

WOMEN IN INFORMAL CROSS-BORDER TRADE IN KENYA:

A SMALL-SCALE TRADER'S GUIDE TO TRADE RULES AND PROCEDURES



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OVERVIEW

In the framework of its project on Informal cross-border trade for empowerment of women, economic development and regional integration in Eastern and Southern Africa (2016-2019), UNCTAD's Trade, Gender and Development Programme developed three booklets on women in informal cross-border trade in Malawi, the United Republic of Tanzania and Zambia.

As part of the Global Initiative towards post-Covid-19 Micro, Small and Medium Enterprises (MSMEs) sector (2020-2021). UNCTAD, developed two new booklets for Botswana and Kenya, while also providing updated versions of the booklets for the United Republic of Tanzania and Zambia.

The present booklet "Women in informal cross-border trade in Kenya: A small-scale trader's guide to trade rules and procedures" is addressed to informal and small-scale cross border traders from Kenya. It presents key and up-to-date information on existing trade procedures and simplified schemes, documentation requirements, rules of origin, taxes, tariffs while providing an overview of trader's rights and obligations and the benefits of formalization.

The information contained in this guide is intended for small-scale and informal traders who operate within the East African Community (EAC) and Common Market for Eastern and Southern Africa (COMESA).

WHICH REGION DOES YOUR COUNTRY BELONG TO?

The Republic of Kenya is a member of the East African Community and the Common Market for Eastern and Southern Africa (COMESA).

DID YOU KNOW?

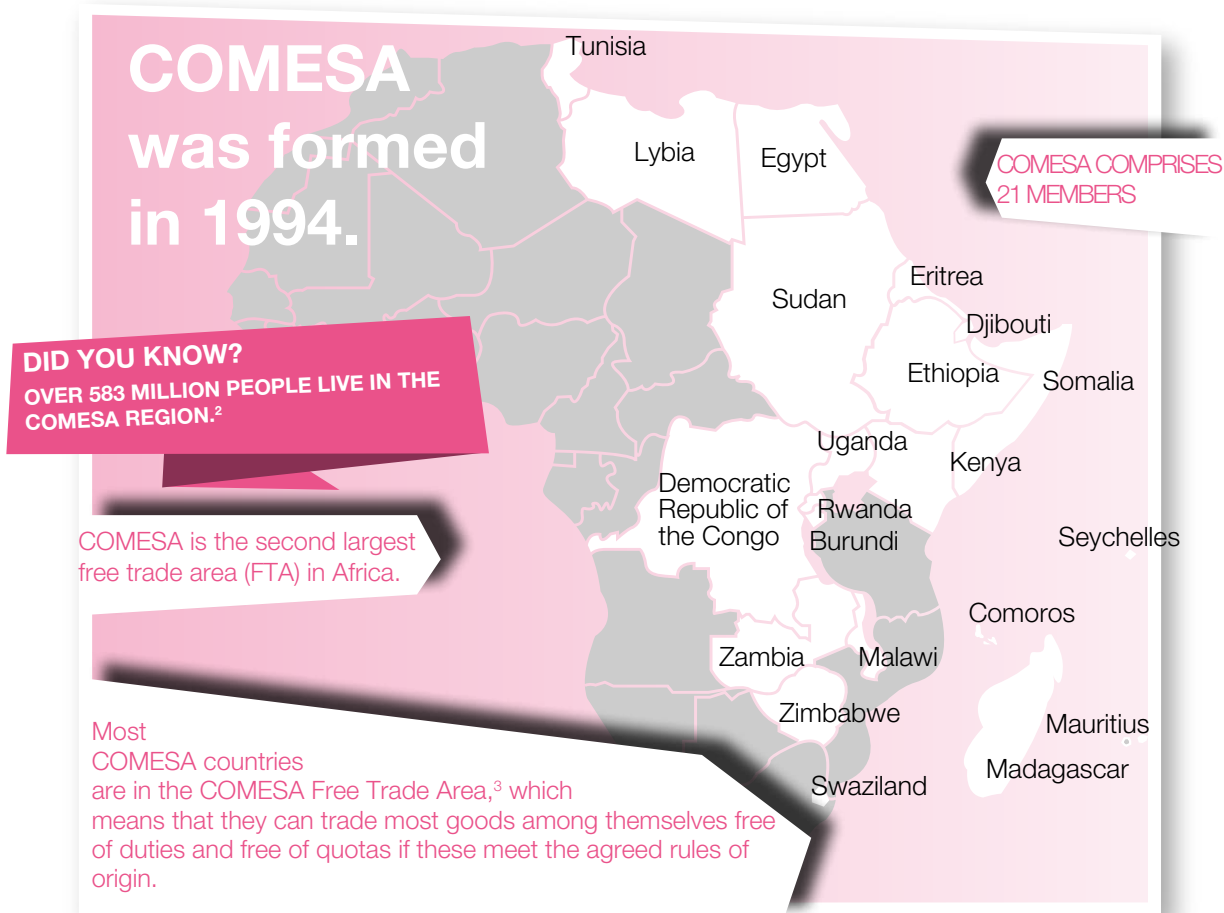
OVER 185 MILLION PEOPLE LIVE IN THE EAC REGION¹.

