Civil Society Dialogue on Africa's meeting of 28 June 2019

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Caution: At the time of concluding this analysis, we learnt that Nigerian Government has finally decided to sign the African Continental Free Trade Area (AfCFTA) on 7 July 2019 in Niamey. This is arising from the report of the Presidential Steering Committee on Impact and Readiness of Nigeria on the AfCFTA which has finally favoured the President to proceed with the signing of the Agreement. The decision to sign raises some questions, but which does not call into question the critical analysis made below of the AfCFTA, the Task Force Rural Africa (TFRA) and the EPAs (Economic Partnership Agreements). According to a source close to the Nigerian government, the signing of the AfCFTA does not change in way the decision of Nigeria regarding the signing of the regional EPA. Notwithstanding the current decision, there may be some difficulties or even impossibilities of implementing the AfCFTA which could lead all the African States that have signed or even ratified it to refocus fairly quickly on deeper regional integration within their Regional Economic Communities (RECs). The European Commission on the other hand should understand the need to meet its commitments on the Sustainable Development Goals (SDGs) and the Paris Agreement on global warming within the context of industrialization, job creation, migration and poverty nexus, while effectively combating at source the influx of immigrants it does not want to welcome and the increase in insecurity in Africa and in the EU linked to the expansion of terrorist movements.

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The following comments tackle in turn the issues of the AfCFTA, the TFRA report and the EPAs.

But, before turning to these three core issues, one should stress that having focused the meeting on comments of the "*Communication on a new Africa – Europe Alliance for Sustainable Investment and Jobs: Taking our partnership for investment and jobs to the next level*" was not optimal. This communication is a long list of the EU financial assistance programmes to Africa as if Africa's development would mainly depend on them to reach the SDGs and face the treble challenge of demographic explosion, growing food deficit and climate change. Forgetting at the same time the huge financial losses that the EU is inflicting to Africa through the EPAs (losses of tariffs and VAT on imports), the support given to the AfCFTA which would cut at least 90% of the tariff revenues on intra-Africa trade, the cumulative detrimental impact over the years of the EU agricultural subsidies (export refunds and domestic subsidies) having reduced the competitiveness of ACPs farmers and agro-industries, and the erosion of preferences supposedly granted to EPAs and GSP countries due to the other EU Free Trade Agreements (FTAs), the last example being the political agreement of the EU-Mercosur FTA concluded the same 28 June with TRQs on sugar and bovine meat offered to Mercosur.

I – The EU support to the AfCFTA

The preparation of the AfCFTA represents a waste of time and resources for the African States that will reduce the resources which should be concentrated for a very long time on economic and political strengthening of the RECs before considering a continental free trade agreement. As I write in my book[1] the 16 West Africa (WA) States have every interest in prioritizing regional trade over trade with the whole of Africa, for the following reasons:

[1] Did you say FREE trade? The Economic Partnership Agreement European Union-West Africa, L'Harmattan, September 2018.

1.1 – WA has a strong interest to promote regional integration over the mirage of a premature continental integration

While, according to TradeMap, WA imported from Africa only 10.5% of its global imports in 2016 and exported to Africa only 20.2% of its global exports, intra-WA imports nevertheless represented 66% of its imports from Africa and intra-WA exports 62% of its exports to Africa. While Côte d'Ivoire (CI) imported from Africa only 21.4% of its global imports and exported to Africa only 33% of its global exports, its imports from WA represented 75.1% of its imports from Africa and its exports to WA accounted for 59.2% of its exports to Africa. And while Ghana imported from Africa only 9% of its global imports and exported to Africa only 24.6% of its global exports, its imports from WA represented 45.6% of its imports from Africa and its exports to WA represented 77.8% of its exports to Africa. Clearly, these two countries have a strong interest in favouring regional integration over the mirage of a premature continental integration.

This contradicts the assertion made by a representative of DG Trade during the Civil Society Dialogue meeting of 28 June 2019 that Ghana exports to the rest of WA are minimal. To the contrary the Third World Network Africa, based in Accra, points out that "*Today, more than 90 per cent of Ghana's most dynamic manufacturing exports go to the West Africa sub-region… the EPAs directly undermine this*"[2]. This finding is confirmed by the World Bank study of 2015 on Ghana iEPA: "*The most important export market for employment is ECOWAS: exporters to ECOWAS employed 38.7 percent of the sample's workers. The second most important market was the European Union: exporters to the European Union employed 4.9 percent of the sample's workers*"[3].

1.2 – The MFN clause provision of the CI and Ghana iEPAs

According to the MFN clause provision of Article 17 of CI's iEPA (and Ghana's iEPA), "*With regard to the areas covered by this chapter, the Ivorian Party shall grant to the EC Party any more favourable treatment that might result from the Ivorian Party becoming a party to a free trade agreement with a major trading partner after the signature of this Agreement... In the context of this Article, "free trade agreement" means any developed country, or any country having a share of world trade of more than 1 percent in the year preceding the entry into force of the free trade agreement referred to in paragraph 2, or any group of countries acting individually, collectively or through a free trade agreement having a share of world trade of more than 1.5 percent in the year preceding the entry into force of the economic integration agreement referred to in paragraph 2*". Indeed in 2016 Africa accounted for 2.2% of world exports and 3.2% of world imports. Now that CI and Ghana, along with the 13 other WA States having signed the AfCFTA except Nigeria, have committed to open their markets to 90% of their imports from Africa, they will be obliged to liberalize 90% of their imports from the EU instead of the 80% provided for in their iEPAs (I calculated this would be 75% in their imports from EU28-UK).

Even if paragraphs 3 and 4 of this article 17 provides that "*3- If the Ghanaian Party obtains from a major trading partner a substantially more favourable treatment than the one offered by the EC Party, the Parties will enter in consultations and jointly decide the implementation of the provisions of paragraph 2. 4- The provisions of this Chapter shall not be so construed as to oblige the Parties to extend reciprocally any preferential treatment applicable as a result of the one of them being party to a free trade agreement with third parties on the date of signature of*

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[2] http://www.socialwatch.org/node/13598

3 MacLeod, Jamie; Von Uexkull, Jan Erik; Shui, Lulu, *Assessing the economic impact of the ECOWAS CET and economic partnership agreement on Ghana*, 1st January 2015, http://documents.worldbank.org/curated/en/845041467999971258/Assessing-the-economic-impact-of-the-ECOWAS-CET-and-economic-partnership-agreement-on-Ghana

this Agreement", these provisions would not necessarily be agreed by the EU Commission, so much so that it has refused to revise the regional EPAs texts of WA, EAC and CEMAC to accommodate the requests of Nigeria[4], Tanzania, and of the 5 CEMAC States other than Cameroon[5].

