**, it also helped reduce NTBs at a "micro-level". These committees enhance the **cohesion between traders** on different sides of the borders, even in complicated and challenging contexts such as the Rwandan and DRC cross-border trading. The Ugandan stakeholders also indicated that the regional border-crossing procedures and process supported by TMA have improved: road construction, border coordination, prevention of illegal trade (smuggling), some software provided for border crossing – leading to more efficiency, for example, the Uganda and Kenya's border crossing time reduced to 2 hours from the previous 7 hours.

Some Solutions to these Challenges

Inspection agencies in importing countries received training to manage risks and balance efficiency and effectiveness of their work. As a result, in many cases, there **were less inspections** (e.g., in Rwanda, from 30 categories of product considered high risk by the Rwanda Inspectorate, Competition and Consumer Protection Authority (RICA)²⁹, the number went down to 14) or inspections were conducted at warehouses instead of at the border, reducing physical bottlenecks. This also reduced the time it took to transport imported goods, some respondents pointing to up to three days less than before the implementation of the TMA projects. See chapter 6.d for more details.

NTFC & Cross-Border Trade (CBT)

Many respondents from all countries mentioned that their **organization's representation in the NTFCs was enhanced** thanks to the support provided overtime by TMA, in some cases in collaboration with UNCTAD. **NTFCs also became more active** (i.e., meetings were held more regularly and frequently) during the projects' implementation. A particular element that was appreciated by these respondents was that the NTFCs were sub-divided into **thematic groups** which made the committee more effective. As a result of these meetings and the work of the sub-committees, in Rwanda for example, where 35 NTFC members were trained through

²⁹ <https://www.rica.gov.rw/home>



TMA's support, **trade procedures were simplified**, with more than 50 steps eliminated and the number of required documents reduced by 30. Much of the procedural process is now online, due to all stakeholders' reaction to the Covid-19 pandemic, including TMA. In Tanzania, the Maritime Gateway helped reduce the complexity of bureaucratic processes and long waiting lines.

It is also to be noted as well that the private sector's representation in the NTFCs has been strengthened during the projects' implementation processes. This was a follow-through of the NTB project's evaluation report, which mentioned that "Regular dialogue between the public and private sector stakeholders to identify and address NTBs. - This dialogue ensures that the concerns of businesses are heard and there is a collaborative approach to solving trade-related issues³⁰." This ensured the **private sector's voice** was heard in these committees, which raised the attention of participants to NTB-related challenges and trade issues they faced. The results hence point to TMA's progress in **strengthening the PPD**. Among other outputs, the road maps developed helped increase the private sector's representation in the NTFC.

The **private sector also received regular capacity building support and training**. Indeed, TMA's projects fully supported and increased information generating activities (analysis on NTBs and position papers, for example) and dissemination processes to all stakeholders but for the private sector actors through second and third-level organizations.

Many cross-border traders (mainly women) showed high levels of satisfaction concerning the support they received. This was particularly noted in Rwanda, Uganda and Tanzania where women cross-border traders mentioned they could more easily access market infrastructure in a relatively **secure environment** (more details are noted in chapter 6.f below).

As in Rwanda, in Tanzania, women traders reported that the improvements in market infrastructure and the establishment of **One-Stop Border Posts (OSBPs)** created a more secure and accessible trading environment. TMA's **awareness sessions** and **capacity-building initiatives** targeting women cross-border traders improved their understanding of customs procedures, documentation requirements, and their rights at the border³¹. Several women members of the Tanzania Women Chamber of Commerce noted that harassment and informal fees had declined, citing clearer procedures and the presence of trained border officials as key factors. These interventions not only enhanced physical safety but also increased the confidence of women traders to expand their businesses and engage in more formalized cross-border trade.

TMA IBM support also generated important results in the targeted countries, especially in Tanzania. Indeed, TMA's IBM support also generated important results in the targeted countries, especially in **Tanzania**, where the approach significantly improved coordination and efficiency at border crossings. At key OSBPs such as **Tunduma (Zambia-Tanzania)**, the IBM model brought together up to **19 government and regulatory institutions** on each side of the border under a single coordinated framework. These included customs, immigration, plant and animal health inspectors, port health, police, and trade facilitation agencies. By housing them in a shared facility with harmonized procedures, the OSBPs reduced duplication of checks, minimized physical inspections, and shortened clearance times. This collaboration enhanced transparency reduced the opportunities for rent-seeking, and improved the experience for traders—particularly small-scale and women traders—who previously faced delays and harassment at multiple checkpoints. According to

³⁰ Maureen Wanyonyi. (2024). Elimination of Non-Tariff Barriers End of Project Report.

³¹ Maureen Wanyonyi. (2024). Elimination of Non-Tariff Barriers End of Project Report. Output 7 (completed): Awareness Raising Campaign of the NTB Act rolled out

Stakeholder engagement events were organized to raise awareness about the reviewed NTB Act.

The events targeted businesses, trade associations, and other relevant groups to explain obligations under the Act and promote compliance. Best practices and guidelines were shared to support smooth adoption of the NTB Act provisions.



stakeholders, this level of institutional integration represented a major shift from siloed operations and was a key driver in reducing transaction costs and improving cross-border trade flow between Tanzania and its neighbours. In Rwanda also important results have been reached, including bringing down the number of institutions at the border from eight to three, such as the border police, migration and customs.

Training and Capacity Building (CB)

A major success of the coordinated border management project was the creation of a **regional training programme** that built a **pool of national champions**—trained customs and border officials—across EAC partner states. These champions provided ongoing, in-country training at various border posts, significantly enhancing capacity without the need for external consultants. With minimal support from TMA (e.g., travel and per diem), they conducted regular, peer-led training sessions across the region, ensuring widespread skills transfer and operational consistency. This approach not only made implementation **highly cost-effective** but also contributed to **long-term sustainability**, as countries now possess a **self-sufficient cadre of trained professionals** capable of maintaining coordinated and integrated border management systems independently. Using a similar approach, “30 regional experts (trainers) were trained on implementation of EAC's Simplified Trade Regime (STR) to improve the region's capacity in the implementation of STR and subsequently promote small scale cross border trade” and “35 trainers were trained on AfCFTA RoO. This has built local resource capacity at EAC and country level on sensitizing and educating traders and border agencies on AfCFTA RoO. 510 stakeholders from EAC Partner States were trained and sensitized on the AfCFTA Rules of Origin.”³²

One of the major achievements under the TMA portfolio was to assist the EAC partner countries in the **preparation of the ratification and implementation of the WTO TFA**. To ratify the WTO TFA, each signatory was required to categorize the **36 identified trade facilitation measures by Category A, B, or C** and then submit the categorization to the WTO Secretariat for review. In Uganda for example, a good study was conducted by an experienced national consultant to highlight the status and challenges for Uganda to implement the WTO TFA. The study was used by the Government of Uganda to complete the categorization of the WTO TFA measures which the Ugandan officials expressed great appreciation to TMA for such assistance. In the last several years, Uganda has implemented most of the CAT B and C commitments. According to the recent submission of the Government of Uganda to the WTO Secretariat (dated 12 June 2024), Uganda has committed to implementing most of the CAT B and C commitments by 1 July 2025 (7 by 1 July 2023 - completed, 10 by 1 July 2024 -completed, 3 by 1 July 2025 and 3 by 1 July 2026).

In Tanzania, TMA provided **technical and advisory support to the Ministry of Industry and Trade and the Tanzania Revenue Authority (TRA)** to conduct a comprehensive assessment of the country's readiness to implement each provision. This included funding and facilitating national consultations and a **diagnostic study** that identified implementation gaps, institutional constraints, and capacity needs. The findings of this study formed the basis for Tanzania's official **TFA categorization submission to the WTO Secretariat**, which was completed in accordance with WTO deadlines. Government officials consulted during the evaluation acknowledged that TMA's support was critical in enabling timely and evidence-based decision-making during the categorization process and in laying the groundwork for the phased implementation of Category B and C commitments, including those related to risk management, automation, and transparency in trade procedures.

³² Trade Mark Africa. (2023). EAC External Trade Policy Annual Project Performance Report: Financial Year Progress Report Jul 2021-Jun 2022.



Similarly, in Kenya, Technical assistance entailed conducting a **needs assessment** on the implementation of the WTO-FTA to identify the gaps, design and implement intervention activities. Support focused on WTO-TFA Category C provisions, where Kenya faced implementation challenges. This included the **preparation of notification schedules and capacity building for key ministries** (Trade, Agriculture, Livestock, Treasury, and other economic sectors). This was followed by the efforts to facilitate **border formalities and documentation**, ensuring the alignment with the WTO TFA and regional trade commitments in trade facilitation. However, the implementation of related activities had not taken place at the time of evaluation.

Concurrently, technical assistance was provided during the US-Kenya FTA negotiations, focusing on **developing negotiation principles** and enhancing capacity, while maintaining coherence with EAC and AfCFTA obligations. However, the negotiations gradually shifted towards a U.S.-driven economic and investment partnership, emphasising market access for products like wheat and Genetically Modified Organisms (GMOs). These demands contributed to stalled negotiations, and the **agreement remains un-concluded**. Government commitment to the process declined following the change in the political leadership in both countries

Success factors

One of the important success factors at all levels, in all countries, was **the political will** to engage and pay attention to the portfolio's activities and objectives. As the projects focused on trade policy results, capacity building, training, coordination, cooperation, trade negotiations' facilitation, NTBs, trade facilitation and simplification, etc. all actors needed to **onboard and buy into this work**. Where and when there was **strong leadership** within the stakeholder groups, higher levels of sustainable results have been found by the ET. For example, the SCT enjoyed strong political backing from Heads of State and Ministers, with regular follow-up in EAC Summits. This prioritisation helped fast-track decisions and align national efforts with regional goals and TMA's efforts. Similarly, all countries' engagement in WTO TFA implementation benefited from consistent support from **senior government officials**, which ensured that the TFA categorization process was not only completed on time but also aligned with national priorities. The presence of active leadership within the NTFC also played a pivotal role in advancing implementation of trade reforms and ensuring that agencies such as TRA, RRA and others, immigration, health, and standards bodies coordinated effectively. Many stakeholders noted that in cases where NTFC members were empowered and well-informed, follow-up on trade facilitation actions was more efficient, and alignment with TMA-supported activities was stronger. These examples underline how political prioritization, institutional ownership, and leadership within key agencies contributed significantly to the observed results under the portfolio.

Additionally, several key enablers contributed to successes:

1. **Strong Legal and Policy Frameworks:** The **EAC Customs Union Protocol**, the **East African Customs Management Act**, and the existence of a **Regional Committee of Commissioners of Customs** provided the necessary legal and institutional backbone. These bodies ensured regular review and accountability, with the committee meeting quarterly or semi-annually to track progress and resolve implementation issues.
2. **Effective Institutional Coordination:** Partner governments collaborated closely to station customs officers across borderse.g., placing Rwandan officers in Mombasa, Ugandan Customs Officials at Inland Container Depot in Nairobi, supported by clear legal frameworks and port-level coordination in Kenya and Uganda
3. **Human Resource Capacity:** The EAC Secretariat and member states had a robust pool of technical customs experts and training institutions to support roll-out and capacity-building.



4. **Donor Support:** Development partners provided essential **financial resources**, recognising the tangible results of the SCT and contributing to its broad adoption and sustainability.

Box 1: Case study: Young Professionals' Programme, a strong success factor

The Young Professionals' Programme was extensively appreciated by many respondents where it was implemented, mainly in Rwanda, and was one of the important and effective approach TMA integrated in its support in the country. Unfortunately, it was not implemented everywhere and in Kenya, due to budget constraints, it did not materialize although it had been designed. Kenyan stakeholders view the Young Policy Professionals Programme as a valuable initiative for building long-term trade policy capacity across institutions. It was never planned to be implemented in Tanzania and Uganda.

In Rwanda, TMA's ministerial counterpart, MINICOM (or the Ministry of Trade), **requested the Young Professionals' Programme** and it became an important success as well as a success factor for many of the initiatives. Young professionals were paired with senior professionals (mentors) and worked on the development, for example, of a new cross-border trading policy and an NTB strategy. In many cases, the young professionals evolved to take part in high level positions.

Hindering Factors

In terms of factors that negatively affected TMA's ability to achieve results, the two main ones were the **Covid-19 and donor fund cuts**. Indeed, these two elements strongly impacted the portfolio's calendar, affecting the timeline as well as the content of the projects. As it will be mentioned below, TMA was quick to adapt and ensure the continuous relevance of its activities, yet these hindering factors complicated its trade regulatory environment work and slowed its progress towards targets.

Additionally, but to a lesser extent, TMA staff turnover was mentioned as a hindering factor as well. Due to the high technical nature of the trade-related work, some respondents pointed to the fact that stable staff with required technical trade-related capacity is necessary in order to provide the support to the projects implementation. Thus, when staff leaves and are replaced frequently, it negatively affects TMA's effectiveness and efficiency.

Based on the nuanced analysis above and beyond the outputs and outcomes indicators' description, the ET finds that:

Finding # 4: As discussed with many respondents, TMA has contributed to an increase in the resolution of NTB-related disputes, by supporting the NTFCs, cross-border committees, etc.

- **However, NTBs evolve and transform, making them moving targets for reduction and elimination, and sometimes, there are political reasons for NTBs, making these barriers more difficult to resolve.**

c) Efficiency /Internal & External Coherence

Economic conversion of resources/inputs (funds, expertise, time, equipment, etc.) into the expected results

In all four countries for the field visits, many stakeholders interviewed pointed out that the overall **efficiency of the TMA portfolio was high**. The TMA national teams and regional experts were always in close contact with the government officials about the projects design and implementation processes. Indeed, TMA had instituted both regional and country teams to assist the targeted countries and regional partners to



coordinate and implement the project activities. In other words, **expertise and human resources worked well together** to lead to the intended results. As reported in TMA documents: “NTBs are addressed under project 2802 (regional) and also country programmes that have NTB components to address country specific issues³³.”

In many cases, external consultants and/or consulting firms were recruited to support the implementation. Beyond the discussions around the presence of consultants in TMA’s work as reported in section 9.2 of the current report, from the opinion of many respondents, **TMA’s use of consultants** for the delivery of services—fees of which represented above 25% or the total portfolio budget³⁴—including the review of trade policy strategic documents for example, was **an efficient way to use programme budgets**. TMA was recognized as a strong manager of service delivery through the hiring of consultants, considering salaries represented around 35% of the total expenses.

The funding and disbursement mechanisms from TMA were overall considered relatively good. However, a few stakeholders across all consulted respondents questioned the **funding modality**. For example, TMA financed EAC trade negotiators to various trade negotiation events with air tickets and high-end hotels and restaurants and there was no flexibility for them to have the **daily per diem instead**, although this was mostly the requirement of donors. The same was true for the participants in regional training workshops and sensitization of the trade agreements. Some of these participants indicated that they would have preferred to receive some per diems as to choose their own hotels if the donors and TMA have the flexibility. .

Recently, TMA went through important **human resources restructuring**, with many movements in terms of staff. This was mainly linked to budgetary cuts as well as normal staff turn-over. The ET noticed that many of TMA evaluation respondents either came from different teams as to those they represented during the interview; had been in country offices before working at headquarters (HQ) level; or simply had only very recently joined TMA. In addition to affecting **institutional memory**, to a certain extent, this did also affect **TMA’s recent work efficiency**, including when these changes started at the end of the S2. Indeed, respondents, although only a few, mentioned they felt, for example, that decision-making processes became a bit less fluid and timely.

As already mentioned, TMA faced funding cuts during S2’s implementation period. Although this was an important bottleneck for the management of the portfolio’s activities, TMA proved to be **responsive** was able to navigate these difficult times, including with the negative effects of the Covid-19 pandemic. This proved that TMA management was **flexible and adaptative**.

Finding # 5: From the data collected during the field missions, the majority of the planned outputs have been delivered, in some cases with delays, as mentioned above, but overall, in a timely and economic manner.

- **The overall efficiency of the portfolio’s implementation is difficult to assess however, because first, there is only very high-level portfolio financial data available (budget vs expenditures by project); and second, although the project level data is relatively detailed, comparing expenditures with portfolio results is challenging because the latter are somewhat intangible.**

³³ Trade Mark Africa. (2018). Project Appraisal Report: Elimination of Non-Tariff Barriers to Trade PAR II.

³⁴ TMA, 2024. TMA S2 Trade Policy Analysis (Budget vs Expenses per project).



Policy and regulatory interventions underpinning and/or contributing to other work streams and intermediate outcomes, and vice versa, including expected results (within the intermediate outcome 1.4 portfolio—with other intermediate outcome portfolios)

In addition to trade facilitation projects under the portfolio, TMA, through Outcome 2 work, also supported other technical trade areas in all countries, such as **border infrastructure, standards harmonization and sanitary and phytosanitary measures (SPS)**. This sectoral support has broad implications for trade facilitation. The internal coherence of those TMA initiatives was considered high by many respondents. The portfolio initiatives formed a foundational layer that enabled and amplified the effectiveness of other TMA work streams. The alignment of trade policy, NTB elimination, and standards harmonisation directly facilitated outcomes in trade logistics, export readiness, women in trade and regional integration. Conversely, investments in infrastructure, automation (e.g. Integrated Customs Management System - ICMS), and private sector capacity development strengthened the case for and implementation of regulatory reforms. This is well demonstrated by the case study on KENTRADE which aligns with TMA's strategy 2 emphasis on public-private collaboration and PPD on to mainstream trade issues.

In Rwanda, much of the portfolio's support was coherent with TMA's contribution to the **cross-border market in Rubavu, constructed in 2019³⁵ with the support of TMA**. Indeed, private sector actors working at the border and in the market were also trained by TMA through the trade regulatory environment project portfolio. As they themselves reported, this helped render their participation in the **joint cross-border committees**—an important aspect of the portfolio—more effective. In Uganda, TMA also supported **technical trade areas** through other portfolio under the country or regional programmes. For example, TMA provided technical support through the country projects in the areas of **standards, technical regulations, conformity assessment, metrology and SPS**. TMA also offered large infrastructure, transport and OSBP crossing through regional or multi-country programmes. These TMA projects/programmes were closely linked with the trade facilitation project and mutually supportive with each other. Overall, the design and planning of TMA country and regional programmes under different portfolio have shown the internal coherence of these interventions.

As similar situation was in Tanzania, where the construction and operationalization of the OSBP at Tunduma/Nakonde—funded through TMA's infrastructure and integrated border management programmes—were closely linked with trade regulatory work. Tunduma OSBP not only improved physical infrastructure but also brought together regulatory agencies responsible for customs, SPS, standards, and immigration—as mentioned above—thereby supporting **the simplification and harmonization** of procedures championed under the trade regulatory portfolio.

Complementary work with the Tanzania Bureau of Standards (TBS) and the Tanzania Plant Health and Pesticides Authority (TPHPA) also enhanced capacity for **conformity assessment, SPS compliance, and risk-based inspections**—key areas that reduce technical barriers to trade and strengthen regulatory systems. In the logistics space, TMA's support to the Central Corridor and the modernization of the Port of Dar es Salaam improved trade flow and directly addressed regulatory inefficiencies at entry and exit points. Collectively, these interlinked projects created a mutually reinforcing ecosystem that advanced TMA's trade regulatory objectives while addressing infrastructure, institutional, and social dimensions of trade facilitation.

The Kenya programme featured some **strong feedback loops** that enhanced coherence and responsiveness. For example, work on National Export Development and Promotion Strategy (NDEPS) supported the implementation of the National Trade Policy, and improved readiness of SMEs participating in AfCFTA's GTI. Similarly, NTB elimination efforts also addressed challenges with Rules of Origin, mutual recognition of

³⁵ <https://www.trademarkafrica.com/news/rubavu-and-rusizi-cross-border-markets-completed-ready-for-occupation-2/>



standards, informing both negotiations and domestic AfCFTA preparations. In addition, the portfolio's dual approach used in Kenya supporting both **policy reform and the competitiveness of export value chains** proved effective in addressing trade barriers at both systemic and operational levels. The expected short-term and intermediate outcomes were observed across several areas. These include improvements in trade-related policy frameworks and increased readiness for regional trade. Notably, the country demonstrated better compliance with regional and international trade frameworks. There was also progress in the overall number of NTBs resolved (although with limited implementation outcomes), supported by active stakeholder participation. Additional outcomes included a reduction in the time and cost of trade, completion of value chain mapping across eight sectors, improved access to trade-related information, better organisation of value chains, and strengthened logistical capacity. Moreover, TMA worked with the Kenya Bureau of Standards (KEBS) to help consult the private sector on the draft National Quality Infrastructure Policy and the reviewed Standards Act (CAP 496) and also communicate in an enhanced manner the expectations in terms of standards. As in many other countries, this effort was coordinated with support from APEX organizations such as FPEAK, KEPSA, and KAM to work with the private sector.

The overall portfolio was **deliberately designed for internal synergy**. Upstream activities (e.g. trade negotiations) informed national policy; downstream efforts (e.g. National Export Strategy) operationalised those policies. Complementary actions like NTB removal and standards compliance were implemented in tandem, ensuring that policy gains translated into real market access. Capacity building was cross-cutting and targeted the same institutions, reinforcing institutional coherence and capacity. This has also been confirmed by the Evaluability Assessment, which mentioned: "...TMA's policy and regulatory interventions underpin and contribute to the potential achievements of other work streams and expected results of all other intermediate outcomes. For instance, the extent to which infrastructure investments at OSBPs deliver expected time and cost reductions depends on several factors beyond only physical infrastructure. These include policy, regulatory and legal frameworks and agreements for joint border operations (intermediate outcome 1.4), ICT systems at border posts (intermediate outcome 1.3) and the application of standards and SPS measures at the border (intermediate outcome 1.2), which all together influence the time and cost of crossing borders." Nevertheless, TMA has learned lessons from S2 while designing S3. Indeed, although at national level, TMA activities to strengthen trade regulatory environment and private sector development was well coordinated and mutually reinforcing, at regional and HQ levels, the synergies were less apparent and the not pre-designed in a fully logical manner.

In addition, in certain circumstances, some respondents mentioned that different actors working on similar components of projects (e.g., different strategies) **did not always communicate sufficiently** to ensure efficient and mutually reinforcing implementation of the activities. In Kenya for example, the ministry of trade wanted its own trade information portal, and the national TMA team wanted to support. However, this was in contradiction to what the TMA regional office had planned. This is a symptom of some minor **challenges between the country offices and HQ**.

Finding #6: In the majority of cases, trade regulatory environment projects also aligned well with other TMA infrastructure and equipment projects.

- **Although some links have been reported by a few respondents, there is less evidence that TMA private sector work in Outcome 2 was officially coordinated with trade regulatory environment efforts.**
- **Although there were strong regional to national links between projects, communication issues have been reported by a few respondents between different teams.**

External coherence with other donor programmes



During the S2 period and the implementation of the evaluated portfolio, many donors were working in trade with governments of targeted countries and in the EAC region broadly. The **private sector business associations or APEX organisations**, in some of the countries, including Uganda and Rwanda, also worked with **different donors**, in collaboration with TMA, to generate more synergies and reduce overlapping/duplications. In some cases, the national and regional institutions and organizations were those that coordinate with different funders as catalysts of different streams of support; in other cases, TMA directly worked with these partners to either provide funding, or to ensure initiatives' coherence. In both contexts synergies were effective and efficient, and duplication was avoided.

