



South–South Trade and Voluntary Sustainability Standards

Challenges and opportunities

SSI POLICY REPORT



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Head Office

111 Lombard Avenue, Suite 325
Winnipeg, Manitoba
Canada R3B 0T4

Tel: +1 (204) 958-7700

Website: www.iisd.org

Twitter: @IISD_news

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South–South Trade and Voluntary Sustainability Standards: Challenges and opportunities

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Written by Steffany Bermúdez and Florencia Sarmiento

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Key Messages

- The increasing integration of voluntary sustainability standards (VSSs) in trade policy has the potential to boost sustainable production, consumption, and intraregional trade of agricultural products in the Global South.
- Developing country governments and regional blocs are increasingly interested in using VSSs as a policy tool and, subsequently, are trying to address and tackle the challenges that directly or indirectly prevent trade policies from integrating and using sustainability standards.
- Although VSSs' integration into trade policy does not come without limitations, the examples showcased in this report illustrate that VSSs can help deliver positive outcomes to farmers and producers in Africa, Asia and the Pacific, and Latin America while promoting trade relationships that protect the environment and foster community well-being and prosperity for farmers.
- The case studies also show that bilateral initiatives can be more efficient than regional or multilateral initiatives in overcoming challenges to the further integration of VSSs in South–South trade. However, the inclusion of VSSs in regional processes would have a greater impact on increasing intraregional—and, potentially, interregional—sustainable trade in the Global South.

1.0 Introduction

Developing countries have begun to integrate voluntary sustainability standards (VSSs) into trade policy to leverage their potential despite facing some limitations. VSSs' integration entails the development of policies that reference, recognize, or use VSSs as tools to help countries achieve their development objectives while increasing trade. In this regard, this report provides insights into the potential role and importance of VSSs to boost and support South–South trade, diversify market opportunities for farmers, and advance sustainable production practices. In doing so, the report delves into the opportunities presented by VSSs' integration into trade policy by analyzing current data on trade flows of agricultural products in developing regions.

Additionally, the report highlights specific instances and examples of VSSs' integration in South–South trade policy, which not only aim to increase trade but also address some of the challenges associated with the adoption of VSSs. Lastly, the report makes recommendations to unlock VSSs' potential in increasing and promoting more sustainable practices through trade policy. These recommendations and findings are also based on multiple research outputs made by International Institute for Sustainable Development's (IISD's) State of Sustainability Initiatives (SSI) team, such as regional reports on VSSs in East Africa (Turley et al., 2022), VSSs in South Asia (Voora, Elder et al., 2023), and an SSI review on VSS and poverty reduction (Elder et al., 2021).



2.0 An Overview: South–South trade and VSSs

The volume and value of South–South trade have grown rapidly in the last two decades, faster than the world average.

South–South trade refers to trade between developing countries. Currently, countries in the so-called Global South¹ are trading with one another more than at any other time in history (Horner, 2016; International Trade Centre [ITC], 2020). South–South trade has grown rapidly over the past couple of decades. To illustrate, South–South trade value grew from USD 600 billion in 1995 to about USD 5.3 trillion in 2021. In this regard, South–South trade has increased as a share of overall trade. In 2021, South–South trade represented 24.4% of world trade, and by mid-2022, there was a 50% increase in South–South trade volumes compared to 2019; trade between developed nations rose just 28% in the same period (United Nations Conference on Trade and Development [UNCTAD], 2022).

The volume of South–South trade is now higher than that of North–South trade and grew at an average annual rate of 9.8% in the period 2000–2021, faster than the world average in the same period (UNCTAD, 2023c). This dynamic expansion suggests new trading opportunities, including for interregional trade between regions and countries that had never traded with each other before and more opportunities for producers and small and medium-sized enterprises (SMEs) in developing economies that could benefit from lower barriers to market entry and increased competitiveness (ITC, 2020; Mohanty et al., 2019).

Moreover, at the end of 2022, Brazil ratified its commitments under the São Paulo Round Protocol, part of the Global System of Trade Preferences among Developing Countries (GSTP). Brazil's ratification is a significant step that revives international interest in the trade agreement since the protocol is one ratification away from entering into force. The GSTP was developed more than 3 decades ago to enhance and promote trade among developing countries by reducing tariffs on the goods they import from each other. The concessions cover goods from fish and food to clothing and machinery-related items, depending on each country's commitments. According to UNCTAD, developing countries could boost their collective prosperity by USD 14 billion if GSTP members implemented the tariff cut commitments agreed during the latest round of negotiations (UNCTAD, 2023c).

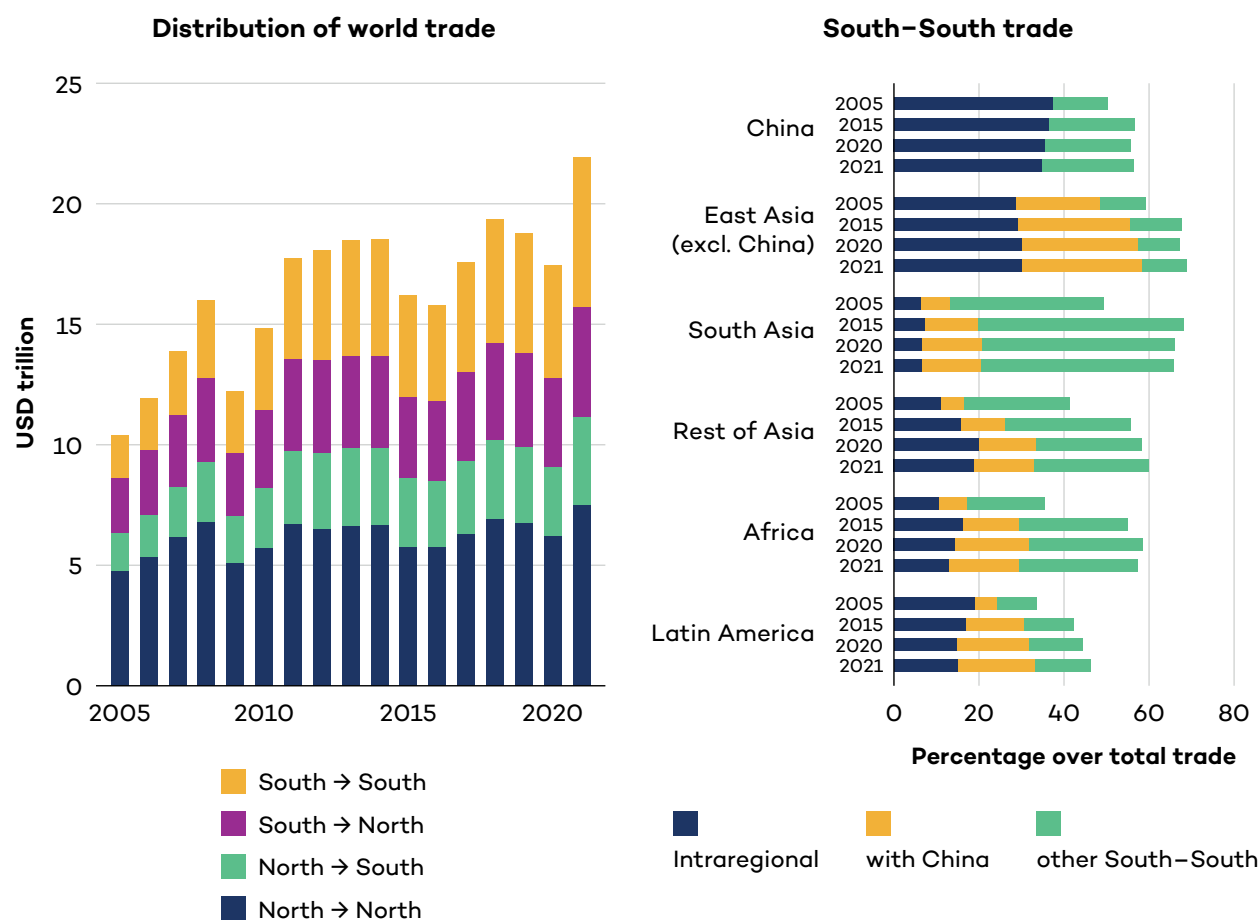
South–South trade shares vary by region. In Latin America, for example, the share of South–South trade represented 45% of the total trade in this region in 2021, while in South and East Asia, it represented more than 65% of total regional trade in the same year. These numbers

¹ The Global South is defined as least developed countries, transition economies, and developing economies (ITC, 2020).



include imports and exports at the intraregional level and trade with China and other developing regions (UNCTAD, 2022). The growing importance of South–South trade is primarily due to the trade performance of Asian economies (UNCTAD, 2021d), as the bulk of South–South trade is concentrated in this region, mainly revolving around China (UNCTAD, 2019).

Figure 1. Trade in goods between/within developed and developing countries



Source: UNCTAD, 2023a.

Historically, trade has been considered a driver of economic development and growth (Bernhardt, 2016; Lewis, 1980; Myrdal, 1956) and, most recently, a tool to advance sustainable development. The 2030 Agenda for Sustainable Development defines international trade as “an engine for inclusive economic growth and poverty reduction [that] contributes to the promotion of sustainable development” (United Nations, 2015). It can also present an opportunity for small-scale farmers, producers, and SMEs in developing countries—which are an important source of economic activity but are generally underrepresented in international trade—to access new markets and integrate into global and regional value chains (Organisation for Economic Co-operation and Development [OECD], 2023).



However, the economic growth generated by the increase in South–South trade is still based on a production model that largely relies on intensive resource exploitation. This model leads to severe environmental degradation and sometimes practices or community relationships in breach of fundamental labour and human rights that exacerbate poverty and inequalities, especially among smallholder farmers in developing countries (Can et al., 2020; De Paula, 2022). The depletion of resources and deterioration of ecosystems are expected to worsen in the coming years due to rising incomes, lifestyle changes, and continued resource-intensive growth patterns, especially in developing countries (United Nations Economic and Social Commission for Asia and the Pacific [UNESCAP], 2017). Moreover, while resource depletion and climate change affect all, they do not do so equally. Most people already living in poverty, especially in the Global South, rely on agriculture and natural resources for their livelihoods. This population will suffer the harshest consequences of climate change as erratic weather and limited water resources put their lives at risk by undermining development, creating shortages of basic supplies such as food and water, and triggering more conflict and tension over access to resources (Mercy Corps, 2021).