While the MFN clause would not have played a role in the WA regional EPA since its Article 16 specifies that it would only apply to "*a trading partner other than African countries and ACP States*", this restriction does not exist in the texts of the CI and Ghana's iEPAs, nor in the text of the CEMAC EPA signed and implemented only by Cameroon. Add to this the inconsistencies in the provisions of Articles 19 and 20 of the AfCFTA dealing with possible conflicts with trade agreements concluded by RECs. On the one hand, Article 19 provides that "*This Agreement shall not cancel, modify or revoke rights and obligations arising from pre-existing trade agreements concluded by States Parties with third parties*", while Article 20 provides that "*In the event of incompatibility between this Agreement and any regional agreement, this Agreement shall prevail to the extent of the specific incompatibility, unless otherwise provided in this Agreement*".

In other words, according to Article 19, the AfCFTA should not modify the provisions of the EPAs concluded with the EU, and in particular the iEPAs of CI and Ghana to liberalize only 75% of their imports from the EU28-UK, whereas, according to Article 20, they should liberalize 90% given the MFN clause of the iEPAs. In that case, if the other WA States having signed the AfCFTA want to protect themselves from the unfair competition of CI and Ghana exports they could only tax them by at most 10%, much less than the tariffs of the WA CET (especially on the 130 tariff lines at 35%, which include many agricultural products). So that they will lose competitiveness vis-à-vis these two countries that will import duty free from the EU (and at most at a 20% duty before the not yet liberalized products), their capital goods and inputs, of which fertilizers and refined petroleum and diesel supposedly liberalized from 1st January 2019 in the CI iEPA, giving a competitive edge to its agricultural products that can move freely within the ECOWAS market without being subject to rules of origin. So that the combination of the AfCFTA and iEPAs will disintegrate the WA regional integration process, a perspective not attractive for the long list of investment programmes that the EU claims to foster. Instead of being stepping stones to the AfCFTA the EPAs, particularly IC and Gahna iEPAs, will be its stumbling blocks.

1.3 – The AfCFTA will have no influence either on trade negotiations in the WTO

And this until it becomes a full member, like the EU, which negotiates on behalf of its 28 Member States (MS). The CFTA will not have bound tariffs, the only ones negotiated at the WTO, and the future Continental Customs Union – which has not yet been negotiated – will have only

[4] On October 13, 2016 the INTA Committee of the European Parliament debated Ghana's interim EPA (iEPA), with the participation of Ms Hannah Tetteh, Ghana's Minister of foreign affairs. The Minister underscored clearly that there is no question to renegotiate the regional EPA which was concluded and initialled by all Members on 10 July 2014, the only thing preventing its implementation being the delay required by Nigeria to ponder on its provisions before signing. Sandra Gallina concurred with the Minister that the European Commission is not prepared either to renegotiate the regional EPA (extract from SOL "*Comments after the INTA Committee's debate on Ghana's interim EPA*", October 17, 2016, https://www.sol-asso.fr/wp-content/uploads/2016/06/Comments-after-the-INTA-Committees-debate-on-Ghanas-interim-EPA-SOL18-October-2016.docx.pdf

[5] The European Commission closed the door to the Central Africa regional EPA in a letter of December 2016 from the European Commissioners for Trade, Cecilia Malmström, and International Cooperation and Development, Neven Mimica, addressed to CEMAC president Pierre Moussa: "*As indicated in our letter of July 19th, our services are at your disposal to study with you the modalities of membership of the current agreement between the EU and Cameroon. That it is therefore not possible to re-launch the regional negotiations interrupted in 2011 and in particular to discuss the text of a new agreement*" (http://bilaterals.org/?cemac-vers-un-accord-de&lang=en)

applied tariffs without the possibility of increasing them to the level of the bound duties of most of its MS which are WTO Members, just as the RECs' Common External Tariffs (CETs) only cover applied tariffs, although most of their MS are WTO Members with individual bound tariffs, as is the case for the 15 ECOWAS MS. On the contrary, the sharp reduction in intra-African tariffs will inevitably lead to a reduction in tariffs applied on African imports from the rest of the world, as confirmed by UNECA: "*The CCU would reduce the average protection imposed by African countries on imports from outside Africa. This increases African imports from the rest of the world by between 2.7 percent (US$16.2 billion) and 3.5 percent (US$21.6 billion) by 2022, as compared to a scenario where only the CFTA is in place… Both intra- and extra-African exports also increase (between US$45.8 billion and US$52.9 billion) as a result of the CCU as African economies become more competitive on the world market due to lower production costs brought about by lower import costs*".

1.4 – Africa is rapidly desindustrializing

Of course this reasoning comes from the idea that Africa will increase its market shares and become more competitive than the rest of the world in industrial products and services whereas the reality is that "*The share of manufacturing in Africa's GDP fell from 15 per cent in 1990 to 10 per cent in 2008 (UNCTAD and UNIDO, 2011)*[6]*. The most significant decline was observed in Western Africa, where it fell from 13 to 5 per cent over the same period. Substantial deindustrialization was also observed in the other subregions of Africa. For example, in Eastern Africa the share of manufacturing in output fell from 13 per cent in 1990 to about 10 per cent in 2008, and in Central Africa it fell from 11 to 6 per cent over the same period. In Northern Africa it fell from about 13 to 11 per cent, and in Southern Africa it fell from 23 to 18 per cent. The declining share of manufacturing in Africa's output is of concern because historically manufacturing has been the main engine of high, rapid and sustained economic growth (UNCTAD and UNIDO, 2011). Furthermore, manufacturing is critical for absorbing the millions of young Africans who will be joining the labour market in the coming years. Already, 40 per cent of Africa's population resides in urban areas, and this number is projected to rise to about 60 per cent by 2050. Taking these considerations on board means rethinking the investment policy approach and moving the policy debate on investment away from the singular focus on FDI attraction towards a more balanced, pragmatic and strategic perspective on how FDI can fit into the development agenda in ways that bring about not only faster and sustained growth but also stimulate domestic investment and links with domestic enterprises to promote structural and technological change*".