In 2014 -2016, TMA (at that time, TMEA) took over NTFC work that was previously being funded by the **German Agency for International Cooperation (GIZ)**. These NTFCs were set-up as TMA's main PPD element in it S2 (2016 – 2019) and then efforts were pursued from 2019 – 2023. Much of the TMA support to NTFCs was **provided through UNCTAD** and the funding provided to this partner went on until 2022, when it stopped, mainly due to budgetary constraints³⁶. The trade information portals were also set-up with UNCTAD in Rwanda and Uganda. Finally, this TMA important partner worked on **single window work** in three countries (Uganda, Burundi, Rwanda), support which was fully complementary to the projects under the Trade Regulatory Environment portfolio.

In Kenya TMA worked in close complementarity with key partners such as the **World Bank, UN agencies, and the Commonwealth Secretariat** to avoid duplication and enhance the effectiveness of trade facilitation efforts. While the World Bank led large-scale infrastructure and modernization initiatives such as the Trade Facilitation Support Programme (TFSP), Mombasa Port upgrades, and customs reform, TMA focused on the accompanying regulatory and policy measures needed to fully leverage these investments. Coordination was maintained through regular engagement with the Bank's Kenya team, allowing TMA to either defer, offer technical expertise, or step in for last-mile implementation where appropriate.

Similarly, for the AfCFTA Implementation Strategy, **TMA aligned with the United Nations Economic Commission for Africa (UNECA)** and the Kenyan government by contributing to action planning and early implementation, resulting in a unified, well-supported strategy document. These partnerships demonstrated TMA's adaptive approach and commitment to building synergies rather than parallel processes.

In Tanzania, TMA also collaborated with multiple development partners, including the World Bank, the EU, GIZ, and previously USAID. In particular, TMA coordinated its interventions with those of GIZ and other regional trade facilitation programmes to ensure complementary support to agencies like the TBS. Private sector associations (i.e., TCCIA and TWCC), which received support from multiple donors, also served as platforms through which TMA and others could channel technical assistance in a coordinated way. These collaboration mechanisms helped minimize fragmentation, reinforced shared objectives, and enhanced the efficiency and effectiveness of trade-related interventions in Tanzania.

Links between NTFC and **trade information portals** and observatories in Rwanda³⁷ or at the regional level³⁸ ensured some sustainability. In Tanzania, these portals did not materialize. Where they were implemented,

³⁶ UNCTAD. (n.d.). TradeMark East Africa-UNCTAD Trade Facilitation and Transport Cooperation Agreement Phase II (2019-2021). "The project (2810) will also build on the results of the UNCTAD project on "Building Capacities of Developing Countries to Shift Towards Sustainable Freight Transport", where UNCTAD has been working with Central and Northern corridors in East Africa to promote sustainability principles along the two corridors. These include, inter alia, economically efficient corridors (i.e. cost-effective, competitive, reliable, run smoothly and effectively, energy efficient, safe, etc.), green (i.e. environmentally friendly, low-carbon, clean energy use, climate resilient, etc.), and socially inclusive (i.e. affordable, accessible, supports rural areas and agricultural development, etc.)."

³⁷ E.g., <https://rwandatrade.rw/>

³⁸ <https://trahelpdesk.eac.int/>



trade information portals contributed to enhance **dissemination of trade processes**, which in turn, contributed to the reduction in time and cost of the cargo moving, as mentioned above and below. Indeed, the private sector, which understood trade requirements better and the different steps needed to export, or import, were better prepared and more effective and efficient in their activities. These portals also contributed to the strengthening of the PPDs as they raised public institutions awareness of the burden the private sector and transportation face. Overall, the development of trade information portals has made **regulatory changes accessible to the private sector and the public in general**, demystifying border processes and exposing inefficiencies.

Finally, TMA also successfully worked with the **IFC, mainly on the development of the scorecards**. The documents evaluated in 2016, 2018 and 2020 the legal compliance of five EAC Partner States—Burundi, Kenya, Rwanda, Tanzania, and Uganda—with their commitments under the East African Community Common Market Protocol (CMP). Focusing on three pillars, here are some of the results from the 2020 scorecard:

Free Movement of Goods

- **Achievements:** All Partner States had formally eliminated tariffs on intra-regional goods.
- **Challenges:** Use of charges with equivalent effect to tariffs, and non-recognition of Certificates of Origin (CoO) continue to hinder trade. NTBs, especially administrative and procedural ones, persist.
- **Notable Result:** 77% of NTBs reported between 2016 and 2020 were resolved by June 2020, a significant improvement from 43% in 2016 EAC Common Market Score.

Free Movement of Services

- **Progress:** The number of Non-Conforming Measures (NCMs) increased from 57 (2016) to 60 (2020), despite several legal reforms. The majority of NCMs were in professional services.
- **Notable Development:** All Partner States agreed to liberalize up to 78 subsectors, aligning with countries' WTO commitments, using the WTO's 120 classification system.
- **Ongoing Gaps:** Inconsistencies remain between the services and workers' movement schedules; and legal reforms are incomplete EAC Common Market Score.

Free Movement of Capital

- **Progress:** Out of 20 capital operations assessed, 8 were unrestricted across all Partner States.
- **Positive Reforms:** Rwanda, Uganda, and Tanzania enacted reforms to reduce barriers on inward and outward investments and securities.
- **Key Obstacle:** Capital controls—particularly for direct investments—remain among the most restrictive, with some states failing to notify exceptions as required under the CMP EAC Common Market Score.

Finding # 7: The scope of what TMA supports was generally coherent with other non-TMA initiatives and did not overlap or duplicate other organizations' work. In other words, TMA finds ways of attracting partners that are complementary to its own work.

TMA's ability to measure and track change at the short-term outcomes, intermediate outcome and outcome levels

The TMA MEL strategy, finalized in mid-2020, highlighted the importance of MEL for institutional strategic learning, impact accountability and evidence-based project management. It **was rigorous and**



comprehensive in its M&E approach and adhered to MEL principles and best practices. TMA's MEL was guided by S2's ToC to assess performance and was rooted in a **Results-based Management (RBM) approach**, giving priority to measuring and assessing outcome achievement. Given its focus on results and impact, TMA's MEL strategy leveraged on the use of econometric modelling tools, such as the George Wolf Model, to forecast the expected impact of its interventions. This information was to be used for decision-making and for comparing actual vs. expected results. **Evaluations** were also envisaged as a key to assess outcome results and address ToC related questions. In addition, TMA was to use a **value for money (VfM) analysis framework** to assess its intervention in order to better understand to what extent investments were optimized in terms of economy, efficiency, equity, effectiveness and cost-effectiveness. The MEL strategy included financial estimations and training needs for undertaking MEL activities. **TMA's RF** included contextual indicators to allow it to better understand the impact of its interventions, and the RF was additionally to monitor cross-cutting indicators to assess contributions to gender equality and climate change.

TMA's strong MEL approach imposed **financial requirements** that the organization **was not able to meet during the S2 implementation**. This hindered its ability to assess to what extent its work has led to the desired expected outcomes. For example, TMA planned to monitor three core key trade metrics to evaluate its overall impact: (1) total trade, (2) total exports from EAC to non-EAC countries and (3), intra-EAC exports. However, TMA was not fully able to monitor or thoroughly evaluate this impact through the entire S2. Indeed, **RF data on these indicators was only available until the 2019-2020 period** (corresponding with the start of the Covid-19 pandemic), and no mention of these was made in the annual reports.

Evidence indicates that while **TMA was able to track progress** towards the intermediate outcome to a large extent, its monitoring and reporting **tools did not provide a full understanding of IO1.4 performance**, limiting stakeholders' ability to assess progress across the result chain. These challenges were also present in Strategy 1 and continue to challenge M&E effectiveness. TMA, however, has been **diligent in the use of evaluations** to assess progress towards intermediate outcomes and address ToC-related questions, which have the potential to assess strategic performance more comprehensively albeit in a more summative manner.

The **RF**, did not track short-term outcomes and only tracked those outputs where change has occurred. As such, the RF did not provide a comprehensive view of the ToC, limiting stakeholders' ability to assess overall progress. **Cross-cutting** gender and climate change related indicators were included in the RF, **but no data was available** to assess progress in these efforts. Moreover, the quality of data in the RF is poor for several indicators, with noticeable gaps in milestone achievement. In some cases, the data appears unreliable, as planned milestones have been copy-pasted as actual progress without any additional explanations. Based on the MEL strategy, all outputs, short-term outcomes and cross-cutting results were supposed to be included and documented in the RF to reflect the status of the trade regulatory environment progress more accurately, ensuring traceability overtime.

Annual reviews followed the same approach as the RF, reporting only on achieved outcomes. While this was helpful for understanding what was accomplished, **it did not provide a full understanding of programmatic performance**. While output-level progress was detailed, corresponding outcome-level progress was not. Outcomes were only framed at the intermediate level, not at short-term level, reducing visibility along the results chain. This resulted in incomplete tracking and reporting, and alignment between activities, outputs, and outcomes within the ToC was difficult to identify. Thus, stakeholders **did not have a complete picture of strategic performance**, at a minimum through a complete RF in an annex. Lessons learned and recommendations in the annual reviews are presented in general narrative form, without



referencing specific short-term outcomes or outputs, making it difficult to identify which results they pertain to.

Many knowledgeable respondents—those aware of the ToC details and process—noted that **the ToC for IO1.4 was updated after the RF had been finalized**. At the time, TMA lacked sufficient information on how change under IO1.4 would occur, resulting in an incomplete framework.

Outputs were tracked at regional and national levels and were aligned to the ToC. The monitoring approach to track these used yearly milestones and, in some cases, specific metrics, ensuring traceability overtime and transparency. In the case of IO1.4, tracking was done through the **annual progression of indicator values**. Outcome tracking relied on secondary sources such as Annual Transport Observatory Reports, which supported cost-efficiency but posed risks in terms of data availability as some of these studies were not always published in a timely manner.

Finding # 8: TMA’s MEL strategy was well designed and showed strong and ambitious plans for M&E of the S2.

- **However, over time, it became difficult to apply the M&E activities as planned, and some challenges emerged for the strategy to really be useful for decision making.**

TMA’s ability to learn and understand the political, economic and social context

Learning was also fostered through the annual reviews, which include a VfM approach that offered timely and relevant insights to support portfolio level decision-making, particularly in areas such as cost-effectiveness, efficiency, and equity.

TMA’s **MEL strategic planning** was founded on the understanding that learning was to be shared and applied to support decision-making. This reflected the organization’s recognition of learning as a key element in managing the overall programme portfolio and maintaining its continued relevance. The 2020 MEL strategic plan proposed several mechanisms to establish a structured internal learning environment, including quarterly strategic review sessions, strategic partnerships to generate lessons learned, extensive research and the development of communities of practice, among others. However, **these initiatives did not all fully materialize**, fundamentally because of conflicting programmatic priorities and lack of funding. TMA staff has stressed that despite these constrains, learning did happen, especially to integrate lessons learned from S1 into S2, albeit not systematically. .

Several aspects of the portfolio worked well. These included strong multi-stakeholder engagement, particularly at the county level, **embedding consultants/advisors within key ministries**, and adopting adaptive programming approaches such as the rapid response to COVID-19 through the Safe Trade initiatives. However, the pandemic also caused significant delays in key activities, including **stakeholder sensitization** on the TFA.

Some elements were less effective. One aspect was TMA’s underestimation of the complexity of **political-economy dynamics** in certain countries, such as Kenya and Rwanda, which slowed progress in implementing the National Trade Policy (NTP) work.

Over time, TMA developed a nuanced understanding of the countries’ political, economic, and social contexts. Its support evolved to align with national priorities and stakeholder needs—for example, in Kenya, the design of the National Development and Economic Planning Strategy (NDEPS) aligned well with the Bottom-Up Economic Transformation Agenda of the new administration. Mechanisms such as the **Country Programme Advisory Committee** and the use of political economy analysis enabled TMA to anticipate risks and seize emerging opportunities, contributing to portfolio relevance and responsiveness.



Finding # 9: TMA was, to a large extent, recognized by many respondents as a learning organization. During the S2 period, it actively promoted learning through different sessions, primarily using programmatic review processes.

d) Impact

Positive and negative, primary and secondary, short-term, medium and long-term effects (specifically on trade outcomes) produced by the portfolio, whether directly or indirectly, intended or unintended

According to the majority of respondents, when comparing the pre-S2 era with the current situation, the TMA portfolio has contributed to **a range of positive impacts** on trade outcomes, including **increased trade volume and value, job creation (especially for women)**, expanded market access, improved trade facilitation, and enhanced business competitiveness, in varying degrees.

According to secondary sources of information and data³⁹, EAC’s real GDP growth by year is:

Table 5: EAC’s real GDP Growth

Year	EAC-Region Real GDP Growth (%)	Notes
2019	~5.4 %	AfDB: the fastest growing region in 2019
2020	~1.9 %	COVID impact
2021	~4.7 %	Recovery supported by easing restrictions and policy support
2022	~4.4 %	Continued rebound, services & industry expansion
2023	~5.1 %	
2024	~5.8 % (AfDB forecast) / ~4.9 % (World Bank)	

In addition, intra-EAC trade trends can be summarized as follows⁴⁰:

³⁹https://www.eac.int/operating-environment/economic-environment?utm_source=chatgpt.com, kilimokwanza.org, uneca.org, furtherafrica.com, masharikirpc.org, furtherafrica.com

⁴⁰ https://www.theeastafrican.co.ke/tea/business-tech/eac-records-subdued-intra-regional-trade-growth-on-ntbs-4797528?utm_source=chatgpt.com

https://www.eac.int/press-releases/2706-intra-eac-trade-hits-the-%2410-billion-mark-as-eac-readies-to-send-out-verification-mission-team-to-assess-somalia-s-readiness-to-join-the-bloc?utm_source=chatgpt.com

https://www.zawya.com/en/economy/africa/ruto-museveni-deplore-trade-barriers-in-east-africa-wnrtqqz7?utm_source=chatgpt.com

https://www.monitor.co.ug/uganda/news/national/eac-records-shs2-8t-revenue-surplus-from-domestic-value-added-goods-5144042?utm_source=chatgpt.com

https://development.finance.go.ug/knowledge-centre-reports/eac-trade-and-investment-report-2023?utm_source=chatgpt.com



Table 6: Intra-EAC Trade Trends

Year Intra-EAC Trade Value (USD billions) Year-on-Year Growth

2019 ~7.1 (baseline)	—
2021 ~9.5	~+20% from 2019 (2 years)
2022 ~10.91	~+12% from 2021
2023 ~12.1	+10.9% from 2022
2024 ~15.2	+9.35% from 2023

Through the analysis of the portfolio support and results achieved at output and outcome levels, the evaluation team can infer that TMA has indeed contributed to these positive trends in both the GDP growth and intra-regional trade. By supporting the resolving of NTB disputes—and hence reducing their negative effects—as well as facilitating the development of relevant and, to a certain extent, effective trade strategic documents, TMA has indeed contributed to improving the region’s trade regulatory environment. By doing so, it indirectly contributed to enhancing trade volumes *among* EAC members and GDP growth at regional and national.

In terms of job creation, regionally aggregated data as well as gender disaggregated data at the EAC level is challenging to find. The evaluation team was able to find some national data—such as for Kenya, where in 2023 approximately 848,200 jobs were created and in 2024, approximately, 782,300 jobs were created—but detailed and regional data was not available or estimable. Nevertheless, anecdotal information provided by many respondents do tend to show that, as shown in other sections of the current report (e.g., where the evaluation addresses cross-cutting Issues in chapter 6.f below), TMA’s portfolio has minimally created and improved jobs in certain communities where direct activities have been taking place. Examples include support to private sector Apex organisations which can then support their members hence generating local economic growth and job creation and improvements.

Nonetheless, overall, available data, which was difficult to triangulate and quantify, still showed that the overall impact of TMA’s *aggregated* interventions has been beneficial for EAC region’s trade landscape, **contributing to economic growth and development**. In addition to generating economic benefits for the private sector, revenue authorities of the targeted countries were also able to **collect more taxes, at a faster pace**, thus increasing state revenues⁴¹.

According to EAC data, NTBs, prior to the TMA S2 period, were estimated to significantly reduce trade volumes in the region (some mentioned up to 58%, although the ET could not triangulate this data). Regarding the reduction of NTBs and its related impacts, to which TMA has contributed, it was reported by many respondents that the portfolio helped reduce the cost of doing business in the EAC region and thus reverse the negative effect of NTBs. Indeed, much of the **NTB dispute resolutions**, through bilateral trade negotiations, **made an important difference** for traders who were able to work more easily, with less

⁴¹ EY. (2020). East African Community: Customs Interconnectivity Study Report. The EAC Partner States have embraced the use of ICT as a key tool for processes and data exchange of information and storage in all sectors. Recent installation of broadband ICT infrastructure connecting the region to the rest of the world has remarkably increased ICT penetration in the EAC. Customs administration can leverage these developments in the ICT sector to improve tax administration and reduce associated tax compliance costs.



bureaucratic processes and simplified cross-border procedures, thus increasing exports and their revenue over time.

Specifically, many respondents from all countries visited have pointed out that the reduced border-crossing time had a positive impact, particularly for SMEs and women traders, leading to the reduced trade costs and time. In Rwanda and Uganda, it was **roughly estimated that what took 2-3 hours** before 2017, now can take less than 20-30 minutes to cross the borders. This is in addition to drastic reduction in clearance times—for example, from around 12–13 days to approximately 4 days at Rubavu crossing in Rwanda. Data also points to the fact that: “Turnaround time was reduced from 13.4 days to 4.5 days for Mombasa –Kampala; 15.6 days to 5.7 days for Mombasa- Kigali; and from 18.5 days to 15.9 days from Dar to Bujumbura⁴².” Reducing transport time for traded goods allows for more trade opportunities within the same time frame, hence, an overall increase in trade volumes.

In Tanzania, TMA’s contributions were particularly impactful. For instance, **average NTB resolution time dropped extensively**, according to data from the Tanzania Chamber of Commerce, Industry and Agriculture (TCCIA). The number of **weighbridges and roadblocks** along the Dar es Salaam–Tunduma corridor was reduced from 17 to just 3, cutting transit times and reducing rent-seeking opportunities. These improvements had tangible effects. In terms of transit time, inbound cargo crossing times at Tunduma fell from 30.15 hours to 21.1 hours while outbound cargo times were reduced from 37.51 hours to 26.3 hours. This represents roughly a 30% reduction in crossing time, aligning with broader trade facilitation impacts reported across the corridor. When looking at the full end-to-end corridor time from Dar es Salaam to regional capitals (like Kigali or Lusaka), shared information shows reductions from over 18 days to under 6 days for some routes.

Assessing the regional impacts of these national changes, the ET found for example that many Rwandan respondents from the private sector—claims backed by analysis from public sector respondents—mentioned the positive aspects of these changes, as it affected them specifically. Indeed, these traders testified that as they were able to reduce their transit time, they could increase their own trading volumes. They also reported that the transport costs had been reduced for each route, leading to increased profits. This again demonstrates the regional benefits of the different TMA initiatives.

As in the other three countries, the **digitalization of border processes** and introduction of **risk-based inspection systems** by the Tanzania Revenue Authority (TRA) and supported by TMA enabled clearance times at OSBPs such as Tunduma to drop to **as low as two minutes for duty-free passengers**, while cargo scanner throughput reached **up to 120 trucks per hour**. Overall, crossing times reduced by an estimated **30%**.

The impact on trade outcomes was substantial. **Tanzania’s exports to EAC countries tripled in value**, rising from **\$466 million in 2017 to \$1.37 billion in 2021**, while export volumes increased fourfold—from **748,398 tons to over 3.1 million tons**. This is a national example of how intra-regional trade is increased by more fluid trade.

In all visited countries, SMEs and women traders reported having benefitted from more predictable and transparent border processes. In Tanzania, over **800 regulatory reforms** were achieved, including the removal of fees and reduction of redundant approvals. TMA-supported initiatives like the **Tanzania Trade Information Portal (TTIP)** and collaboration with the **Tanzania Investment Centre (TIC)** and **Export Processing Zone Authority (EPZA)** further improved the regulatory landscape by reducing processing steps, simplifying permits, and accelerating turnaround times for approvals.

⁴² EY. (2020). East African Community: Customs Interconnectivity Study Report.



Moreover, the **automation of border and standards compliance procedures** through the Tanzania Bureau of Standards (TBS) cut clearance times from **up to 14 days to less than a day**, and in some cases, **under 30 minutes**, while reducing transaction costs by up to **25%**. As with reduction in transit time, reduction in transaction costs also increases profitability of trade, thus contributing to economic development at national and regional levels.

Such reforms—though often incremental and institutionally complex—cumulatively created a more enabling environment for businesses, particularly those engaged in intra-EAC trade. While challenges remain in sustaining and institutionalizing these gains, the TMA portfolio was widely seen as a critical driver in improving regulatory efficiency and addressing the NTBs that previously constrained trade competitiveness.

The Ugandan stakeholders also indicated that the TMA portfolio has positively influenced trade volumes and value by streamlining cross-border procedures, reducing trade costs, and improving efficiency. Key interventions such as the Electronic Single Window (ESW) and Regional Electronic Cargo Tracking System (RECTS) have led to faster cargo clearance, increased predictability, and improved trader compliance, **thereby leading to higher trade flow across the borders at lower costs**. For example, the Uganda Electronic Single Window reduced the cost of doing business with the cost saving of \$26.4 million by traders in 2021. The average customs clearance time reduced from 9 days in 2014 to 2 days in 2022. The Regional Electronic Cargo Tracking System reduced 50% of clearance time for the tracked cargos at the Ugandan borders. This resulted in the improved truck turnaround time from 4 to 8 trips per month – double the previous results. At an estimated rate of US\$50 per trip, a total of US\$8,695,060 was saved in physical cost in the year (2018-2019)⁴³.

In Kenya and Rwanda, several trade policies and regulatory instruments have been developed to strengthen the countries' participation in regional and global trade. These efforts have contributed to increased trade volumes, **greater export diversification (notably under the NDEPS and GTI work in Kenya for example)**, reduced trade costs due to NTB resolution, and stronger institutional capacities. At portfolio level, by 2022, 80% of high priority national restrictions had been addressed requiring legislative alignment, and TMA supported the development of accompanying strategic documents, as already mentioned. As many of these integrated concerns voiced by the private sector through Apex organizations'—through the position papers developed with the financial support of TMA—and other organizations such as the NTFCs, as well as hired contractors' consultations, the impacts of activities and projects undertaken under the guidance of these documents were direct. Many private sector respondents from all four countries reported that for example, the cross-border committees' related project enhanced their access to existing and new markets as they allowed for traders from all sides to exchange and resolve market access challenges.

On the **operational front**, Kenya has also taken initial steps towards diversifying its export base, including growth in apparel, emerging sectors, agrolological (e.g., in the mango sector and exports to EU and Middle East markets) and livestock products, and professional services, thereby contributing to increased trade performance. Kenya's growing integration into AfCFTA and the EAC through the programme support has expanded market access.⁴⁴ This expanded market access and diversification have been confirmed by private sector entities during FGDs held by the ET. **Long-term reductions in border delays** and transport costs have enhanced Kenya's trade competitiveness⁴⁵. This has led to firm-level benefits, such as lower logistics costs, and more competitive pricing. The establishment of KETRA represents a significant institutional milestone, addressing persistent challenges around injurious trade practices that have undermined the competitiveness

⁴³ The information could not be triangulated and is derived from a written testimony from a respondent during the portfolio evaluation.