**EAC was
established in
the year 2000.**

**EAC COMPRISES
SIX STASE**

South
Sudan
Uganda
Rwanda
Burundi
Kenya
United
Republic of
Tanzania

EAC members have established free trade (or zero duty imposed) on goods amongst themselves.



As you will see in this Guide, you may find different trade rules according to whether you are trading with a country that is part of the EAC or COMESA.

For instance, the EAC has designed the Simplified Trade Regime (STR) for small-scale traders, so if you buy or sell your products in an EAC country you may benefit from lighter and less costly trade procedures,

provided that the consignment meets the EAC rules of origin and some other requirements.

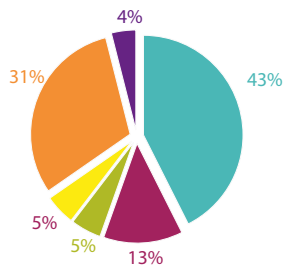
Also COMESA has designed the Simplified Trade Regime (STR) for small-scale traders, so if you buy or sell your products in a COMESA country you may benefit from lighter and less costly trade procedures.

KENYA'S OFFICIAL EXPORTS

Do you know which are the main products that the Republic of Kenya exports to the world and to its neighbouring country the United Republic of Tanzania?

What are the Republic of Kenya's main exports to the world?

Export structure by product group in 2020
(as % of total exports)



- All food items
- Agricultural raw materials
- Ores and metals
- Fuels
- Manufactured goods
- Other

Source: UNCTADStat Country profile

Which products is the Republic of Kenya trading with the neighbouring country the United Republic of Tanzania?

TOP THREE EXPORTS TO THE UNITED REPUBLIC OF TANZANIA

- Soaps, lubricants,
- Waxes, candles, modelling pastes,
- Vehicles other than railway, tramway and pharmaceutical products.

REPUBLIC OF KENYA

TOP THREE IMPORTS FROM THE UNITED REPUBLIC OF TANZANIA

- Cereals
- Residues, wastes of food industry, fodder
- Electrical and electric equipment.

Source: UNCTAD calculations based on the UNCTADStat database, available at <http://unctadstat.unctad.org/EN/> (accessed in May 2018).

WHAT IS INFORMAL CROSS BORDER TRADE?

Informal cross-border trade (ICBT) is a major form of informal activity in most African countries. Trading goods across borders is crucial for self-employment, poverty reduction and wealth creation.

CROSS-BORDER TRADE IS INFORMAL WHEN:

01

It is carried out by avoiding border stations.

02

It is carried out through border stations, but goods are partially concealed, are under-declared, misclassified or under-invoiced.



TRADE IS THEREFORE NOT PROPERLY RECORDED OR NOT RECORDED AT ALL.

IN SUB-SAHARAN AFRICA WOMEN ARE ESTIMATED TO BE BETWEEN 70 AND 80 PERCENT INFORMAL TRADERS.⁴

TRADERS WHO ENGAGE IN INFORMAL TRADE CAN BE:

01

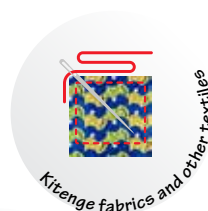
Registered operators who evade trade-related regulations and duties by avoiding official border crossing.

02

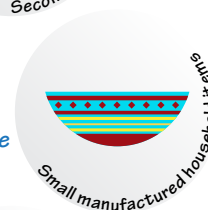
Unregistered operators who operate entirely outside the formal economy.

03

Registered operators who use official border crossing but who partially evade trade-related regulations and duties, for instance by resorting to the practice of under-invoicing.



The goods most commonly traded through informal trade comprise



WHY FORMALIZATION IS IMPORTANT FOR AN UNREGISTERED TRADE OPERATOR?⁵

There are many reasons why formalizing your business is important for you and for the economy of your country. You may be already familiar with the numerous challenges confronting informal traders. Here below we present some of the drawbacks of informal trade:

DID YOU KNOW?

INFORMAL TRADE MAY TURN OUT TO BE EXTREMELY COSTLY FOR YOUR CAPITAL AND FOR YOUR SAFETY



Risks of personal safety

The risks associated with ICBT are many, particularly for women traders: corruption, getting arrested or fined, harassment and demands for sexual favours, forced prostitution, and exposure to health risks such as HIV infection.



Risks for your business

Bribery and seizure of merchandise are common when engaging in informal trade activities. The financial costs of paying bribes or undue fees and of confiscation of goods may have significant impacts on your business.



Difficulty in getting credit

Informal traders and owners of informal businesses face more difficulties to access credit and other services from formal financial institutions, as they are regarded as high-risk customers. As a result, they are either denied credit or offered very high interest rates.



No access to social protection

Generally in the informal sector, traders or workers operating informally have no access to social protection, health coverage and other social security benefits in the formal sector, when they exist. This creates situations of vulnerability and social marginalization that are perpetuated through their lives. Women are particularly at a disadvantage because they are typically overrepresented in the informal economy and concentrated in the most insecure jobs. In Kenya there are social protection mechanisms available including Bao pension plan that is licensed by the regulator- (RBA) and the NSSF also has scheme for voluntary contribution. Concerning health, the NHIF has products tailored made for MSMES under the Universal Health Care Act. This was recently passed by Parliament on 28 September 2021.