The Asia–Pacific region leads South–South trade growth and is fast becoming the largest market in the world, driven by infrastructure development, rising domestic private consumption, and intraregional trade. However, to achieve stable and sustainable growth momentum that benefits small-scale producers, communities, and the environment, countries in the region must adopt policies to address social and environmental issues such as poor working conditions, income inequalities, soil depletion, water scarcity, and biodiversity loss while opening market access opportunities to small-scale producers and SMEs (UNESCAP, 2017).

To illustrate, soybeans and palm oil—considered among the most environmentally problematic crops because of the current agricultural practices used to harvest them—are mainly traded between southern countries, most of them in Asia. Growing demand for palm oil has fuelled deforestation and biodiversity loss in Indonesia and Malaysia, which together produce about 40% of global crude palm oil (Schleifer, 2014). Moreover, growing global demand for soy has driven rapid agricultural expansion throughout South America in countries such as Brazil, resulting in substantial clearing of forest and savannah vegetation and subsequent losses of carbon and biodiversity, as well as changes in local to regional hydrological cycles (Le Polain De Waroux et al., 2019). In this regard, governments can make use of several measures to address these concerns, including VSSs.

VSSs can help address environmental, social, and economic concerns in agricultural production and trade.

VSSs are defined as “standards specifying requirements that producers, traders, manufacturers, retailers, or service providers may be asked to meet, relating to a wide range of sustainability metrics, including respect for basic human rights, worker health and safety, the environmental impacts of production, community relations, land use planning, and others” (United Nations Forum on Sustainability Standards [UNFSS], 2013). These standards largely operate in the



agriculture sector, with an important number of them being used in developing countries and covering products that are traded between southern countries, such as palm oil and soybeans (Voora, Elder et al., 2020, Voora, Bermúdez et al., 2023b). Recent studies reveal that the number of VSS operating in the Global South is increasing (Marx & Fernández de Córdoba, 2021) (see Box 1).

In the agricultural sector, VSSs usually require farmers to adopt more sustainable practices that can support soil health and prevent soil erosion and surface water and groundwater pollution while providing healthy and safe working environments. All these practices can ultimately result in improved productivity and profitability (Elder et al., 2021). In that sense, governments can make use of VSSs as instruments to help tackle major environmental and social challenges affecting the production and trade of several agricultural products in developing countries and regions while contributing to increasing market opportunities for small-scale producers and SMEs.

In general, the evidence in terms of VSSs' impacts on different sustainability dimensions is mixed, with studies showing more positive impacts in aspects such as environmental and socio-economic indicators (UNCTAD, 2023d). In some cases, VSS criteria, support, and assurance systems can lead to better farming practices that improve productivity and profitability, as well as soil fertility, water protection, and workers' well-being. Depending on the context, these standards can also increase producers' knowledge and capacity to farm sustainably, leading to better natural resource conservation (i.e., of forests and biodiversity) and more resilient and competitive farms (Günther et al., 2022; Larrea, 2023). VSSs can also bring about higher and more stable crop incomes and give producers access to employment opportunities, markets, and financial services in developing countries. At the same time, they can create opportunities for stakeholder collaboration, including private and public sector engagement (Elder et al., 2021).

The rising trade flows of agricultural products among developing countries and regions, along with the increasing presence of VSSs in the Global South supporting trade between VSS-compliant South–South partners, may indicate that integrating VSSs in trade policy presents significant opportunities for promoting more sustainable production practices while diversifying markets for small-scale producers and SMEs (Asia–Pacific Economic Cooperation [APEC], 2022). Moreover, VSS adoption and integration in trade policy instruments can foster private–public synergies and complementarities for achieving common goals while encouraging South–South trade, especially in the main agri-food commodities produced and traded in the Global South (see Box 1). This means that the adoption of VSSs has the potential to advance both market opportunities for producers and public policy objectives in the Global South.



Box 1. Potential agri-food products where VSSs could play a role in South–South trade

Data on the evolution of exports and VSS adoption in developing countries from 2015 to 2020 suggest that the main agri-food products in South–South trade where VSSs could play an important role are meat and meat products, fishery, and agriculture products such as cereals (i.e., maize, rice, and wheat), oilseeds (i.e., soybeans, palm oil), and fruits and vegetables (Marx & Fernández de Córdoba, 2020; United Nations, 2021).

Most intraregional trade in **Latin America and the Caribbean** involves agricultural products and fossil fuels (in weight). Furthermore, agriculture is the fastest-growing sector that also represents the highest value of trade in the region (approximately USD 25.3 billion in 2023). The most traded agricultural products are cereals (maize, wheat, and rice); oilseeds (soybeans and palm oil); horticulture (fruits and vegetables); meat (beef and poultry), dairy, eggs, and honey. Oilseeds are the fastest-growing sector in the region in terms of volume and value of trade (ResourceTrade.Earth., 2023). Several VSSs are operational in the region, including Bonsucro, Fairtrade International, the Forest Stewardship Council (FSC), GLOBALG.A.P, and others (ITC, 2023). Brazil has a higher proportion of VSSs in the region and the world, as it produces and exports many of the key agricultural products most covered by certification schemes, such as coffee, soybeans, and sugarcane, as well as forestry and forestry products (UNCTAD, 2023d).

In **East and Southeast Asia** (excluding China), agricultural products such as rubber, fish, palm oil, fruits and vegetables, and cereals like maize and rice are the most traded in the region after fossil fuels and metals and minerals. Live animals, meat, and cereals are among the fastest-growing sectors in volume and value of trade in East and South Asia since 2015 (ResourceTrade.Earth, 2023). Also, agricultural products, such as cotton yarn and linters, are important to the region, as much of the cotton produced in South Asia feeds the domestic and regional textile and readymade garment industries (Voora, Elder et al., 2023). Many VSSs are present in this region, covering the production of palm oil (i.e., Roundtable on Sustainable Palm Oil [RSPO]), soybeans (i.e., Round Table on Responsible Soy Association, Soja Plus), cotton (i.e., Better Cotton Initiative and Global Organic Textile Standard), fisheries (i.e., Marine Stewardship Council), and fruits and vegetables (i.e., GLOBALG.A.P. and Organic). India, China, Indonesia, Vietnam, and Thailand all have a higher presence of VSSs in the region (UNCTAD, 2023d).

In **sub-Saharan Africa**, fossil fuels are the most traded products intraregionally, followed by metals and minerals and agricultural goods, including cereals (maize, wheat, and rice) and oilseeds (palm oil and soybeans) (ResourceTrade.Earth, 2023). In subregions such as East Africa, for instance, VSSs can play a role in staple crops like maize, rice, palm oil, wheat, sorghum, and beans, which are the most traded in the region in terms of volume and value and represent an important part of diets (Turley et al., 2022). Improving the sustainable production of these agricultural crops is key to ensuring future food security and securing the benefits of regional trade and integration. Among the nations in sub-Saharan Africa,



South Africa, Kenya, and the United Republic of Tanzania demonstrate the most substantial prevalence of VSSs (UNCTAD, 2023d). GLOBALG.A.P., the Sustainable Rice Platform, and the East African Organic Products Standard (EAOPS) are already operating in these critical sectors in sub-Saharan Africa. This suggests the potential for these international and regional standards to play a part in enhancing the regional trade of sustainable agri-food products in the continent (UNCTAD, 2023b).

Agricultural products are among the most traded and fastest-growing traded commodities at both the intraregional and interregional levels, which presents an opportunity for greater use of VSSs among developing regions. For instance, trade between sub-Saharan Africa and the East and Southeast Asia regions (excluding China) represented around USD 12.9 billion in 2020 and mainly involved agricultural products such as cocoa, coffee, nuts, rubber, palm oil, rice, and fish. Trade between Latin America and the Caribbean and sub-Saharan Africa, worth about USD 5 billion in 2020, is mainly composed of sugar, cocoa, maize, wheat, soybeans, meat, and frozen fish (United Nations, 2021). VSSs already operate in some of these commodity sectors, including cocoa, coffee, rice, palm oil, and sugar.

Although interregional trade is on the rise, there is an opportunity to increase the volume and value of trade among developing regions, which represents a small share of global trade. For instance, trade between sub-Saharan Africa and East and Southeast Asia accounted for about 0.2% of global trade in 2020, and between Latin America and the Caribbean and sub-Saharan Africa just 0.1%, while trade between Latin America and the Caribbean and China and sub-Saharan Africa and China represented about 3.7% and 2%, respectively, that year (United Nations, 2021). Thus, considering the inclusion of VSSs in trade policy in the Global South could not only facilitate the growth of trade among and between developing regions and countries in target sectors, but it could also promote more sustainable agricultural practices while giving value chain actors such as producers, local processors, and traders more opportunities to access markets and resources (UNCTAD, 2018).



3.0 Increasing Use of VSSs in Domestic and Trade Policy in the Global South

VSSs are instruments that can influence how global value chains operate at international, regional, and national levels. Indeed, governments increasingly recognize VSSs as tools to help them achieve their sustainable development objectives, and they are being integrated or referenced into trade-related domestic regulations as well as bilateral and regional trade policy in several ways, including the following:

- **national and regional regulatory frameworks** that support or promote the development of certification schemes to advance sustainable production,²
- references in **free trade agreements** (FTAs),³ and
- **market access regulations or export-promotion measures**,⁴ according to which certain products, such as timber or biofuels, are allowed to leave or enter the country only if they comply with specific sustainability criteria or with recognized/accepted certification systems (UNCTAD, 2023d; UNFSS, 2020).