⁴⁴ <https://www.knbs.or.ke/button/quarterly-bop/>,

⁴⁵ ditto,



of local industries. The **institutionalisation of evidence-based policymaking and public-private dialogue**, supported through various technical assistance activities, has enhanced the government's ability to adapt to emerging trade issues. In Rwanda, although impact has also been noticed, **these date back to pre-S2 work**. For example, the ET has found that the country was able to reduce customs clearance time from 11 days in 2011, to under a day by 2015⁴⁶. However, it is clear that these positive changes cannot be related to the evaluated portfolio's impacts. Because Rwanda achieved these objectives before other countries, less relevant data is available, even though research papers on the impact of prioritized NTBs and high priority restrictions were completed and disseminated⁴⁷ for example.

These results show concrete changes for multiple countries in the region, not just for specific countries through targeted projects and activities. These are examples of the overall portfolio's cumulative results. They clearly show that barriers to trade have been reduced in numerous instances.

It is important here to reiterate that at impact level—results, which, as already mentioned, are at the basis not easy to measure—the TMA portfolio under review can **only claim contribution** to changes. In other words, the ET cannot attribute the noticed changes to TMA trade regulatory environment work alone, whether they are linked to NTBs or trade policy activities, as changes in time and cost to trade are caused by numerous factors and variables, many of which are outside TMA's control. Other TMA streams of work are also co-contributing to these impact level results. Thus, the impact assessment logically links the visible, high-level changes to work accomplished through the portfolio evaluated. In other words, testing the ToC points to a confirmation of the logic behinds it but does not prove it. To do so, an impact evaluation methodology would have been necessary. In the current context, in both the current chapter and chapter 6.b., the ToC implementation has been tested with varying but positive findings. The realisation or not of the ToC's assumption played an important role in ensuring the logic materialized, including for example, the political will of government to support agreements. Thus, whether this political will was present or not affected whether countries and the region would benefit from an improved trade regulatory environment. Similarly, the positive impacts of NTB resolution processes depended on the fact that “no new NTBs arose to replace those that were eliminated, or those that do are more limited and less costly”. As already mentioned, it was mainly the second portion of this assumption that materialized, as indeed, many respondents pointed to the fact that NTB were being resolved, but others did also appear.

Finding #10: EAC data showed reduction in trade transportation time and trade cost during the S2 period. Most of the noted impact, to which TMA has contributed, benefited the private sector actors in addition to the public sector institutions.

- **Trade policy support impact was somewhat difficult to measure due to its indirect link to impact-level results. As for TMA NTB work, these should have been easier to track, but the agency lacked the needed data to do so.**

e) Sustainability

The institutionalization of the policy & regulatory reforms supported under TMA's trade regulation portfolio

⁴⁶ https://research.trademarkafrica.com/wp-content/uploads/2023/10/TMEA-RESW-Evaluation-Final-Report.pdf?utm_source=chatgpt.com

⁴⁷ TMA, Technical Assistance to Support The National Trade Facilitation Committee (NTFC) Secretariat in the Ministry Of Trade And Industry (MINICOM)



During the evaluative process, the sustainability question was interesting to address because some of the projects evaluated in the portfolio had been closed for some time when the ET was collecting data for the evaluation. This provided the opportunity to assess the extent to which the results achieved under the portfolio were still present after two or three years. However, on the other hand, S3 was already underway so getting a clear picture of which changes are the results of S2 and which are emanating from S3 continuous support was not always simple.

Relevance and Sustainability

As demonstrated in the relevance's section 9.1 above, TMA had positioned the portfolio's initiatives so that they generally responded to priority themes and topics for the region and the targeted countries. **Relevant activities always have better chances of achieving sustainable results.** Indeed, technical assistance focused on trade policy, trade strategy, trade negotiations, customs and trade facilitation and cross-border trade support, etc. These were important issues embedded in the trade development strategies and policies of the EAC partner countries. As a result, the partner countries were more committed to perpetuating the benefits and results of the portfolio. For example, in all countries, relevant public institutions and private sector business associations **have all indicated their intention to pursue regional economic integration** through trade policy reforms, trade agreement negotiations, cross-border trade facilitation and customs procedure simplification, to reduce trade and investment barriers and to increase the competitiveness of their businesses.

In Tanzania, the government's continued participation in regional platforms such as the **Tripartite NTB Reporting Mechanism**, and national follow-up structures under the **NTFC**, underscores its commitment to regional integration and policy alignment. While Kenya's establishment of KETRA is a notable milestone, Tanzania's own efforts to reform **technical barriers to trade (TBTs), SPS systems, and border clearance procedures**, alongside expanding the role of **TBS and EPZA digital systems**, reflect parallel and sustainable institutional progress.

Nonetheless, there are some challenges ahead. Indeed, although the NTFCs are in many cases still active, in some cases, it is difficult to ensure the meetings are held frequently and regularly. For example, in Rwanda, the committee needs an **NTFC coordinator**, but the Ministry of Trade does not have budget for this post. A similar situation has been noted in Tanzania. Even though the NTFC remains active and functional, there are concerns from many respondents about **budgetary constraints and institutional ownership** that could affect the committee's long-term effectiveness. However, unlike in Rwanda, where the absence of a funded NTFC coordinator is a specific bottleneck, in Tanzania the challenge is more related to **irregular meeting schedules and limited follow-through on NTFC action plans**, particularly in the absence of direct project funding. Although the Ministry of Industry and Trade leads the NTFC, the operational and administrative functions—such as coordination of member institutions, follow-up on reform commitments, and stakeholder consultations—have at times depended on **donor-funded secretariat support**, mostly channeled through TMA. There is also concern that as TMA phases out certain trade facilitation programmes, the **momentum for regular NTFC engagement may decline**, especially if domestic budgets do not allocate dedicated resources to maintain committee functionality.

In the views of some respondents, some EAC-level work also seems fragile without further support from TMA, such as **the EAC Policy Committee**. The same is true for Kenya and Uganda. As the trade facilitation project in Uganda was completed more than a year ago, there are no direct follow-up project funded by TMA. Some meetings and consultations supported by TMA before are now discontinued because of the lack of an alternative funding source. The training workshops and skills development have also been placed on hold as there is currently no project support for such activities.



Important Outputs

The TMA portfolio has supported a few important trade facilitation initiatives that have led to **important outputs** in the region, such as the Electronic Single Window; the Regional Electronic Cargo Tracking Systems; the risk-based customs procedures, which have already embedded within the operation frameworks of the EAC partner countries. These outputs are contributing to the sustainability of TMA's work. Although they do depend on continued government ownership basically, they are there to stay in the short and medium term. During the data collection phase, broadly speaking, the ET found that, the government and private sector institutions were still working together to continue the operations around these initiatives, with or without TMA. In addition, the **digitization efforts and system interconnectivity** across the border agencies of the partner countries are still ensuring, to varying degrees, the sustainability of results by turning those reforms into daily operational routines in those partner countries.

The Right Partners

TMA, through its portfolio, **selected the right partners for implementation**: at regional level, its main partner was the EAC Secretariat, and at national level, the relevant government and private sector institutions have been selected. TMA strengthened the EAC secretariat and partner country institutions' capacities by fostering their staff's participation in TMA training and capacity building.. TMA personnel itself, in both headquarters and country offices, have also increased their knowledge and skills through the design, coordination and implementation of the projects. This **enhanced institutional capacity** has the potential of ensuring the sustainability of benefits and results of the portfolio. However, in some cases, EAC Secretariat, TMA and partner institutions' staff turnover rates are high. This situation can negatively impact institutional sustainability, unless there are safeguards for institutional memory. For example, in Rwanda and Kenya, not all reviewed trade policies and strategies were **officially adopted by governments**. This situation is normally due to elections and ministers' turn-over. In Rwanda specifically, the reviewed and newly produced strategies and policies, directly resulting from TMA funding, were not all adopted, in some cases due to the documents misalignment with governmental orientation, but also due to Covid-19 and ministry staff turnover.

The ET did note that notwithstanding this situation, in a few cases, **the strategic documents' contents were clearly used** for planning and implementation in trade. In addition, the process itself of developing the strategic documents stirred **important discussions among high-level decision makers** and raised their awareness on topics like NTBs. Still in Rwanda, **the Young Professionals' Programme (YPP)**, as described above, was considered by all respondents consulted by the ET as a source of long-lasting results for the country, whether for the sustainability of the results directly achieved by TMA's portfolio, or for other sectors of the country's economy or politics. Indeed, many young professionals are now strategic officers in different national and international organizations.

Considering TMA's own ability to support the sustainability of its results, the most important factor to consider was the **financial sustainability of the organization**, which was key to the planning and implementation of future interventions. Given the recent withdrawal of USAID in the region and globally and the funding cuts of a few traditional donors such as FCDO, the financial sustainability is now somewhat at risk for TMA, as for other international development actors. Recently, the EU has committed to two trade facilitation projects in Uganda. These include the Uganda-Southern Sudan Trade Facilitation Project (€10 million co-funded between the EU and DANIDA); and the Uganda-DRC Border-Crossing and Trade Facilitation project (€10 million solely funded by the EU).

While the **EU has committed to new trade facilitation investments in Uganda**, no equivalent, high-profile funding commitments have yet been confirmed for **Tanzania or in Rwanda** in the post-S2 period. This leaves



a potential financing gap that could affect TMA's ability to support further NTB resolution, private sector export readiness, and policy implementation follow-through in the country.

Some TMA partners, such as UNCTAD, are also continuing their trade regulatory environment related work, which is now being funded by the African Development Bank (ADB) to continue supporting their NTFC and trade portal initiatives. This complementary work strengthens the sustainability of TMA's results under the portfolio.

Finding # 11: Although there are important signs that some of the results achieved through the evaluated portfolio are sustainable, the overall assessment is mixed. Some outputs, such as capacity building for various stakeholders and NTB complaints' online platforms, supported the sustainability of the results.

- **However, many respondents mentioned that without TMA support, some of the results would dissolve and between project cycles, less engagement is noticed in group efforts (e.g., NTFCs, joint cross-border committees, National Monitoring Committees (NMCs) and the Regional Monitoring Committee (RMC) etc.)**

f) Cross-cutting Issues

Poverty reduction and the impacts on the poor, gender and inclusion, environment and climate change

Trade facilitation efforts—like reducing time and cost to trade—can have **indirect poverty reduction impacts**, but these benefits **may not always reach end consumers**. Indeed, logically, lower trade costs resulting from increased regional integration and removal of NTBs albeit with mixed results, should have led to more affordable goods and improved market access for small producers and women traders, with long-term implications for poverty alleviation. However, savings may be retained by logistics providers rather than passed down in the market chain. This raises concerns, including by some of the respondents consulted by the ET, about how effectively **trade gains trickled down** to lower-income groups. To address this, there was a call to integrate **competition policy** into the trade agenda, as it can help ensure **fairer distribution of benefits of trade** and enhance the **poverty-reducing potential** of trade reforms. In the S2 portfolio here evaluated, this competition policy element was not integrated. There was no clear data that pointed to TMA's portfolio's contribution to poverty reduction. Nevertheless, there was **anecdotal evidence** from the four targeted countries, collected through the portfolio evaluation, revealing that TMA support in the area of trade policy and trade facilitation has indeed contributed to some poverty reduction and improved the gender inclusion. In Uganda, at the Busia border and in Rwanda, at the Rubavu market, stakeholders interviewed have confirmed that **TMA's projects targeted poor (women) traders** to assist them in formally registering as cross-border traders and cooperatives, leading to increased income for their families and contributing to poverty reduction in the border community. In Tanzania, TMA's targeted support to **women cross-border traders** at key OSBPs such as **Tunduma**, where infrastructure upgrades included **gender-sensitive design features** like improved lighting, separate sanitation facilities, and designated trading spaces for women, was also effective.

Gender-targeted approaches were used in several projects as depicted in the PARs under the portfolio. Empowerment of women through technical assistance and capacity building has been widely recognized through the projects under the portfolio. These include :

- tailored training and capacity building **through women chambers**; and



- the support, through trade facilitation and the trade policy updates, to the cross-border traders to increase women's access to trading opportunities, enhancing their ability to adapt and comply with the new trade rules and procedures under the new trade agreements.

In Rwanda, TMA worked with a federation of cooperatives called **Pro-femmes** through the portfolio as well as through a Global Affairs Canada separate earmarked project. As the name in French mentions, in the majority of cases, the organization supports women cooperatives. Thus, the majority of the results achieved through the work done with Pro-femmes tackle **gender equality as well as youth related trade elements**. Much of TMA's work in this case is coordinated with other projects Pro-femmes does with budgets from other donors, such as Global Affairs Canada (GAC). Many times, the joint cross-border committees supported by TMA will help increase security for women traders, including through the tackling of important themes such as gender-based violence (GBV).

Similarly in Uganda, the TMA trade policy and trade facilitation project worked closely with the **Uganda Women Entrepreneurs Association Limited (UWEAL)** and other women traders' cooperatives at the borders to enhance their capacities and skills. One of the main objectives was to help members explore increased trade opportunities under the new trading environment. The stakeholders interviewed in Uganda have indicated that TMA has greatly **increased the confidence** of those women in engaging in regional and international trade. Through the training workshops and skills development, as in Kenya, Rwanda and Tanzania, the members of those women organizations have gained a **better understanding of the international and regional trade rules under the WTO, EAC** and other regional and bilateral trade agreements negotiated. Some women traders in Uganda shared with the evaluator at the border that they used to be engaged in informal trade, even small smuggling across the borders, and now they have formally been registered as cross-border traders. With the support of TMA, they have become **proud small traders and earned more money for their families**. They have also built a good network of communications with the government agencies and border authorities. They would like to attribute this to TMA support for their participation in the cross-border trade.

In partnership with other organizations, TMA also achieved additional results. For example, "In partnership with TMEA, UNCTAD produced the report *The East African Community Regional Integration: Trade and Gender Implications*, and the evidence-based advocacy document *Advocating for gender-sensitive trade policymaking in the East African Community*. Both documents will be used as the basis for the advocacy campaign "A stronger EAC through women " meant to sensitize EAC policymakers about trade and gender issues and providing them with recommendations on how to use regional integration to foster women's economic empowerment and gender equality⁴⁸."

Overall, several initiatives created new economic pathways for women and youth. These included support for women-led SMEs, AfCFTA-linked tariff reductions benefiting women and youth entrepreneurs, and agro-value chain development aligned with national policy strategies. These interventions helped to address long-standing inclusion challenges, particularly among rural and marginalised communities, enabling broader participation in formal trade.

While gender was mainstreamed at the policy level and thereby laying a foundation for inclusion, **direct input from informal sector actors and rural populations was limited**, as the portfolio had minimal direct engagement with these groups.

As to the **environment and climate change**, the trade policy and trade facilitation projects under the portfolio have both indirect and direct impacts. For example, the support to the WTO, ACFTA, TFTA and other

⁴⁸ UNCTAD. (n.d.). TradeMark East Africa-UNCTAD Trade Facilitation and Transport Cooperation Agreement Phase II (2019-2021).



regional/bilateral trade agreement negotiations is always linked with the **environment-related provisions embedded in those trade agreements**. The NTB, TBT, SPS provisions in those trade agreements also have indirect environmental implications. In particular, the trade facilitation efforts are closely linked with the **improvement of infrastructure, transport and logistics** which normally have positive and direct impact on the environment and climate changes, For example, many of the stakeholders interviewed in all four countries confirmed that the trade facilitation projects had positive impacts on the environment through the better understanding of the environmental provisions in those trade agreements as well as through the reduction of the CO₂ emissions of the implementation of the WTO TFA measures in the region. Some consulted respondents mentioned that reducing the delays in cross-border trading has a positive impact on **CO₂ emissions** as trucks are not stalled at the borders.

Other stakeholders noted that **digitalization of border and regulatory systems**, such as TelW, and e-certification in Tanzania, has contributed to **reduced paper use, lower transport inefficiencies, and less congestion at borders**, offering some climate co-benefits. That said, the environmental dimension remains the **least visible** among the cross-cutting themes, and more explicit integration of **green trade standards, sustainable logistics, or climate-smart SME support**—would strengthen TMA's contributions going forward.

Beyond the cross-cutting issues mentioned in the evaluation question, data collected by the ET points to the fact that greater economic interdependence within the EAC supports long-term regional stability and cooperation. In 2017, intra-EAC trade was valued at approximately \$2.9 billion, accounting for about 12% of the region's total trade volume. By 2023, this figure had risen to \$12.1 billion, representing a 13.1% increase from the previous year and constituting 15% of the EAC's total trade. This upward trend indicates a significant enhancement in trade activities among member states over the seven-year period⁴⁹ and demonstrates an increasing economic interdependence, particularly in food, manufactured goods, and energy sectors. With some notable exceptions, this trade expansion creates **shared economic stakes** in regional peace and functional border cooperation. In addition, **joint cross-border committees** and dispute resolution mechanisms supported by TMA have enhanced bilateral dialogue and reduced the recurrence of informal trade restrictions or ad hoc policy actions that could destabilize relations. Trade corridors also underpin regional integration by connecting landlocked neighbors (e.g., Rwanda, Burundi, Uganda, and DRC) to global markets. Continued investment in these linkages through trade facilitation promotes not only economic growth but also **regional trust and political stability**, as countries increasingly rely on each other's infrastructure, policy harmonization, and regulatory systems to sustain trade flows.

Finding #12: The ET has found that the portfolio had minimally integrated cross-cutting issues (i.e. gender equality/inclusion, the environment/climate change, and poverty reduction/SDGs) into the design and implementation of the portfolio. The majority of the stakeholders/informants have confirmed the positive impacts of the portfolio on those cross-cutting issues.

- **However, in some instances, it is difficult to measure the impacts of the portfolio/projects on those cross-cutting issues as there was a lack of sex-disaggregated data on gender equality/inclusion, specific data/information on environment/climate change and poverty reduction at both portfolio and project levels.**

⁴⁹ https://www.trademarkafrica.com/news/intra-regional-trade-in-africa-2023-improvement-of-eacs-intra-africa-trade/?utm_source=chatgpt.com



7. Conclusions and Recommendations

a) Main Conclusions

To conclude, it is important to highlight that several key themes emerged that are critical for understanding the relevance, adaptability, and future trajectory of TMA trade regulatory work in Africa. A key reflection shared during the portfolio evaluation cautioned against the common tendency to assess relevance solely in relation to high-level national or regional development plans. Instead, the evaluation drew more deeply from the **region's pathways of change, lived contextual experiences, and emerging needs**. This was not an easy task as all political-economy elements these days evolve quickly.

In addition to geopolitical shifts, **global crises** such as Covid-19, the Russia-Ukraine conflict, and Brexit—coupled with shifting donor funding priorities—had major implications for TMA's resourcing and staffing and has been fully taken into consideration during the evaluative process. In face of these challenges, TMA has demonstrated notable management agility. Staffing was streamlined, programming was re-prioritised, and the trade policy portfolio was reshaped. Importantly, collaboration with the EAC Secretariat and partner countries remained resilient, providing an anchor for continuity and a platform for region-wide impact.

Relevance

TMA's portfolio, as articulated in Strategy 2 and its TOC, demonstrates a **strong alignment with the priorities of partner country governments, regional economic communities, and global frameworks**, in a context of shifting external factors and variables. The portfolio's core mandate—to support governments in facilitating trade—is consistent with partner states' aspirations to integrate more fully into regional and global trading systems. All participating countries are members of the WTO, signatories to the AfCFTA, and committed to the EAC integration protocols. Within this context, TMA served as a bridge between high-level global and regional commitments and national implementation, deploying a demand-driven model that responded to expressed and emerging needs. Moreover, **TMA's responsiveness** to complex national contexts, its embedded regional and country presence, and the flexibility of its implementation mechanisms enabled it to adapt to both technical and political constraints. However, some disparities in number of project allocation by country, and occasional tensions between donor priorities and national strategies, present ongoing coordination challenges.

In addition, some relevance gaps were noted. While TMA focused its support on goods and customs, trade in services—despite being a strategic priority in the EAC protocols—remained underexplored, with some notable exceptions such as in Rwanda. This omission reflects the broader policy de-prioritisation of the service sector, but also a missed opportunity in advancing regional competitiveness.

Effectiveness

TMA S2's Trade Regulatory Environment Portfolio delivered a **broad range of tangible and strategic results** that significantly contributed to the achievement of its short-term and intermediate outcomes. Notable progress was made in **reducing trade barriers, enhancing border efficiency, and supporting policy and institutional reform** across partner states. Key achievements include the **modernization of border management systems** (e.g., OSBPs and the IBM framework), which reduced clearance times and improved



inter-agency coordination. The **Regional Electronic Cargo Tracking System** and the **Uganda Electronic Single Window**, for instance, generated substantial cost and time savings for traders.

The portfolio also led to the **development and implementation of critical trade and investment policies**, including export strategies, infrastructure investment at the borders, and trade facilitation roadmaps across Kenya, Uganda, Tanzania, and Rwanda. At the regional level, TMA facilitated technical negotiations and alignment with AfCFTA and TFTA frameworks, further supporting partner states in expanding their participation in continental trade. Equally significant was TMA's contribution to **empowering private sector stakeholders** through training, NTFC involvement, and policy dialogue platforms—ensuring their needs were reflected in national trade agendas. The increased inclusion of **women traders** and the strengthening of grassroots trader networks also demonstrated TMA's commitment to inclusion and socio-economic outcomes of its portfolio.

Despite these achievements, the portfolio faced **structural and contextual challenges**. The Covid-19 pandemic disrupted implementation cycles and necessitated reactive adjustments, which slowed long-term system building. There were also **delays in trade policy support** due to difficulty sourcing qualified consultants, internal capacity limitations, and shifts in political leadership. Further, the resolution of NTB disputes—while improved—remained constrained by **slow practical implementation, less-than-optimal follow-up mechanisms**, and **politically motivated trade restrictions**. Persistent fiscal NTBs and unresolved tax asymmetries, along with weak feedback loops in NTB platforms, continued to erode private sector confidence. Variability in national commitment and institutional readiness led to uneven results across countries.

Efficiency

Overall, the evaluation concludes that TMA was able to **deliver majority of its planned outputs in an economically sound manner**, despite external and internal constraints. In terms of economic efficiency, TMA demonstrated resilience and adaptability amid an increasing constrained funding environment. **TMA's structure of regional and country teams**, supported by skilled consultants, provided an efficient model for resource deployment and service delivery. Coordination with government partners, close technical assistance, and a relatively agile use of budgets ensured that intended results were largely met, albeit with occasional delays. TMA was widely seen as a **competent and pragmatic manager of Aid-for-Trade projects**, capable of adapting to complex implementation environments in the partner countries and in the region.

However, some challenges temper this positive assessment. First, the **lack of comprehensive financial data at the portfolio level** makes it difficult to perform a rigorous analysis of cost-effectiveness or to draw clear correlations between inputs and outputs. Second, the **fragmentation of data at project level** and the **intangible nature of some results** (such as improved coordination or institutional learning) created measurement gaps. It is to be noted that TMA staff indicated that Strategy 3 is already introducing more detailed RFs at the intermediate outcome level, including standardized outputs, short-term outcomes for each country programme, and corresponding indicators. Third, **recent staff turnover and internal restructuring**, as well as budget cuts, affected institutional continuity and created short-term inefficiencies. These changes, especially toward the end of Strategy 2 implementation, slowed down decision-making and weakened the consistency of project follow-up, according to some respondents.

