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ECOWAS strengthens the capacities of public and private sector managers in border controls, customs nomenclature, quality standards and labelling, with a focus on milk and dairy products in west africa and the sahel



1

In 2020, the Economic Community of West African States (ECOWAS) adopted a strategy aimed at promoting local milk value chains in West Africa and the Sahel, known as the 'Local Milk Offensive'. This strategy aims to double the volume of local fresh milk production (from pastoral and agropastoral production systems) by 2030, increasing it to 10 billion litres per year, compared with approximately 5.8 billion litres in 2018. It also aims to increase the proportion of collected milk processed by dairies from 5 per cent to 20 per cent and, finally, to create a more conducive business environment for the development of local milk value chains.

2

Since 2024, ECOWAS has been receiving catalytic support from the French Development Agency (AFD) to implement the West African Dairy Offensive Support Project (PAOLAO). Among other objectives, this project aims to assist ECOWAS in formulating incentive-based trade and tax policy reforms, on the one hand, and to strengthen the capacities of officials in government and the private sector regarding border controls, customs nomenclatures, and quality and labelling standards, on the other. The project contributes to the implementation of this strategy across 18 countries in West Africa and the Sahel.



3

With this in mind, the Directorate of Agriculture and Rural Development and the Regional Agency for Agriculture and Food organised a training workshop from 24 to 28 August 2026 in Agbodrafo, in the Togolese Republic for:

- *health inspectors, customs officers responsible for border controls,*
- *managers of dairy processing units,*
- *representatives of regional livestock farmers' organisations (APESS, RBM),*

The aim of this activity was to develop a core group of regional trainers specialising in border controls (for both imports and exports), quality standards and labelling of milk, dairy products and milk-based food preparations (particularly re-fatted powders), whether imported or locally produced. Funded by the French Development Agency, the training workshop was opened by the Executive Director of the Regional Agency for Agriculture and Food (ARAA). The programme was structured into three sessions focusing on theoretical concepts, a field visit and practical classroom exercises.

4

The theoretical training covered:

- *the types of milk, dairy products and food preparations as defined by the Codex Alimentarius and the ECOWAS Common External Tariff (CET) nomenclature;*
- *good agricultural and manufacturing practices and the HACCP system;*
- *an introduction to SPS agreements, health risk analysis, health inspection and certification at borders;*
- *an introduction to milk quality and food safety;*
- *labelling standards and requirements;*
- *regulatory frameworks (international standards, ECOWAS regulations, country-specific regulations).*

Milk and dairy products': a dual meaning.

In trade and customs regulations, the terms 'milk' and 'dairy products' do not always refer to the same thing. Yet this distinction is essential for understanding market dynamics relating to local milk value chains in West Africa and the Sahel.

According to the customs nomenclature:

Milk is strictly defined as a product of animal origin. It may be whole, partially or fully skimmed, but it must retain its original nature.

Dairy products refer exclusively to milk derivatives that meet the criteria set out in Chapter 4 of this nomenclature, covering headings 04.01 to 04.06.

This definition is therefore based on the natural composition of milk and the absence of any substantial alterations to its constituents.

In everyday commercial language, the terms 'milk' and 'dairy products' are used in a much broader sense. They may include products of plant origin, such as soya milk, or processed products that mimic the appearance and use of milk.

This broadening of the terminology contributes to a certain degree of confusion, as products that are very different in terms of their composition may be perceived as equivalent by consumers.

This confusion is exacerbated by the existence of hybrid products, such as skimmed milk to which plant-based fats have been added. In this case, the milk-derived fat is replaced by plant-derived fat. Consequently, the product no longer meets the customs definition of milk. It is reclassified as a 'food preparation' and placed in other categories of the nomenclature, notably headings 19.01 or 21.06.

This change in classification is not without consequence. Food preparations generally benefit from lower customs duties than traditional dairy products. Consequently, products that resemble milk powders – and are consumed as such – can be imported at a lower cost whilst circumventing the tariff protections applied to the dairy sector.

In West African and Sahelian countries, this situation has significant repercussions. Preparations made from skimmed milk enriched with vegetable fats are imported in large quantities, often in 25-kilogramme bags. Their low taxation gives them a significant price advantage on the market, making them particularly competitive against local milk.