While VSSs have been increasingly referenced in trade policy in recent years, they remain, for the most part, optional and promotional measures rather than conditional legally binding requirements (Bermúdez, 2021; UNFSS, 2020).⁵ Also, developed countries mainly promote VSSs for South–North trade dynamics, and historically, they have been created and supported by firms, civil society, and state regulators in the Global North to source goods and services produced in the Global South that support good socio-economic and environmental practices (Langford et al., 2022). Developing countries also see the inclusion of VSSs as a threat or an obstacle to trade, fearing it will lead to the exclusion of small-scale producers and SMEs that do not meet certification criteria from key export markets (Glasbergen & Schouten, 2015; UNFSS, 2022a).

² See, for instance, Mozambique’s national standard for cotton, which was developed based on the criteria and indicators of the Better Cotton Initiative standard to boost sustainable cotton production and exports (Bermúdez, 2021).

³ See, for example, Art. 5.6 of the Republic of Korea–Turkey FTA (2013), which promotes trade and investment in environmental goods and services, including eco-labelled goods.

⁴ See the Republic of Korea’s Act on the Sustainable Use of Timbers (2017), the European Union’s Renewable Energy Directive for market access regulation illustrations, and Gabon’s cooperation agreement with Forest Stewardship Council aiming to improve access to exports as an export-promotion measure.

⁵ Sustainability standards are, for the most part, voluntary; however, in some cases they are becoming mandatory. An example of a sustainability standard becoming mandatory is the European Free Trade Association–Indonesia Comprehensive Economic Partnership (CEPA), which is the first trade agreement that makes a regulatory distinction between conventional and sustainable production for preferential treatment (Larrea et al., 2021). In Switzerland, importers of Indonesian palm oil and palm oil derivatives must prove certification from the RSPO (an international sustainability standard established by the Roundtable on Sustainable Palm Oil), International Sustainability and Carbon Certification (ISCC Plus), and Palm Oil Innovation Group to benefit from CEPA preferential tariff treatment.



Despite this, developing countries have participated more in VSS governance in the last two decades, and a diverse range of global standards have been developed and used in the South (Schleifer & Sun, 2018). In addition, local sustainability standards are increasingly being used in domestic and regional value chains across numerous sectors. These VSSs—designed and implemented by actors including non-governmental organizations, the private sector, government agencies, or national standard-setting bodies across the Global South—seek to promote production or consumption practices in domestic and regional markets in developing countries, as well as access to markets in developed countries demanding more sustainably produced goods (Langford et al., 2022).

The adoption of VSSs in the Global South varies at the country level, and though the number of standards has increased over time, they are not evenly distributed across countries, sectors, and products (UNCTAD, 2023d). According to the ITC standards map, more than 50 VSSs have a presence and are being used in the Global South, with most covering agricultural products (ITC, 2023). Some of them are **national, government-led standards**, such as the national organic standards developed by the governments of India, Tunisia, Chile, and, more recently, Madagascar. These countries have also developed regulatory frameworks, including laws, national strategies, and action plans to promote local organic agriculture (Agricultural and Processed Food Products Export Development Authority, 2023; Biblioteca del Congreso Nacional de Chile, 2006; Centre Technique de l'Agriculture Biologique, 2023; IFOAM Organics International, 2021).

Other examples of government-led standards in the Global South include the Indonesian Sustainable Palm Oil and Malaysian Sustainable Palm Oil schemes. The governments of Indonesia and Malaysia developed these schemes to fill a gap in private standards—such as the RSPO, which is considered too costly for smallholder farmers—while aligning with national interests and policies (UNFSS, 2022a). These government-led standards do not require membership fees but are mandatory for oil palm growers and millers operating in both countries. They intend to address environmental issues in the sector and improve the competitiveness of their palm oil in the global market (Indonesian Sustainable Palm Oil, 2023; Malaysian Sustainable Palm Oil, n.d.). National government-led standards can also complement international schemes already operating in developing countries, as they offer an alternative way for growers to become sustainable and supply different destination markets (UNFSS, 2022a).

Other VSSs in the South are built under a **multistakeholder approach**, such as the Trustea standard, which was created in India in 2013 and aims to provide a sustainability code and verification system for the tea sector in the country. Trustea is governed by a multistakeholder council, including tea producers and manufacturers, buyers and packers, civil society and multilateral organizations, and research and academia members (Trustea Sustainable Tea Foundation, 2023). Others are built under **regional approaches**, including Eco Mark Africa, established by the African Organisation for Standardisation (ARSO) to be used as a sustainability standard for agriculture, fisheries, forestry, and tourism across Africa (ARSO, 2023), and EAOPS, adopted by the East African Community in 2007 and becoming the official standard for organic products in five countries (ITC, 2021b).



International and private VSSs have also developed local versions of their standards to adapt their criteria and practices to local conditions in developing countries. For instance, GLOBALG.A.P., the international standard for farm production under good agricultural practices, designed localg.a.p. to be used as a capacity-building tool or be applied as a local standard for agricultural supply chains in developing economies and emerging markets (GLOBALG.A.P., n.d.). Another example is the Sustainable Rice Platform, which has undertaken pilot projects and set up national chapters of the standard in Tanzania and Uganda while building demand for sourcing rice grown under cultivation practices benchmarked against the standard (Turley et al., 2022). Also, countries including Chile, Kenya, India, and Mexico have benchmarked their national farming standards against GLOBALG.A.P. to help local producers of fruits, vegetables, flowers, and ornamentals access international markets where this standard is widely recognized (i.e., KenyaGAP; IndGAP; ChileGAP) (Valk & Roest, 2009).



4.0 Challenges of Further Using VSSs in South–South Trade and Integrating Them Into Trade Policy

Developing countries have designed and used many VSSs to access markets. These standards are increasingly integrated into trade policy in the Global South to foster trade between developing countries. Yet several challenges have prevented local, national, and international VSSs, from achieving their full potential. These challenges to VSSs uptake, although general, are most clearly seen in the developing country context. They are described below.

Consideration of VSSs as Barriers to Trade

VSSs can be considered as catalysts to trade. Implementing VSSs in value chains in the Global South could lead to greater productivity and boost intraregional trade (Turley et al., 2022). VSSs could also give a competitive advantage to compliant producers who implement sustainable production practices that facilitate their market access to foreign and local markets. Recent research by IISD also reveals that several enabling conditions are needed to help farmers access VSSs-compliant markets, including an ecosystem of supporting actors that work closely with smallholders, offering them information and training on VSSs and their requirements, as well as market information. Market demand, direct links with buyers and producer organizations, and access to financial resources and price incentives are also key factors for farmers to access markets (Elder et al., 2021).

However, it is also suggested that VSSs can become barriers to trade. In this regard, the expansion and growing influence of VSSs has become, in many cases, worrisome, as upscaling these standards can exclude producers in developing and least developed countries who cannot afford certification, or that do not have the enabling conditions, presenting a major barrier to the adoption of VSSs (Bermúdez, 2021; UNFSS, 2020). In addition, VSSs can be considered non-tariff barriers to trade and can be perceived as being more trade restrictive than necessary, thus limiting the potential of their use by developing countries (OECD, 2005).

In addition, many agricultural raw materials and food in developing countries and emerging economies are traded informally, which creates major impediments to trade and business development and a lack of incentives to adopt VSSs. This informality is due to highly fragmented supply chains that result in small volumes traded due to poor transport and market infrastructure and, in the case of informal cross-border trade, cumbersome trade registration and border procedures. Informal trade in Africa represents an estimated USD 5 billion to USD 15 billion—more than 30% of the total value of cross-border trade between neighbouring African countries, with women accounting for a high percentage of informal traders (UNCTAD, 2021c; UN Economic Commission for Africa, 2021).



Compliance Cost, Lack of Information, and Incentives

The administrative costs associated with the certification process and compliance with audits are among the main challenges to the uptake of VSSs (Carter et al., 2018; Marx & Wouters, 2015; UNCTAD, 2021a). As obtaining and maintaining certification requires financial strength, many producers in developing countries, especially smallholders, face exclusion from participating in VSSs, particularly when lacking the necessary financial support to cover associated costs.

Indeed, high compliance costs are much more likely to exclude smallholders from trade and access to markets than cooperatives or larger producers, as the latter may be able to obtain finance to cope with these costs (Sellare et al., 2020). This might result in certification outweighing the benefits. For example, according to a study of Latin America's coffee sector, it was found that there is a strong concentration of certified producers in larger-scale farms and groups of producers with greater membership, which may help them accessing financial resources more easily than smallholders (Grabs et al., 2016).

On top of compliance costs, the Global South has a shortage of accredited auditors, which increases the costs of audits and certification. This results in a comparative disadvantage, given that Global North governments offer financial assistance for certification to their domestic operators (Auld & Renckens, 2021; UNCTAD, 2021a).⁶ Farmers may also lack information that is vital to their decisions on using more sustainable practices (Falconer, 2000). For instance, a lack of information was identified as a weakness for adopting the FSC standard in South Africa, where farmers struggled to find information on how to prepare for FSC certification (Morris & Dunne, 2004). Indeed, one of the essential requirements for VSS adoption is an ecosystem of supporting actors working closely with smallholder farmers. These enabling factors go beyond inherent VSS limiting factors and include information and training on VSSs and their criteria, operation, and market information (Elder, 2023; Elder et al., 2021).

Another issue is the lack of monetary incentives. For many producers, higher prices and incomes are the primary motivations to comply with VSSs (Elder et al., 2021). However, farmers are sometimes unable to sell their certified products due to a lack of demand, so they do not receive higher prices or premiums and struggle to pay certification compliance costs (Voora, Bermúdez et al., 2023a). Even when VSSs help participants earn more money by adopting good agricultural and management practices that can result in productivity increases and reduced costs (UNDP China, 2020), the lack of direct monetary incentives, such as fixed minimum prices and premiums implemented by all VSSs, or the lack of consistent contracts for certified produce play a critical role as a limiting factor to their uptake (ISEAL Alliance, 2018).