Coherence

TMA's portfolio under the Trade Regulatory Environment has generally demonstrated a **strong degree of internal coherence**, with many projects designed to reinforce and amplify each other. Interventions in trade



policy, NTB elimination, standards harmonisation, and infrastructure investments were often sequenced or layered in a way that allowed for **cumulative benefits**. These upstream and downstream linkages were especially effective in the targeted and evaluation-team-visited countries, where national and regional policy reform efforts translated into tangible market access opportunities, streamlined procedures, and enhanced competitiveness for SMEs and cross-border traders. The training and mobilisation of private sector actors at the border, for example, complemented infrastructure upgrades and trade facilitation tools, ensuring that policy changes were actionable and impactful on the ground.

However, challenges remain. While most technical and regulatory efforts aligned well with infrastructure and regional integration goals, there was **less evidence of systematic linkage with private sector development work**, particularly under Outcome 2. Some misalignments were also noted between country teams and regional offices, leading to occasional inefficiencies in planning and implementation. Communication issues, such as those in Kenya over trade information portal development, underscore the need for **stronger internal coordination mechanisms**. In addition, while external coherence with donors like GIZ, IFC, UNECA, and UNCTAD was generally high, sustainability gaps emerged in some countries (e.g., Tanzania) where important digital tools were not fully implemented or maintained.

M&E

TMA's **MEL strategy for S2 was well-conceived, technically robust, and grounded in international best practices**. It included ambitious tools such as the George Wolf Model and Value for Money (VfM) frameworks to assess institutional performance, as well as plans to integrate cross-cutting priorities such as gender and climate change. The MEL approach placed strong emphasis on results-based management and outcome tracking, and was aligned with TMA's ToC, aiming to measure trade-related impacts such as export performance and trade costs. The strategy rightly intended to use contextual indicators and rigorous data to support strategic decision-making and adaptive learning.

Nevertheless, several challenges limited the practical application of this strategy. The most significant constraint was financial: the **ambitious MEL vision outstripped available resources, making implementation inconsistent**. In particular, the RF lacked comprehensive data on outputs and short-term outcomes and did not fully track cross-cutting issues or allow for alignment across the ToC result chain. Indicators for key trade metrics were not updated beyond 2020, and output-outcome linkages were often missing in annual reporting. Additionally, changes in the ToC for IO1.4 were not mirrored in the RF, further undermining coherence. These gaps reduced stakeholders' ability to fully assess impact or use MEL data for real-time decision-making.

Impact

The TMA Trade Regulatory Environment portfolio has demonstrably **contributed to positive trade impacts in the EAC region during the S2 implementation period**. Improvements in cross-border procedures, reduction in trade costs and delays, and enhanced regulatory alignment have supported expanded market access, greater trade volume and value, and strengthened business competitiveness—particularly **benefiting SMEs and women traders with the reduced border-crossing time/costs and the increased income for their families and communities**. Notable examples include reduced customs clearance times, significant cost savings through electronic cargo tracking systems, and economies' export diversification supported by improved trade policy instruments. Institutional reforms further exemplify how TMA's support has helped align national legal frameworks with international standards, contributing to increased predictability and improved business climates.



Nonetheless, despite the positive trends, key challenges emerged in assessing these impacts. Measurement of trade policy support remains difficult due to its indirect influence on outcomes, and although the NTB component of TMA's work is more amenable to impact analysis, data availability gaps constrain reliable attribution. **The lack of comprehensive, disaggregated⁵⁰, and timely data undermines TMA's capacity to demonstrate its full contribution to outcomes.** Furthermore, given the complexity of regional trade ecosystems, isolating the impact of one portfolio is inherently difficult, as multiple actors and interventions operate simultaneously in the same space.

Sustainability

The portfolio evaluation indicates that while several important outputs have been institutionalised, the **overall sustainability of results is mixed**. Key trade facilitation initiatives, such as for example the trade facilitation portals and NTB monitoring and reporting systems, have become embedded in national regulatory frameworks and continue to deliver benefits with or without TMA support. Similarly, strategic partnerships with regional (EAC Secretariat) and national public and private organizations, alongside capacity-building investments, have laid a foundation for sustainability. Yet, the sustainability of more collaborative structures like NTFCs, joint cross-border committees, and regional monitoring platforms appears less robust, often stalling in the absence of active TMA support or alternative funding sources.

Several systemic challenges threaten the long-term impact of these reforms. **High institutional staff turnover, limited government budget allocations, and gaps in political ownership**—especially following elections or ministerial reshuffles—have delayed or derailed the adoption of critical trade strategies and policies. The discontinuation of training and joint coordination efforts between project cycles also weakens momentum. Furthermore, TMA's own financial sustainability is at risk due to reduced donor funding, notably the exit of USAID and reduced FCDO contributions. While some complementary efforts (e.g. by UNCTAD or AfDB) are helping the sustainability aspects of the work, TMA's ability to guarantee consistent follow-up and bridge project cycles remains a critical vulnerability.

Cross-Cutting Issues

The evaluation confirms that TMA integrated, to varying degrees, cross-cutting issues (i.e., gender equality, poverty reduction, and environmental sustainability) into both project design and implementation. Positive outcomes were particularly noted in terms of **women's empowerment and informal traders' transition** to contribute to the formal economy. In many countries, targeted support to women-led cooperatives, training programmes, and improved border procedures enabled small-scale women traders to formalize their activities, increase their incomes, and build better relationships with government agencies. Moreover, TMA's collaboration with local organisations such as UWEAL and Pro-femmes enhanced inclusion outcomes, particularly in **underserved border regions**. Environmentally, trade facilitation efforts indirectly contributed to **emission reductions** by decreasing transport delays and modernizing infrastructure. The incorporation of environmental provisions in trade policy reforms also created a positive, if less quantifiable, impact.

Still, the overall assessment highlights important challenges. While anecdotal evidence suggests contributions to poverty reduction, gender inclusion, and environmental sustainability, there is a lack of systematic and

⁵⁰ This lack of disaggregated data exists even though TMA had mentioned: "The overall impact of TMEAs programming on women (either through gender targeted or gender mainstreaming) will be measured and aggregated in the corporate results framework." Trade Mark Africa. (2018). Project Appraisal Report: Elimination of Non-Tariff Barriers to Trade PAR II



disaggregated data to verify these outcomes. For example, TMA's results frameworks did not fully track gender- or **poverty-specific indicators, and environmental impact assessments** were not systematically integrated into project-level MEL. Moreover, while policy-level mainstreaming of cross-cutting issues is commendable, direct engagement with informal traders, rural populations, and marginalized communities remains limited in the portfolio. Additionally, the economic benefits from reduced trade costs may not always trickle down to end consumers or producers, especially without complementary competition policies to ensure fair distribution of the increased trade benefits.

b) Lessons Learned

- **Importance of Stakeholder Engagement:** One of the most significant lessons emanating from the TMA Trade Regulatory Environment portfolio evaluation is the critical role of engaging stakeholders throughout the project lifecycle. Involving local communities, businesses, and government agencies in the design and implementation of interventions has led to greater ownership, relevance, and sustainability of the initiatives.
- **Need for Tailored Approaches:** The diversity of the EAC economies means that a one-size-fits-all approach is often ineffective. Successful interventions have been those that are tailored to the specific needs and contexts of different sectors and target groups, such as smallholder farmers, women entrepreneurs, and youth.
- **Public-Private Partnership Model:** The NMC demonstrates the effectiveness of PPDs in addressing regulatory barriers. The balanced co-chairmanship structure and comprehensive stakeholder representation have proven essential for building trust, ensuring buy-in, and facilitating collaborative problem-solving.
- **Digital Innovation and Accessibility:** The integration of digital reporting mechanisms with traditional consultation processes has enhanced the committee's reach and responsiveness. The SMS-based reporting system has proven particularly effective in making barrier reporting accessible to traders across different technological and geographic contexts.
- **Regional Integration and Coordination:** The committee's participation in regional forums and coordination mechanisms has strengthened its effectiveness and contributed to broader EAC integration objectives. This regional approach has enabled knowledge sharing and the development of harmonized approaches to barrier elimination.

c) Key Recommendations

Considering the overall positive nature of the portfolio evaluation, TMA should work on taking advantage of the results it contributed to in the past and continue developing and building on them.

Considering the analysis brought forward throughout the current report, the ET would like to make the following recommendations for TMA's and other stakeholders' (beneficiaries and donors) consideration, as well as for discussions for their co-construction and their improvements based on TMA and partners' inputs. These recommendations are closely linked to the conclusions immediately above, the latter themselves based on findings and answers provided to the main evaluation questions. In other words, there is a clear flow from what TMA wanted the portfolio evaluation to look into and the recommendations that described below. Because of this approach, the ET is suggesting recommendations for each OECD-DAC criterion. After review and discussions between TMA and ET, the recommendations can be prioritized, and some can also be eliminated if deemed non-relevant.



Relevance

R.1 To address the relevance related challenges presented above and enhance future effectiveness, and sustainability of this type of portfolio, TMA should consider introducing a more transparent and balanced mechanism for **country-level project allocation within regional portfolios**. In addition to the design phase processes, which have been identified as collaborative, this could include clearer selection criteria and communication strategies to manage expectations and ensure more equitable engagement of the partner countries, particularly the private sector entities.

- The implementation of this recommendation would allow TMA's Planning and information's division and relevant staff to explain better its programming to partners individually and collectively.
- The recommendation would also allow for more strategic planning of each of the six thematic groups, assessing how some country projects might have spill-over effects on surrounding countries and regional entities, and vice-versa, for example.

R.2 Second, TMA director level staff should continue strengthening the integration of **political economy analysis** into its programming processes, through a continuous approach. This will enable the organisation to better anticipate and manage tensions between regional/international frameworks and national-level political realities, thereby maintaining momentum and stakeholder alignment.

Linked to the R2 recommendation, specifically, as trade dynamics evolve under AfCFTA and the Tripartite FTA, TMA should expand its support for competition policy and trade in services, areas often overlooked but critical for ensuring that the benefits of trade reforms reach consumers and SMEs, and not only large intermediaries or logistics providers.

These recommendations would be implemented by **TMA strategic decision-makers in close collaboration with partners' decision-makers**. They would be operationalized at the beginning of each design processes, depending on the strategy and portfolio implementation cycles. For R2, the analysis would be ongoing and could be embedded in M&E activities.

Effectiveness

R3. TMA and its partners should prioritize upgrading the **NTB reporting platforms and resolution mechanisms** to include real-time tracking, automated feedback, digitalized reporting processes, greater transparency, and structured accountability mechanisms. Supporting the finalizing of the revised EAC NTB Act and the embedding of clear resolution timelines into national legislation will be critical for ensuring faster and enforceable implementation.

The progress made at the institutional level in terms of NTB resolution thanks to support provided during the S2 should now be reinforced at the practical level so that private sector actors, whom are the main beneficiaries of this work, see concrete changes.

To ensure some specific operationalization of this recommendation, the ET presents here an accompanying element to consider: where possible, goods could be permitted to move under provisional arrangements while formal resolution is being pursued, in order to avoid unnecessary economic disruptions and losses. Thus, TMA could work with targeted government to advocate for this measure to be adopted in the short term.

R4. Embed flexibility and responsiveness into **trade policy processes**: To mitigate delays caused by political transitions or unforeseen disruptions (e.g., pandemics), TMA should promote adaptive policy planning



approaches, including modular strategy development and digital stakeholder consultation platforms. Regular mid-term reviews of strategic documents and scenario planning should be institutionalized to maintain relevance and pace. This recommendation links with R2, and both processes could be linked (political economy and strategic documents' reviews.)

These recommendations would be implemented by **TMA project teams in close collaboration with director level staff and strategic partners**. R3 could be central to relevant projects, and R4 would be operationalized throughout implementation processes.

Efficiency

R5. Strengthen Knowledge Management and Institutional Memory: In response to high staff turnover and internal mobility, TMA should invest in robust knowledge management systems, including onboarding protocols, process documentation, and experience-sharing platforms. This would help reduce the institutional learning curve and maintain operational consistency even in the face of organizational changes. First, TMA would need define critical knowledge domains (technical, operational, contextual) where when staff leave, knowledge gets lost (high-risk areas for knowledge loss). Second, the organization could build or upgrade a searchable, role-based access platform. This would entail organising resources by function, geography, and program. An important specific element to recommendation 5 would be to integrate mandatory “handover notes” during staff transitions. Third, to render onboarding and offboarding, manuals will have to be officialise by role or function. Finally, staff recognition for knowledge-sharing practices should become an important best practice. The implementation of this recommendation should be lead by the Planning and Information Division.

Coherence

R6. Strengthen Strategic Integration Across Outcomes: TMA should enhance linkages between Outcome 1 (regulatory reform) and Outcome 2 (private sector development), particularly by embedding private sector engagement more deeply into trade policy and regulatory planning processes. Joint **planning sessions and shared outcome** indicators could support this objective and ensure more coherent delivery across workstreams. In addition, it would be important for TMA to increase the embedded private sector consultations into policy reform processes. Beyond the NTFC and the cross-border trader committees, TMA could fund participatory policy dialogues and cross-sector working groups, including from firms and companies involved in other TMA projects.

In addition, TMA could hence enhance **cross-portfolio learning and coordination**. Since multiple streams within TMA contribute to trade outcomes, as the evaluation has demonstrated, it could be interesting to build on this effective approach to foster stronger integration between regulatory, infrastructure, private sector, and trade facilitation initiatives. Developing joint learning platforms and cross-cutting MEL mechanisms will help assess synergies and improve the strategic coherence of interventions, ultimately enhancing long-term trade impacts.

After the submission of the draft evaluation report, the ET was informed that TMA has already been working on enhancing internal coherence among private sector development work and trade policy efforts. In Strategy 3, currently under implementation, there are six thematic groups within which private sector and trade policy stream interlink. This approach could be mixed with recommendation 6 so that the new Strategy can be even more effective and impactful.



R7. Leverage Donor Synergies more Strategically: TMA should continue to map donor ecosystems in each intervention country and proactively co-create initiatives that build on others' comparative advantages. **Complementary engagement** seen in some cases with the World Bank and UNECA for example should serve as a model for other countries, particularly in high-impact areas like AfCFTA implementation, NTB reduction, and infrastructure-logistics reform. This recommendation should be implemented at the highest level of decision-making in TMA, in collaboration with the EAC Secretariat.

M&E

R8. Integrate all Outputs, Short-Term Outcomes and Cross-Cutting Results: The revised RFs should explicitly include **all of the expected results**, particularly for complex result areas like IO1.4, to better capture incremental progress. It is important to stress that even if no progress is made for some of these results, it should still be reflected in the RF as it is still relevant information for strategic decision making.

As previously noted, the initial MEL planning was thoughtful and ambitious. However, its operationalization was challenged, primarily due to budget cuts. A more effective approach would be to design the MEL strategy in a more realistic manner, one that ensures, at a minimum, timely and consistent tracking of all Results Framework (RF) indicators using TMA's core operational budget, without depending on earmarked donor funding. This does not mean that more complex assessments and evaluations should be excluded. Rather, it ensures that their absence would not compromise traceability or accountability due to a lack of core performance data.

The MEL strategy could continue leveraging the milestone-based monitoring approach currently used by TMA to assess progress. This approach could also be strengthened by coding the milestones so that they can be easily identified when reporting progress, also by institutionalizing milestone status when reporting (e.g. achieved, in progress, not achieved), which would ease performance assessment and minimize interpretation risks. Furthermore, all milestones, even early milestones, should be accounted for in the final RF to ensure comprehensive traceability. In addition, a second complementary approach could involve incorporating perception-based indicators for selected short-term outcomes. These would rely on qualitative benchmarks collected through surveys, which should ensure minimum response quotas from key stakeholder groups to reduce bias, and include open-ended questions to foster learning. If possible, these perception-based indicators could be eventually triangulated with findings from other research and evaluation methods to enhance precision and credibility. Together, these two approaches would allow TMA to capture change in a timely, more structured manner, while also documenting progress in a way that supports strategic storytelling.

In the same line of thought, TMA should improve **its ToC-RF Alignment and Reporting Practices**. Updates to the ToC should be consistently reflected in the RF and supporting monitoring tools. Additionally, reporting formats, particularly annual reports, should include an Annex with the actual values or milestone progress data for all of the indicators, even those in which no progress has been achieved, this is key in terms of transparency. Similarly, these formats could include lessons learned and recommendations explicitly linked to outcomes and outputs, creating a clearer learning and accountability loop for internal and external stakeholders.

Impact

R9. If budgets allow, TMA should introduce **targeted impact evaluations**: Considering its noted ability to manage relevant evaluations, to better understand the portfolio's effects—especially where impact attribution is challenging—TMA should conduct independent, periodic impact evaluations using mixed-methods approaches, probably through quasi-experimental approaches to avoid high costs. These should include



longitudinal tracking and stakeholder surveys, focusing on both direct and indirect outcomes as well as impacts across different segments of beneficiaries, including women and SMEs. Looking back at the intervention logic of the portfolio, the improved trade regulatory environment was to be measured by the reduced barriers to trade and improved business competitiveness, so in the S2 case, the impact measurement should have focused on increased export volume/value caused by the implementation of the portfolio's projects. Therefore, a TMA impact evaluation could have collected such relevant data/progress in order to report the results and measure the impact. A simple tool could also be developed to track TMA's impact over time in areas such as the facilitation of WTO regulations, which would help unpack progress in future thematic evaluations such as this one.

Coordinating an impact evaluation would mainly be the responsibility of Results Based M&E (or results team) in collaboration with the procurement division.

Sustainability

R10. Linked to R3 and R7, TMA should ensure the sustainability of key digital and regulatory tools. For trade information portals, scorecards, and NTB tracking tools to remain effective, TMA should work with governments to develop sustainability strategies, including funding models, institutional ownership, and maintenance plans. Technical training and institutional anchoring—especially in countries like Tanzania where gaps persist—should be prioritized to maintain functionality post-TMA support.

Additionally, TMA should support the establishment of **institutional safeguards for sustainability**. It should promote the formal institutionalisation of structures it supports—such as NTFCs, cross-border committees, and monitoring platforms—by advocating for their further integration into national legal frameworks and most importantly, budget lines. Support for developing sustainability strategies (e.g. costed action plans, staffing models) should be included in project exit plans to strengthen local ownership and reduce dependence on external funding⁵¹.

This recommendation would be the responsibility of all project teams.

Cross-Cutting Issues

Some cross-cutting elements have already been addressed in other recommendations above, including in the M&E sub-section. The ET members are here presenting two smaller additional ones.

R11. Introduce inclusive engagement mechanisms: To ensure the most vulnerable groups are heard, TMA should develop engagement platforms for informal and rural traders, youth entrepreneurs, and climate-vulnerable communities. Participatory needs assessments and community-based monitoring could be institutionalized at the project level to ensure that policies reflect the lived realities of those most impacted by trade reforms.

R12. Integrate competition policy and pro-poor trade frameworks: To enhance the poverty-reduction potential of trade facilitation, TMA should advocate for integrating competition policy into national trade

⁵¹ This is aligned with the NTB project evaluation recommendation that stated: "The regular convening of National Monitoring Committees (NMCs) and the EAC Regional Monitoring Committee (RMC) is essential to the timely elimination of NTBs at the national and regional levels. However, it is important that these committees are fully institutionalised and mainstreamed into the budgets of Partner States and the EAC Secretariat to ensure long term sustainability of their operations given the critical role they play in NTB monitoring and elimination in the region." Maureen Wanyonyi. (2024). Elimination of Non-Tariff Barriers End of Project Report.



strategies. This would help ensure that cost savings from trade reforms benefit end consumers and not only intermediary actors. A dedicated pillar on equitable market access and inclusive value chain participation should also be considered under Strategy 3, particularly for sectors dominated by women or rural producers. This recommendation would be the responsibility of all project teams.



Annex 1: Evaluation Question Matrix

Table 7: Evaluation Matrix

Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered by EQ
Relevance					
EQ1. To what extent were the objectives of the portfolio, as laid out in the TMA Strategy 2 and TOCs, consistent with recipients' requirements, country needs, global and regional priorities and partners' policies?					
	1.1 Alignment of the objectives of the portfolio with the countries' trade policy frameworks	1.1.1 Evidence of alignment of the portfolio's objectives with the countries' trade policy frameworks	Desk and Document reviews	TMA Progress reports Portfolio and/or project documents Regional and national trade strategies and policies TMA Strategy 2-linked evaluation reports ⁵² Common market scorecard	Output "Effective trade policy and strategy developed" Shorter-term Outcome "Improved public and private sector coordination in addressing binding constraints to trade policy making"
			KIIs FGDs	TMA staff National government representatives (e.g., Trade and EAC ministries) Private sector	

⁵² As referred to here: <https://research.trademarkafrica.com/downloads/category/tma-evaluation-reports/all-strategy-2-evaluations-reports/?form=MG0AV3>



Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered by EQ
	1.2. Needs and priorities identified and addressed by the portfolio to reduce trade barriers and improve business competitiveness	1.2.1 Evidence of needs and priorities identified by the portfolio to reduce trade barriers and improve business competitiveness	Desk and Document reviews	TMA Annual Progress reports Programme and project documents WTO TFA Database National Trade Facilitation Committee reports Regional and national trade policies Common market scorecard	
			KIIs FGDs	TMA staff National government representatives (e.g., Trade ministries, customs authorities, NTFCs)	
	1.3 Needs for reduction and/or elimination of trade barriers and other key trade bottlenecks identified and addressed by the portfolio	1.3.1 Number and examples of trade barriers and other bottlenecks identified and addressed in the region and in the targeted countries	Desk and Document reviews	Strategy 2 document Project appraisals Project progress reports Programme and projects' documents Strategy 2 evaluation reports TMA Annual Reports	
			KIIs FGDs	TMA staff	



Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered by EQ
				National government representatives (e.g., Trade ministries, customs authorities, national trade facilitation secretariats) Private sector companies and business associations CSOs and NGOs	
Effectiveness					
EQ2. To what extent have TMA's portfolio and support contributed to the intended short-term outcomes and the intermediate outcome in the theory of change?					
Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered y EQ
EQ2A To what extent has TMA's support contributed to improving the policy and regulatory environment for trade and led to a reduction in policy and regulatory barriers to trade? How and in what ways?	2A.1 Alignment of national policy environments with regional, continental and international trade regulations	2A.1.1 TMA results framework's indicator 1.4a: Proportion of high priority national restrictions in the movement of goods requiring legislative alignment fully addressed (Number of priority national laws and regulations of EAC partner states that are aligned to regional commitments (e.g., to regional trade commitments	Desk and Document review	Progress reports Programme and project documents Regional and national trade policies and procedures WTO/TFA, EAC, COMESA, and Tripartite Trade Agreements Common market scorecard Legislative audits at national level	Intermediate outcome "Improved trade regulatory environment" Shorter-term Outcome "Improved alignment of national trade policies to regional and continental commitments" Output "Regional, continental and global trade frameworks implemented"



Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered by EQ
		(WTO/TFA, EAC, COMESA AfCFTA etc)	KIs FGDs	TMA performance results framework TMA staff National government representatives (e.g., Trade and other relevant ministries) Representatives from Regional Economic Communities (RECs) such as EAC, COMESA or Tripartite Free Trade Area (TFTA)	
		2A.1.2. Evidence of harmonised trade policies and regulations	Desk and Document review	Progress reports Programme and project documents	



Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered by EQ
		and simplified trade procedures among the EAC countries	KIIIs FGDs	Previous and new national trade policies Common market scorecard TMA staff National government representatives (e.g., Trade ministries) Private sector representatives, including cross-border traders and border site visits.	
	2A.2 Improved public and private sector coordination in addressing the binding constraints to trade policy making	2A.2.1. Number of public-private dialogue mechanisms formalised	Desk and Document review KIIIs FGDs	Progress reports Programme and project documents Data from external sources (e.g., WTO, UN, OECD, World Bank, AGRA, EAGC, etc.) TMA staff Private sector representatives National government representatives (e.g., Trade ministries)	Shorter-term Outcome "Improved public and private sector coordination in addressing binding constraints to trade policy making"
		2A.2.2. Degree of improvement of trade-related laws and	Desk and Document review	Progress reports Programme and project documents	



Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered by EQ
		regulations to meet the public and private sector expectations		Data from external sources (e.g., WTO, UN, OECD, World Bank, AGRA, EAGC, etc.)	
			KIIs FGDs	Private sector representatives, including traders, MSMEs and firms National government representatives (e.g., Trade and other relevant ministries)	
	2A.3 Improved institutional capacity of trade agencies/bodies/ministries, private sector associations to effectively negotiate and implement national/regional trade agreements and commitments	2A.3.1 Number of sensitization and capacity building activities on trade agreements and commitments conducted	Desk and Document reviews	Progress reports Programme and project documents	Intermediate outcome "Improved trade regulatory environment" Shorter-term Outcome "Improved institutional capacity to effectively formulate and implement national/regional trade agreement and commitments"
KIIs			TMA staff		
2A.3.2. Participants' perception of the effectiveness of these projects and activities		KIIs	Private sector companies and business associations Trade ministries agencies and other relevant bodies		
		FGDs	Private sector associations, women traders and/or producers of traded products		



Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered by EQ
		2A.3.3. Number of participants trained with increased trade-related capacities and skills	Desk and Document review	Progress reports and other project documents	
		KIIs FGDs	Project participants, particularly women traders and producers		
		2A.3.4. TMA results framework's indicator 1.4b: Rate of implementation of WTO TFA commitments by partner states	Desk and Documents review	Common market scorecard TMA performance results framework WTO TFA database	
		2A.3.5. Evidence of enforcement of other policies and regulatory frameworks	Desk and Documents review	Common market scorecard EAC annual reports	
		KIIs	TMA staff National government representatives (e.g., Trade ministries and other relevant agencies)		
	2A.4 Availability of evidence to support sustainable and inclusive trade policy enhanced	2A.4.1. Quantity and quality/usefulness of research and data produced (i.e on sustainable and inclusive trade and on NTBs) by TMA	Desk and Document review	Progress reports Programme and project documents NTB impact analysis TMA policy briefs TMA materials	Shorter-term Outcome "Enhanced availability of evidence to support sustainable and inclusive trade policy"



Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered by EQ
			KIIIs FGDs	TMA staff National government representatives (e.g., Trade and other relevant ministries) Representatives of private sector companies and business association	
		2A.4.2 Perception of the relevance of research and data produced (i.e on sustainable and inclusive trade and on NTBs)	KIIIs FGDs	Private sector National government representatives (e.g., Trade ministries, customs authorities, national trade facilitation secretariats) Private sector	
	2A.5 Elimination of NTBs	2A.5.1 Evidence of new legal mechanisms for elimination of NTBs 2A.5.2. Number of NTBs eliminated	Desk and Documents review KIIIs	EAC annual reports NTB impact analysis TMA staff Private sector National government representatives EAC Secretariat	Shorter-term Outcome "Coordinated public/private action taken to reduce NTBs among EAC Partner States



Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered by EQ		
		2A.5.3. Evidence of enhanced awareness of the NTB Act	Desk and Documents review	NTB impact analysis			
			KIIs	Private sector National government representatives CSOs and NGOs			
	2A.6 Improved trade efficiency	2A.6.1. TMA results framework's indicator 1.4c: Change in time and cost to import/export goods from the elimination of EAC-prioritised NTBs of a regulatory nature	Desk and Document review	EAC Timebound Programme for the elimination of NTBs NTB impact analysis TMA performance results framework		Intermediate outcome "Improved trade regulatory environment"	
			KIIs	TMA staff Private sector Policy makers			
		2A.6.2. Examples of simplification of customs procedures	Desk and Document review	Progress reports Programme and project documents Strategy 2 evaluation reports			
			KIIs	TMA staff Customs Authorities Private sector representatives			
			FGDs	Private sector, particularly SMEs and women traders			



Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered by EQ
		2A.6.3 Other measurable improvements in trade efficiency	Desk and Document review	Progress reports Programme and project documents Strategy 2 evaluation reports	
			KIIs	TMA staff Private sector representatives	
			FGDs	Private sector representatives	
		2A.6.4 TMA results framework's indicator 1.4d: Experiences of the trade regulatory environment (experiences of men, women and people with disabilities under the trade regulatory environment)	Desk and Document review	TMA's performance results framework	
			FGDs	Private sector representatives, particularly those women, youth and people with disabilities	
EQ3. To what extent are the assumptions and causal pathways in the theory of change valid and change happened as expected?					
EQ3A. What factors have contributed to or hindered change? How and in what ways did the changes take place?	3A.1 Political, economic and social influence	3A.1.1 Evolution and developments of Political, economic and social situation in the countries as well as regionally and globally	Desk and Document review	Project appraisals Programme and projects documents Data from external sources (e.g., WTO, UN, OECD, World Bank, AGRA, EAGC, etc.) National government reports	Potential assumptions and assumptions in the ToC



Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered by EQ
			KIIs	TMA staff National government representatives (e.g., Trade ministries) Private sector representative	
		3A.1.2 Different groups and actors motivations and incentives	Desk and Documents review	Project appraisals Progress reports Projects and programme's documents	
			KIIs	TMA staff National government representatives (e.g., Trade ministries) Private sector CSOs and NGOs	
	3A.2 Institutional and governance structure of the portfolio and projects	3A.2.1 Assessment of the formal and informal institutional and governance structures	Desk and Documents review	Project appraisals TMA MEL Strategy Report Programme and projects documents	
			KIIs	TMA staff National government representatives (e.g., Trade ministries)	



Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered by EQ
	3A.3 Trade challenges and external shocks influence	3A.3.1 Consequences/impact of COVID-19	Desk and Document review	Progress reports Corporate strategy paper for adjustment to external factors Strategy 2 evaluation reports	
			KIIs	TMA staff Private sector	
		3A.3.2 Assessment of the growing protectionism	Desk and Document review	Progress reports Data from external sources (e.g., WTO, UN, OECD, World Bank, AGRA, EAGC, etc.) Strategy 2 evaluation reports	
			KIIs	TMA staff National government representatives (e.g., Trade ministries) Private sector representatives	
		3A.3.3 Emerging NTBs under the new trading environment	Desk and Document review	Progress reports Common market scorecard Strategy 2 evaluation reports	
			KIIs	TMA staff	



Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered by EQ
				National government representatives (e.g., Trade ministries) Private sector	
	3A.4 Commitment from the partner states	3A.4.1 Willingness of Partner states to support regional, continental and international trade agreements and reduce policy and regulatory barriers to trade and collaborate with other partner states	Desk and Documents review	Common Market Scorecard National trade policies and strategies	
			KIIs	TMA staff National government representatives (e.g., Trade ministries) Private sector	
EQ3B Have the interventions led to any unintended consequences? How and in what ways?	3B.1 Unintended consequences	3B.1.1 Examples of unintended positive or negative results	Desk and Document review	Progress reports Strategy 2 evaluation reports	All Shorter-term Outcomes
			KIIs	TMA staff National government representatives (e.g., Trade ministries) Private sector CSOs and NGOs	
Efficiency / coherence					
EQ4: How economically were resources/inputs (funds, expertise, time, equipment, etc.) converted into the expected results?					
	4.1 Efficiency in terms of financial management	4.1.1 Administrative overheads (administrative costs vs programme expenses)	Desk and Document review	Strategy 2	All Shorter-term Outcomes and Outputs



Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered by EQ
		4.1.2 Percentage of budgets used vs planned budgets	Desk and Document review	Strategy 2 Final budget and expenditure reports of those projects	
	4.2 Efficiency in terms of project delivery	4.2.1 Mechanisms to monitor and address potential inefficiencies in project delivery	Desk and Document review	Progress reports Final reports of evaluated projects	
			KIIs	TMA staff DFID and other donors	
		4.2.2 Percentage of activities implemented within the planned timeframe	Desk and Documents review	Progress reports and Final reports	
EQ5: To what extent do policy and regulatory interventions underpin and/or contribute to other work streams and intermediate outcomes, and vice versa, including expected results?					
EQ5A To what extent and how do interventions reinforce each other and deliver synergies a) within the intermediate outcome 1.4 portfolio?	5A.1 Internal coherence of the interventions within the intermediate outcome 1.4	5A.1.1 Synergies among the projects under the portfolio	Desk and Document review	Programme and projects' documents	All Shorter-term Outcomes
			KIIs	TMA staff	
EQ5.B To what extent and how do interventions reinforce each other and	5B.1 Internal coherence of the interventions with other intermediate outcomes of TMA's portfolios	5.B.1.1 Synergies with intermediate outcome 1.1 -	Desk and Documents review	Strategy 2 Programme and project documents	



Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered by EQ
deliver synergies b) with other intermediate outcome portfolios?		Sustainable and efficient transport infrastructure	KIs	TMA staff	
		5B.1.2 Synergies with the intermediate outcome 1.2 Improved trading standards and SPS measures	Desk and Documents review	Strategy 2 Programme and project documents	
			KIs	TMA staff	
		5B.1.3 Synergies with the intermediate outcome 1.3 Effective trade systems and procedures	Desk and Documents review	Strategy 2 Programme and project documents	
			KIs	TMA staff	
		5B.1.4 Synergies with the intermediate outcome 2.1 Increased trade capacity of East African businesses	Desk and Document review	Strategy 2 Programme and project documents	
			KIs	TMA staff	
		5B.1.5 Synergies with the intermediate outcome 2.2 More inclusive trade	Desk and Document review	Strategy 2 Programme and project documents	
			KIs	TMA staff	



Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered by EQ
EQ 5C To what extent and how do interventions reinforce each other and deliver synergies c) with other donor programmes? (external coherence)	5C.1 External coherence of the interventions with other donors' programmes in East Africa	5C.1.1 Synergies with other donors' programmes in the region	Desk and Document review	Data from external sources (other donors) Donor matrix to be compiled with the assistance of TMA	
			KIIs	TMA staff Other like-minded donors National government representatives (e.g., Trade ministries)	
EQ6: To what extent has TMA been able to measure and track change at the short-term outcomes, intermediate outcome and outcome levels?					
To what extent has TMA learnt? What has worked well or not so well? To what extent does TMA understand the political, economic and social context and use this learning?	6.1 Results-oriented management of TMA's programme	6.1.1 Clarity of the roles attributed to the management team's members	Desk and Documents review	Business case Strategy 2	All Shorter-term Outcomes and Outputs
			KIIs	TMA staff	
		6.1.2 Perception of the utility of the M&E system in place	KIIs	TMA staff Development partners DFID/GAC and other donors	
		6.1.3 Regularity in the data collection and reporting	Desk and Documents review	Business case Strategy 2	
KIIs	TMA staff Development partners DFID/GAC and other donors				



Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered by EQ
Impact					
EQ7: What are the positive and negative, primary and secondary, short-term, medium and long-term effects (specifically on trade outcomes) produced by the portfolio, whether directly or indirectly, intended or unintended?					
	7.1 Trade growth and competitiveness	7.1.1 Volume or value of Increased trade among EAC and with other trade partners	Desk and Document review	EAC Trade and Investment Reports National Statistics World Bank Statistics WTO Reports	Outcomes “Reduced barriers to trade” and “Improve business competitiveness”
			KIIs	TMA staff EAC Secretariat	
		7.1.2 Number of jobs created, particularly for women, due to the increased trade and competitiveness	Desk and Document review	World Bank Statistics EAC reports National statistics	
			KIIs	EAC Secretariat National government representatives (e.g., Trade and other ministries)	
		7.1.3 GDP growth or similar economic metrics	Desk and Documents review	World Bank Statistics	
			KIIs	National government relevant representatives (e.g., Trade ministries)	
	7.2 Market accessibility	7.2.1 Expanded market access of the products from EAC	Desk and Document review	TMA studies WTO, UNCTAD and ITC reports	



Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered by EQ
			KIs	TMA staff National government representatives (e.g., Trade and other ministries)	
		7.2.2 Number of reduced clearance documents processed	Desk and Documents review	Customs Authorities reports	
			KIs	TMA staff National government representatives (e.g., Customs Authorities)	
		7.2.3 Changes in trade agreement compliance levels	Desk and Documents review	Strategy 2 evaluation reports Customs Authorities reports	
			KIs	TMA staff National government representatives (e.g., Customs Authorities)	
		7.2.4 User satisfaction with trade facilitation processes	Desk and Document review	TMA Beneficiary surveys	
			KIs	Private sector	
		7.2.5 Enhanced business competitiveness	Desk and Documents review	World Economic Forum Global Competitiveness Reports	



Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered by EQ
			KIIs	Private sector National government representatives (e.g., Trade ministries)	
	7. 3Unintended effects	7.3.1 Examples of unintended positive or negative effects	KIIs	TMA staff Private sector National government representatives (e.g., Trade ministries, Customs Authorities)	

Sustainability

EQ8: To what extent have the policy & regulatory reforms supported under TMA's trade regulation portfolio been institutionalised?

Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered y EQ
	8.1 Enhanced institutional capacities in the targeted countries to continue with the policy and regulatory reforms supported by the portfolio <ul style="list-style-type: none"> Established mechanisms in place to ensure the continued implementation of 	8.1.1 Number of people trained with increased skills and knowledge in those relevant and targeted institutions (both government and private sector) 8.1.2 Stakeholder engagement 8.1.3 Examples of other enhanced institutional capacities	KIIs	TMA staff Private sector National government representatives (e.g., Trade ministries, Customs Authorities)	Intermediate Outcome "Improve trade regulatory environment"
			Desk and Documents review	Progress reports Programme and projects' documents	



Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered by EQ
	the programme's key components beyond the project period		KIIs	TMA staff Government and private sector representatives	
	8.2 Government and private sector capacities to maintain and advance the reforms introduced.	8.2.1 Examples of increased and sustainable Institutional capacity for trade reforms	KIIs	TMA Staff National government representatives (e.g., Trade ministries)	
		8.2.2 Availability of skilled personnel	KIIs	TMA Staff National government representatives (e.g., Trade ministries)	
EQ8A To what extent were the supported interventions financially sustainable?	8A.1 Financial sustainability	8A.1.1 Amount of private sector investment directed towards sustaining trade facilitation initiatives introduced by the portfolio	Desk and Document review	Programme and project documents Final budget and expenditure reports of those projects	



Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered by EQ
		8A.1.2 Evidence of willingness of the donors to continue the financial support	KIIs	TMA staff Donors	
Cross cutting themes					
EQ9: To what extent does TMA consider poverty reduction and the impacts on the poor, gender and inclusion, environment and climate change in the design and implementation of its interventions?					
EQ9A To what extent has TMA in Trade policy support contributed to reduced poverty, improved gender and inclusion outcomes and improved environment and climate change outcomes? For whom and in what ways?	9A.1 Integration of gender issues and development challenges in the design and implementation of portfolio projects	9A.1.1 Degree of gender equality and inclusion considerations 9A.1.2 Percentage of women participation in the portfolio/project activities	Desk and Document review	Strategy 2 Programme and project documents Progress reports Project appraisal reports	All Shorter-term outcomes and outputs
			KIIs	TMA staff (including: Steering Committee, TMA gender adviser, etc.) Project participants, particularly women and other disadvantaged participants (elderly, youth, disabled, etc) CSOs and NGOs	



Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered by EQ



	Environmental sustainability of the interventions	9.2.1 Degree of integration of environment and climate change into the design and implementation of the portfolio activities	Desk and Document review	Strategy 2 Programme and project documents Progress reports Project appraisal reports	
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Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered by EQ
			KIs	TMA staff (including: Steering Committee, TMA gender adviser, etc.) CSOs and NGOs	
		9.2.2 Examples of environmental regulations or standards introduced or strengthened to mitigate the environmental impact of trade activities	Desk and Document review	Programme and project documents Progress reports Project appraisal reports	
			KIs	TMA staff CSOs and NGOs	
		9.2.3 Examples of trade-related processes shifted to digital platforms, reducing environmental footprint.	Desk and Document review	Programme and project documents Progress reports Project appraisal reports	
			KIs	TMA staff	



Sub-questions	Judgement criteria	Indicators	Data Collection Tools	Source of Information	TOC Areas Covered by EQ
	Poverty reduction	9.3.1 Examples of poverty reduction in targeted countries as the result of contributions from interventions of the portfolio.	Desk and Document reviews	Project progress reports Case studies	
			KIIs	TMA staff National government representatives (e.g., Trade ministries) Private sector beneficiaries particularly women, elderly, youth and disabled, if possible	



Annex 2: Data Collection Tools

Key informant tools

Protocols

Interview notes by:	
Date:	
Interviewee(s):	
Interviewee(s) gender:	
Interviewee(s) Organisation:	
Job title:	
Location:	

Interview instructions:

- Interviews will normally last between 60 and 90 minutes. It should not exceed 90 minutes, and some will take around 30 to 45 minutes.
- Prior to each interview, the evaluator must obtain the informed consent of the participant. Please read the following statement to participants.

Greetings, introduction of the evaluator and thank you for your availability.

I am meeting with you today to solicit your contribution to the Evaluation of the Portfolio: Improved Trade Regulatory Environment. The objectives of this portfolio are to contribute to improving the Trade Regulator Environment of the EAC countries, to reduce the barriers to trade and to improve business competitiveness of the region.

This is a confidential and independent exercise. As an evaluator, I am not attached to TMA, or any other partners or organisations involved in one way or another in the implementation of the portfolio. I work for an external consultancy firm called Le Groupe-conseil baastel.

After six year of implementation, TMA is seeking to improve the quality and relevance of its actions.

Your participation is voluntary, and you can end the discussion at any time. The duration of the discussion can vary from 1 to 1.5 hours maximum. The information shared is confidential, and notes are taken for the purpose of faithfully transcribing the ideas and information retained, without citing their sources. These notes will not be shared outside the external, independent evaluation team at Baastel.

Do you understand the purpose of the evaluation process?



Do you agree to participate on a voluntary basis?

Do you have any questions?

- To the extent possible and realistic, the evaluator should ask all the questions in each protocol and ask the questions as they are written.

Before beginning, the evaluator should clarify the objectives of the Outcome 1.4 portfolio and ensure that each reference to 'the portfolio' specifically pertains to this Outcome 1.4 portfolio.

- It's very important to tell respondents that the changes they have observed can be positive or negative, and that we want to know about all the types of changes they have observed. There are no "right" or "wrong" answer. The evaluator is interested in their insights and perspectives. The evaluator can learn a lot from looking at what worked well as well as what did not work well.
- When (and if) you ask probing questions following a response, the evaluator needs to make sure to ask only neutral questions, not leading questions, as this may prompt the interviewee to answer what you suggest.
- If requested by the potential respondents, the evaluator may choose to send the interview questions to the interviewee several days in advance of the interview date; this will enable the interviewee to prepare their responses and to select questions and issues of greatest interest to them in the forthcoming conversation.

Interview Notes Should Contain:

Background: Interviewee's general background; Nature and dates of interviewee's involvement with the programme.

Topics: Record responses by topic with clear headings – using the EQs where possible, not necessarily in chronological sequence of discussion. Make clear when a direct quote is recorded. Add headings and sub-headings as needed and/or record against evaluation criteria.

EQs: Relevance

EQs: Effectiveness

EQs: Efficiency / Coherence

EQs: Impact

EQs: Sustainability

EQs: Cross-cutting themes

EQs: Lessons and Recommendations

Non-EQ specific notes

Data/documents provided/recommended: Seek full references for documents not already in evaluation team library.

Other proposed follow-up: e.g., other interviewees recommended (obtain full contact details) / proposals on consultation and dissemination etc.



Questionnaire for TMA operational teams

Introduction

1. What is your current position?
2. What is your role and relationship to the portfolio?
3. How long have you been involved with the portfolio?

EQs: Relevance

(EQ1. To what extent were the objectives of the portfolio, as laid out in the TMA Strategy 2 and TOCs, consistent with recipients' requirements, country needs, global and regional priorities and partners' policies?)

4. How well do the portfolio's objectives fit within the trade policy frameworks of EAC countries?
5. To what extent does the portfolio respond to the EAC countries' needs and priorities in reducing trade barriers and improving business competitiveness? Could you provide specific practical examples?
6. According to you, which important trade barriers or business competitiveness challenges remain unaddressed despite the portfolio's interventions, and could have been included in the portfolio?

EQs: Effectiveness

(EQ2. To what extent have TMA's portfolio and support contributed to the intended short-term outcomes and the intermediate outcome in the theory of change?)

7. To what extent has the portfolio supported the development of national laws and regulations in EAC partners states to ensure alignment with regional, continental and international agreement (such as AfCFTA, WTO/TFA, COMESA, etc.)?
8. To what extent has the portfolio contributed to the harmonization of trade policies and regulations and the simplification of trade procedures across EAC countries? Can you provide specific examples?
9. How has the portfolio helped enhance the institutional capacity of trade agencies, ministries, and private sector associations in effectively negotiating and implementing national or regional trade agreements and commitments? Can you provide specific examples?
10. To what extent have public and private stakeholders collaborated to address the binding constraints to trade policy making? Can you provide specific examples of this collaboration?
11. To what extent has TMA research dissemination efforts on sustainable and inclusive trade, as well as on NTBs, reached a broad audience?
12. To what extent has TMA support contributed to the elimination of NTBs? Can you provide specific examples?
13. In your opinion, what are the most significant improvements in trade efficiency that the portfolio has brought about?

EQs: Efficiency / Coherence

(EQ4: How economically were resources/inputs (funds, expertise, time, equipment, etc.) converted into the expected results?)

14. To what extent were the financial resources allocated during the design phase appropriate and sufficient to achieve the intended outcomes?
15. How would you assess the efficiency of the portfolio's financial and operational management?
16. Were there any activities planned but not implemented within the original timeframe or budget? What were the reasons for these delays or deviations, and how were they addressed?



(EQ5: To what extent do policy and regulatory interventions underpin and/or contribute to other work streams and intermediate outcomes, and vice versa, including expected results?)

17. To what extent do the projects within the Intermediate Outcome 1.4 portfolio reinforce each other and create synergies?
18. To what extent do the projects in the Intermediate Outcome 1.4 portfolio generate synergies with projects in other intermediate outcome portfolios? How do these synergies occur?

Reminder for the evaluator:

- *intermediate outcome 1.1 Sustainable and efficient transport infrastructure*
- *intermediate outcome 1.2 Improved trading standards and SPS measures*
- *intermediate outcome 1.3 Effective trade systems and procedures*
- *intermediate outcome 2.1 Increased trade capacity of East African businesses*
- *intermediate outcome 2.2 More inclusive trade*

19. To what extent is this portfolio aligned with other donor programmes in the same area within the EAC region? Have synergies been created, or do you observe duplication?

(EQ6: To what extent has TMA been able to measure and track change at the short-term outcomes, intermediate outcome and outcome levels?)

20. In your opinion, how appropriate is the portfolio's monitoring system? How are M&E materials shared and used?
21. How clear are the roles and responsibilities assigned to the management team members in the results-oriented management of TMA's programme?

EQs: Impact

(EQ7: What are the positive and negative, primary and secondary, short-term, medium and long-term effects (specifically on trade outcomes) produced by the portfolio, whether directly or indirectly, intended or unintended?)