This ECA reasoning that a decline in customs duties (CDs) on imports from the rest of the world could increase Africa's competitiveness overlooks the multiple constraints that will long hinder it: deficiencies in infrastructures, particularly of transport; access to energy and water; technical skills; functioning of administrations, including customs; access to credit at reasonable rates and wide disparities in monetary policies and exchange rates; huge differences in CDs, in living standards, in political regimes, etc. Until these constraints are removed, the AfCFTA would encourage an increased loss of customs revenues and competitiveness and, consequently of jobs, while the focus should be on strengthening the RECs.

An excellent article of Michael Odijie shows clearly that the lack of coordination of industrial policies, but also of agri-food industries, in the ECOWAS, has fostered the multiplication of non-competitive national projects by lack of economies of scale, the same fate being even more expected with the AfCFTA which "*currently has no programme governing industrial policy. Instead, African continental free trade is expected to encourage intraAfrica trade; for example,*

[6] It was of 10.6% in 2015: http://data.worldbank.org/indicator/NV.IND.MANF.ZS?locations=ZG

the United Nations Economic Commission for Africa estimated that the agreement will boost intra-African trade by 52 percent by 2022. This is in turn expected to promote industrialization, or change in economic activities. However, a mechanism must be found to deal with the lack of coordination that is likely to occur at a continental level"[7].

1.5 – The AfCFTA madness of eliminating tariffs on agricultural products

Add to that the madness of eliminating tariffs on agricultural trade, even though they could be among the sensitive products whose elimination would only be postponed for a maximum of 10 years. Simon Mevel and Stephen Karingi of UNECA write: "*African agri-food exports to the rest of the world... would increase by 9.4% in the case of the continental FTA in 2022 compared to the baseline scenario... The largest increase would occur in sectors such as wheat, cereals, sugar, meat, milk and dairy products*"[8]. Such an assertion shows their total ignorance of African agriculture since the deficit of these four products – cereals (of which wheat), sugar, meat and dairy products and their preparations – was of $30 billion (bn) in 2016, of which $18.9 bn for cereals, $3.8 bn for sugar and also for meat and $3.3 bn for dairy products. Sub-Saharan Africa's share of this deficit was $10.4 bn for cereals, $2.5 bn for sugar, $2.2 bn for meat and $1.5 bn for dairy products respectively. In fact, Africa's annual net deficit in wheat increased from $3.150 bn in 2000-02 to $11.452 bn in 2013-15[9]. At the same time, intra-African wheat exports increased from just $24,572 to $139,900. Not a single African country exports wheat and intra-African wheat exports are only re-exports to neighbouring countries of non-African imports.

Furthermore UNCTAD adds that "*The elimination of tariffs on intra-African agricultural trade due to the CFTA would be a key factor as the protection of agricultural products is higher than that of non-agricultural products*", and proposes to make "*mutual concessions between the parties on market access between agriculture and industry*". The same statement comes from TRALAC researcher Willemien Viljoen, for whom, in the CFTA, "*Tariff reductions should include sensitive products such as textiles, agricultural products and processed food products, and low tariffs should be reduced to zero to eliminate "compound" tariffs for products that cross borders several times*"[10].

All this evidence militates in favour of the AfCFTA being only a very long-term objective, the last step in the consolidation of RECs that would have achieved a high level of integration, including monetary and political integration, with in particular a substantial budget allocated to catching up of the least competitive States that will suffer most from the decline in their customs revenues, failing which they will leave the RECs and a fortiori the AfCFTA. Following the example, once in a while, of the EU, which has always devoted a third of its budget to the Structural and Cohesion Funds allocated to catching up of the least competitive MS, to the point that Poland is the largest net recipient of EU aid with more than €9 bn per year, 7 times more than the EPADP for the WA alone!

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[7] Michael Odijie, *The need for industrial policy coordination in the African Continental Free Trade Area*, article in African Affairs, March 2019 https://www.researchgate.net/publication/331936142_The_need_for_industrial_policy_coordination_in_the_African_Continental_Free_Trade_Area

[8] Simon Mevel and Stephen Karingi, "*Towards a Continental Free-Trade Area in Africa: a CGE modelling assessment with a focus on agriculture*", in UNCTAD & ILO, *Shared Harvests: agriculture, trade and employment*, 2013, pp 289-324, http://unctad.org/en/PublicationsLibrary/ditctncd2013d2_en.pdf

[9] http://unctadstat.unctad.org/wds/TableViewer/tableView.aspx

[10] http://us2.campaign-archive1.com/?u=3bfd093b3611382763c2c1a5e&id=867493c6b5&e=7590d8f955

II – The EU report of the Task Force Rural Africa (TFRA)

The TFRA report is basically inviting Africa to copy the EU experience of agricultural policy as if it had fostered a sustainable rural development, forgetting its huge flaws that could not and should not be followed by Africa. We will quote excerpts of Jacques Berthelot's application to be selected in the Task Force. But you should first read the "*Reaction by civil society organisations to: Report by the Task Force Rural Africa - "An Africa-Europe Agenda for Rural Transformation" June 2019*"[11].

2.1 – The lessons that African countries could draw from the CAP experience cannot be based on the present CAP

The best lessons that African countries could draw from the CAP experience in agriculture, agri-food industries and rural development, cannot be based on the idea that they are the present models of EU policies which would correspond to the present needs of Africa, and particularly of SSA, for the following reasons:

- The employment issue: while the number of agricultural employments in AWU (agricultural working units) has declined by 3.42% per year on average from 1993 to 2014 in the EU28 (from 19,422 million to 9,349 million), and as the DG Agri anticipates a further decrease by 2.3% per year from 2015-17 to 2030, SSA needs to increase sharply its agricultural jobs as its population would more than double from 2017 to 2050, rising by 2.3% annually. The UN foresees that the SSA rural population would rise by 47% (by 1% per year) from 2011 to 2050.

- The main source of farmers' income: another clear impossibility is to replicate the EU model of farm income in SSA given the huge share of subsidies in the EU. For Alan Matthews, "*Over the full period 2004-2013, direct payments have accounted for 47% of farm net income, other public transfers 15%, and market income the remaining 38%*"[12].

- Reliance on public transfers to finance agricultural production: it is illusory to rely on large public transfers from rich countries as total ODA per capita to SSA has decreased from $66.8 in 2010 to $56.9 in 2016 and that going to agriculture from $1.94 to $1.45, the share of agriculture in total ODA to SSA having decreased from 6.68% to 5.69%.