***Lack of access to adequate facilities***

Engaging in informal trade implies that traders must use secondary routes to cross the border. This does not only expose traders to a wide array of personal safety risks but also precludes them the possibility of benefiting from and accessing infrastructure at the border such as toilets, storage space or sleeping facilities when available.

***Public revenue losses***

Informal trade leads to high revenue losses for the Governments. Informality has thus negative consequences on the overall economic growth of a country. Revenues accrued by integrating informal traders into the formal sector would in the long run allow governments to increase public spending on essential services and to invest in facilitation of formal cross-border trade through the improvement of border facilities and business environment. This may be particularly beneficial for women.

***Unfair competition***

Because of their lower prices, informal imports constitute unfair competition to goods that are produced locally and products that are imported through formal channels, harming other traders and producers in the community.

***Risks for public health and safety***

Informal trade may pose health and safety concerns as products traded through informal channels fall outside regulatory mechanisms of safety and standards enforcement. Prohibited or illegal goods or goods that do not meet minimum safety and health standards may eventually pose risk to consumers' wellbeing and national security.

YOUR RIGHTS AND OBLIGATIONS^{6,7}

WHAT ARE YOUR RIGHTS:

Right to security of person



Traders should be able to cross the border without the risk of abuses, harassment or gender-based violence. The right to security of person is guaranteed by several international instruments.

Freedom of movement

For traders from Kenya do not require a visa to enter Tanzania but do require a valid passport or national ID. In some cases, a pass would suffice. Please check with Immigration authorities for the different types of passes available.⁸



Right to transparency



Traders have the right to access relevant information about regulations, trade procedures, documentary requirements, duties, fees and taxes. Such information and any further change should be publicly available or displayed at the border.

Efficient processing of transactions

Trade transactions should be processed by customs officials in an efficient and timely manner. Traders have the right to demand receipts for any payment made.



Right to carry goods for personal use



Persons who carry small consignments that are not meant for resale and are for personal use have the right to use the personal rebate scheme, granting tax-free allowance on small amounts of merchandise, regardless of its origin.

WHAT ARE YOUR OBLIGATIONS:

Having a valid document

Before you start your journey you should make sure to have a valid document to be allowed into the other country. This can be a passport, your national ID, or a temporary pass document. Please check with Immigration authorities.⁹

Knowing where to go

When you arrive at the border. Traders should familiarise themselves with all the different processes of using the border and knowing where to get assistance in the event of challenges.

Declaration of goods

It is the trader's responsibility to declare the merchandise to customs authorities under the applicable trade regime. Remember, avoiding border stations, concealing, under-declaring and misclassifying your goods is considered illicit trade.

Prohibited goods

Traders should be aware of the list of prohibited goods that cannot be imported, exported or transited. These may include narcotics, hazardous chemical substances, weapons, wildlife and so on. Please check with Customs authorities the specific regulations covering these prohibitions. Traders found importing or exporting these products are prosecuted by law.



Restricted goods

Traders should be aware of the list of restricted or controlled goods and acquire the necessary permits and licenses. Depending on the country, restricted goods for which an import/export permit is required may include grains, maize, fruits and vegetables, live animals, fresh milk, liquors, gemstones, petroleum products and others. Please check with Customs authorities the specific regulations covering these restrictions. Traders found importing or exporting these products without a permit may be prosecuted by law.

COVID-19

Traders should be aware or familiarise themselves with all the COVID-19 measures related to crossing the border.


- Covid-19 testing at border points or producing COVID-19 free certificate when entering and exiting Kenya.
- Use of masks in public places, practice social distancing and to frequently wash hands with soap and clean water.
- Mandatory quarantine for persons travelling from or transiting through COVID-19 high risk zones.

Bribes

Traders should not attempt to bribe customs official to avoid payment of duties or to obtain preferential treatment.

Sanitary and phytosanitary (SPS) measures and other certification

Traders should be aware of goods subject to sanitary and phytosanitary regulations, for which a certificate may be required to attest compliance with norms related to food safety, and animal and human health. Traders should be familiar with all other certification requirements.



! The section below explains the EAC Simplified Trade Regime. Remember: This scheme can be used only if you are trading with other EAC countries. It cannot be used if you are trading with other countries outside the EAC.

HOW TO USE THE EAC SIMPLIFIED TRADE REGIME

The Simplified Trade Regime is a mechanism launched in the EAC to support small-scale traders from EAC partner states to trade with other countries in the EAC region. The STR simplifies trade procedures and reduces the costs of trading across borders. You can utilize this scheme only if you are trading with another EAC partner State, namely Burundi, Kenya, Rwanda, South Sudan, and Uganda. Traders from Kenya who

trade with Tanzania can rely on the EAC STR.