22. How has trade volume or value increased within the EAC region and with external trade partners, as a result of the portfolio?
23. What impact have the portfolio's interventions had on job creation, particularly for women?
24. How has market access for EAC products expanded?
25. What improvements in trade facilitation (e.g., reduced clearance documents, trade agreement compliance, etc.) have been made, and how have they contributed to trade efficiency?
26. In what ways has business competitiveness been enhanced as a result of the portfolio?
27. Has the portfolio led to any unintended effects (positive and / or negative)?

EQs: Sustainability

(EQ8: To what extent have the policy & regulatory reforms supported under TMA's trade regulation portfolio been institutionalised?)

28. To what extent do you think the policy and regulatory reforms supported by TMA's portfolio will be sustainable, and how do you envision this happening?



29. In your opinion, what factors could hinder the institutionalization of the reforms or mechanisms introduced by the programme?
30. Conversely, what factors could contribute to the institutionalization of the reforms or mechanisms introduced by the programme?
31. To what extent were the supported interventions financially sustainable?

EQs: Cross-cutting themes

(EQ9: To what extent does TMA consider poverty reduction and the impacts on the poor, gender and inclusion, environment and climate change in the design and implementation of its interventions?)

32. To what extent has TMA portfolio contributed to reducing poverty and improving gender and inclusion outcomes? For whom and in what ways have these improvements occurred?
33. To what extent has TMA portfolio contributed to addressing climate and environmental challenges?
34. To what extent are the projects within the portfolio environmentally sustainable?
35. Could you provide specific examples of environmental sustainability within the portfolio?

EQs: Lessons and Recommendations

36. What key lesson has been learned from the TMA portfolio, and what recommendations would you suggest for improving future projects or interventions?

Non-EQ specific notes



Questionnaire for national government offices

Introduction

1. What is your current position?
2. What is your role and relationship to the TMA projects' portfolio?
3. How long have you been involved with the TMA projects' portfolio?

EQs: Relevance

(EQ1. To what extent were the objectives of the portfolio, as laid out in the TMA Strategy 2 and TOCs, consistent with recipients' requirements, country needs, global and regional priorities and partners' policies?)

4. How well do the portfolio's objectives fit within your country's trade policy frameworks?
5. To what extent does the portfolio respond to your country's needs and priorities in reducing trade barriers and improving business competitiveness? Could you provide specific practical examples?
6. According to you, which important trade barriers or business competitiveness challenges remain unaddressed despite the portfolio's interventions, and could have been included in the portfolio?

EQs: Effectiveness

(EQ2. To what extent have TMA's portfolio and support contributed to the intended short-term outcomes and the intermediate outcome in the theory of change?)

7. To what extent has TMA support contributed to the development of new national laws and regulations or led to changes in existing policies to ensure alignment with regional, continental and international commitments (such as AfCFTA, WTO/TFA, COMESA, etc.)? Could you provide specific examples?
8. To what extent has the portfolio contributed to the harmonization of trade policies and regulations and the simplification of trade procedures across EAC countries? Can you provide specific examples?
9. To what extent has TMA support helped enhance the institutional capacity of your country's trade agencies, ministries, and private sector associations in effectively negotiating, developing and implementing national or regional trade agreements and commitments? Can you provide specific examples?
10. To what extent has TMA support contributed to your country's progress in implementing WTO Trade Facilitation Agreement (TFA) commitments? Could you provide specific examples of how TMA's assistance has facilitated this process?
11. As a result of the TMA portfolio, have you observed increased collaboration between public and private stakeholders in addressing the binding constraints to trade policy-making? Could you provide specific examples of such collaboration?
12. To what extent have TMA activities been effective in promoting and sharing knowledge on sustainable and inclusive trade, as well as on non-tariff barriers (NTBs)? Do you find this shared knowledge useful for your country's trade policy and decision-making?
13. To what extent has TMA support contributed to the elimination of NTBs in your country? Can you provide specific examples?
14. In your opinion, what are the most significant improvements in trade efficiency, if any, that the portfolio has brought about in the EAC region and in your country?

(EQ3. To what extent are the assumptions and causal pathways in the theory of change valid and change happened as expected?)



15. Have some factors contributed to or hindered the process towards improved trade regulatory environment and reduction in barriers to trade in your country? How did these factors influenced the process?
16. How has your country contributed to supporting regional, continental, and international trade agreements? What specific actions have you taken to reduce policy and regulatory barriers to trade, and how have you collaborated with other partner states in this process?
17. To your knowledge, have any of the changes resulting from TMA's interventions led to unintended positive or negative consequences for the EAC region and your country? Could you provide specific examples? For any negative impacts, what measures could help mitigate them?

EQs: Efficiency / Coherence

(EQ5: To what extent do policy and regulatory interventions underpin and/or contribute to other work streams and intermediate outcomes, and vice versa, including expected results?)

18. To what extent is this portfolio aligned with other donor programmes in the same area within your country? Have synergies been created, or do you observe duplication?

EQs: Impact

(EQ7: What are the positive and negative, primary and secondary, short-term, medium and long-term effects (specifically on trade outcomes) produced by the portfolio, whether directly or indirectly, intended or unintended?)

19. How has trade volume or value within your country, as well as with external trade partners been impacted by the TMA portfolio?
20. What impact have the portfolio's interventions had on job creation in your country, particularly for women?
21. How has the TMA portfolio contributed to expanding market access for your country's products within the EAC and externally?
22. What improvements in trade facilitation (e.g., reduced clearance documents, trade agreement compliance, etc.) have been made, and how have they contributed to trade efficiency in your country?
23. In what ways has the business competitiveness of your country been enhanced as a result of the TMA portfolio?

EQs: Sustainability

(EQ8: To what extent have the policy & regulatory reforms supported under TMA's trade regulation portfolio been institutionalised?)

24. To what extent do you think the policy and regulatory reforms supported by TMA's portfolio in your country will be sustainable, and how do you envision this happening?
25. In your opinion, what factors could hinder the institutionalization of the reforms or mechanisms introduced by the programme?
26. Conversely, what factors could contribute to the institutionalization of the reforms or mechanisms introduced by the programme?

EQs: Cross-cutting themes

(EQ9: To what extent does TMA consider poverty reduction and the impacts on the poor, gender and inclusion, environment and climate change in the design and implementation of its interventions?)



27. To what extent has TMA portfolio contributed to reducing poverty in your country? For whom and in what ways have these improvements occurred?

EQs: Lessons and Recommendations

28. What key lesson has been learned from the TMA portfolio, and what recommendations would you suggest for improving future projects or interventions?

Non-EQ specific notes



Questionnaire for regional or global trade institutions (i.e. EAC Secretariat)

Introduction

1. What is your current position?
2. What is your role and relationship to the TMA projects' portfolio?
3. How long have you been involved with the TMA projects' portfolio?

EQs: Relevance

(EQ1. To what extent were the objectives of the portfolio, as laid out in the TMA Strategy 2 and TOCs, consistent with recipients' requirements, country needs, global and regional priorities and partners' policies?)

4. How well do the portfolio's objectives fit within the EAC region's trade policy frameworks?
5. To what extent does the portfolio respond to the EAC region's needs and priorities in reducing trade barriers and improving business competitiveness? Could you provide specific practical examples?
6. According to you, which important trade barriers or business competitiveness challenges remain unaddressed despite the portfolio's interventions, and could have been included in the portfolio?

EQs: Effectiveness

(EQ2. To what extent have TMA's portfolio and support contributed to the intended short-term outcomes and the intermediate outcome in the theory of change?)

7. To what extent has TMA support contributed to the development of new regional laws and regulations or led to changes in existing policies to ensure alignment with regional, continental, and international commitments (such as AfCFTA, WTO/TFA, COMESA, etc.)? Could you provide specific examples?
8. To what extent has the portfolio contributed to the harmonization of trade policies and regulations and the simplification of trade procedures across EAC countries? Can you provide specific examples?
9. To what extent has TMA support helped enhance the institutional capacity of the [name of the institution interviewed] and its members in effectively negotiating, developing and implementing national or regional trade agreements and commitments? Can you provide specific examples?
10. To what extent has TMA support contributed partners states' progress in implementing international trade agreements like the WTO Trade Facilitation Agreement (TFA) for instance? Could you provide specific examples of how TMA's assistance has facilitated this process?
11. To what extent have TMA activities been effective in promoting and sharing knowledge on sustainable and inclusive trade, as well as on non-tariff barriers (NTBs)? Do you find this shared knowledge useful for the EAC region and its partners states trade policy and decision-making?
12. To what extent has TMA support contributed to the elimination of NTBs in the EAC region? Can you provide specific examples?
13. In your opinion, what are the most significant improvements in trade efficiency, if any, that the TMA portfolio has brought about in the EAC region?

(EQ3. To what extent are the assumptions and causal pathways in the theory of change valid and change happened as expected?)

14. Have some factors contributed to or hindered the process towards improved trade regulatory environment and reduction in barriers to trade in your country? How did these factors influenced the process?



15. How has your institution/ organization contributed to supporting regional, continental, and international trade agreements? What specific actions have you taken to reduce policy and regulatory barriers to trade, and how have you collaborated with other partner states in this process?
16. To your knowledge, have any of the changes resulting from TMA's interventions led to unintended positive or negative consequences for the EAC region and your country? Could you provide specific

EQs: Impact

(EQ7: What are the positive and negative, primary and secondary, short-term, medium and long-term effects (specifically on trade outcomes) produced by the portfolio, whether directly or indirectly, intended or unintended?)

17. How has trade volume or value within the EAC region, as well as with external trade partners been impacted by the TMA portfolio?
18. What impact have the portfolio's interventions had on job creation in the EAC region, particularly for women?
19. How has the TMA portfolio contributed to expanding market access within the EAC and externally?
20. What improvements in trade facilitation (e.g., reduced clearance documents, trade agreement compliance, etc.) have been made, and how have they contributed to trade efficiency in the EAC region?
21. In what ways has the business competitiveness in the EAC region been enhanced as a result of the TMA portfolio?

EQs: Sustainability

(EQ8: To what extent have the policy & regulatory reforms supported under TMA's trade regulation portfolio been institutionalised?)

22. To what extent do you think the policy and regulatory reforms supported by TMA's portfolio in the EAC region will be sustainable, and how do you envision this happening?
23. In your opinion, what factors could hinder the institutionalization of the reforms or mechanisms introduced by the programme?
24. Conversely, what factors could contribute to the institutionalization of the reforms or mechanisms introduced by the programme?

EQs: Cross-cutting themes

(EQ9: To what extent does TMA consider poverty reduction and the impacts on the poor, gender and inclusion, environment and climate change in the design and implementation of its interventions?)

25. To what extent has TMA portfolio contributed to reducing poverty in the EAC region? For whom and in what ways have these improvements occurred?

EQs: Lessons and Recommendations

26. What key lesson has been learned from the TMA portfolio, and what recommendations would you suggest for improving future projects or interventions?

Non-EQ specific notes



Questionnaire for private sector companies

Introduction

1. What is your current position and in what sector do you work?
2. What is your role and relationship to the TMA projects' portfolio?
3. How long have you been involved with the TMA projects' portfolio?

EQs: Relevance

(EQ1. To what extent were the objectives of the portfolio, as laid out in the TMA Strategy 2 and TOCs, consistent with recipients' requirements, country needs, global and regional priorities and partners' policies?)

4. What are the most significant trade barriers and competitiveness challenges that you face as a private sector actor?
5. To what extent does the TMA's activities respond to your needs and priorities and help you face the barriers you mentioned? Could you provide specific practical examples?

EQs: Effectiveness

(EQ2. To what extent have TMA's portfolio and support contributed to the intended short-term outcomes and the intermediate outcome in the theory of change?)

6. How was your company/ MSME/firm accompanied by the portfolio of TMA projects? In what way? How and to what extent would you say that TMA's support has contributed to putting in place adequate policies and regulations that reduce trade barriers? Can you provide specific examples of how these policies have impacted your business operations?
7. To what extent do you, as a private sector actor, collaborate with public actors (such as government ministries or trade agencies) in addressing constraints to trade policy making? Could you share any examples of this collaboration, and do you feel that your involvement in these processes is sufficient?
8. Have you or your company / association benefited from capacity building activities supported by TMA that have enhanced your trade skills and/or ability to negotiate and implement national or regional trade agreements and commitments?
9. In your view, how useful have these capacity-building efforts been for your business?
10. To what extent has TMA been effective in promoting sustainable and inclusive trade practices? Have you come across any research or data produced by TMA, and if so, how useful has it been for your business decision-making and operations?
11. How would you assess the effectiveness of TMA's support in simplifying customs procedures? Have you observed improvements in this area, and how has it affected your business operations?
12. How would you assess the effectiveness of TMA's support in reducing delays at borders? Have you observed improvements in this area, and how has it affected your business operations?
13. How would you assess the effectiveness of TMA's support in reducing transaction costs at borders? Have you observed improvements in this area, and how has it affected your business operations?
14. If your country has implemented One Stop Border Posts (OSBPs), have you experienced any positive or negative impacts as a result? How have these impacts affected your business operations?
15. Have you experienced any improvements in the reduction of NTBs in your country or in your trading partner countries as a result of TMA's interventions? If yes, could you provide specific examples of how these improvements have impacted your business or sector?



16. In your opinion, what are the remaining challenges in trade facilitation or business competitiveness that still need to be addressed by initiatives like TMA, and what further support would be most helpful for your business moving forward?

(EQ3. To what extent are the assumptions and causal pathways in the theory of change valid and change happened as expected?)

17. Have any of the changes resulting from TMA's interventions led to unintended positive or negative consequences for your business? Could you provide specific examples? For any negative impacts, what measures could help mitigate them?

EQs: Impact

(EQ7: What are the positive and negative, primary and secondary, short-term, medium and long-term effects (specifically on trade outcomes) produced by the portfolio, whether directly or indirectly, intended or unintended?)

18. To what extent do you feel that TMA's interventions have enhanced the overall competitiveness of your business or sector? How has this support improved your ability to compete both locally and internationally? Additionally, have TMA's efforts improved your access to new markets or enhanced your position in existing markets?

EQs: Cross-cutting themes

(EQ9: To what extent does TMA consider poverty reduction and the impacts on the poor, gender and inclusion, environment and climate change in the design and implementation of its interventions?)

19. To your knowledge, to what extent have the changes in trade, such as those supported by TMA, benefited vulnerable populations such as the poor, women, youth, and people with disabilities?
20. Has your business been positively or negatively impacted by environmental regulations or standards introduced in trade activities? Can you provide examples?

Non-EQ specific notes



Questionnaire for CSOs/NGOs

Introduction

1. What is your current position and what type of CSO/NGO do you represent?
2. What is your role and relationship to the TMA projects' portfolio?
3. How long have you been involved with the TMA projects' portfolio?

EQs: Relevance

(EQ1. To what extent were the objectives of the portfolio, as laid out in the TMA Strategy 2 and TOCs, consistent with recipients' requirements, country needs, global and regional priorities and partners' policies?)

4. What are the most significant trade barriers and competitiveness challenges that you observe in the EAC region and more particularly in your country? How do these challenges impact different sectors or groups?
5. Are there specific trade-related barriers that disproportionately affect vulnerable populations, such as women, youth, people with disabilities, or small-scale traders? Could you provide examples of how these barriers manifest in practice?
6. To what extent does the TMA's activities respond to the needs and priorities of the groups affected by trade barriers? Could you provide specific practical examples of how these activities address those needs and where gaps still remain?

EQs: Effectiveness

(EQ2. To what extent have TMA's portfolio and support contributed to the intended short-term outcomes and the intermediate outcome in the theory of change?)

7. How and to what extent would you say that TMA's support has contributed to putting in place adequate policies and regulations that reduce trade barriers? Can you provide specific examples of how these policies have impacted the private sector?
8. Has your organization played a role in shaping or influencing trade-related policies? If so, what successes or challenges have you encountered?
9. How effectively do you think CSOs are engaged in shaping trade policies and programmes in the EAC region? What could be improved to enhance their role in advocacy and policy influence?
10. Have you or your organization benefited from capacity building activities supported by TMA that have enhanced your trade skills and/or ability to negotiate national or regional trade agreements and commitments?
11. How have these capacity-building efforts translated into tangible impacts for your organization and the communities you support?
12. To what extent has TMA been effective in promoting sustainable and inclusive trade practices? Have you come across any research or data produced by TMA, and if so, how useful has it been for your initiatives?
13. In your view, what have been the most significant improvements in promoting sustainable and inclusive trade in recent years? How effective has TMA's support been in driving these changes, particularly in areas such as trade facilitation, transparency, social impact, and economic inclusion?



14. In your opinion, what are the remaining challenges in trade facilitation or business competitiveness that still need to be addressed by initiatives like TMA, and what further support would be most helpful for sustainability and inclusion?

(EQ3. To what extent are the assumptions and causal pathways in the theory of change valid and change happened as expected?)

15. Have any of the changes resulting from TMA's interventions led to unintended positive or negative consequences for the communities, sectors, or stakeholders you work with? Could you provide specific examples? For any negative impacts, what measures could help mitigate them?

EQs: Sustainability

(EQ8: To what extent have the policy & regulatory reforms supported under TMA's trade regulation portfolio been institutionalised?)

16. Do you think the improvements driven by TMA's interventions will be sustained in the long term? What factors are needed to ensure their lasting impact?

EQs: Cross-cutting themes

(EQ9: To what extent does TMA consider poverty reduction and the impacts on the poor, gender and inclusion, environment and climate change in the design and implementation of its interventions?)

17. From your perspective, to what extent have the changes in trade, such as those supported by TMA, benefited vulnerable populations such as the poor, women, youth, and people with disabilities?
18. How have environmental regulations or sustainability standards in trade impacted the communities or sectors you work with? Have these changes created new opportunities or challenges, and could you provide specific examples?
19. What role do digital trade solutions (e.g., e-commerce, digital customs systems, online business registration) play in reducing trade barriers? Are there challenges preventing vulnerable groups from accessing these solutions?

Non-EQ specific notes



Questionnaire for funding partners

Introduction

1. What is your current position?
2. What is your role and relationship to the TMA projects' portfolio?
3. How long have you been involved with the TMA projects' portfolio?

EQs: Relevance

(EQ1. To what extent were the objectives of the portfolio, as laid out in the TMA Strategy 2 and TOCs, consistent with recipients' requirements, country needs, global and regional priorities and partners' policies?)

4. To what extent does the portfolio respond to the EAC countries' needs and priorities in reducing trade barriers and improving business competitiveness? Could you provide specific practical examples?
5. According to you, which important trade barriers or business competitiveness challenges remain unaddressed despite the portfolio's interventions, and could potentially be incorporated into future portfolio?

EQs: Effectiveness

(EQ2. To what extent have TMA's portfolio and support contributed to the intended short-term outcomes and the intermediate outcome in the theory of change?)

6. In your experience, how does TMA's approach to addressing trade barriers and improving competitiveness compare with other similar programmes you support in the region? Are there any distinct advantages or gaps?
7. What do you consider the most significant outcomes or achievements resulting from TMA's activities to date?

EQs: Efficiency / Coherence

(EQ4: How economically were resources/inputs (funds, expertise, time, equipment, etc.) converted into the expected results?)

8. How would you assess the efficiency of the portfolio's financial and operational management? Have resources been effectively utilized to achieve the desired outcomes?

(EQ5: To what extent do policy and regulatory interventions underpin and/or contribute to other work streams and intermediate outcomes, and vice versa, including expected results?)

9. To what extent is this portfolio aligned with other donor-funded programmes in the same area within the EAC region? Have synergies been created, or do you observe duplication?

EQs: Sustainability

(EQ8: To what extent have the policy & regulatory reforms supported under TMA's trade regulation portfolio been institutionalised?)



10. To what extent do you think the policy and regulatory reforms supported by TMA's portfolio will be sustainable, and how do you envision this happening?
11. In your opinion, what factors could hinder the institutionalization of the reforms or mechanisms introduced by the programme?
12. Conversely, what factors could contribute to the institutionalization of the reforms or mechanisms introduced by the programme?
13. To what extent were the supported interventions financially sustainable? What measures could be put in place to enhance sustainability?

EQs: Lessons and Recommendations

14. What recommendations would you suggest for improving future projects or interventions? Are there any new areas or approaches that should be considered in future programming?

Non-EQ specific notes



Focus Group Discussion Guide

For private sector actors

Guide

Instructions

The purpose of this focus group discussion is to assess the experience of the private sector actors who have experienced the impacts from the projects (whether positive or negative) or were involved in the project execution.

The focus groups should be organized separately for male and female private sector actors to ensure open and comfortable participation, as well as to ensure the disaggregation of data by gender. The discussions should take place in a conducive environment, such as a community centre, a local trade hub, or any other familiar setting where participants feel at ease. Consent should be secured for the evaluation team to take notes and again for taking photos later.

While prominent private sector actors (such as successful business owners, well-established entrepreneurs, etc.) may be more inclined to speak first, the facilitator should ensure that a wide range of traders are encouraged to respond to the questions. Special attention should be given to including actors who may be less prominent or economically disadvantaged, as well as those who might not belong to the dominant political, ethnic, or social groups, to ensure that diverse voices and perspectives are represented.

The FGD should take between 1 and 1.5 hours. The evaluation team should arrange for local food and drinks (coffee, tea, bottled water, etc.) to be provided before and during the FGD. Babies and children are welcome! Some participants may require a cash contribution from the evaluation team, delivered through an appropriate intermediary, to cover transport costs.

Introduction

Good morning/afternoon and thank you all for joining us today. We are very grateful for your time and input today.

As you may be aware, TMA has requested us to evaluate its trade portfolio of projects, some of which have likely impacted your business operations. We want to learn what your experience with these projects and the changes that they have brought has been.

We will ask you several questions this morning/afternoon. We will not quote any of you by name in our report. We would like to take notes on your answers, if you agree. Would that be OK? [Confirm agreement/disagreement].

FGD form

Introduction

To start, let's go around the table and have everyone introduce themselves. As you do so, please share:

- Your current position and the sector you work in.
- Your connection to the TMA projects (how you know them and / or your involvement in them).

EQs: Relevance



(EQ1. To what extent were the objectives of the portfolio, as laid out in the TMA Strategy 2 and TOCs, consistent with recipients' requirements, country needs, global and regional priorities and partners' policies?)

1. What are the most significant trade barriers and competitiveness challenges that you face as a private sector actor?
2. To what extent does the TMA's activities respond to your needs and priorities and help you face the barriers you mentioned? Could you provide specific practical examples?

EQs: Effectiveness

(EQ2. To what extent have TMA's portfolio and support contributed to the intended short-term outcomes and the intermediate outcome in the theory of change?)

3. How and to what extent would you say that TMA's support has contributed to putting in place adequate policies and regulations that reduce trade barriers? Can you provide specific examples of how these policies have impacted your business operations?
4. Have you seen any improvements in customs procedures, border delays, transaction costs, or NTBs as a result of TMA's efforts? How has this impacted your business?
5. In your opinion, what are the remaining challenges in trade facilitation or business competitiveness that still need to be addressed by initiatives like TMA, and what further support would be most helpful for your business moving forward?

(EQ3. To what extent are the assumptions and causal pathways in the theory of change valid and change happened as expected?)

6. Have any of the changes resulting from TMA's interventions led to unintended positive or negative consequences for your business? Could you provide specific examples? For any negative impacts, what measures could help mitigate them?

EQs: Impact

(EQ7: What are the positive and negative, primary and secondary, short-term, medium and long-term effects (specifically on trade outcomes) produced by the portfolio, whether directly or indirectly, intended or unintended?)