- Reliance on PPP (public-private-partnership) on agricultural investments is not appropriate either if we mean large-scale farms using modern technologies detrimental to employment and the environment, which would demand tax exemptions, and generally for exports to international markets rather than to local markets. During the joint hearing of the AGRI and DEV Committees of the European Parliament on 27 February 2018, Leonard Mizzy, in charge of agriculture at DG DEVCO, has acknowledged that agriculture is a sector which has been under-invested in SSA as it is considered too risky, which is the reason why DG DEVCO avails of a substantial portfolio to encourage the private sector to overcome their risk aversion.

2.2 – The CAP experience which should be inspiring SSA is that from 1962 to 1992

The CAP which should inspire SSA countries is that implemented from 1962 to 1992, while eliminating its main drawbacks – lack of import protection of feedstuffs, large export refunds and lack of supply management –, for the following reasons:

[11] https://nigeria.actionaid.org/news/2019/reaction-civil-society-organisations-report-task-force-rural-africa-africa-europe-agenda

[12] Alan Matthews, *The dependence of EU farm income on public support*, April 20, 2016, http://capreform.eu/the-dependence-of-eu-farm-income-on-public-support/

- The first priority of SSA agricultural policies should be to lower its food dependency instead of trying to export more non-basic staples through participation in global value chains where SSA farmers and agro-industries have been confined to the lowest level of unprocessed products. Excluding trade in coffee-cocoa-tea-spices – which are not staple foods and are mainly exported – the SSA food deficit with all countries was multiplied by 4.2 from 2005 to 2016, of which by 10.9 for West Africa[13].

- To reinforce the trade policies of SSA their RECs (such as ECOWAS or EAC) should become full WTO members, as the EU has done (the EEC joined the GATT in 1960 before finalizing its Common external tariff and the rules of the CAP[14]), to avail of bound duties because their CET (common external tariffs) are only of applied duties, even if their MS avail of bound duties at the WTO, but which they cannot use without leaving their regional integration objectives. The RECs could then weigh on WTO rules to prioritize local food markets instead of global value chains[15].

- SSA farmers must avail of stable and remunerative prices to be able to self-finance the necessary increase in food production because of the incapacity of SSA governments to subsidize their so many farmers at a significant level and because of the present context of the huge volatility in international prices, amplified by the volatility in exchange rates together with SSA low rates of agricultural tariffs. Even if public money would clearly be required to finance upstream and downstream investments, particularly on transport, energy and irrigation infrastructures.

- These stable and remunerative prices to SSA farmers should be reached, as the CAP had done very efficiently, through variable levies[16] before the WTO (but that the EU is still using on some cereals and fresh fruits and vegetables), on the main staple foods: cereals, sugar, milk powder, meats and eggs. FAO and the EU (in the Argentine-Chile case on the Chile price-band system) have argued that variable levies should be allowed at the WTO as long as they do not exceed the bound duties. Furthermore all countries are still using actual variable levies hidden under several masks as explained in "*How to regulate agricultural prices*"[17].

- The EU should cease to enforce the signature and implementation of EPAs as they would deprive SSA countries of huge customs duties (CDs) and foster unemployment by loss of competitiveness with imports from the EU. It should be committed to prioritize its development objectives over its short run trade objectives, to implement the Agenda 2030 and the Sustainable Development Goals, to attack the root causes of illegal immigration to the EU and enrolment in Boko Haram and other jihadist movements.

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[13] Jacques Berthelot, *Rebâtir la politique africaine sur la souveraineté alimentaire*, Revue Africa21, n°2/2017, pages 69-81, http://www.africa21.org/4eme-numero-dafrique-durable-2030-lagriculture-africaine-les-defis-de-nourrir-la-population-developper-leconomie-et-preserver-lenvironnement/ du

[14] http://www.cyelp.com/index.php/cyelp/article/view/122

[15] *Addressing the imbalances in the WTO rules to promote local food systems in West and Eastern Africa in line with the Sustainable Development Goals (SDGs)*, ROPPA, SEATINI Uganda and SOL, WTO Public Forum, 28 September 2017, https://www.sol-asso.fr/analyses-politiques-agricoles-jacques-b-2/

[16] J. Berthelot, *Selon que vous serez puissant ou misérable… La question agricole dans le commerce mondial*", Revue Internationale et Stratégique, hiver 2017, pp. 121-131.

[17] Jacques Berthelot, *Réguler les prix agricoles*, L'Harmattan, 2013. An English version (*How to regulate agricultural prices*) may be downloaded: https://www.sol-asso.fr/wp-content/uploads/2013/05/How-to-regulate-agricultural-prices-J.-berthelot-2013.pdf

- Imposing SSA countries to cut their tariffs on food imports from the EU is all the more unfair that the EU tariffs on its basic food products are well above those of SSA[18] and they cannot exclude all food products from liberalization because they need to protect also infant industries. The more so as SSA competitiveness on the EU market is already eroded by the FTAs signed with nine Latin America's countries which have almost the same duty free-quota free access for the same tropical products (even if they would still have to pay a reduced MFN duty on bananas), with more erosion to come from the EU new FTAs with Mercosur, Mexico, Chile and several Asian countries.

- The EU should cease to claim that it is no longer subsidizing its food exports because it has deleted its export refunds since 2014, ignoring that the WTO has ruled four times – in the Dairy products of Canada case of December 2001 and December 2002, the US Cotton case of March 2005 and the EU Sugar case of April 2005 – that domestic subsidies (and particularly the alleged decoupled ones in the US cotton case) should be taken into account in assessing dumping[19]. Let us add that the EU might lose the panel established on 24 June 2019 at the WTO to challenge the antidumping and countervailing duties imposed by the US on its imports of table ripe olives from Spain, in which case it is the whole CAP based on so-called fully decoupled subsidies that would fall down[20].

- Clearly implementing stable and remunerative agricultural prices in SSA RECs over a period of 5 to 10 years would spill over the level of food prices, which would generate massive riots if not offset by the parallel implementation of large domestic food aid programmes, as in India, and other measures such as in Brazil's Zero Hunger programmes. As unfortunately SSA is too poor to finance itself such programmes, the funding could come, besides the traditional ODA providers – of which the EU and its MS –, from a very long-term loan (30-40 years) of the World Bank subsidiary AID (Agency for International Development), at an interest rate of 0.75% and with a 10-year deferred repayment. This would be a component of a "Marshall Plan" for ECOWAS and other SSA RECs, alongside an infrastructure component to increase regional trade, a "research and diffusion of technologies" component on processing local cereals and tubers as a substitute to imports of wheat and partially rice, and a "non-agricultural jobs" component to raise the purchasing power of urban citizens, through raising the tariffs on the textile and clothing sector to ensure profitable outlets to regional cotton.