This competitiveness affects the entire dairy sector. Locally produced milk – fresh milk from West African farms – struggles to compete with these low-cost imported products. Clearly, this reduces the incentives to invest in improving herd productivity, collection systems or processing infrastructure. It hinders the development of a structured local dairy sector and limits the realisation of the potential of local production.

Thus, behind what appears to be a technical issue of customs classification lies a broader economic challenge. The way in which products are defined and classified directly influences their tax treatment, their market price and, consequently, the balance between local production and imports. Understanding this distinction between milk, dairy products and food preparations sheds light on the challenges facing the dairy sector in the region

The challenge for the West Africa and Sahel region is how to reclassify the product known as 'Fat filled Milk Powder (FFMP) - skimmed milk enriched with vegetable fats' (a food preparation) within the ECOWAS customs nomenclature to a rate of 20–35 per cent, instead of the 5 per cent customs duty currently applied.

The challenge is to make regional and national policymakers understand that food preparations, in particular 'fat filled milk powders', are the main competitors to local fresh milk. This food product is imported in 25 kg packs and falls under the tariff category for inputs or raw materials, subject to a customs duty of just 5 per cent. This discriminatory treatment allows it to be cheaper on the market and undermines the benefits of local milk collection.

5

The field visit to the Autonomous Port of Lomé, particularly to the border health and veterinary inspection post, enabled participants to gain practical experience in methods for identifying the nature of dairy products, the relevant Codex standards and their classification under the ECOWAS External Tariff. It enabled them to consolidate their knowledge of the required documentation and health inspections, particularly regarding the identification of dairy product samples, the corresponding customs nomenclature, physical and organoleptic tests, decision-making and the justification of decisions.



6

Although the delegation did not have access to the warehouses nor observe the control and identification operations, it was able to familiarise itself with the procedures used, as well as the level and nature of collaboration between the various technical departments. It noted some shortcomings in decision-making, which sometimes fall within the remit of the line ministry rather than the technical departments, as prescribed by ECOWAS regulations.

7

Using a large sample of dairy products purchased from local shops and stalls, the participants honed their skills and expertise in identifying the nature of dairy products and classifying them according to the ECOWAS Common External Tariff (CET) nomenclature. This practical exercise highlighted numerous irregular practices on the part of both manufacturers and importers. Labelling on packaging is sometimes difficult to read and does not provide all the information required by regulations regarding the product's composition.

8

The discussions that followed the debriefing on the information received at the Autonomous Port of Lomé and the practical classroom exercises enabled participants to exchange views on certain practices that sometimes account for the presence on the market of dairy products, and, above all, food preparations unfit for consumption:

- a. The intervention of political and religious authorities in certain countries to facilitate the entry of dubious products,
- b. The failure of certain importers and freight forwarders to produce the required administrative documents providing precise details on the characteristics, origin and actual provenance of the products,
- c. Failure to comply with procedures requiring health inspections to be carried out prior to customs clearance of products,
- d. The failure to systematically use analyses carried out by specialist laboratories explains the increasingly widespread presence of food products of dubious quality on the region's markets.

9

The participants made several recommendations, notably the need to:

- a. Systematically carry out health inspections of products prior to their customs clearance and release for consumption,
- b. Comply with ECOWAS standards, which make heads of control posts responsible for granting import authorisations for products only after a proper inspection of their compliance with standards, quality and labelling,
- c. Strengthen the capacity of control and inspection teams by providing adequate human resources, equipment and working materials. Certain facilities, notably laboratories for carrying out tests, are sorely lacking in many countries,
- d. Revitalise and expand advocacy and lobbying campaigns to reclassify food preparations into the fifth tariff band of the ECOWAS Common External Tariff (CET), accompanied, where necessary, by specific levies.

11

11. Three recommendations for action were put forward by the participants

- a. Expand the role of the Regional Multi-stakeholder Platform for the Promotion of Local Milk / Livestock Producer Organisations / inter-professional bodies in mobilising their own resources and providing services beyond advocacy and stakeholder representation,
- b. Raise awareness throughout the local dairy value chain, particularly regarding cold chain management (good practice in the management of refrigeration equipment),
- c. Establish a mechanism for recognition, awards and prizes for exemplary stakeholders in the value chain within the region.

10

This training highlights the need to:

- a. Enhance the knowledge of stakeholders, operators, consumers and other decision-makers regarding product quality and labelling standards,
- b. Develop a regional standard to underpin a policy on trade defence and consumer health. This standard must help to limit imports of food preparations that are mistakenly classified as dairy products.



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