⁶ Some Southern countries, such as Costa Rica, do offer for financial assistance to farmers to cover certification costs (Levert & Larrea, 2023).



Absence of Trust and Recognition of VSSs

Although Global South-based VSSs have been expanding in recent years, most VSSs are created and adopted in the North (Minnesota, 2018). Against this background, some authors report that VSSs might be seen as mechanisms that exacerbate and reinforce existing asymmetries in power relations, especially by lead firms in global value chains, often located in developed countries (Auld & Renckens, 2021; UNCTAD, 2023d).

As a result, there is resistance in developing countries to international VSSs due to the perception that they are Northern-dominated programs in terms of stakeholder engagement and substantive requirements (Auld & Renckens, 2021; Hospes, 2014; Schouten & Bitzer, 2015; van der Ven et al., 2021). This has led to the development of alternatives that are more adapted to the local context. For instance, producers in Nicaragua have developed alternative institutional arrangements by advancing and formalizing their own scheme to encourage the expansion and commercialization of products grown by smallholder farmers using agri-ecological methods. This scheme developed a Collective Mark/Trademark of Trust intended to inform the public in the domestic market. The scheme covers basic grains, fruit, vegetables, medicinal plants, processed products, live animals, meat, milk and milk products, flowers, honey, and organic fertilizers (Starobin, 2021).

This resistance is also seen in East Africa, where one of the major challenges in scaling up VSSs' reach and benefits is the lack of political will to support and recognize VSSs through official channels. For instance, producers' representatives and organic organizations in Tanzania lobbied for the Tanzania Bureau of Standards to recognize the organic regional standard (EAOPS). So far, Tanzania is the only country in the region that recognizes EAOPS (Turley et al., 2022). Improving the potential impact and reach of VSSs to improve intraregional trade in East Africa hinges on (i) building trust, support, and recognition through official channels in the ministries of agriculture, the national bureaus of standards of the country members of the East African Community, and sector development programs and (ii) inviting them to participate in public processes and consultations related to the development of sustainable agriculture policies (Turley et al., 2022). This recognition is also essential for developing knowledge and expertise on such production standards and facilitating border control processes.

A Lack of Demand for VSSs-Compliant Products

The lack of demand for certified products in the Global South also limits the upscaling of VSSs in South–South trade, as there is the perception that goods with sustainable characteristics are more expensive than conventional ones. Largely, end consumers and the private sector (i.e., buyers, processors, manufacturers, and retailers) in developing countries are unaware of the environmental and social issues concerning commodity production in agricultural value chains, including deforestation, use of pesticides, human rights violations, etc. (Meier et al., 2021).



Trends in the consumption of several agricultural products show that traditional markets in Europe and North America still lead the consumption of VSSs-compliant products, as end consumers in these regions are more aware of sustainability challenges in their production. In addition, private sector actors, such as manufacturers, processors, and retailers, can use VSSs as a tool to help them comply with due diligence mechanisms, report on sustainable commitments and practices, or reduce reputational risks (Bermúdez & Perri, 2020; Meier et al., 2021).

While consumption of VSS-compliant products in the Global South is growing, it remains a niche market with the potential to expand, particularly as recent research has shown that consumers in developing countries are willing to pay for certified products, as it provides more confidence about the safety of food (Tran et al., 2022). Many emerging and developing countries, especially in Asia, are the biggest consumers of some of these products and can drive more consumption of VSS-compliant products due to an increasing middle-income class, higher disposable incomes, and health concerns among end consumers (IISD & Evidensia, 2021; Millet, 2021). There is an opportunity for more sustainable consumption in the Global South, which ultimately would promote more sustainable trade. However, this requires addressing issues such as price sensitivity and the lack of end-consumer and private-sector awareness of sustainability issues concerning commodity production in value chains (Meier et al., 2021).

Proliferation and a Lack of Harmonization of VSSs

The rapid proliferation and multiplicity of VSSs globally is a growing concern, particularly to smallholders and farmers in developing countries who are increasingly required to comply with several standards to access markets at local and international levels, including mandatory quality and safety standards. Also, the absence of a common regulatory or guiding framework and defined transparency rules that apply to all schemes makes it difficult for producers and consumers to distinguish reliable, credible, or effective VSSs from ineffective ones, as well as understand how they define sustainable production and measure the environmental and social performance of their compliant practices (APEC, 2022; UNCTAD, 2021a).

This situation highlights the need to set up common recognition systems that distinguish credible from non-credible standards and for regional, national, and international standards to work together to facilitate the mutual recognition and harmonization of their schemes (UNCTAD, 2021a).



5.0 Examples of Integrating VSSs Into Trade Policy to Enhance the Trade of More Sustainable Products Between Developing Countries

Developing countries stand to gain much from increased South–South trade and the use and integration of VSSs in trade policy if the obstacles mentioned above can be reduced. Some countries and regional blocs in the Global South are already taking action to address these challenges. Below are some examples showing how this integration has played out in practice with positive results for farmers (i.e., access to markets, sustainable agricultural practices) and governments (i.e., influence on the development of national and regional policies) in Africa, South America, the Pacific, and Southeast Asia.

Memorandum of Understanding of Organic Products Between Chile and Brazil



In 2018, Chile and Brazil signed a Memorandum of Understanding (MoU) of Organic Products (Simfruit, 2018). The MoU, which covers products such as wine and fruit, entered into force in 2019 and is the first mutual recognition system between South American countries. The MoU aims to boost exports and value addition of Chilean and Brazilian agricultural organic production, lowering the costs of certification and making it easier for smallholder producers to export (Ruella et al., 2020).



The MoU is also the first one in the world that recognizes Participatory Guarantee Systems (PGSs)⁷—a voluntary and complementary tool for third-party certification in the organic sector that mainly benefits small-scale farmers. These systems are based on the active participation of stakeholders, peer support, and trust and represent a more affordable option for small farmers who sell their organic produce in local and regional markets (IFOAM Organics International, 2023). As a result, PGS farmers in Brazil and Chile share a common label signifying the authenticity of their organic products without needing external certifiers (Jacobi et al., 2023).

The MoU was signed for an initial period of 5 years and automatically renewed for the same period. After 3 years of implementation, despite the COVID-19 pandemic, Brazilian consumption of Chilean organic products had grown significantly. Since the agreement entered into force, the Brazilian organic food market rose by 30% between 2019 and 2020 (Oliveira et al., 2021), and Chilean organic exports to Brazil rose by 24% as of 2021 (ProChile, 2022), benefiting smallholders and SMEs in both countries that have gained access to new markets and improved their ability to invest in and expand their operations.

Box 2. Association of Southeast Asian Nations' (ASEAN's) mutual recognition agreement on organic agricultural products

Another potential example of mutual recognition in organic products in the Global South is in the developing stage. ASEAN has developed the ASEAN Standard for Organic Agriculture (ASOA), which the ASEAN Ministers on Agriculture and Forestry adopted in 2014. ASEAN members are aligning their national organic standards with ASOA. The national standards of Brunei Darussalam, the Philippines, and Singapore are already aligned, while the remaining member states are revising their standards.

As a next step, ASEAN members are currently developing a mutual recognition agreement on organic agriculture goods. This initiative, led by Thailand, is part of the Strategic Plan of Action of the Expert Working Group on Organic Agriculture 2021–2025. The objective is for products that meet the organic standards set by the agreement to be recognized in the regional market as genuinely organic. This certification will also make it easier to export these products beyond ASEAN (ARISE Plus, 2021). The draft text of the mutual recognition agreement has been discussed, and it is expected to be finalized in 2024 for signing (personal communication, ASEAN Economic Community Department, July 2023).

Brazil and Chile were largely responsible for the increase in PGSs in Latin America in 2020, just a year after the MoU entered into force. The total number of producers involved in PGSs in both countries increased by 1,437, reaching 23,584 in 2020, up 14% from 2019 (Willer et al., 2021). Small-scale farmers associated with PGSs in the two countries now know more about

⁷ PGSs are non-hierarchical, shared ownership, and democratic structures of participating producers focused on members' capacity building and accountability (Cannon et al., 2019; D'Alessandro, 2018). They allow the expansion of local organic markets to help producers get better prices (D'Alessandro, 2018).



organic agricultural practices and have strong social cohesion with other PGS members. They also enjoy more access to training and capacity building, as well as local and export markets, as they can sell their organic goods across the border in products such as fresh and processed fruits and vegetables, including dried fruits and pulps (Hruschka et al., 2022). Brazil and Chile have the most operational PGS initiatives in Latin America—28 and 18, respectively (Hruschka et al., 2022; Willer et al., 2022).

The MoU emerged due to the efforts of local organic associations, Chile’s long commercial relationship with Brazil, and the strong collaboration and communication among agricultural services and ministries, according to the Agriculture and Livestock Service of Chile. The similarities of the certification systems for organic production and sanitary and phytosanitary (SPS) measures in both countries were crucial in driving this collaboration, as they made the mutual recognition of both schemes easier (FreshPlaza, 2018; Turley et al., 2022).

ARSO–Eco Mark Africa



Eco Mark Africa (EMA) is a recognition system for sustainability standards in Africa and an eco-label owned by ARSO, an intergovernmental body established by the Organization of African Unity (now African Union) and the UN Economic Commission for Africa in 1977. One of the fundamental mandates of ARSO is to create a unified conformity assessment system to eliminate administrative barriers that deter trade among African countries and to promote the quality of African goods and services to facilitate intraregional trade as well as access to international markets for African smallholders and SMEs (Kosolapova et al., 2023).

ARSO has also developed and implemented the African Ecolabelling Mechanism Programme and established the EMA Certification Scheme under the African Conformity Assessment Programme. This label, which is expected to be widely used across the continent for sustainably



produced products and services, consists of four standards covering agriculture, fisheries, forestry, and tourism (UNFSS, 2022b). It covers items such as food, beverages, bee and wild harvested products, forest products and services, marine and inland capture fisheries, and tourism management services (ARSO, 2019).