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[18] *From customs duties to total agricultural protection: the case of the European Union-West Africa trade*, SOL, April 19, 2018, https://www.sol-asso.fr/wp-content/uploads/2019/01/From-customs-duties-to-total-agricultural-protection.-April-19-2018.pdf

[19] See Annexes 1 and 2 of *The EU actual AMS and OTDS in 2013-14*, SOL, 29 April 2017, https://www.sol-asso.fr/wp-content/uploads/2017/01/The-EU-actual-agriculrural-supports-AMS-and-OTDS-in-2013-14.pdf

[20] https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds577_e.htm; *The European Commission has crossed the Rubicon on Spanish table olives*, SOL, 19 February 2019, https://www.sol-asso.fr/wp-content/uploads/2019/01/The-European-Commission-has-crossed-the-Rubicon-on-Spanish-table-olives-19-February-2019.pdf

III – The necessity to reconsider the EPAs

Without repeating what has already been said above, let us consider the main other flaws of the EPAs, extracted for my quoted book on the WA EPA.

3.1– The argument that it was legally impossible to maintain the non-reciprocal trade preferences of Lomé Agreements between the EU and the ACP countries does not hold.

DG Trade claimed that they were no longer WTO-compatible, especially after the EU was twice convicted of violating the GATT's non-discrimination principle following complaints from the 9 countries of Latin America exporting bananas as they had to pay customs duties (CDs) to the EU while the ACP countries were exempted. Yet, if discrimination is prohibited by the GATT and the WTO according to a geographical criterion, it is possible according to the level of development. This has been at the origin of the EU's 'Generalized System of Preferences' (GSP) since 1971 for developing countries (DCs) and duty free-quota free (DFQF) for the 'Least Developed Countries' (LDCs) since the EU 'Everything But Arms' (EBA) Decision of 2001. Indeed the per capita GDP of the nine Latin American countries was 2.3 times higher in 1995 than that of the three African countries exporting bananas (Cameroon, CI and Ghana) and was 3.9 times higher in 2016. And the per capita GDP of the EU28 ($ 31,785) was 20.8 times higher in 2017 than that of WA ($ 1,527).

The EU could all the more obtain a new waiver from the WTO to maintain its non-reciprocal preferences that the "banana war" was buried twice. First, by the December 2009 agreement at the WTO where Latin American countries have agreed that the EU could maintain its duty free imports from ACP countries in return for a reduction of the CDs on their exports, from 148 € per tonne (€/t) in 2010 to 114 €/t in 2017. Then by the FTAs concluded with these countries in 2012 (in 2015 with Ecuador) which programmed a stronger reduction of their CDs, falling to 75 €/t from 2020 against the normal MFN duty of 127 €/t (reduced to 117 €/t since 1 January 2018) and the abolition of import quotas. If the EU had buried this war as early as 2000 it could have obtained a waiver from the WTO to extend the Lomé's preferential agreements, especially for SSA countries, as the United States (US) had got for the AGOA (African Growth Opportunity Act) also in May 2000, with a renewed exemption for 10 years in 2015 with the unanimous consensus of the WTO, including of the EU.

3.2 – The EU has reneged on its "Everything But Arms" Decision and contradicted the WTO stance on LDCs

By requiring that all the MS of each regional EPA abolish their CDs on about 80% of EU exports, this was cancelling the preferences of its 2001 EBA Decision. And this on the pretext of promoting the regional integration of each regional EPA which would not work with different trade regimes since the free movement of products would oblige the LDCs to tax imports from the DCs to avoid being invaded by products that they would import duty free from the EU. Yet a legal solution compatible with EBA and the WTO would have been to deduct from the percentage to be liberalized in each regional EPA that of exports from the EU to the LDCs. For the WA EPA, 43.5% of EU exports to the 13 LDCs in 2015 would have been deducted from the 76.2% to be liberalized, which would fall to 32.7% and for the EAC EPA, 45.4% of exports to the 4 LDCs in 2015 would have been deducted from the 82.6% to be liberalized, which would fall to 37.2%. But the EU has rejected this legal interpretation, which was too much of a hindrance to its trade objectives. Yet the House of Commons International Development Committee had defended this possibility on April 6, 2005 and the EU Trade Commissioner Peter Mandelson said: "*ACP countries will be no worse off joining once the EPAs kick in, from the*

EBA... We are asking for 'EBA plus', not 'EBA minus'"[21]. And the drafter of the House of Commons concluded: "*We understand 'EBA plus' to mean that LDCs who choose to sign an EPA will not have to offer the EU reciprocal market access*".

3.3 – DG Trade refused to release the last three impact assessments of the WA EPA that it had funded since their conclusions were negative for WA, but they were leaked[22]

Trade Commissioner Cecilia Malmström responded on July 7, 2016 to a request for clarification on this issue addressed by the French NGO CRIDEV on May 16, 2016, that "*The first two studies, carried out by ITAQA in 2008 and 2012, were sponsored by the ECOWAS Commission*" and that "*these studies are now obsolete*", which is false since "sponsored" means "paid" in French law. On the one hand, the logo of the European Commission appears at the top of the two ITAQA reports of April 2008 and April 2012, alongside the logos of ITAQA and ECOWAS, and the April 2008 report states that "*at the express request of the European Union this mandate has been extended to cover also the analysis of the long-term consequences of the signing of possible Economic Partnership Agreements between the ECOWAS countries and the European Unio*n". As for the IFPRI study of January 2016, Commissioner Malmström wrote in her letter to CRIDEV: "*The report of the IFRI of January 2016 that you mention was not transmitted to my services*", another lie as IFPRI wrote: "*This study was prepared at the request of the Chief Economist of DG Trade to provide an economic analysis in support of trade negotiations and trade policy issues related to the Economic Partnership Agreement between the EU and the West Africa-Economic Partnership Agreement Group*"[23].

3.4 – The untruths about the EU development aid to the West Africa EPA

DG Trade has stated on numerous occasions that the EPA assistance program (PAPED) will grant €6.5 bn to WA from 2015 to 2020 while DG Development and Cooperation (DEVCO) pointed out in June 2015 that this is a simple retargeting of the aid already programmed by the EDF, the EIB and normal funds from the European Development Cooperation, so that there are no additional specific funds for the EPA. Among the recent pressures on Nigeria to sign, the EU Ambassador to Nigeria and ECOWAS, Michel Arrion, said the EU pledges to fund the PAPED to the tune of €6.5 bn every 5 years until 2035. An unfounded promise since the Cotonou Agreement expires in 2020 and we do not know if it will be renewed and with what budget, and in any case not until 2035 since the EU Budget is not programmed beyond 2020. Not to mention that the UK, which will leave the EU, contributes 14.5% to the 11th EDF which is not an EU budget but is financed by the MS.