7. To what extent do you feel that TMA's interventions have enhanced the overall competitiveness of your business or sector? How has this support improved your ability to compete both locally and internationally? Additionally, have TMA's efforts improved your access to new markets or enhanced your position in existing markets?

EQs: Cross-cutting themes

(EQ9: To what extent does TMA consider poverty reduction and the impacts on the poor, gender and inclusion, environment and climate change in the design and implementation of its interventions?)

8. To your knowledge, to what extent have the changes in trade, such as those supported by TMA, benefited vulnerable populations such as the poor, women, youth, and people with disabilities?



9. Has your business been positively or negatively impacted by environmental regulations or standards introduced in trade activities? Can you provide examples?

Wrap up

10. Is there anything else you would like to add about your experience with TMA's support or any final thoughts on how the programme could be improved?

Non-EQ specific notes



For Customs officials and cross-borders traders

Guide

Instructions

The purpose of this focus group discussion is to assess the experience of the customs officials and cross-border traders who have experienced the impacts from the projects (whether positive or negative) or were involved in the project execution. The discussion will focus specifically on cross-border trade facilitation.

The discussions should take place in a conducive environment, such as a community centre, a local trade hub, or any other familiar setting where participants feel at ease. Consent should be secured for the evaluation team to take notes and again for taking photos later.

The FGD should take between 1 and 1.5 hours. The evaluation team should arrange for local food and drinks (coffee, tea, bottled water, etc.) to be provided before and during the FGD. Babies and children are welcome! Some participants may require a cash contribution from the evaluation team, delivered through an appropriate intermediary, to cover transport costs.

Introduction

Good morning/afternoon and thank you all for joining us today. We are very grateful for your time and input today.

As you may be aware, TMA has requested us to evaluate its trade portfolio of projects, some of which have likely impacted your daily operations. We want to learn what your experience with these projects and the changes that they have brought has been.

We will ask you several questions this morning/afternoon. We will not quote any of you by name in our report. We would like to take notes on your answers, if you agree. Would that be OK? [Confirm agreement/disagreement].

FGD form

Introduction

To start, let's go around the table and have everyone introduce themselves. As you do so, please share:

- Your current position and the sector you work in.
- Your connection to the TMA projects (how you know them and / or your involvement in them).

EQs: Relevance

(EQ1. To what extent were the objectives of the portfolio, as laid out in the TMA Strategy 2 and TOCs, consistent with recipients' requirements, country needs, global and regional priorities and partners' policies?)

1. What are the most significant barriers you noted in cross-border trade, particularly in customs procedures, border delays, transaction costs, and other trade barriers?
2. To what extent does the TMA's activities respond to your needs and priorities and help you face the barriers you mentioned? Could you provide specific practical examples?

EQs: Effectiveness



(EQ2. To what extent have TMA's portfolio and support contributed to the intended short-term outcomes and the intermediate outcome in the theory of change?)

3. How and to what extent would you say that TMA's support has contributed to putting in place adequate policies and regulations that reduce trade barriers? Can you provide specific examples of how these policies have affected cross-border trade operations?
4. Have you seen any improvements in customs procedures, border delays, transaction costs, or NTBs as a result of TMA's efforts? How has this impacted your operations?
5. What additional support or measures would you suggest to further improve cross-border trade facilitation and customs procedures from the perspective of customs officials / cross-border trader?

(EQ3. To what extent are the assumptions and causal pathways in the theory of change valid and change happened as expected?)

6. Have any of the changes resulting from TMA's interventions led to unintended positive or negative consequences for your cross-border trade activities? Could you provide specific examples? For any negative impacts, what measures could help mitigate them?

EQs: Cross-cutting themes

(EQ9: To what extent does TMA consider poverty reduction and the impacts on the poor, gender and inclusion, environment and climate change in the design and implementation of its interventions?)

7. To your knowledge, to what extent have the changes in cross-border trade, such as those supported by TMA, benefited vulnerable populations such as the poor, women, youth, and people with disabilities?
8. Have you seen an increase in women's participation in formal cross-border trade? Can you explain?
9. Have the environmental regulations or trade standards introduced through TMA's interventions had any impact on your work as a customs official? Could you share any examples of how these changes have affected customs procedures or trade facilitation at your border post?

Wrap up

10. Is there anything else you would like to add about your experience with TMA's support or any final thoughts on how the programme could be improved?

Non-EQ specific notes



Annex 3: List of Consulted Persons

Persons consulted during the ToC workshop:

Table 8: Consulted persons

Name	Organization and function
Catherine Nanzigu	Director, Results & Impact
Jane Nyawira	Manager, Impact
Mark Priestley	Senior Director, Trade Environment
Benedict Musengele	Director, Trade & Customs
Martha Bande	Programme Manager, Trade Environment
Elizabeth Kamunyu	Manager, Trade & Customs
Theresia Komba	Programme Officer, Trade
Maureen Wanyonyi	Programme Officer, Trade
Job Wanjohi	Programme Manager, Trade Facilitation
Loyce Kalembo	Assistant



Annex 4: Bibliography

The following documents were consulted, when available, for the 16 selected projects:

- Annual programme progress reports
- Baseline reports
- Completion reports
- Evaluation reports and studies
- Financing agreements
- Inception reports
- Meeting notes
- Monitoring plans
- Project appraisal reports
- Project documents
- Project sheets
- Project work plans
- Result chains documents
- Risk plans

Other documents:

Annual reviews of TradeMark Africa Strategy 2

Department for International Development (DFID). (2021). *Memorandum of Understanding: Support to TradeMark East Africa – Strategy 2.*

Department for International Development (DFID). (2023). *Memorandum of Understanding: Support to TradeMark East Africa – Strategy 2.*

East African Community Secretariat, the International Finance Corporation and the World Bank. (2016). *East African Common Market Scorecard 2016*

East African Community Secretariat, the International Finance Corporation and the World Bank. (2018). *East African Common Market Scorecard 2018*

East African Community Secretariat, the International Finance Corporation and the World Bank. (2020). *East African Common Market Scorecard 2020*

Foreign, Commonwealth & Development Office. (2017). *Business Case: Summary Sheet: Support to TradeMark East Africa – Strategy 2 (STS2).*

TradeMark East Africa. (2017). *Corporate Strategy 2017/18 – 2022/23.*

TradeMark East Africa. (2020). *Strategy 2 – Monitoring, Evaluation and Learning Strategy.*

TradeMark East Africa. (n.d). *Strategy 2 – Monitoring, Evaluation and Learning Strategy (Summary).*

TradeMark East Africa. (n.d). *Terms of Reference: Improved Trade Regulatory Environment Portfolio Evaluation.*

TradeMark East Africa. (n.d). *TMEA Organization Structure.*

TradeMark East Africa. (n.d.). *TMEA Strategy 2 – Results Framework.*



Turner, L. (n.d.). *Evaluability assessment: TradeMark Africa – Improved Trade Regulatory Environment*. Equals2.



Annex 5: List of TMA Focal Points for Each Portfolio Project

Table 9: TMA Focal Points

#	Code	Project Title	Budget	Duration	Implementer	Contact
1	2810	Implementation of WTO Agreements	\$1,049,529.00	2018-2023	EAC	Racheal Kemigisha Racheal.kemigisha@trademarkafrica.com
2	2802	Elimination of NTBs	\$1,573,733.23	2018-2026	EAC	Racheal Kemigisha Racheal.kemigisha@trademarkafrica.com
3	2805	OSBP IBM Border Management and Coordination	\$819,884.80	2017-2023	EAC	Elizabeth Kamunyu Elizabeth.kamunyu@tradermarkafrica.com
4	2902	Single Customs Territory	\$3,147,129.16	2017-2024	EAC	Elizabeth Kamunyu Elizabeth.kamunyu@tradermarkafrica.com
5	2908	EAC External Trade Policy	\$1,470,226.73	2017-2024	EAC	Elizabeth Kamunyu Elizabeth.kamunyu@tradermarkafrica.com
6	2904	EAC CMP Implementation Monitoring	\$836,900.72	2017-2024	EAC	Elizabeth Kamunyu Elizabeth.kamunyu@tradermarkafrica.com
7	3554	Implementation of Trade Policy in Kenya	\$1,394,543.83	2018-2024	Department of Trade and Enterprise	Job Wanjohi Job.wanjohi@trademarkafrica.com
8	3555	???, Kenya				Job Wanjohi
9	3833	Support to MINICOM on Trade Policy Rwanda	\$1,060,257.63	2018-2021	??	Anataria Karimba Anataria.karimba@trademarkea.com
10	3815	Elimination of NTBs and Trade Facilitation, Rwanda	\$523,100.38	2008-2021		Anataria Karimba Anataria.karimba@trademarkea.com



#	Code	Project Title	Budget	Duration	Implementer	Contact
11	3734	Trade and Investment, Tanzania	\$1,971,826.69	2018-2024		Solomon Michael Solomon.michael@trademarkea.com
12	3735	Cross-Border Trade, Tanzania	\$469,634.66	2018-2023	TMA	Solomon Michael Solomon.michael@trademarkea.com
13	3733	Implementation of WTO TFA, Tanzania	\$350,130.65	2018-2022	TMA	Solomon Michael Solomon.michael@trademarkea.com
14	3713	NTB Programme, Tanzania	\$379,864	2018-2022	TMA	Solomon Michael Solomon.michael@trademarkea.com
15	3704	??? Tanzania				Solomon Michael
16	3615	Trade Policy Ratification, Uganda	\$831,840.80	2018-2023	???	David Baziwane David.baziwane@trademarkafrica.com



Annex 6: Itinerary tool

TMA S2 Evaluation – Rwanda

Week of XX, 2025 - Arrival at Kigali airport X October X - 6 p.m.

Monday, X - Institutional interviews

Time	Activity	Stakeholders' contact information, addresses and comments
9h30 – 10h00	Ministry of Trade, Industry and EAC Affairs	
10h00-10h30	National Monitoring Committee (NMC)	
11h 00-12h 30	Tanzanian Investment Centre (TIC)	
12h 30-14h	Lunch	
14h 00-15h 00	...	
15h 00 -16h 00		
16h 00-17h 00		

Tuesday, - Institutional talks & transport

Time	Activity	Contact information, addresses and comments
9h -10h 00		
10 h 30 – 13 h 00		
13 h 00– 13h30		
13 h 30 14 h 30		
14h30-15h30		
15h30-18h30	Travel to X (e.g., border, secondary city, etc_)	Spend a night in X HOTEL

Wednesday, - Innovation site visits and group discussions



Time	Activity	Contact information, addresses and comments
07h00- 09h30	Travelling to X	
09h30-	FGDs with private sector representatives	
10 h - midi		
14h-15h30		
16h00 – 17 h	Return to X	

Thursday, - Continued visit to X

Time	Activity	Contact information, addresses and comments
07h30- 09h00	Travelling to X	
09h00-11h00	Return to X	
11h00-13h00	FGDs with private sector (women's discussion group)	
13h00-14h00	Lunch at Bomang'ombe	
14h00-16h30	Return to X	

Friday, - Continued visit to X

Time	Activity	Contact information, addresses and comments
07h30- 09h00	Travelling to X	
09h00-11h00	Return to X	
11h00-13h00	FGDs with private sector	
13h00-14h00	Lunch at	
14h00-16h30	Return to X	

Saturday, - Continued visit to X



Time	Activity	Contact information, addresses and comments
07h30- 09h00	Travelling to X	
09h00-11h00	Return to X	
11h00-13h00	FGDs with private sector	
13h00-14h00	Lunch at	
14h00-16h30	Return to X	

Sunday, - Continued visit to X

Time	Activity	Contact information, addresses and comments
07h30- 09h00	Travelling to X	
09h00-11h00	Return to X	
11h00-13h00	FGDs with private sector (women's discussion group)	
13h00-14h00	Lunch at Bomang'ombe	
14h00-16h30	Return to X	

Monday - Debriefing

Time	Activity	Commentaries
07h30-09h30	Debriefing preparation	
09h30-11h00	Debrief with X	
1.45pm-6.25pm	Depart from X Airport. (Leave for the Airport at X pm)	



Annex 7: List of consulted stakeholders

Table 10: Consulted Stakeholders

No.	Name	Position	Organization
Kenya			
1	Amb. Nelson Ndirangu	Consultant	Trade Hub East Africa
2	Elijah Manyara	Consultant	Trade Hub East Africa
3	Benard Kagira	Trade expert & Technical Assistance provider	
4	Denis Osoro	Assistant Director and Chair of NTB Committee	State Department of EAC
5	Mr. Owango		State Department of EAC
6	Daniel Wachira	NTFC Coordinator	National Trade Facilitation Committee (NTFC)
7	Mathew Kamau	Alternate Coordinator	National Trade Facilitation Committee (NTFC)
8	Daniel Nderi	Acting Head, trade remedies investigations and evaluations.	KenTrade
9	Erick Lukoye	Projects manager	KenTrade
10	Furaha Wanjiru	Manager customer service/change management	KenTrade
11	Abel Kamau		Trade Policy Manager
12	Wycliffe Wanda	Chief Executive Officer	Kenya International Freight and Warehousing Association (KIFWA)
13	Patrice Ngenga	Market access programme	Fresh Produce Exporters Association
Rwanda			
14	Doreen Ntawebasa	Director General Trade (MINICOM)	National Trade Facilitation Committee (NTFC)
15	Peter Mwizerwa		Rwanda Revenue Authority (RRA)
16	Alex Mugire		Rwanda Revenue Authority (RRA)
17	Anthony Kajangwe	Permenant Secretary Minicom	Ministry of Trade and Industry (MINICOM)
18	Isaac Ndungu	Trade Policy Advisor	
19	Naphtal Kazoora	Head of exports and SEZ	Rwanda Development Board
20	Nzair Philip	Head of inspections	Rwanda Inspectorate, Competition and Consumer Protection Authority (RICA)
21	Anonymous	Cooperative Member	Joint Border Committees (JBCs)
22	Chantal Tuyishimire	Young Professionals' participant	Prime Minister's office
23	James Tayebwa	Head of unit	Pro-Femmes Twese Hamwe (PFTH) (group of cooperatives)



24	Martin Mutabazi	PSF representative to NTFC	Rwanda Private Sector Federation (PSF)
Tanzania			
25	Goodluck Luhanjo		Tanzania Mercantile Exchange (TMX)
26	Ombeni Mwashu		Ministry of Industry and Trade
27	Gervas Kaisi		Tanzania Bureau of Standards (TBS)
28	Elias Mshomba		Tanzania Export Processing Zones Authority (EPZA)
29	Mr. Mwaya		Tanzania Freight Forwarders Association
30	Mr. Farajik		Tanzania Private Sector Foundation (TPSF)
31	Jackson Paul	Manager Scanner Sites	Tanzania Revenue Authority (TRA)
32	Mwambagele Nsajigwa	Assistant Regional Manager - Customs (Songwe) - Tunduma IBM	Tanzania Revenue Authority (TRA)
33	Zahoro Makame	Officer Incharge - Tunduma OSBP	Tanzania Revenue Authority (TRA)
34	Justin Kisoka	Director for Policy and Planning	Ministry of Foreign Affairs and East African Cooperation
35	Gao Ngwilizi	ICT Manager	Tanzania Investment Centre (TIC)
36	Glory Lucas	ICT Officer	Tanzania Investment Centre (TIC)
37	Joseph Nyerro	ICT Officer	Tanzania Investment Centre (TIC)
38	Olinga Manderu	ICT Officer	Tanzania Investment Center (TIC)
39	Nuru Ndile	Assistant Commissioner- Debt Management Division	Ministry of Finance
40	Mpanduji Mathias	Trade Officer	Ministry of Industry and Trade
41	Thomas Mcharo	Trade Officer	Ministry of Industry and Trade
42	Oliver Amani	Trade Officer	Ministry of Industry and Trade
43	Prosper Sangawo	Trade Officer	Ministry of Industry and Trade
44	Rashid Masuwe	Tarde Integration	Ministry of Industry and Trade
45	Anna Shayo	Principal Planning Officer	Tanzania Ports Authority (TPA)
46	Eric Hatia	Risk Management Officer	Tanzania Ports Authority (TPA)
47	Mary Peter	Intern	Tanzania Ports Authority (TPA)
48	Abdul Abubakari	Intern	Tanzania Ports Authority (TPA)
49	Fadhila Muhanga	Senior Planning Officer	Tanzania Ports Authority (TPA)
50	Abigael Mpoli	Planning Officer II	Tanzania Ports Authority (TPA)
51	Innocent Kapinga	Senior Planning Officer	Tanzania Ports Authority (TPA)
52	Vilet Muagama	Quality Assurance Officer	Tanzania Ports Authority (TPA)
53	Dr. Elias Aloyce Mshomba	IT Head	Export Processing Zone Authority (EPZA)
54	Alfred Ngelula	Marketing Officer	Export Processing Zone Authority (EPZA)



55	Veronica Ngeregeza	Investment Officer	Export Processing Zone Authority (EPZA)
56	Godluck Luhanjo	IT Officer	Tanzania Mercantile Exchange (TMX)
57		Planning Officer	Tanzania Mercantile Exchange (TMX)
58	Juster Martine	Senior Trade Officer	Tanzania Mercantile Exchange (TMX)
59	Gasper Mdee	Head of Programs and Enterprise Development	Tanzania Private Sector Foundation (TPSF)
60	Semali Kisamo	Head of Research and Policy Advocacy	Tanzania Private Sector Foundation (TPSF)
61	Victoria Michael	Former Policy Analyst	Tanzania Private Sector Foundation (TPSF)
62	Maurine Kiboko	Policy Analyst	Tanzania Private Sector Foundation (TPSF)
63	Hadija Bakari	Policy Analyst	Tanzania Private Sector Foundation (TPSF)
64	Eng. Melchior	Director	Central Corridor Transit Transport Facilitation Agency (CCTTFA)
65	Faraji Kondo	Database Manager	Central Corridor Transit Transport Facilitation Agency (CCTTFA)
66	Edward Urio	President	Tanzania Freight Forwarders Association (TAFFA)
67	Liston Godluck	Executive Secretary	Tanzania Freight Forwarders Association (TAFFA)
68	Godifi Muganda	Training Coordinator and Policy Analyst	Tanzania Freight Forwarders Association (TAFFA)
69	Mercy Philip	Business Development Manager	Tanzania Chamber of Commerce Industry and Agriculture (TCCIA)
70	Victoria Michael	Technical Advisor - Trade	Tanzania Chamber of Commerce Industry and Agriculture (TCCIA)
Uganda			
71	Cleophas Ndoreire	Under secretary	Ministry of Trade, Industry and Cooperatives (MoTIC)
72	Edith Mwanje	Perminent Secretary	Ministry of EAC
73	Dianah Nannono		Ministry of Planning and Economic Development (MoPED)
74	Asadu Kigozi Kisitu		Uganda Revenue Authority (URA)
75	Brian Kato		Uganda Revenue Authority (URA)
76	Peace Viko		Uganda Revenue Authority (URA)
77	James Kasigwa		Uganda National Bureau of Standards
78	Patricia Bageine		Uganda National Bureau of Standards
79	Aziz Mukota		Uganda National Bureau of Standards
80	Peter Malinga		ESAB
81	Abubaker Moki	Consultant	



82	Mr. Stephen Asimwe	Chief Executive Officer	Private Sector Foundation Uganda (PSFU)
83	Connie Kihembo		Uganda Women Entrepreneurs Association Limited (UWEAL)
84	John Walugembe		Federation of Small and Medium Enterprises Uganda (FSME)
85	Olive Kigongo		Uganda Small Scale Industries Association (USSIA)
86	Lino Criel Icila	Secretary General	Uganda Clearing Industry and Forwarders Association (UCIFA)
Regional			
87	Fiona Nakasiga		EU (Uganda)
88	Jean Lubega-Kyazze		IFC
89	Hellen Orrario	Economist	GAC
90	Alex Fraser	Senior Adviser	FCDO
TMA			
91	Mark Priestly	Senior Director, Country Programme	TMA
92	David Butera	Project manager	TMA - Rwanda
93	Patrick Maingi	Former Technical Programme Manager	TMA - Kenya
94	Matthew Maiyo	Former Programme Manager	TMA - Kenya
95	Mary Odongo	Programme Manager, NTBs for Africa programme	TMA - Kenya
96	Joshua Mutunga	Trade Policy Manager	TMA - Kenya
97	Josephat Magita-Fredy	Program Manger	TMA
98	Catherine Nanzigu	Impact and Results Director	TMA
99	Benedict Musengele	Director Trade and Customs	TMA
100	Jane Nyawira	Monitoring/ Evaluation/ Results/ Impact Measurement Specialist	TMA
101	Stephen Muli	Impact and Results	TMA
102	Graudia Nyambura	Impact and Results	TMA
103	Eugene Torero	Director, Trade Policy and Facilitation	TMA
104	Rachel Kemigisha	Programme Manager	TMA



Annex 8: Project-level details

EAC level and trade policy (TP) related projects

1. Project 2802: Elimination of NTBs TP

- i. **Timeframe:** 2018 – 2026
- ii. **Budget:** US\$1,573,733.23⁵³
- iii. **Project description:**

The regional NTB elimination project seeks to strengthen the institutional capacity of various agencies in the EAC to effectively respond to and resolve NTBs as well as improving cooperation and dialogue in their resolution. This is then to lead to a more coordinated approach to NTB identification, monitoring and elimination, while using more effective delivery channels and better integration with other TMA projects in the EAC.

2. Project 2805: Coordinated border management (OSBP-IBM)

- i. **Timeframe:** 2018 – 2023
- ii. **Budget:** The total indicative budget for both regional and country projects is US\$ 20.57 million, of which \$15.17million was committed. The Coordinated border management project's budget is US\$819,884.80. For Tanzania, the budget is of \$469,634.66
- iii. **Project description:**

The project focused on the most immediate priorities that would sustain and further enhance operational efficiency, capacity and environmental sustainability of selected One-stop border post (OSBP). These priorities aim at minimising costs and delays at borders; further streamlining of border procedures and establishing a sustainable and systematic border performance improvement programme. There are two specific areas that the programme seeks to address at OSBPs supported under TMEA Strategy one and those proposed under strategy two and these include enhancing monitoring of OSBP performance and improving trade flow efficiency at new borders.

3. Project 2810 WTO Agreements

- i. **Timeframe:** 2018 – 2023
- ii. **Budget:** US\$1,049,529.98
- iii. **Project description:**

The project was aimed at providing support to the EAC Partner States at both national and regional levels in the implementation of the WTO Trade Facilitation Agreement (TFA) through increasing the transparency of cross-border trade procedures and enhancing the role of women in cross border trade in EAC.

4. Project 2902: Single Customs Territory (EAC)

- i. **Timeframe:** 2017 – 2021

⁵³ All budgets are valued in USD.



ii. **Budget: US\$4,395,000**

iii. **Project description:**

The Single Customs Territory was aimed at improving the trade environment and creating competitiveness of goods traded in the region through removal of internal border controls, documentation and minimisation of costly processes that delay movement of goods. The Single Customs Territory was to contribute to the consolidation of the Customs Union by making it effective and supportive to the implementation of the EAC Common Market.

5. Project 2904: Common Market Protocol (CMP) Implementation Monitoring EAC

i. **Timeframe:** 2017 – 2024

ii. **Budget:** US\$836,900

iii. **Project description**

TMA is providing support towards the implementation of EAC CMP and the monitoring of the implementation of the Partner States' commitments and the recommendations arising from the 2014 and 2016 Common Market Scorecards. This project allows member states to review their regulatory environment and align them with the provisions of the EAC CMP. This is done in collaboration with IFC, from the World Bank Group (WBG). The project also supports the EAC to enhance its East African Monitoring System which monitors the implementation of directives given by the summit/Council and Sectoral Council of EAC.