The standard features a range of social and environmental criteria, including requirements on land-use rights, integrated pest management, soil and water conservation, the implementation of climate adaptation measures, and training workers on sustainability issues. For instance, the standard on agriculture requires that the farmers or cooperatives possess legal land tenure and valid user rights according to formal and customary laws, which can help to protect and secure equal access to land, as well as productive resources and inputs. In turn, it can help vulnerable groups, such as women and Indigenous Peoples, access markets and other opportunities, which can help mitigate poverty, increase shared prosperity, and enhance social inclusion in the continent (Elder et al., 2021).

The recognition system developed under the EMA works as a quality assurance mechanism. It is open to benchmarking with regional and international sustainability standards operating in the region that are working in the agriculture, fisheries, forestry, and tourism sectors. These standards could use the EMA label if they fulfill the benchmarking requirements. EMA aims to develop one continent-wide and cross-sectoral standard to mark sustainably produced African goods and create synergies with other certification schemes operating in the region, thus reducing marketing expenditure and additional costs for producers while fostering trade and market opportunities across the continent (ARSO, 2023).

This promising initiative has the potential to benefit many African farmers—smallholders and SMEs—as the system was designed to address their realities and needs while recognizing the efforts of those already certified by other national or international VSSs. It also helps to promote more sustainable production methods, transparency, and safety in food and non-food products; expand regional market demand for more sustainable products; and bring more opportunities to small-scale producers to access international and regional markets (ARSO, 2019). Some firms in Ghana, Kenya, Nigeria, Uganda, and Zimbabwe are already certified under EMA and are commercializing products in the continent, such as coffee, fish (i.e., tilapia and catfish), timber, and fruit (i.e., oranges and lemons) (ARSO, 2023; Changtoek, 2023). Currently, some initiatives support the piloting of the standard and benchmarking with other VSSs, such as Fairtrade International. In February 2021, ARSO and Fairtrade Africa signed an MoU, looking at collaborating to facilitate intra-African trade, harmonize standards, and improve the livelihoods of smallholder farmers and workers on plantations. ARSO is also organizing capacity-building activities for the bureaus of standards and auditors in Cameroon, Ghana, Kenya, Rwanda, and Zimbabwe (Anyango, 2018).



Pacific Organic Standard: The role of PGSs in Oceania



The Pacific Organic Standard (POS) is a regional organic standard, the third regional organic standard produced in the world after the European Union and East African Organic standards. It was developed in 2008 by the Pacific Organic and Ethical Trade Community (POETCom), a membership-based initiative composed of a network of organic stakeholders across the Pacific Island region, with support from the Secretariat of the Pacific Community. The standard aims to raise the profile of organic agriculture among farmers and consumers, strengthen organic production capacity in the region, and promote the development of local, regional, and international markets for Pacific organic agriculture products. It was designed considering IFOAM organic principles and the specificities of the Pacific Island countries and territories (Secretariat of the Pacific Community, 2008).

The standard sets requirements for organic production in the region—including plant production, animal husbandry, beekeeping, collecting wild products, and aquaculture—and relies on PGSs to facilitate access to local, national, and regional markets, including those in New Zealand and Australia. Farmers can also use the Organic Pasifika Mark label on products containing ingredients certified to standard (POETCom, 2023). PGSs are also considered a stepping stone to help farmers transition to third-party certification and access export markets. Consequently, the POS offers the option to obtain third-party certification to producers interested in selling their products to international markets, such as the European Union and the United States.

The POS promotes organic food production as a source of nourishment free of harmful chemicals while meeting market demand and satisfying the food and nutritional security needs of Pacific people. To facilitate this, POETCom trains farmers and offers technical support for implementing the PGS in the region. Organic production has increased in the Pacific since the POS was created. As of 2020, more than 100,000 ha of land in 10 Pacific Island countries were certified Organic;



13,351 growers were certified under the third-party option and commercializing in international markets; and 11 PGS groups were operational in territories, including Cook Islands, Fiji, French Polynesia, New Caledonia, Samoa, and Vanuatu. These PGS groups represent 2,102 producers who sell their products in local and regional markets (POETCom, 2020). Some goods are already commercialized under the POS in local and intraregional markets in New Caledonia, Fiji, and Tuvalu, including coconut syrup (toddy), which is used as an alternative to sugar, citrus fruits such as mandarins, and bananas (POETCom, 2020).

The POS is seeking equivalence with the Australian Organic Standard, the U.S. National Organic Program, and the Japanese Agricultural Standard. This will enable local farmers to access key export markets (Impakter Business, 2021). In addition, the governments of Fiji and Solomon Islands developed their national organic policies in 2021 and 2010, respectively, to frame the operation of these regional standards and PGS in their own countries. They were looking to establish national accrediting processes and guidelines for organic farming in their jurisdictions and support the adoption of practices (Naikaso, 2023). The Government of Palau is also drafting a national organic policy based on these principles, with support from POETCom, and has assisted in the development of local organic farming initiatives in the territory, such as the Palau Organic Growers Association, which obtained the Organic Pasifika Mark through PGS certification in June 2023 (Island Times, 2023).

Namibia and Zambia: Potential recognition of GLOBALG.A.P.-certified products to enhance intraregional trade



Namibia and Zambia are trying to integrate GLOBALG.A.P. in national policies and programs to support sustainable production practices in several domestic sectors and potentially join efforts to boost the trade of compliant products with each other and ultimately within the Southern Africa Development Community region.



On the one hand, Namibia is working toward a major transformation of its food safety systems for local production and export. This includes integrating VSSs, such as GLOBALG.A.P., in national legislation. This work is being carried out by the Namibian Agronomic Board (NAB), which is mandated by the Agronomic Industry Act (Act No. 20 of 1992) to promote the agronomic industry and facilitate the production, processing, storage, and marketing of controlled agronomic and horticultural products in the country. The Ministry of Agriculture, Water and Land Reform presented draft legislation in 2022 to develop Namibia’s food control system for agronomic and horticultural products. This is expected to lead to an integrated food safety, standard quality, and traceability system to control imported, exported, transit, and local market agronomic and horticultural products (NAB, 2022).

The draft legislation includes the minimum requirements to produce crops that are sold domestically or to neighbouring countries in Southern Africa (NAB, 2022). Once adopted, this regulation will require that producers comply with at least the localg.a.p. primary farm assurance assessment at the entry level (NAM G.A.P.), which will serve as the minimum national standard for local products that are destined for sale on the Namibian and other regional markets. Namibian goods destined for export markets such as the European Union or the United States should adhere to the GLOBALG.A.P. Integrated Farm Assurance standard, which is a globally recognized food safety standard.⁸ Farms and facilities would be inspected through a risk-based approach to ensure that the agronomy and horticulture sector manages food safety risks associated with various crops.

This integration is seen by GLOBALG.A.P. as very positive for enhancing the effectiveness of the country’s regulatory system, especially regarding sanitary and phytosanitary measures, food safety, and quality compliance audits. In this context, the standard is currently working with NAB to build capacity in Namibia, training NAB inspectors to provide localg.a.p. and GLOBALG.A.P. farm assurance services. GLOBALG.A.P. also supports NAB by offering farm assurer workshops on fruit and vegetables, as well as group certification workshops. Additionally, they conduct awareness-raising sessions and train future farm assurers how to implement and assess localg.a.p. (GLOBALG.A.P., 2023a).

Zambia hopes to follow the same path as Namibia. In May 2022, the Zambian government and GLOBALG.A.P. discussed creating a program to support and train local producers and supply chain operators in all the GLOBALG.A.P. farm assurance standards for fruit and vegetables, grains, rice, aquaculture, and livestock to develop trade opportunities across the wider Southern Africa region (GLOBALG.A.P., 2022). The project kicked off with GLOBALG.A.P. partnering with the Southern African Business Development Forum to raise awareness and provide recommendations to private actors and government officials in Zambia on using the standard to professionalize farming practices of domestic small-scale producers of fruit and vegetables,

⁸ An analysis of the criteria of GLOBALG.A.P. and localg.a.p. standards can be found in IISD’s report: *Voluntary Sustainability Standards in East Africa* (Turley et al., 2022).



livestock, aquaculture, and rice products, and potentially scale this to enhance regional and international trade of more sustainable and safe products (GLOBALG.A.P., 2023b).

The partnership between the Government of Zambia and GLOBALG.A.P. aims to train experts on the Integrated Farm Assurance standard, as well as on the GLOBALG.A.P.-managed Sustainable Rice Platform—the world’s first VSSs for rice. It also aims to improve the Zambian farming infrastructure so small-scale producers can become certified while improving practices and accessing new markets. These capacity-building activities and other steps are expected to take place in late 2023 (GLOBALG.A.P., 2023b).

These developments in both countries are promising initiatives with the potential to escalate trade of products compliant with GLOBALG.A.P. among each other, and possibly with neighbouring countries and trade blocs in Southern Africa, such as the Common Market for Eastern and Southern Africa or the Southern Africa Development Community. They show that international VSSs and their local versions can be used to enable and enhance the trade of more sustainable products at the local and regional levels while aligning with local and regional laws. This integration also presents an opportunity to advance sustainable production practices in the Southern African region, as the GLOBALG.A.P. standard includes criteria and requirements that protect workers’ health, safety, and welfare and look after and enhance biodiversity and soil fertility, as well as measures to promote the efficient use of water resources and other climate adaptation activities.

The standard also can foster intraregional trade, as it includes requirements to promote the efficient use of fertilizers and seeds and other measures to prevent and control transboundary pests and diseases in crops, such as training on pest management and disease control and the targeted application of chemicals and pesticides. GLOBALG.A.P. and its local version, localg.a.p., also require compliance with national standards and/or legislation for technical standards regarding food safety and quality, as well as recognition of other national or regional standards related to agriculture (i.e., production and quality). These schemes can be used as a tool to help producers align with SPS measures led by national, regional, or international regulatory bodies while also providing guidance and capacity building on best practices to reduce and control pests and diseases in crops (Turley et al., 2022).