An equally gratuitous promise comes from article 60 of the WA EPA that "*West Africa undertakes to establish tax reforms as part of the change in taxation resulting from liberalisation. The European Union undertakes to help West Africa to implement these reforms. In view of these reforms, the European Union undertakes to provide funding to cover the fiscal impact agreed by the Parties for the period of tariff dismantling*"[24].

Even with the possible extension of the PAPED until 2035, IFPRI anticipates that a tax would still be needed to maintain the fiscal revenues, which would otherwise be reduced by the liberalization due to the EPA. The conclusion of the study is that "*The EPA agreement raises the*

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[21] House of Commons International Development Committee, *Fair trade? The European Union's trade agreements with African, Caribbean and Pacific countries*, 6 April 2005, https://publications.parliament.uk/pa/cm200405/cmselect/cmintdev/68/68.pdf.

[22] http://www.bilaterals.org/?four-impact-studies-of-the-west&lang=en. In fact, the fourth study, from the University of Ibadan, was not financed by DG Trade but it also refused to mention it.

[23] http://www.ifpri.org/publication/european-unionwest-africa-economic-partnership-agreement

[24] http://data.consilium.europa.eu/doc/document/ST-13370-2014-INIT/fr/pdf

issue of a fiscal adjustment. Custom tariffs represent an important part of public revenues in ECOWAS countries. However, the EPA entails a significant reduction of custom duties, since the EU is an important and significant trading partner in the region. To maintain public expenses and the provision of public goods constant, ECOWAS governments will have to find an alternative source of public revenues… which necessarily reduces welfare… In conclusion, the benefits of the EPA between the EU and the EU countries seem weak, even negative"[25]. It is therefore understandable why Commissioner Cecilia Malmström replied to CRIDEV that "*The IFRI report of January 2016 that you mention has not been sent to my services*"!

3.5 – Bilateral and multilateral safeguards will benefit the EU much more

Bilateral safeguards would only occur in the EPA in the event of large increases in the quantities imported, but not in the event of a fall in import prices. However, in the current context of high volatility of prices and exchange rate of the euro – which is also that of the CFA franc for the eight WAEMU MS and the six CEMAC MS – a price-related safeguard is essential. While the safeguards invoked by WA must prove a serious injury to the companies concerned, the EU is not obliged to prove that the EU sugar producers have suffered injury or that WA was at the origin of this fall in the sugar price.

Peter Lunenborg of the South Centre[26] emphasizes that multilateral safeguards and the infant industry clause cannot be used by WA MS individually but only by the "*West Africa Party*" which Article 99 of the EU-WA EPA defines as follows: "*The West Africa Party comprises ECOWAS, UEMOA, and their Member States within their respective areas of competence as derived from the ECOWAS and UEMOA Treaties, and Mauritania*". It would be very difficult to find an agreement between all these components, especially since they will have to apply the safeguards in the same way and "*on the basis of the non-preferential rules of origin of the parties*" that WA has not defined, implying that they would be those of the EU or the WTO, in other words these safeguards would be inapplicable.

No reference is made in the WA EPA to the ECOWAS Supplementary Protection Tax (SPT), a surcharge on the CET applicable to products imported from third countries in case of increased volumes of imports of at least 25% of the average of the last three years for which data are available, as well as in case of price increases if, in a given month, the average CIF price of a product falls below 80% the average CIF price of the last three years for which data are available. Each ECOWAS State can set the level of SPT up to 70% of its bound MFN customs duties (CDs) in the WTO. The WA EPA or the iEPAs would thus prevent the use of SPT for imports from the EU, in contradiction with regional integration.

3.6 –The EU cannot pledge not to subsidize its agricultural exports to West Africa

Although the EU claims that it has eliminated its export refunds since 2013, the WTO Appellate Body has ruled four times – in the Dairy Products of Canada case of December 2001 and December 2002, in the US Cotton case of March 2005 and the EU Sugar Case of April 2005 – that domestic subsidies to exported agricultural products are to be taken into account in assessing dumping. SOL has carried out numerous evaluations of the EU dumping of agricultural exports to ACP countries, of which to WA. The EU28 exported 3.4 million tonnes (Mt) of cereals in 2016 (including those incorporated in processed cereal products) through domestic subsidies of € 203.7 M, with a dumping rate of 36.6% on the raw cereals exported[27]. It also exported 2.5 Mt

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[25] http://www.ifpri.org/publication/european-unionwest-africa-economic-partnership-agreement

[26] Peter Lunenborg, *Analysis of the West Africa EPA*, South Centre, Geneva, February 2017.

[27] *The subsidies to the EU exports of cereal products to West Africa in 2015 and 2016*, SOL, March 17, 2017; https://www.sol-asso.fr/wp-content/uploads/2017/01/The-subsidies-to-the-EU-exports-of-cereal-products-to-West-Africa-in-2015-and-2016-February-172017.pdf

of dairy products in milk equivalent thanks to € 168.6 M in subsidies and at an average dumping rate of 20.8%[28]. In 2016, the EU28 subsidies to its agricultural exports to CI amounted to € 99.9 M, of which € 42 M to cereals (dumping rate of 30.2%), € 34.9 M to beef, € 11.7 M to dairy products (dumping rate of 16.4%) and € 11.3 M to pigmeat.

3.7 – The pseudo-scientific evaluation of DG Trade on the impact of WA EPA

DG Trade carried out its own study published in March 2016[29], while using the same expert from IFPRI, David Laborde, who had already participated in the three rejected previous studies. Indeed, using a computable general equilibrium model to validate politically determined results is considered essential by DG Trade to give an irrefutable scientific truth in the eyes of the political authorities, and this in all its bilateral FTAs.

Specialist of models applied to the analysis of agricultural policies and former President of the French Académie d'agriculture, Jean-Marc Boussard has long debunked their presuppositions and conclusions. He observed in 2000 that "*everywhere in the world, computable general equilibrium models (CGEMs) serve as a hammer to drive the nail of liberalism*"[30]. One of these CGEMs, GTAP, "*will exert a great influence on all the people who will use it in believing that the reality is in line with this model, especially on many negotiators in the upcoming WTO negotiations. When working on this model... they will learn very quickly that everything that comes close to liberalization is 'good', everything that moves away from it is 'bad'*". However "*the 'standard MCEGs'... presented as oracles responsible for saying good economic policies... (have) two major flaws: first, to unduly favour liberalization... then, to neglect the essential aspects of economic dynamics*".