➤ **Note that the STR is not available at all EAC borders.**

You can use the EAC STR if you meet these criteria, provided you are trading within EAC:

1. You are exporting or importing goods whose total value is below 2,000\$.
2. Your goods are in the STR Common List of eligible products. The list can be requested to customs officers if it is not displayed on a notice board at the border.
3. Your goods meet the agreed rules of origin.

If your goods are not in the Common List of products eligible for STR treatment:

- They cannot benefit from STR treatment;
- If goods are subject to preferential treatment (duty free or reduced tariffs) you need to obtain a Certificate of Origin before traveling to the border; This certificate can be obtained from the Kenya Revenue Authority.
- Duties may be paid if goods are produced in non-EAC countries.

What are the rules of origin?¹⁰

The EAC Customs Union Protocol came into force in 2005, providing free trade (or zero duty) on goods and free movement of persons among member countries and a Common External Tariff (CET) on goods imported from outside the region. Goods moving freely within the EAC must comply with the EAC Rules of Origin.

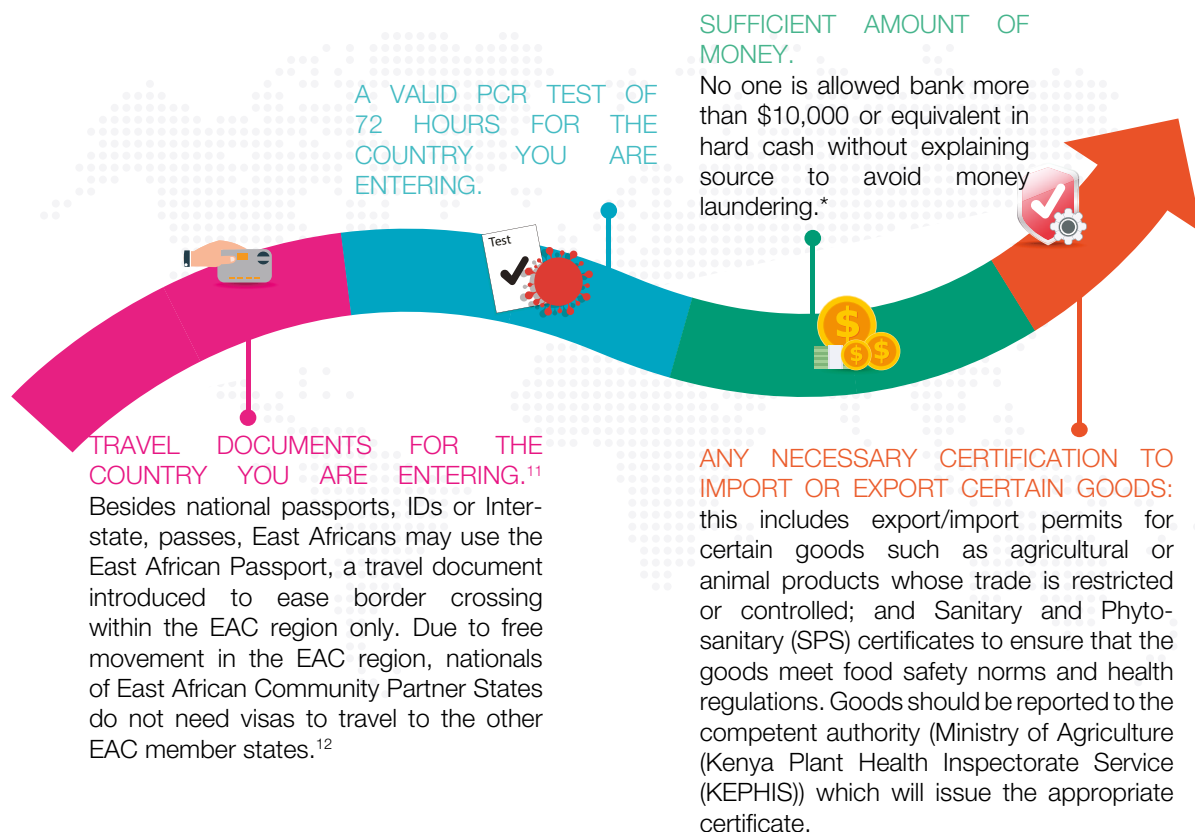
Rules of origin allow to distinguish goods produced within a free trade area or a customs union from those produced elsewhere. If goods are fully or partially produced within the same free trade area or customs union, they can be traded duty-free within the free trade area or the customs union.

EAC rules of origin establish that:

1. goods must be wholly produced or obtained in an EAC partner State.
2. goods must undergo sufficient industrial processing to ensure that significant part of their value addition takes place in an EAC member State