Namibia and Zambia agreed in February 2023 to revive the joint trade and investment committee to strengthen bilateral cooperation on trade and investment. This cooperation aims to improve market access for products—including sugar, salt, fish, livestock, meat and meat products, wheat, maize, mealie meal, bran, soybeans and soy products, sorghum, mangoes, avocados, honey, and tomatoes (Food Business Africa, 2023)—that are also covered by GLOBALG.A.P. and localg.a.p. standards. Given these developments, there is an untapped opportunity to encourage neighbouring countries to recognize GLOBALG.A.P. farm assurance standards as a tool to facilitate cross-border trade in the region. This also presents an opportunity for GLOBALG.A.P. to be included in the VSSs benchmarking process promoted by the Eco Mark recognition system at the continental level, as it would be used as a quality assurance mechanism by Southern African countries.



The East African Organic Production Standard



The East African Community (EAC) adopted the EAOPS in 2007 as a single official voluntary sustainability standard for organic agricultural production in the region. The EAOPS was developed locally by the Regional Standard Technical Working Group, a public–private sector partnership comprised of representatives of national standards bodies, national organic movements, and country members’ organic certifying bodies, as well as the East African Business Council. The EAOPS provides regional requirements for organic agriculture. It is the second regional organic standard created in the world after the European Union’s and the first developed with cooperation between organic movements and national standards bodies (ITC, 2021).

The standard emerged from the need to harmonize requirements governing the quality of products and services in East Africa. It provides a uniform set of criteria and procedures for growing and marketing organic produce in East Africa and covers plant production, animal husbandry, beekeeping, the collection of wild products, and the processing and labelling of these products. The scheme encourages the recognition of national, regional, and international production and quality standards. It requires compliance with national regulations (i.e., quality and SPS), as well as procedures to address crop pest and disease outbreaks, which could be leveraged to support harmonization processes in the continent (e.g., ARSO) (Turley et al., 2022) and facilitate transboundary trade. Certified producers can use the regional organic trademark Kilimo hai Organic, which uses the Swahili word for “living agriculture.”⁹

Many different crops in the EAC region have been produced in line with the EAOPS, including cereals (i.e., maize, sorghum, rice, and wheat), pulses (i.e., beans, lentils, and peas), vegetables,

⁹ An analysis of the criteria of EAOPS can be found in IISD’s report, *Voluntary Sustainability Standards in East Africa* (Turley et al., 2022) and SSI’s review on *Standards and the Sustainable Development Goals* (Kosalapova et al., 2023).



fruit, tea, coffee, and spices. Other products are sold in local markets and may be either third-party certified or certified through a PGS. There is more evidence of farmers selling their products under the Kilimo hai label in domestic markets than in regional ones. For instance, Tanzanian farmers in Morogoro, Arusha, Masasi, and Zanzibar sell their organic produce, such as seeds and nuts (i.e., sunflower, cashews), spices, or fruits and vegetables (i.e., bananas, tomatoes, and carrots) to specialty stores, hotels, and restaurants or through direct sales in the village or at farms. They are also trying to open new markets through e-commerce options (Ninnin, 2021). And while the Kenya Bureau of Standards has not officially recognized the EAOPS, the standard is being used informally as the organic standard for local markets, with farmers selling products, including organic honey and organic beeswax. AfriCert acts as a certification body in the country (AfriCert, 2023).

EAOPS-compliant farmers have reported lower input costs and savings on the use of pesticides as a result of transitioning to organic production (Gro Intelligence, 2015; Maweni Farm Documentaries, 2013; Ngoto, 2021; Nkurunziza, 2020). In countries such as Tanzania, EAOPS-compliant farmers are getting premium prices that are up to 50% higher than conventional prices when selling their organic produce to outlets such as restaurants and hotels. While sales of EAOPS-compliant produce at local markets or the farm do not generally bring in premium prices, farmers can usually sell off their stocks more quickly because of the superior quality of their products (European Commission, 2023; Ninnin, 2021).

Countries in the region have also set up support structures for organic production in recent years. For example, Uganda published its Draft Organic Agriculture Policy in 2009 and officially launched a national policy in 2020 (Biovision Africa Trust & Ecological Organic Agriculture – Initiative Department, 2020). Kenya created a dedicated desk for organic agriculture in its Ministry of Agriculture in 2010. In addition, the region has consolidated its organic production since 2008, and EAC members, including Kenya, Tanzania, and Uganda, are among the 10 countries with the largest organic agricultural area and number of organic producers (Willer et al., 2022).

Despite the EAOPS supporting compliance with national policies and regulations, the wide adoption of the standard has proven challenging, as there is no regional law or policy that defines organic farming in East Africa. Additionally, some EAC members lack recognition of the EAOPS in their national legislation or organic agriculture programs, undermining the potential use of the standard formally across the region (UNEP, 2007). To fully unlock the potential of EAOPS to facilitate the intraregional trade of organic products in East Africa, the EAC must address these issues effectively. Moreover, it is possible to harmonize or benchmark the EAOPS with EMA, considering the EMA recognition system's aspirations to boost the trade of more sustainable products within the continent. This situation presents a promising opportunity for ARSO and the EAC to not only engage in collaborative efforts to enhance trade opportunities for farmers who are already implementing good agricultural and more sustainable practices in East Africa but also to significantly contribute to ongoing African integration efforts.



Box 3. The EAOPS has defined several PGSs in East Africa

More and more small-scale farmer groups have emerged and certified their production systems in East Africa since 2018, thanks to the unique relationship between the EAOPS and PGSs. As mentioned previously, certifying a farm under the EAOPS enables a farmer to label their produce with the Kilimo hai mark. To make the certification process more accessible, groups of farmers may apply for certification together through PGSs, low-cost quality management systems that, according to IFOAM Organics International, “are locally focused quality assurance systems that certify producers based on the active participation of stakeholders and are built on a foundation of trust, social networks and knowledge exchange” (IFOAM Organics International, 2023).

Various PGS groups in the East African region, where national organic agriculture movements operate as oversight bodies, have also consolidated. Examples include the Sustainable Agriculture Tanzania (SAT) group and the National Organic Agricultural Movement of Uganda (NOGAMU). Indeed, Uganda and Tanzania are among the countries with large amounts of land dedicated to organic agriculture in the East African region (Willer et al., 2021). This availability of organic land also supports the establishment of more PGSs, relying on the participation of farmers and local stakeholders to define their own organic production and control standards and to monitor and inspect one another.

In Tanzania, farmers operating under PGSs have been certified under the EAOPS since 2012 following visits by external inspectors (Ninnin, 2021). As of 2021, 60 farmer groups were certified using PGS and EAOPS licences, and more than 500 groups have been inspected but not yet certified. The SAT is one example of a PGS operating successfully in the country, as it has supported farmer groups not only on the way to certification but also by creating market opportunities for their organic products by opening a local organic market in Morogoro, Tanzania. The market is accessible to local consumers and provides healthy food at fair prices (Turley et al., 2022).

Moreover, SAT has helped these farmers sell their goods in local markets while obtaining a premium price for organic produce that ranges from 20% to 50% above the conventional price for fruit and vegetables. For instance, whereas a conventional farmer would expect to get TZS 1,000 (USD 0.45) for a bundle of carrots, SAT pays its organic farmers TZS 1,500 (USD 0.70) (European Commission, 2023). The SAT is also working to help farmers sell these items across the border.

Uganda had 210,352 organic producers as of 2020, mostly small-scale farmers, of whom 9,237 were organized in 14 PGS groups (Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH, 2020). A wide range of organic products for the domestic and regional markets is sold through outlets like supermarkets, restaurants, international schools, and open markets. These products include coffee, bee products, fresh and dried fruit, shea nuts, and vegetables. The NOGAMU, the umbrella organization for all organic sector stakeholders in the country, has been a crucial actor in developing the sector and supporting the development of PGSs in Uganda.



With help from international development organizations, NOGAMU has supported organic farmers by building capacity and offering training in organic farming techniques; providing extension services and organizing farmers for organic production; offering market support; raising awareness and launching lobby and advocacy campaigns for organic policies, such as pushing for the inclusion of action plan to guide the development of the organic sector in Uganda established by the national organic policy; and disseminating the policy approved in September 2020 (Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH, 2020). NOGAMU has also coordinated the weekly farmer's market in Kampala, where farmers sell organic fruits and vegetables, spices, honey, and other bee products to local consumers (NOGAMU, 2023).

Despite these efforts from local organizations in both countries, most products are still not sold as certified to neighbouring countries (Turley et al., 2022). Given the increasing importance of PGSs in East Africa, however, there is a potential opportunity for Tanzania and Uganda to join forces to boost intraregional trade and value addition for more sustainable agricultural production in both countries. This, of course, requires the support of private actors to mobilize and invest much-needed resources. Following the steps of Chile and Brazil, the governments of these African countries can work toward recognizing participatory certification or PGSs in the same way as third-party verification and open more opportunities for small-scale farmers and SMEs.



6.0 Analysis of the Examples: Challenges and lessons learned

An analysis of the cases detailed above shows that the integration and operationalization of VSSs in South–South trade policy have limitations. For instance, the key factors that have contributed to the successful inclusion of VSSs in trade-related policies—such as the similarities between organic systems and long-term collaboration between Chile and Brazil—may not be present in other contexts and regions.

Bilateral or national initiatives, such as in the case of Namibia and the collaboration with GLOBALG.A.P., could be more successful in further integrating VSSs into trade policy. That is because they were initiated based on assessments of local needs and capabilities, with the potential to expand their use in the trade with neighbouring countries or being implemented in other regional trade processes facing similar challenges (such as SPS issues). This approach can be more efficient in tackling the difficulties of further integrating VSSs in South–South trade policies, particularly on issues such as harmonization, trust, and recognition, as regional initiatives often need more time to develop and operationalize and usually require greater consensus among partners that already bring different interests to the table.