6. Project 2908: EAC External Trade Policy

i. **Timeframe:** 2017 – 2024

ii. **Budget:** US\$1,470,226.73

iii. **Project description**

The purpose of the TMA TP Project is to support EAC Partner States improve their trade regulatory environment and contribute to the reduction of trade barriers and improved business competitiveness in the region. The support is building on previous achievements under Strategy 1 and ongoing efforts to review, develop and implement TPs that together provide a framework for the EAC to realise its ambitious integration agenda. It entails supporting the EAC in development and implementation of the EAC TP frameworks, with specific focus on Trade Facilitation, NTBs/Non-Tariff Measures (NTMs) and informal cross border trade, negotiations with third parties, implementation of agreements and capacity building. Other areas include support towards the EAC Simplified Trade Regime and the Rules of Origin, operationalization of Trade Remedy mechanism and the conclusion of CET review, among others.

Kenya project

7. Project 3554 – Trade Policy Kenya

i. **Timeframe:** 2018 – 2023

ii. **Budget:** US\$475,971.09

iii. **Project Description:**



Project 3554 focused on the improvement of trade regulatory environment, application of streamlined and coherent trade rules and regulations that are aligned to regional and international trade practices. This is achieved through ensuring alignment of national and county legislation and regulations, supporting alignment of national policies with regional frameworks, operationalising agencies to address trade remedies, enhancing capacities of trade officers, providing a mechanism for addressing trade issues/complaints, reducing dumped and subsidised products in the Kenyan market. Furthermore, the project supports implementation of National Trade Policy, strengthened capacities of Market Development Assistance (MDA) to formulate and implement trade agreements and commitments, elimination of NTBs, and implementation of both the EAC common Market Protocol and the AfCFTA. While focused on trade regulatory and policy implementation, the project improved trade efficiency indirectly benefiting women and vulnerable groups by accelerating implementation of trade agreements and eliminating the NTBs.

Uganda project

8. Project 3615

- i. Timeframe:** 2018 - 2023
- ii. Budget:** US\$831,840.8
- iii. Project Description:**

Project 3615 focused on the development of the National Trade Facilitation Plan and the implementation of Uganda's WTO TFA commitments. The National Trade Facilitation Plan was developed with two distinct but interrelated dimensions. First, the NTFP was based on the thematic topics of the WTO TFA suggested by the TFA sub-committee; Second, the NTFP also identified the WTO-Plus trade facilitation measures under the responsibilities of relevant agencies.

Tanzanian projects

9. Project 3713 – NTB Programme

- i. Timeframe:** 2017 - 2021
- ii. Budget:** US\$288,000
- iii. Project Description:**

The NTB Programme (Project 3713) targets identifying and mitigating non-tariff barriers that impede the smooth movement of goods. The project aims to create a more predictable trading environment and reduce regulatory friction by conducting in-depth policy reviews and engaging stakeholders to develop effective strategies. It also implements targeted capacity-building interventions to ensure that the reductions in NTBs are sustainable. Key stakeholders involved include regulatory agencies, trade associations, local business communities, TMEA, and regional trade partners. As an integral part of the broader regulatory reform portfolio, this project works with initiatives focused on trade policy reform and WTO compliance to enhance overall market efficiency.

10. Project 3733 – WTO Agreements



- i. **Timeframe:** Not provided - 2021
- ii. **Budget:** US\$316,000
- iii. **Project Description:**

Project 3733 is dedicated to ensuring that Tanzania's trade regulations comply with the WTO rules, thereby enhancing transparency and regulatory consistency within the national trade framework. This project involves a detailed review and revision of legislative frameworks to identify and address gaps in WTO compliance, coupled with facilitating dialogue among policymakers, regulators, and trade experts. The primary stakeholders are government legislative bodies, trade regulatory authorities, TMA, and international trade partners. Serving as the regulatory cornerstone, Project 3733 reinforces Tanzania's commitment to international trade norms, and its alignment with related projects—such as those on trade policy reform and border management—creates a cohesive strategy to reduce trade barriers and promote market efficiency.

11. Project 3734 – Trade Policy Project

- i. **Timeframe:** 2018 – 2022
- ii. **Budget:** Allocated Funds: Approximately USD \$3,015,000 Expenditure: Approximately USD 2,888,000
- iii. **Project Description:**

Project 3734 focuses on reviewing and updating Tanzania's national trade policy to remove inconsistencies and to align the regulatory framework with regional trade systems. The project undertakes a comprehensive analysis of existing trade policies to identify gaps and harmonize legislation with both regional and international standards. In doing so, it also strengthens institutional capacity through targeted training and extensive stakeholder consultations. Key stakeholders include national regulatory authorities, legislative bodies, East African Community institutions, TMEA, and international trade partners. As a cornerstone of policy reform, this project establishes a robust regulatory foundation that supports complementary initiatives—such as WTO compliance and NTB elimination—thereby contributing to the overall strategy of reducing trade barriers and enhancing market efficiency.

12. Project 3735 – Cross Border Trade

- i. **Timeframe:** 2017 – 2023
- ii. **Budget:** US\$966,000
- iii. **Project Description:**

Project 3735 aims to enhance the efficiency of cross-border trade operations by streamlining customs procedures and eliminating regulatory bottlenecks. The initiative standardizes and simplifies border crossings processes while improving coordination among border agencies through better data collection and communication. Process improvements implemented under this project are intended to reduce delays and lower transaction costs, facilitating smoother trade flows. The project engages key stakeholders such as border agencies, customs authorities, local governments, TMEA, and regional trade partners. By serving as the operational arm that complements higher-level policy reforms, Project 3735 plays a vital role in the broader strategy of regulatory harmonization and integrated border management.



13. Project 3704 – Tunduma IBM Phase 2

Timeframe: 2018 - 2021

Budget:

- Allocated Funds: Approximately US\$ 4,108,000
- Expenditure: Approximately US\$ 3,956,000

Project Description:

Project 3704 focuses on modernizing and optimizing border management operations at Tunduma, a key border crossing in Tanzania. The initiative involves upgrading infrastructure, refining joint operating procedures, and strengthening legal frameworks that govern border operations. Additionally, the project provides comprehensive capacity-building for border personnel to ensure coordinated and efficient management of cross-border processes. Stakeholders include border management authorities, local governments, TMA, and regional trade bodies. As a flagship integrated border management (IBM) project, Tunduma IBM Phase 2 converts policy reforms and regulatory improvements into tangible operational efficiencies, complementing higher-level initiatives in trade policy and WTO compliance to reduce overall trade barriers.

Rwandan projects

14. Project 3815: NTBs Elimination Rwanda

- Timeframe:** 2018 – 2021
- Budget:** US\$523,100.38
- Project description:**

In Rwanda, TMA has been supporting the elimination of NTBs to trade through the Ministry of Trade, Industry and EAC Affairs as the Chair and Secretariat to the National Monitoring Committee (NMC). The Rwanda NTB programme therefore aims to support Improvement of Mechanisms for Active Engagement on Elimination of Cross-Border NTB's; Enhance operations of the Rwanda NMC for elimination of outstanding NTBs; Implementation of the EAC Time Bound Matrix on Elimination of NTBs and; Increase awareness on NMC activities and NTB elimination mechanisms.

15. ⁵⁴Project 3833: TP and CBT Rwanda

- Timeframe:** 2018 – 2021
- Budget:** US\$1,060,257.63
- Project description:**

This project focused on national policy coherency and implementation, leading to improved trade strategy and policy alignment with priorities such as the National Strategy for Transformation, "Made in Rwanda" Policy, export priorities, Industrial development and Regional Trade Policy. It built on work already done in

⁵⁴ The ET does not have sufficient details on the 16th project "3555 Moyale IBM Kenyan project" to present it here. Once the information is available, it will be added to the list.



Phase 1, focusing on achieving successful implementation and continuous review of strategic policy documents as well as encouraging cross-stakeholder coordination on issues related to trade policy and facilitation.



Annex 9: Sampling, Key Institutions/Team with Stakeholders for the Portfolio Evaluation (IO1.4)

Table 11: Sampling, Key Institutions / Team with Stakeholders

Category	Key Institutions/Teams with Potential Stakeholders/Informants
(1) TMA Implementing Teams	<p>TMA's Headquarters, Nairobi, Kenya: Project teams involved in projects implementation; MEL/Impact team; and Finance team</p> <p>Country Operational Offices: TMA country teams in Keyna, Rwanda, Tanzania, Uganda, and other country offices (for example, Ghana, Burundi, Ethiopia)</p>
(2) National Government Agencies	<p>Relevant government ministries/agencies involved in the design and implementation of project activities in the region and in their respective countries</p>
(2.1) Kenya	<ul style="list-style-type: none"> • TMA's Kenya Country programme • State Department of Trade (SDT) • State Department of Investment Promotion • State Department of EAC • Kenya Maritime Authority (KMA) • Kenya Port Authority (KPA) • National Trade Facilitation Committee (NTFC) • National Monitoring Committee of NTBs (NMC) • National Implementation Committee-AfCFTA • Northern Corridor Transit and Transport Coordination Authority (NCTTCA, also at regional level) • Boarder Management Secretariat • Kenya Revenue Authority • KenTrade <p>Secondary stakeholders</p> <ul style="list-style-type: none"> • Kenya National Highway Authority (KeNHA) • National OSBP Steering Committee (Moyale OSBP)
(2.2) Rwanda	<ul style="list-style-type: none"> • Joint Risk Management Committee (JRMC) • National Trade Facilitation Committee (NTFC) • Rwanda Food and Drugs Authority (FDA) • Rwanda Revenue Authority (RRA) • Ministry of Trade and Industry (MINICOM) • Trade Information Desks (TIDs) • Rwanda Development Board • Rwanda Inspectorate, Competition and Consumer Protection Authority (RICA) • Joint Border Committees (JBCs) • National Monitoring Committee (NMC) •
(2.3) Tanzania	<ul style="list-style-type: none"> • E-Government for Tanzania • Tanzanian Investment Centre (TIC) • Tanzania Mercantile Exchange (TMX) • • Ministry of Finance and Planning



Category	Key Institutions/Teams with Potential Stakeholders/Informants
	<ul style="list-style-type: none"> • Ministry of Foreign Affairs and East African Cooperation • Ministry of Industry and Trade • • National Trade Facilitation Committee (NTFC) • Prime Minister’s Office (PMO): • Tanzania Bureau of Standards (TBS): • Tanzania Electronic Investment Window (TeIW) • Tanzania Export Processing Zones Authority (EPZA) • Tanzania Export Promotion Zones (EPZs) / Special Economic Zones (SEZs) • Tanzania National Roads Agency (TANROADS) • Tanzania Ports Authority (TPA): • Tanzania Revenue Authority (TRA) • Tanzania Trade Development Authority (TanTrade) • Central Corridor Transit Transport Facilitation Agency (CCTTFA)
(2.4) Uganda	<ul style="list-style-type: none"> • Ministry of Trade, Industry and Cooperatives (MoTIC) • Ministry of EAC • National Committee on Trade Facilitation • National Monitoring Committee for NTB • Ministry of Planning and Economic Development (MoPED) • Uganda Revenue Authority () • Joint Border Committee (JBC) (chose one for two countries) • Uganda Free Zones and Export Promotions Authority •
(3) Private Sector Institutions and NGOs/CSOs	<ul style="list-style-type: none"> • Private Sector Foundation of Uganda (PSFU) • Uganda Manufacturing Association
(3.1) Kenya	<ul style="list-style-type: none"> • Kenya Association of Manufacturers (KAM) • Kenya Private Sector Alliance (KEPSA) • Kenya National Chamber of Commerce and Industry • Cross-border Traders Associations (CBTAs - Namanga, Busia, Malava, Moyale) • Kenya Transporters’ Association (KTA) • Kenya International Freight and Warehousing Association (KIFWA) • East Africa Tea Trade Association (EATTA) • Shippers’ council of East Africa <p>Secondary stakeholders</p> <ul style="list-style-type: none"> • Kenya Tea Development Agency (KTDA) • Kenya Flower Council (KFC)
(3.2) Rwanda	<ul style="list-style-type: none"> • Rwanda Freight Forwarders Association (RWAFFA) • Rwanda Private Sector Federation (PSF) • Cross Border Traders' Cooperatives/Associations (CBTAs)
(3.3) Tanzania	<ul style="list-style-type: none"> • Confederation of Tanzania Industries (CTI) • Tanzania Freight Forwarders Association • Tanzania Chamber of Commerce, Industry and Agriculture (TCCIA) • Tanzania Electronic Investment Window (TeIW) • • Tanzania Private Sector Foundation (TPSF) • Tanzania Women Chamber of Commerce (TWCC) •



Category	Key Institutions/Teams with Potential Stakeholders/Informants
(3.4) Uganda	<ul style="list-style-type: none"> • Uganda National Chamber of Commerce and Industries (UNCCI) • Uganda Manufacturers' Association (UMA) • Private Sector Foundation Uganda (PSFU) • Uganda Freight Forwarders Association (UFFA) • Uganda Women Entrepreneurs Association Limited (UWEAL) <p>Secondary Stakeholders</p> <ul style="list-style-type: none"> • Federation of Small and Medium Enterprises Uganda (FSME) • Uganda Small Scale Industries Association (USSIA) • Uganda Global Business Association (UGBA) • Uganda Clearing Industry and Forwarders Association (UCIFA) • National Association of Women's Organisation in Uganda • Trade and Business Development Centre (TBDC), Uganda
(4) Regional/Global Trade Institutions	<p>EAC Secretariat Directorate of Trade and Customs, Planning, private sector and investment promotion, and EAC Business Council</p> <p>UNCTAD</p> <p>Secondary Stakeholders</p> <p>AfCFTA Secretariat,</p> <p>ITC,</p> <p>WB</p> <p>WTO, WCO,⁵⁵ etc.</p>
(5) Development Partners	Both the current funding governments/foundation and other like-minded potential funding partners
(5.1) Current Funding Partners of TMA	Liaison Persons of the current funding agencies : AFD (France), Belgium, Global Affairs Canada (GAC), Danida (Denmark), INTPA (EU), Finland, Norway, IrishAid, the Netherlands, FCDO (UK), USAID, and Bill & Melinda Gates Foundation ⁵⁶
(5.2) Other Potential Partners	Potential Funding Partners : GIZ, AusAid, JICA, KOICA, CIDCA, World Bank, UNDP

⁵⁵ The stakeholders will be mainly covered through secondary literature review.

⁵⁶ A selection of two or three funders, involved in S2, will be interviewed.



Annex 10: Sampling Strategy

Presented below is the three-step process undertaken in the sampling strategy for data collection:

- 1) **Step 1** – The evaluators collaborated closely with the TMA operational teams (i.e. the 6 TMA coordinators/officers in charge of the 16 regional and country projects under the portfolio see annex 5) to select relevant participants, contributors or coordinators from those institutions for both virtual and in-person interviews. Through the process, a list of informants for potential KIIs and FGDs was elaborated, it included their names, contact information and their roles and responsibilities in the projects under review.

In addition to collecting contact information, TMA coordinators were interviewed by the ET to get their views and opinions about the performance, progresses, results and impacts of the projects under review, in addition to confirming the lists of potential interviewees to consult concerning these projects. The TMA impact team, finance team and senior management in charge of this portfolio were also to focus on the results, impacts, efficiency, value for money and overall management and coordination. In total, 9 interview sessions were organized.

- 2) **Step 2** – Baastel evaluators made field visits to Kenya, Rwanda, Tanzania and Uganda to collect primary data. Interviews were grouped to a large extent, including two or three stakeholders, although some strategic KIIs were also conducted individually. A total of 320 stakeholders were consulted in 96 data collection sessions (KIIs and FGDs) during the field missions. The KIIs mainly targeted the institutions' representatives and the FGDs were predominantly used for private sector stakeholders (see Table 1, section 4.3.). Each evaluator coordinated, in average, 24 face-to-face data collection events in every country. Data collection also included government officials and private sector representatives who participated in project design and implementation. The ET made sure that women entrepreneurs and traders were included in data collection as well, so they could share their views and opinions about project results and impacts. The associations and groups of private sector entities were also consulted, as were S1 TMA representatives, to ensure sufficient private sector participation in the evaluative activities. The evaluation experts also conducted interviews with regional entities, including, for example, the EAC Secretariat. The team visited specific sites at borders or other locations where public security was assured. These site visits were coordinated around the FGD sessions when and where possible. The evaluators maintained close communication with each other during the field missions and shared the collected data on Baastel's SharePoint in to conduct joint and collaborative analyses and answer the evaluation questions.

- 3) **Step 3** – The team included a sample of additional key stakeholders to be interviewed after the field missions. These stakeholders/informants were grouped into three categories: (a) those who were based in other EAC partner countries and who were also involved in the 16 regional or country projects; (b) those from relevant regional/global trade institutions and involved in TMA project design and implementation; and (c) those development officers from current or potential TMA donors. These virtual interviews were conducted by one or more evaluation experts, depending on the issues involved in the discussions.



Annex 11: Revised Work Plan

The Baastel team followed a timeline of 6 months (24 weeks) for this assignment. Day one of week 1 corresponded to the signature of the contract. This timeline agreed upon with TMA during the inception phase.

Table 12: Revised Work Plan

N°	Activity ¹	Weeks																							
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
	Inception phase																								
1	Kick off meeting	█																							
2	Preliminary document review	█	█	█																					
3	Drafting of the PRI			█																					
4	Comments on PRI			█	█	█																			
5	ToC Workshop			█		█	█																		
6	Final PRI			█			█																		
7	Drafting of the evaluation Inception report							█	█																
8	Presentation of the IR							█	█	█															
9	Comments on IR							█	█	█															
10	D1. Detailed Final inception report										█														
	Data collection phase																								
11	In-depth desk review											█	█												
12	Trade Policy review											█	█												
13	Data collection (Remote interviews, field missions' preparation and field mission)												█	█	█	█	█								



N°	Activity ¹	Weeks																							
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
14	Data analysis																								
15	Key findings of the evaluation based on the OECD-DAC criteria																								
	Reporting																								
16	Data triangulation																								
17	Shaping key findings preliminary conclusions, lessons learned and recommendations																								
18	Draft report finalization																								
19	Comments on draft report																								
20	D3. Final report																								
21	Presentation of the findings																								

1. **Weeks 1-10: Inception Phase**

- Signing of the contract.
- Preparation and submission of the Inception Report, including the Evaluation Workplan.
- Approval of the Evaluation Workplan by TMA's Results and Impact Director.

2. **Weeks 11-16: First Draft Evaluation Report**

- Commencement of the evaluation activities outlined in the approved workplan.
- Continuous data collection and analysis.
- Drafting of the first evaluation report.
- Submission of the first draft evaluation report.
- Agreement between TMA and the evaluation team on the final structure of the draft report.

3. **Weeks 17-20: Review Period**

- TMA and the Evaluation Committee review the first draft evaluation report.



- Provide written comments within two weeks of receiving the draft report.

4. **Weeks 20-24: Final Evaluation Report**

- Incorporate comments received into the final evaluation report.
- Delivery of the final evaluation report, including an Executive Summary, no later than two weeks following TMA's submission of comments on the draft report.



Annex 12: Sampling of the stakeholders/Informants for Interviews

Table 13: Sampling of the Informants for Interviews

Partner/Country	Estimated # of sessions	Role played in the portfolio and/or Focus of the interviews	Interview Mode
TMA Teams	6	Officers/Coordinators in charge of the evaluable projects in the region and in Kenya, Rwanda, Tanzania and Uganda	Virtual
	3	Representatives from MEL/Impact Team, focusing on the results/impacts (grouped or individual) Representatives from Finance, focusing on the efficiency/value for money (grouped or individual) Representatives Director in charge of the portfolio, focus on management and coordination (grouped or individual)	Virtual
Kenya	20 KII sessions 4 FGD sessions	Representatives from government agencies involved in the projects (grouped or individual) Representatives from private sector and CSOs, involved in the projects or impacted by the project implementation	In-person, supplemented by virtual
Rwanda	20 KII sessions 4 FGD sessions	Representatives from government agencies involved in the projects (grouped or individual) Representatives from private sector and CSOs, involved in the projects or impacted by the project implementation	In-person, supplemented by virtual
Tanzania	20 KII sessions 4 FGD sessions	Representatives from government agencies involved in the projects (grouped or individual) Representatives from private sector and CSOs, involved in the projects or impacted by the project implementation	In-person, supplemented by virtual
Uganda	20 KII sessions 4 FGD sessions	Representatives from government agencies involved in the projects (grouped or individual) 5-7 from private sector and CSOs, involved in the projects or impacted by the project implementation	In-person, supplemented by virtual
Regional/Global Trade Institutions	5	Representatives regional trade institutions (i.e. EAC, AfCTFA, AU), involved in TMA project design and implementation (grouped or individual) Representatives global trade institutions (i.e. UNCTAD, WTO), providing trade-related assistance in the region (grouped or individual)	Virtual
Development Partners	5	Representatives current funding agencies (i.e. GAC, EC, FCDO, Gates), focusing on the	Virtual



		continuation of funding and financial sustainability of TMA (grouped or individual) Representatives potential funding agencies (i.e. GIZ, JICA), exploring potential funding for TMA (grouped or individual)	
Sub-total	115 (representing more than 300 individuals consulted)		



Annex 13. Evaluation Questions (EQs)

Through a collaborative approach, TMA and the ET arrived at a final list of EQs to guide the review, please see below:

Relevance
EQ1: To what extent were the objectives of the portfolio, as laid out in the TMA Strategy 2 and TOCs, consistent with recipients' requirements, country needs, global and regional priorities and partners' policies?
Effectiveness
EQ2: To what extent have TMA's portfolio and support contributed to the intended short-term outcomes and the intermediate outcome in the theory of change?
EQ2 sub-question: To what extent has TMA's support contributed to improving the policy and regulatory environment for trade and led to a reduction in policy and regulatory barriers to trade? How and in what ways?
EQ3: To what extent are the assumptions and causal pathways in the theory of change valid and change happened as expected?
EQ3 sub-question: What factors have contributed to or hindered change? How and in what ways did the changes take place?
Efficiency / Coherence
EQ4: How economically were resources/inputs (funds, expertise, time, equipment, etc.) converted into the expected results?
EQ5: To what extent do policy and regulatory interventions underpin and/or contribute to other work streams and intermediate outcomes, and vice versa, including expected results?
EQ5 sub-question: To what extent and how do interventions reinforce each other and deliver synergies a) within the intermediate outcome 1.4 portfolio?
EQ6: To what extent has TMA been able to measure and track change at the short-term outcomes, intermediate outcome and outcome levels?
EQ6 sub-question: To what extent has TMA learnt? What has worked well or not so well? To what extent does TMA understand the political, economic and social context and use this learning?
Impact
EQ7: What are the positive and negative, primary and secondary, short-term, medium and long-term effects (specifically on trade outcomes) produced by the portfolio, whether directly or indirectly, intended or unintended?
Sustainability
EQ8: To what extent have the policy & regulatory reforms supported under TMA's trade regulation portfolio been institutionalised?
Cross-cutting themes:
EQ9: To what extent have the policy & regulatory reforms supported under TMA's trade regulation portfolio been institutionalised?



EQ9 sub-question: To what extent has TMA in Trade policy support contributed to reduced poverty, improved gender and inclusion outcomes and improved environment and climate change outcomes? For whom and in what ways?

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