The most breathtaking is that the assessment of WA losses of CDs do not account for the 64.4% increase in the WA population from 2015 to 2035 (when the EPA liberalization would be completed), as the method claims not to need to, since it compares the impact at the end of the period with EPA and without EPA, where WA would continue to tax its imports from the EU but would have to pay CDs on its exports to the EU. Because the basic situation without EPAs is not the current situation of non-reciprocal preferences since the Lomé agreements (1975) and even since independence, including for CI and Ghana insofar as they initialed iEPAs in 2007 and 2008 and have benefited from the Council Regulation No. 1528/2007 of 20 December 2007 (known as the MAR, market access regulation) which has applied to them in advance the provisions for finalized EPAs. No, the basic situation is that without EPA, where non-LDC developing countries have to pay the GSP CDs (or MFN CDs on bananas, hides and skins, and aluminum), which is the actual situation for Nigeria only as it had refused to initial an iEPA in 2008. Yet taking into account explicitly the demographic change is all the more important as it will be very different in WA – where it would increase by 64% from 2015 to 2035, which would have a considerable impact on its import needs and export availabilities – and in the EU28 where the population is expected to stagnate and age and would even been exceeded by that of WA by 2030 according to the revised UN projections of 2017.

3.8 – We do not know the level of trade of WA without EPA in 2015

In its comparison of the evolution of the WA situation between 2015 and 2035 with and without EPAs, DG Trade considers that in 2015 the current preferential agreement would not have

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[28] *The huge dumping of extra-EU exports of dairy products and to the EPAs of West Africa, SADC, CEMAC and EAC in 2016,* SOL, April 11, 2017, https://www.sol-asso.fr/wp-content/uploads/2017/01/The-huge-dumping-of-extra-EU-exports-of-dairy-products-and-to-the-4-African-EPAS.pdf

[29] http://trade.ec.europa.eu/doclib/docs/2016/april/tradoc_154422.pdf

[30] Jean-Marc Boussard, *Agriculture, équilibre général et OMC. Une vision critique des modèles utilisés dans les négociations*, Economie Rurale, n°257, mai-juin 2000, p.3-16.

existed for CI and Ghana – in other words they would not have initialed iEPAs in 2007 and 2008 – so that since 2008, like Nigeria, they would have been in the much less favorable GSP regime, the other 13 WA States being in the LDCs EBA regime. One can then wonder about the relevance of the figures retained by the DG Trade – not given in the study – to characterize the economic situation of CI and Ghana in 2015, and in particular their foreign trade with the EU, the other WA countries and the rest of the world (RoW). Since they had always benefited from preferential trade since their independence it is impossible to identify what would have been their trade since 2008 without this MAR regulation. DG Trade would surely have a hard time giving the amount of CDs collected in 2015 without the EPA as CI and Ghana would have been in the GSP regime (and MFN for bananas and aluminum) since 2008, like Nigeria. These two countries would have lost already much of their competitiveness by having to pay significant CDs on their exports of bananas, pineapples, processed cocoa, canned tuna and aluminum to the EU since 2008, and their export earnings would have weakened considerably. As a result, their imports from the EU would also have been much lower than under the effective MAR regime that prevailed in 2015 and until today, and the CDs collected on these declining EU imports would have also been weaker.

This idea that CI and Ghana did not benefit of DFQF access to the EU market before the entry into force of their iEPAs by end 2016 is amazingly shared by the UK impact assessment made on 4 July 2018 before ratifying the iEPA: "*The EPA provides considerable benefits to Ghana by giving it immediate duty-free, quota-free access into the EU goods market. This will benefit Ghanaian producers by improving incomes, and give certainty of market access to exporters*"[31].

It is therefore likely that DG Trade simply considered that the actual trade of CI and Ghana in 2015 was the same as without the MAR regulation, which introduces a huge doubt about the relevance of its studies on WA EPA and iEPAs.

3.9 – Other DG trade's significant errors on trade between the EU28 and WA

- Error on the cereals and beef trade of WA with the EU: DG Trade writes: "*Almost all sectors in West Africa are expected to benefit from the EPA through an increase in exports – with the highest increases in the following sectors: cereals (10.2%), other food (9.9%), red meat (8.4%) and wearing apparel (12.8%)*". This is totally absurd for cereals and red meat since cereals are the main agricultural imports of WA, risen from 7.1 Mt in 2000 to 16.1 Mt in 2013 (increase of 6.1% per year), of which from 3.9 Mt to 7.4 Mt for wheat, the share of imports from the EU being of 2.9 Mt in 2017. DG trade shares the same ignorance for red meat as the EU did not import a single kg of beef and preparations from WA in 2015, but instead exported 93,100 tonnes. This ignorance of DG Trade on the reality of WA agriculture, which is its main productive sector, tells a lot about the reliability of its entire study of March 2016.

- DG Trade argues that EPAs should not have a negative impact on ACP agriculture since they can prioritize agricultural products in the 20% of imports excluded from liberalization

But several RECs have chosen to protect a minimum of infant industries, forcing them to liberalize some basic food products. In particular 37.5% of WA agricultural imports would be liberalized, for € 1.469 bn in EU FOB value in 2015, of which 80.4%, taxed at 5% (Group A), would be liberalized from the beginning, in year T5. The reduction from 5% to 0 of the CD on cereals excluding rice (that the EU does not export) and on milk powder – which accounted for 84% of EU exports in milk equivalent – will have considerable consequences on the impoverishment of traditional cereal producers (millet, maize, sorghum, fonio), tubers (cassava, yams, taro) and plantains, and on the producers of animal products.

[31] http://www.legislation.gov.uk/ukia/2018/113/pdfs/ukia_20180113_en.pdf

- <u>The EU has hidden to West Africa the strong erosion of its preference</u>. DG Trade stresses that, without EPAs, the processed cocoa exports of the three non LDCs countries would be subject to GSP CDs of 6.1% for cocoa paste, 4.2% for cocoa butter and 2.8% for cocoa powder. But DG Trade avoided to tell that the FTAs passed with 9 Latin American countries in 2012 (2015 for Ecuador) allow them to export duty free all these products to the EU.