As an example, Eco Mark and EAOPS standards in Africa struggle with official recognition among their members, which limits their reach. For instance, ironically, the Kenya Bureau of Standards, which actively worked toward the creation of the EAOPS in 2007, does not officially recognize the standard now, and its operationalization is not part of its mandate; instead, it recognizes the Eco Mark certification scheme (Kenya Bureau of Standards, 2023). However, in the case of EMA, only 8 firms have been certified so far (ARSO, 2023). In Asia, ASEAN’s mutual recognition agreement on organic products, the process of aligning the national standards with ASOA, and the development of the agreement are still ongoing and expected to take time, as it requires several policy changes to ensure alignment between the different member states.

According to our analysis, although each of these examples was developed under different conditions and has certain limitations, each shows how to address major barriers to integrating VSSs in South–South trade policy and how these standards can be used as catalysts for the trade in more sustainable goods among developing countries. Some cases also signal the potential to integrate VSSs in regional processes further.

Table 1 illustrates how each example included in this report has helped address or has the potential (P) to address some of the barriers to the integration of VSSs in South–South trade policy to boost sustainable South–South trade by removing barriers to trade, lowering compliance costs, promoting trust and recognition of VSSs, boosting demand for more sustainable products in the countries or regions, and promoting the harmonization of standards.



Table 1. How have or might the examples showcased help integrate VSSs in South–South trade?

Contribution to the integration of VSSs in South–South trade	Examples in developing regions & countries					
	Chile–Brazil MoU	EAOPS	ARSO–Eco Mark	PGSs in East Africa and Oceania	Namibia–Zambia/ GLOBAL G.A.P.	ASEAN–ASOA
Reducing barriers to trade	●	●	●		○	○
Lowering costs of compliance	●		●	●		
Boosting trust and recognition	●	●	●	●	○	○
Increasing demand for VSSs-compliant products	●		○		○	○
Promoting the harmonization of standards	●	●	●		○	○

Note: ○ = potential to address barriers

On the issue of **reducing barriers to trade**, VSSs can help to address some of the barriers relating to the recognition of other standards. For instance, VSSs such as the EAOPS in East Africa or GLOBALG.A.P. in Southern Africa require in their design to work toward recognition with other national, regional, or international standards or schemes. They also support seeking compliance with national, regional, and international regulations, and GlobalG.A.P. requires compliance with national quality management systems (Turley et al., 2022).

Both the EAOPS and GLOBALG.A.P. also have processes in place to prevent and control transboundary pests and diseases in crops (Turley et al., 2022). Thus, their integration into trade policy can potentially enhance intraregional trade by preventing yield losses and increasing agricultural productivity at the local level and reducing the costs of control or preventive measures (i.e., seed inspection and phytosanitary services) and rejections across borders (Intergovernmental Authority on Development, 2020; Prasanna et al., 2022). This is important, as there is a perception that VSSs can themselves be non-tariff barriers to trade because of the additional production requirements they entail, the investment needed to comply with them, and the capacity that is required to verify VSSs-compliant produce at border crossings and other points of trade (Turley et al., 2022). In these cases, however, the EAOPS



and GLOBALG.A.P in East Africa can be used as tools to bring producers into alignment with SPS measures and facilitate trade.

Some examples also show that integrating VSSs in trade policies can **increase demand for and availability of VSS-compliant products** and boost more sustainable consumption in the Global South. The case of Brazil and Chile suggests that after the implementation of the MoU, the trade of organic products between both countries rose significantly. This increase in trade volumes may be related to the fact that Brazil has a relatively higher proportion of VSSs when compared to countries globally (UNCTAD, 2023d), serving not only the export market but also the domestic market, as the country also represents the most prominent growing organic consumer market in Latin America (Oliveira et al., 2021). Therefore, effectively implementing these bilateral—or intraregional—measures, mainly when there is evidence of increasing demand for more sustainable products, can increase market access for VSS-compliant producers while making these products more accessible to the population. The cases of ARSO–EMA and ASEAN also show potential to boost the consumption of VSS-compliant products in their respective regions, as these initiatives strive to integrate sustainability into mainstream practices and foster more sustainable consumption patterns. In both cases, increasing sustainable consumption is considered an objective.

In addition, some initiatives, such as PGSs in East Africa and the POS in Oceania, have been **effective in reducing compliance costs**. This certification approach is typically used for short and local value chains, allowing farmer groups to organize themselves and agree to follow organic standards while developing their own mechanisms to check how they meet the standards' requirements—significantly reducing the costs of compliance, such as for third-party audits. In Oceania, this system has proven more successful than third-party certifications in aligning the needs of farmers and the special characteristics of the region and territories while also providing opportunities to access key export markets. This collective approach also means farmers can be assessed by their peers while receiving support from consumers and local interest groups and collectively market their produce as certified (POETCom, 2023).

Tanzania's SAT says farmers may prefer to participate in PGSs because they can get recognition for their goods for much less money than with third-party certification, which is very costly to many of them. The system is considered more accessible while promoting friendship and collaboration among farmers, as well as offering capacity-building opportunities. In Oceania, PGSs that are part of the POS underpin community values, support traditional practices, and promote equity and fairness through the organic production chain (POETCom, n.d.). PGSs can also serve as a transitional tool to achieve third-party certification that helps producers access international markets when they are ready.

In Latin America, the Chile–Brazil example offers potential cost reductions to compliant farmers, as it recognizes PGSs as a means of organic verification, facilitating trade, and eliminating the need for farmers already adopting sustainable practices to obtain additional certifications. Furthermore, the mutual recognition agreement has shown its potential to increase demand for organic products in both countries.



The development of PGSs in Chile, Brazil, and East Africa shows how **trust among actors** (i.e., producers, peers, government officials) and political will are crucial to enabling mutual recognition of their national organic standards and successfully integrating VSSs in trade policy. Trust will likely be a vital factor for successful integration in the ASEAN region, which presents a great opportunity for benchmarking national organic standards, given the ambition, willingness, and steps already taken to boost the trade and the sustainability of agricultural products grown in the region.

The involvement of GLOBALG.A.P. in Namibia and Zambia highlights that VSSs have the potential to build synergies with policy action for encouraging trade that supports sustainable production between multiple actors in agricultural value chains. VSSs usually help connect farmer organizations with other actors in the value chain—such as input and financial service providers, agro-services companies, or public institutions—while providing other services, such as technical assistance for farmers and sometimes offering training and coaching to the public and private workers involved (Elder, 2023).

Finally, most of the cases showcased in this report illustrate **how VSSs look to facilitate harmonization processes in the Global South**. Indeed, some of the standards already contain provisions or criteria related to supporting the harmonization and recognition of other VSSs. The EAOPS, for instance, requires producers to comply with national and regional laws and regulations, which inherently supports standardization and harmonization and includes provisions on working toward recognition and equivalence with other standard systems (Turley et al., 2022). EMA was conceived as a certification recognition system for national and international sustainability standards operating in Africa (ARSO, 2019). Following this logic, EAOPS and EMA could benefit from being benchmarked to help harmonize their schemes and catalyze the trade of VSS-compliant products between East Africa and the rest of the continent. These harmonization efforts can potentially benefit supra-regional trade processes, such as the African Continental Free Trade Area (AfCFTA), which became active in January 2021. AfCFTA countries have committed to liberalizing trade by scrapping tariffs on 90% of their goods. The agreement has the potential to increase intra-African trade in agricultural products, including those that comply with VSSs, and manufactured goods by 49% and 62%, respectively (World Bank, 2022).

There is an opportunity to increase trade in and demand for sustainable agricultural products in Africa, and the AfCFTA can be used as a strategic instrument to achieve this goal and leverage sustainable growth across the continent. In addition, “to enhance alignment between the AfCFTA and Africa’s green growth agenda, state parties are also encouraged to adopt a proactive approach to removing non-tariff barriers to trade in green products and services” (van der Ven & Signé, 2021). This is in line with the MoU signed by the AfCFTA Secretariat and ARSO in 2021 aimed at recognizing standards to eliminate technical barriers that hinder intra-African trade (ARSO, 2021).

Some of the examples showcased are more operational than others since some are still being developed and are not yet implemented in practice, but overall, they highlight interest in



supporting VSSs' adoption to boost South–South trade and the adoption of more sustainable production and consumption practices. Also, it shows that the integration of VSSs in trade policies and instruments has the potential to increase trust and mutual understanding between trading partners as formalization mechanisms, such as MoUs or mutual recognition agreements, can be catalysts for long-lasting commercial relationships.

The analysis of these examples also shows that VSSs have the potential to boost South–South trade, while helping to promote sustainable agricultural practices and deliver sustainable development outcomes (Elder, 2023; Kosolapova et al., 2023; Larrea, 2023). At the same time, they can improve smallholders' market access and encourage alignment with policy goals to boost bilateral or intraregional trade, further supporting the integration of regional blocs. In addition, though the cases illustrated in this report show the potential for VSSs integration at the intraregional level, this could potentially enhance the trade of VSS-compliant products between regions in the Global South, given the increasing trade between developing countries, including in commodity sectors where VSSs operate (see Box 1).

VSSs are already present in the agricultural sector in many developing regions, and they cover many of the products that are among the most traded or show the fastest-growing trends in the Global South, but also that present high social and environmental risks. This includes oilseeds (i.e., palm oil and soybeans), cotton, sugar, and cocoa or crops that are key for food security in the Global South, such as maize and rice. VSSs can function then as a trade-enhancing tool that helps integrate producers from developing countries into global value chains and regional markets while encouraging best practices for sustainable production and building trust in those practices among consumers and other stakeholders (UNFSS, 2022a).

Examining the different examples of VSSs' integration into trade policy leads to the conclusion that governments in developing countries and regional blocs in the Global South are increasingly interested in using VSSs as a policy tool and, subsequently, are trying to address and tackle the challenges that directly or indirectly prevent the adoption of these standards. Examples and success factors are context-dependent, and some governments favour bilateral measures, others the development of national or regional standards, while still others work toward aligning with international VSSs. However, all ultimately seek to lower trade barriers, help small-scale farmers and SMEs access markets, and improve trade and cooperation.