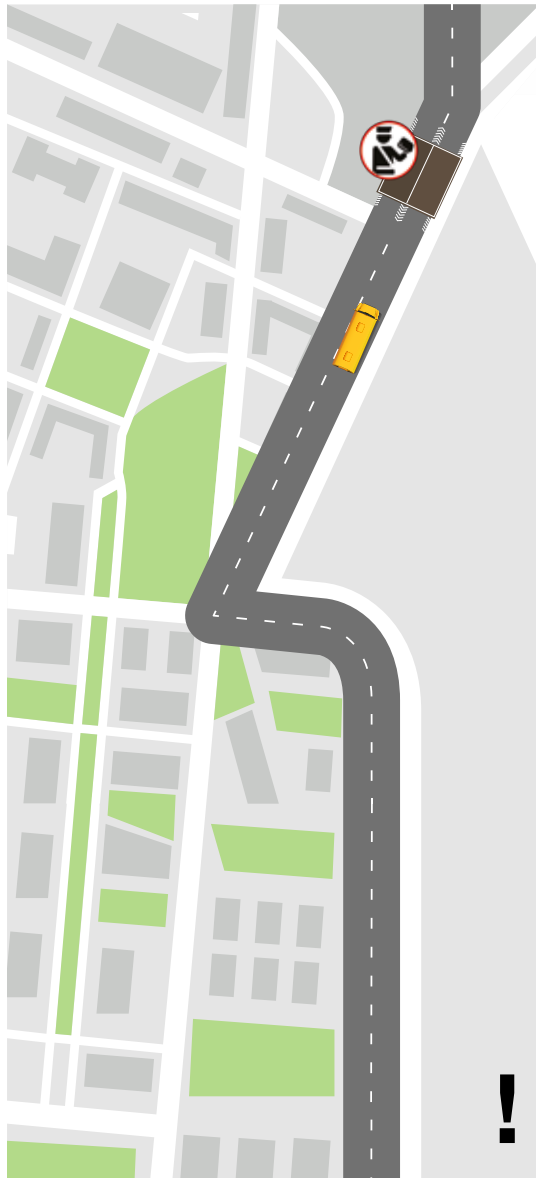
THE EAC STR STEP BY STEP

BEFORE YOU TRAVEL TO THE BORDER, MAKE SURE YOU HAVE THE FOLLOWING:



*Please check if there are any currency exchange bureaux on the other side of the border or otherwise carry foreign currency

ONCE YOU REACH THE BORDER FOLLOW THESE STEPS:



Check that goods are on the STR list of eligible products. The list should be publicly displayed at all borders.

Value your goods under STR scheme. The total value of your consignment should be below 2,000\$.

Fill in the Simplified Certificate of Origin and have it stamped by a customs officer in the country where the goods are coming from.

Fill in a Simplified Customs Document form (declaration form) to declare your goods and have it stamped by a customs officer in the country where the goods are coming from.

Clear immigration formalities when entering the other country.

Submit the stamped documents at the customs desks on the other side of the border. If your goods are on the STR list you won't be asked to pay any duty and you can continue your travel. Yet, you may be asked to pay other taxes or fees: for example, VAT and excise duty are still required under STR. Check the following section for more information.



Beware of the services offered by middlemen and the charges they apply. For instance, you should know that there is no fee to get your passport stamped by the authorities.

The Eastern African Sub-Regional Support Initiative for the Advancement of Women (EASSI)

EASSI is a sub-regional organisation that advocates and strengthens the capacity of women in civil society organisations. They advocate for gender equality and social justice through capacity building, research, networking and advocacy for women.

They work with informal cross-border traders in nine countries to

- identify opportunities that are provided for in various EAC trade instruments such as the Customs Union and Common Market protocols
- enable women to benefit in the integration process just like the male counterparts.
- contribute to an enabling gender responsive trade environment.
- formed women cross border traders' associations across the different borders in the EAC region including Taveta Women's Cross Border Traders Association and Holili Women Cross Borders Traders Association.

EASSI has also established information and resource centers at the different border posts to act as a point of linkage between the women traders, border officials and other stakeholders seeking to engage with the women traders.

What are the tariffs? What are the taxes? Is there any other fee that you should pay?

Tariffs or customs duties are taxes imposed by Governments on imported goods. These should be paid to the customs authority of the importing country. Remember, if you are trading under STR: - you should not pay any customs duty - you should still provide a certificate to prove the origin of your goods (Simplified Certificate of Origin). The Simplified Certificate of Origin can be obtained at the border and is free of charge.

Customs duties should not be confused with other taxes. For instance, STR does not exempt traders from paying other taxes such as:

Value Added Tax (VAT), a type of consumption tax levied on most goods whenever value is added. If applicable, VAT should be paid in the country where goods will be sold. Note that in some cases, VAT is refundable. The applicable VAT rate is 16%. However, this tax rate may change every year. Check the Kenya Revenue Authority for new VAT rates.

Excise tax levied on products such as alcohol, tobacco, gasoline, cosmetics, soft drinks etc. If applicable, excise tax should be paid in the country where goods will be sold. Visit the Kenya Revenue Authority for the full list of excise rates applicable to different products.

Administrative fees applied to certain procedures such as for obtaining a SPS certificate or for entering transactions into the Automated System for Customs Data (ASYCUDA). The ASYCUDA fee is 0.80 US\$.

Checklist of documents to trade duty free under STR



Simplified Certificate of Origin: it provides evidence that the goods you are carrying are entirely produced or obtained in an EAC partner State when they are worth up to 2,000\$. You can obtain this certificate at the border points from Custom Officials, Kenyan Chambers of Commerce.

- **Kindly take note to not falsify the value of goods to qualify for the certificate as this be an offence.**



Simplified Customs Form (declaration form): it is used to declare the goods that appear on the list of goods eligible for STR treatment. You can obtain this certificate at the border.