The political scandal is that the reduced or zero CD on imports from the countries having signed FTAs means that the EU does not care about their compliance with the fundamental international conventions on human rights, social rights, environment and good governance, which the EU requires from ACP countries to grant them the GSP+ status. According to the 2016 Human Rights Watch report, "*Rampant crime and impunity for human rights abuses remain the norm in Honduras. Despite a downward trend in recent years, the murder rate is among the highest in the world*"[32]; "*Violence and extortion by powerful criminal organizations remain serious problems in Guatemala. Corruption within the justice system, combined with intimidation against judges and prosecutors, contributes to high levels of impunity. Gang-related violence is also one of the principal factors prompting people, including unaccompanied youth, to leave the country*".

- <u>Criticisms of the final conclusions of the DG Trade study</u>
DG Trade concludes that "*In a conservative manner, only the impact of the tariff reductions was assessed, i.e. what is easily quantifiable from the agreement. Essential provisions of the EPA (rules of origin, trade facilitation, cooperation on norms, the EPA Development Programme, etc.) were left out from the model since they are difficult to quantify… As a result of tariff reductions, collected import duties will on average be lower in 2035 (by 11.7%)*" with EPA than without EPA.

And the Head of these negotiations at DG Trade, Sandra Gallina, told a meeting of MEP of INTA and DROI Committees on 15 October 2018: "*Some critics of the EPAs mention the loss of fiscal resources that will be brought about by the liberalization of tariff lines. On the one hand these losses are difficult to assess, on the other hand it must be borne in mind that it will be in reality a simple transfer between the funds of the ACP States and the pockets of the ACP consumers who will be winners*". In fact the study of DG Trade and the model supporting it were manufactured in such a way as to show a positive impact to give a pseudo-scientific guarantee to the political decision-makers.

Other constraints linked to WA EPAs are the "rendez-vous clause" (to enlarge the liberalization to services, intellectual property, investment, competition, government procurement, current payments and capital movements, sustainable development, protection of personal data), the "status quo clause" (prohibiting to increase the CDs applied at the beginning of the provisional application of the WA EPA (Article 9) or CI and Ghana iEPAs (Article 15) on imports from the EU – a clause that CI and Ghana have violated up to now since they have applied the WA CET when they should have applied the CDs of their iEPAs since the end of 2016 –, and the interdiction to increase export taxes despite the reduction in CDs due to the iEPAs and the large increase of their population.

We will spare the readers the alternative methodology proposed to assess the actual net losses of customs revenues (CRs, equal to customs duties, CDs, plus VAT on imports) due to the regional EPA and the iEPAs. The WA EPA would have led to a loss of €3.4 bn in 2035 and a cumulative loss of €28.4 bn from 2000 to 2035 on the 76.2% liberalized imports from the EU28-UK. And

[32] https://www.hrw.org/sites/default/files/world_report_download/wr2016_web.pdf

the ratio of net CRs losses on EPA-related imports from the EU28-UK to total CRs of all origins without EPAs would increase from 7.9% in T5 to 18.1% in T20.

For Ghana the Ministry of Trade and Industry (MOTI) has largely underestimated the CRs losses with the EPA, due to multiple factors, of which the serious inadequacy of the impact study conducted by the World Bank on 1st January 2015 based on 2013 data. First because this assessment was made on the WA regional EPA impact on Ghana, as if there were no doubt that the regional EPA would be finalized, and not on the Ghana iEPA[33]. It is clear that Ghana will lose more CRs on its non-liberalized imports coming from the EU as the maximum tariff will be of 20% instead of 35% in the regional CET. This WB study assumed that total government revenues, including CRs, would increase by 3% per year, based on the growth rate estimated by the IMF, adding: "*As other government revenues increase in importance, the relative dependence on import revenues and thus the significant impact on revenue losses from the EPA will decrease*". Even if this prospect of Ghana GDP growth rate were verified, it does not take into account Ghana's annual population growth rate of 1.91% between 2019 and 2035 according to the UN population revised estimate of 2017.

SOL has calculated that Ghana's net cumulative losses of CRs – comparing CRs without iEPA with those with iEPA – would reach €14.7 bn from 2017 to 2035, the losses being incurred not only on imports from the EU28-UK but also on the CRs to pay on Ghana's exports to the other WA MS which would protect themselves to avoid losses of competitiveness due to Ghana iEPA (the same would apply on imports from CI)[34]. Furthermore the EU subsidies to its exports of bovine meat, poultry meat, dairy and cereals to Ghana have reached €70 million in 2013, a figure largely exceeded in 2018. These subsidies will explode with the iEPA as the tariff on imports of cereals and milk powder from the EU will fall from 5% to 0, which would at the same time be highly detrimental to the production of local cereals, tubers and local milk, and the same will happen in CI.

For the CI iEPA SOL has calculated that cumulative losses of CRs on imports from the EU28-UK would increase from €65.1 million in T5 (3 September 2021) to €4.4 bn in T20 (2035)[35]. The cumulative duties on IC exports to the other WA MS would increase from €413 million in 2020 to €9.2 bn in 2035, 2.3 times higher than those on imports from the EU. And in 2016, EU agricultural export subsidies to the IC amounted to €99.9 million, of which €42 million for cereals (dumping rate of 30.2%), €34.9 million for beef, €11.7 million for dairy products (dumping rate of 16.4%) and €11.3 million for pig meat.

Conclusion: the EU is shooting itself in the foot by imposing EPAs

These effects will occur on two levels: they will explode the influx of illegal migrants that the EU does not want to welcome and feed the terrorist movements in WA as in the EU; and they will reduce the huge potential medium to long run trade exports of the EU value-added products and services if the EPAs were deleted.

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[33] World Bank, *Assessing the Economic Impact of the ECOWAS CET and Economic Partnership Agreement on Ghana*, January 1st, 2015, http://documents.worldbank.org/curated/en/845041467999971258/Assessing-the-economic-impact-of-the-ECOWAS-CET-and-economic-partnership-agreement-on-Ghana

[34] *Le Ghana n'aurait jamais dû mettre en œuvre son APE intérimaire*, SOL, 13 février 2018, https://www.sol-asso.fr/wp-content/uploads/2017/01/Le-Ghana-naurait-jamais-d%C3%BB-mettre-en-%C5%93uvre-son-APE-int%C3%A9rimaire-SOL-13-02-18.pdf

[35] *L'absurde APE intérimaire de Côte d'Ivoire*, SOL, 31 mars 2018, https://www.sol-asso.fr/wp-content/uploads/2017/01/Labsurde-APE-int%C3%A9rimaire-de-C%C3%B4te-dIvoire-SOL-31-mars-2018.pdf