Moreover, from our analysis, certain regional highlights can be observed. For instance, most of the examples and initiatives looking to integrate or include VSSs in trade policies are undertaken by African countries to boost bilateral or intraregional trade. Persistent challenges remain, though, such as a lack of coordinated actions, government support, and trust among stakeholders that would need to be addressed to take full advantage of the benefits of this integration. While some evidence signals that VSSs can help farmers in developing countries improve access to resources and markets (i.e., better prices for certified crops, higher crop income, forest and soil conservation, social capital, and links to financial service providers), enabling conditions—such as an adequate ecosystem of supporting actors, demand for more sustainable products, and access



to financial resources—must be present to help these smallholders enter potential VSSs markets (Elder, 2023).

Fewer examples of VSSs’ integration to boost intraregional trade are reported in Latin America and the Caribbean, though the case involving Chile and Brazil seems to have been very successful in increasing trade values and volumes of organic-compliant products between the two countries. It has also reduced implementation and certification costs and helped small farmers access markets, ultimately improving their livelihoods. This case demonstrates that a supporting environment consisting of strong institutional robustness and trust among ministries, certification bodies, and other stakeholders can foster collaboration and effectively address the hurdles of integrating VSSs in trade policy.

Other economies in the region are well placed to follow this example, as 19 countries in Latin America and the Caribbean already have some type of legislation on organic agriculture (European Commission, 2020). In any case, to increase sustainable intraregional trade while using VSSs as a tool, this region would need to overcome structural challenges, such as poor physical infrastructure and inefficient custom processes that add transaction costs and complexity (Gonzalez, 2017). These challenges are critical for the efficient exchange of products and services. Nevertheless, regional integration initiatives, such as the Pacific Alliance, which comprises Chile, Colombia, Mexico, and Peru, could see the bilateral example of Brazil and Chile as a reference to incorporate VSSs in the cooperation space.

While Asia has the most potential for VSSs’ integration into trade policy in the Global South, given the region’s rising importance in global and intraregional trade, as well as growing populations and consumption, only a few Asian initiatives include VSSs. ASEAN’s mutual recognition agreement on organic agriculture could significantly help to transform the trade of certified Organic agricultural products in the region and inspire other examples. However, it remains to be seen how this initiative will be implemented in practice and whether it will be adopted effectively.



7.0 Recommendations: How to leverage VSSs' potential to promote sustainable South–South trade

Based on the analysis and examples presented in this report, governments and regional blocs in the Global South are showing a growing interest in utilizing VSSs as a policy tool and are trying to address and tackle the challenges that directly or indirectly prevent trade policies from including standards. In light of these findings, policy-makers should consider the following recommendations to leverage VSSs' potential to promote sustainable South–South trade. These are also drawn from the SSI's regional reports on VSSs in East Africa (Turley et al., 2022) and VSSs in South Asia (Voora, Elder, et al., 2023), as well as an SSI review on VSSs and poverty reduction (Elder, 2021).

1. Strengthen the institutional and regulatory policy framework with VSSs and vice-versa

Developing countries and regions could align their institutional and regulatory policy frameworks with VSSs as appropriate—for instance, with their sustainability criteria and practices supported—and encourage more trade of sustainable products. Governments can also help producers in the Global South improve their production practices to provide environmental and social benefits. Some cases, like the partnership between the Government of Namibia and GLOBALG.A.P. and the MoU between Chile and Brazil, are good examples of how countries in the Global South have made efforts to align their policies with private or national standards to support common objectives or are creating the enabling conditions for VSSs to operate to encourage the trade of more sustainable products and better production practices.

This alignment can offer advantages to both VSSs and governments. VSSs can benefit from regulations that bolster sustainable production practices, as producers complying with legal requirements will be in a favourable position to comply with VSSs too. This may stimulate greater adoption and trade of VSS-compliant products. This alignment can also help improve VSS design to conform with more demanding regulations or policies concerning sustainable production (UNCTAD, 2023d).

Countries and regional blocs can use or collaborate with VSSs to reach policy objectives—for instance, by sharing costs and resources to support the adoption and verification of more sustainable practices. While these standards are voluntary and are the subject of soft law, there are different ways in which governments can support their adoption—for instance, by partnering with VSS-setting bodies to train farmers on sustainable production practices or by incorporating some of their sustainability criteria in sectoral policies. Political commitment to and recognition of VSSs and their certification programs in the Global South are also needed. This



sort of commitment and recognition in regional and national processes (e.g., agricultural policy formation, development of trade agreements, and establishment and enforcement of food quality and safety standards) is essential to improve the potential impact and reach of VSSs to strengthen intraregional trade (Turley et al., 2022).

2. Leverage and learn from other experiences and initiatives

The integration of VSSs into trade policy-making is not novel, and countries in the South can learn from and leverage other experiences and initiatives already in place or being developed in other regions. The MoU facilitating the trade of organic products between Chile and Brazil and the integration of GLOBALG.A.P in Zambian and Namibian national policies to enhance production and trade of more sustainable products in Southern Africa can serve as an inspiration to other developing countries desiring to incorporate more sustainability-related considerations in trade policy.

Another promising example that includes developing countries is the negotiation of an Agreement on Climate Change, Trade and Sustainability launched in 2019 by Costa Rica, Fiji, Iceland, New Zealand, Norway, and Switzerland. One of the key areas to be covered in the agreement is the development of principles-based guidelines to inform the development and implementation of voluntary eco-labelling programs and associated mechanisms (Steenblik & Droege, 2019). These guidelines are intended to be a tool that ensures the development and effectiveness of eco-labels in achieving their environmental purposes (The Beehive, 2022). This example shows how several trade partners from different geographies can join efforts in agreed solutions to environmental challenges, and how VSSs can be recognized as tools to help achieve those objectives.

3. Provide support for smallholders to reduce compliance costs

The experience of some developing countries that have supported and recognized PGS systems in trade policy has been positive for participating farmers in reducing compliance costs of accessing certifications. The cases of Tanzania, Uganda, Chile, and Brazil showcased in this report show that these types of certification systems can be accessible, affordable, and widely implemented or adopted to support local and regional value chains and open market access to smallholders while also keeping the door open to qualify for third-party certifications if other export markets require it.

In addition, governments and VSSs, along with international organizations, non-governmental organizations, donors, and the private sector, could facilitate producers' access to financial and technical resources for meeting the cost of certification. For instance, VSS bodies or governments could assist by adopting cost-sharing arrangements—such as covering part of the cost of audits to make them more accessible, to ensure that producers in developing countries successfully implement and maintain the standards after their adoption. Beyond cost, other challenges also hinder producers' capacity to comply with standards. To tackle this, governments and regional



blocs could partner with VSSs already operating in their territories to offer capacity building and training on VSS-compliant practices and ease their adoption so more smallholders and producers can join regional and global value chains through VSSs (see Gabon and FSC cooperation agreement) (Forest Stewardship Council, 2020).

4. Create an enabling environment for the uptake of VSSs in South–South trade

The successful integration of VSSs in South–South trade policy requires a supportive enabling environment so all actors can meet their objectives. To this end, countries should encourage government agencies to share experiences and learn from what other countries or regions are doing to use VSSs as a tool to boost bilateral or intraregional trade. For instance, countries like Namibia and Zambia could learn from the experience of Brazil and Chile, and ASEAN could learn from the experience of East Africa with the development of the EAOPS. Better dialogue among countries will help to identify or encourage an enabling environment for sustainable production practices through the integration of VSSs in trade policy or by facilitating the mutual recognition of standards. A lack of coordinated actions, government support, and trust among stakeholders will hinder the successful integration of VSSs in South–South trade policy measures. Consequently, fostering coordination and cooperation becomes essential to maximizing the benefits of these initiatives.

This enabling environment also requires the design and implementation of effective incentives. VSSs and governments in producing and consuming countries should create stronger incentives for producers in developing countries to use, adopt, and maintain these standards (UNCTAD, 2021b). This support can include different measures, such as providing minimum prices and premiums above market prices that reward farmers that implement sustainable growing practices and deliver positive results; providing tax benefits to local processors and manufacturers that source VSS-compliant products; and launching promotional campaigns to boost the local and regional consumption of more sustainable products.

5. Continue to seek harmonization and establish mutual recognition

Governments interested in integrating VSSs into trade policies need to explore how to promote mutual recognition and equivalence systems between existing VSSs. An interesting example is what ARSO is aiming to do with the development of EMA as a recognition system open to benchmarking with other regional and international VSSs operating in the continent. These kinds of systems not only create synergies between VSSs but can also reduce implementation and certification costs for small-scale farmers while enabling market access to local and export markets. The Chile–Brazil collaboration can also serve as an inspiration to other countries desiring to develop equivalence agreements on sustainable products, such as organic certification. The agreement not only recognizes both national organic standards and their assurance systems to enable the trade of certified Organic products between the two countries, but it also accepts



those products that have been certified by participatory guaranteed systems, an affordable means of verification used by producers and supporting agents.

In addition, VSSs bodies should consider the following recommendations:

6. Develop local versions of VSSs that are adapted to local conditions

VSSs can have a greater impact on their integration into policy in South–South trade by considering the local context and establishing robust monitoring and evaluation systems. This includes adapting international standards to local needs that can help expand the reach of farmers and lower the cost of complying with VSSs for them as GLOBALG.A.P. has done by developing the localg.a.p. scheme as an entry point for local markets, with the possibility to access to third-party certification when farmers are ready. Several VSSs already operating in the Global South could follow this example not only to promote more sustainable practices at the production level but also to increase the consumption of VSS-compliant products in the South and catalyze trade. Standards can also establish better monitoring and evaluation systems by engaging with supporting local actors who regularly interact with farmers to track the performance of their farming practices, assess changes, and support learning and continuous improvement. This would enable local decision-makers to evaluate the opportunities and challenges associated with the integration of VSSs into trade policy.



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Head Office

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