Travel documents: having a valid document is necessary to clear immigration procedures and enter the neighbouring country. This can be a passport, your national ID, or your border pass when the border pass scheme is in place. If you are trading within a perimeter of 10 km from the border you don't need any documentation.

Additional documents that you may need to provide at the border:



Export/import permits: these may be required for certain goods, including for instance agricultural or animal products, whose trade is restricted or controlled. Goods should be reported to the competent authority, which will issue the appropriate export/import license.



Sanitary and Phyto-sanitary (SPS) certificates: these may be required to ensure that the goods comply with norms related to food safety, and animal and human health regulations. Goods should be reported to the competent authority (such as Ministry of Agriculture (KEPHIS)), which will issue the appropriate certificate attesting conformity with SPS measures.

- EAC states may prohibit the importation of certain goods to protect animal, plants and human and health safety. It is important to know which goods have been banned before exporting or importing. For a full of list of banned products, visit the relevant revenue authority in which the goods will be imported and sold.
- Products that do not comply with the standards will be confiscated from the trader.

- The EAC has harmonised 366 product quality standards. In addition, EAC member states are required to recognise or accept marks of quality from other EAC members. Hence a trader exporting or importing goods with a mark of quality from the home Bureau of standards, should do so without the goods being tested again for quality standards.

HOW TO USE THE COMESA SIMPLIFIED TRADE REGIME

The Simplified Trade Regime (STR) is a mechanism launched in the COMESA region to support small scale traders to trade with other COMESA countries. The STR simplifies trade procedures and reduces the costs of trading across borders. You can utilize this scheme only if you are trading with countries in the COMESA region.

➤ **Note: Not all the members of COMESA are implementing the COMESA STR.¹³**

You can use the COMESA STR if you meet these criteria:

1. You are exporting or importing goods whose total value is below 2,000\$.

2. Your goods are in the STR Common List of eligible products. The list can be requested to customs officers if it is not displayed on a notice board at the border.

The COMESA STR does not require goods to meet rules of origin as long as they are in the common list agreed between two Member States.

If your goods are not in the Common List of products eligible for STR treatment:

- They cannot benefit from STR treatment;
- If goods are subject to preferential treatment (duty-free or reduced tariffs) you need to obtain a Certificate of Origin before travelling to the border;
- Duties may be paid if goods are produced in non-COMESA countries.

What are the rules of origin?

COMESA launched a Free Trade Area in 2000 to provide duty free and quota free market access to products originating in COMESA.

Rules of origin allow to distinguish goods produced within a free trade area from those produced elsewhere. If goods are fully or partially produced within the same free trade area, they may be traded to a member country of the same area duty-free.

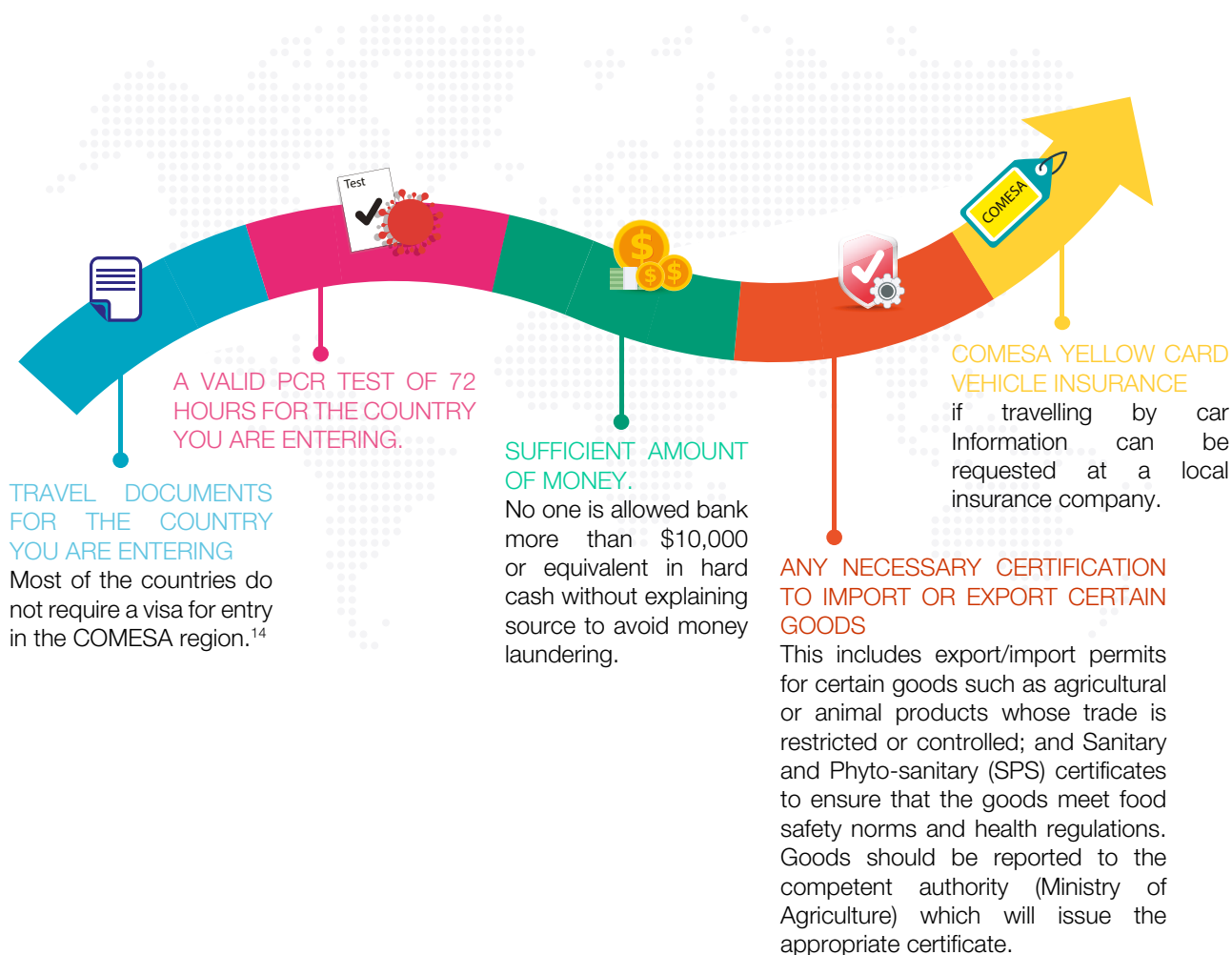
COMESA rules of origin establish that:

1. goods must be wholly produced or obtained in a COMESA member State.
 - ▶ Examples of such products include vegetables harvested in a member state, animals born and raised in a member state, fishing products obtained in the waters of a member state, or any other product that does not contain material from outside COMESA.
2. goods produced in COMESA using materials imported from outside must undergo sufficient industrial processing to ensure that significant part of their value addition takes place in a COMESA member State. You may seek assistance at the Zambia Revenue Authority for the calculation of this criteria

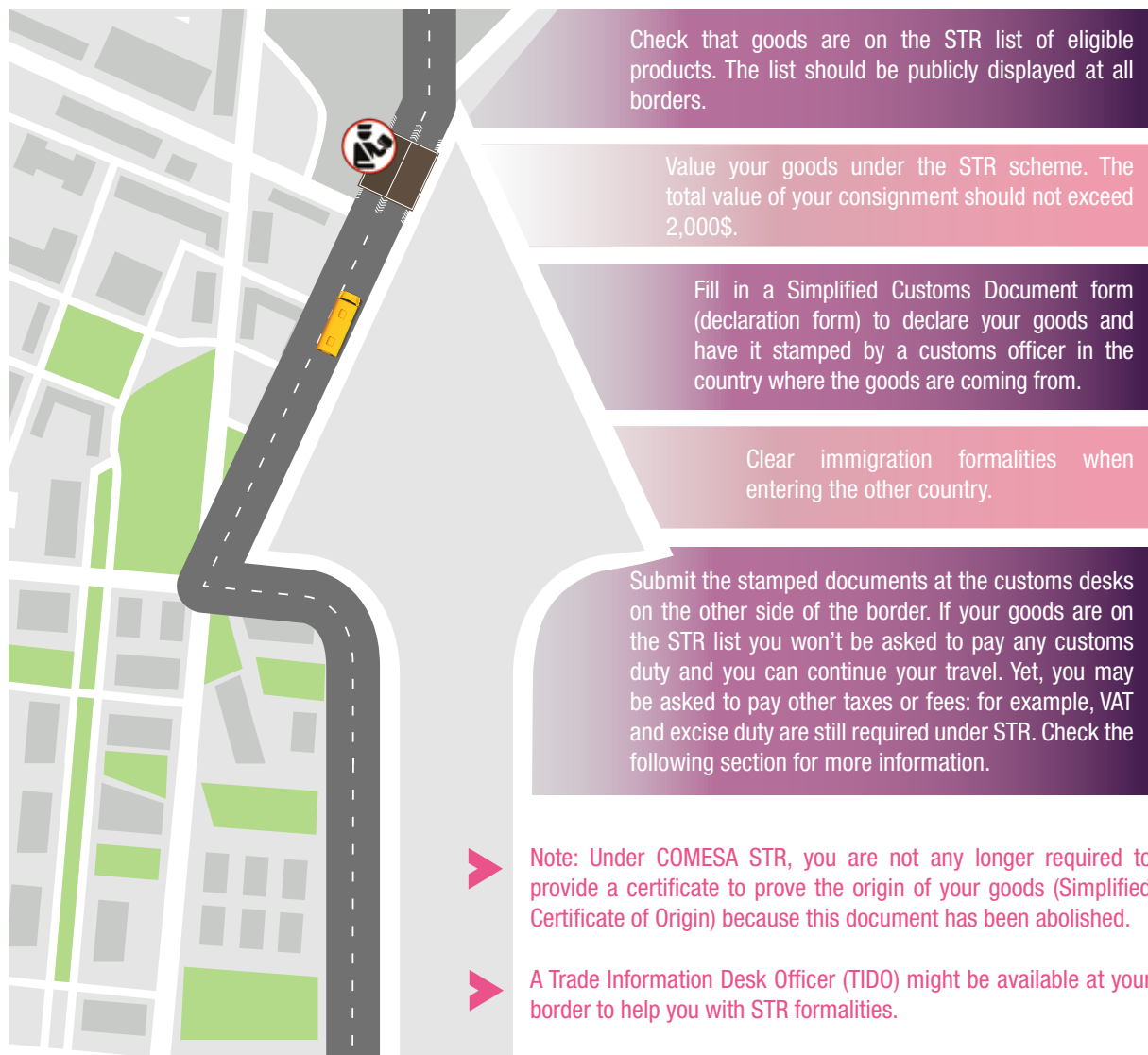
For example, second-hand clothes are usually imported from developed countries, hence they do not meet the rules of origin and are subject to payment of duties even when traded within COMESA. Second-hand clothing that is imported into Malawi from the United States and purchased by a trader to sell in Zambia would not meet the COMESA rules of origin. The trader would pay the customs duties that Zambia would normally apply to these products.

THE COMESA STR STEP BY STEP

BEFORE YOU TRAVEL TO THE BORDER, MAKE SURE YOU HAVE THE FOLLOWING:



ONCE YOU REACH THE BORDER FOLLOW THESE STEPS:



*What are the tariffs? What are the taxes?
Is there any other fee that you should pay?*

Tariffs or customs duties are taxes imposed by Governments on imported goods. These should be paid to the customs authority of the importing country.

Remember, if you are trading under STR:

- you should not pay any customs duty
- you are not any longer required to provide a certificate to prove the origin of your goods (Simplified Certificate of Origin) because this document has been abolished.

Customs duties should not be confused with other taxes. For instance, STR does not exempt traders from paying other taxes such as:

- **Value Added Tax (VAT)**, a type of consumption tax levied on most goods whenever value is added. If applicable, VAT should be paid in the country where goods will be sold.
- **Excise tax** levied on products such as alcohol, tobacco, gasoline, cosmetics, soft drinks etc. If applicable, excise tax should be paid in the country where goods will be sold
- **Administrative fees** applied to certain procedures such as for obtaining a SPS certificate or for entering transactions into the Automated System for Customs Data (ASYCUDA). The ASYCUDA fee is 0.80 US\$.

Checklist of documents to trade duty free under STR



Simplified Customs Form (declaration form): it is used to declare the goods that appear on the list of goods eligible for STR treatment. You can obtain this certificate at the border.



Travel documents: having a valid document is necessary to clear immigration procedures and enter the neighboring country. This can be a passport, your national ID, or your border pass when the border pass scheme is in place. Please check with the Immigration authorities. Additional documents that you may need to provide at the border:



COVID-19 Certificate: A valid PCR test of 72 hours.



Export/import permits: these may be required for certain goods, including for instance agricultural or animal products, whose trade is restricted or controlled. Goods should be reported to the competent authority, which will issue the appropriate export/import license.



Sanitary and Phyto-sanitary (SPS) certificates: these may be required to ensure that the goods comply with norms related to food safety, and animal and human health regulations. Goods should be reported to the competent authority (such as Ministry of Agriculture), which will issue the appropriate certificate attesting conformity with SPS measures.



COMESA Yellow Card vehicle insurance if you are travelling by car. Information can be requested at a local insurance company.

NOTES

¹ UN DESA Population Division: <https://population.un.org/>

² COMESA Secretariat (2021).

³ 16 COMESA members are currently in the free trade area: Burundi, Comoros, Djibouti, Libya, Kenya, Egypt, Madagascar, Malawi, Mauritius, Rwanda, Seychelles, Sudan, Uganda, Zambia, Zimbabwe and the Democratic Republic Congo

⁴ Afrika, J. & Ajumbo, G. 2012. Informal Cross border Trade in Africa: Implications and Policy Recommendations. Africa Economic brief Volume 3, Issue 10, African Development bank.

⁵ UNCTAD (2018). *borderline: Women in informal cross-border trade in Malawi, the United Republic of Tanzania and Zambia*.

⁶ Brenton P. et al (2014). Improving behavior at borders to promote trade formalization: The Charter for Cross-border Traders. Available at: <https://bit.ly/2TDkCOC>

⁷ World bank (2012). *basic rights and obligations for traders and border officials*. Available at: <https://bit.ly/2H0uLne>

⁸ Department of Immigration, Kenya, Available at <https://www.immigration.go.ke/>. Or the EAC website - <https://www.eac.int/travelling-within-the-eac>

⁹ EAC Rules and Regulations on short term/temporary supply or provision of services, movement of persons/people and workers. Available at <http://meac.go.ke/wp-content/uploads/2018/02/EAC-Book-3.pdf>

¹⁰ The East African Community Customs Union (Rules of origin) (2015). Available at: <https://bit.ly/2AFSBPs>

¹¹ National Identification Cards are also recognized as travel documents by Kenya, Rwanda and Uganda and can be used when travelling between the 3 Partner States.

¹² East African Community website: <https://bit.ly/2FhP2Tt>

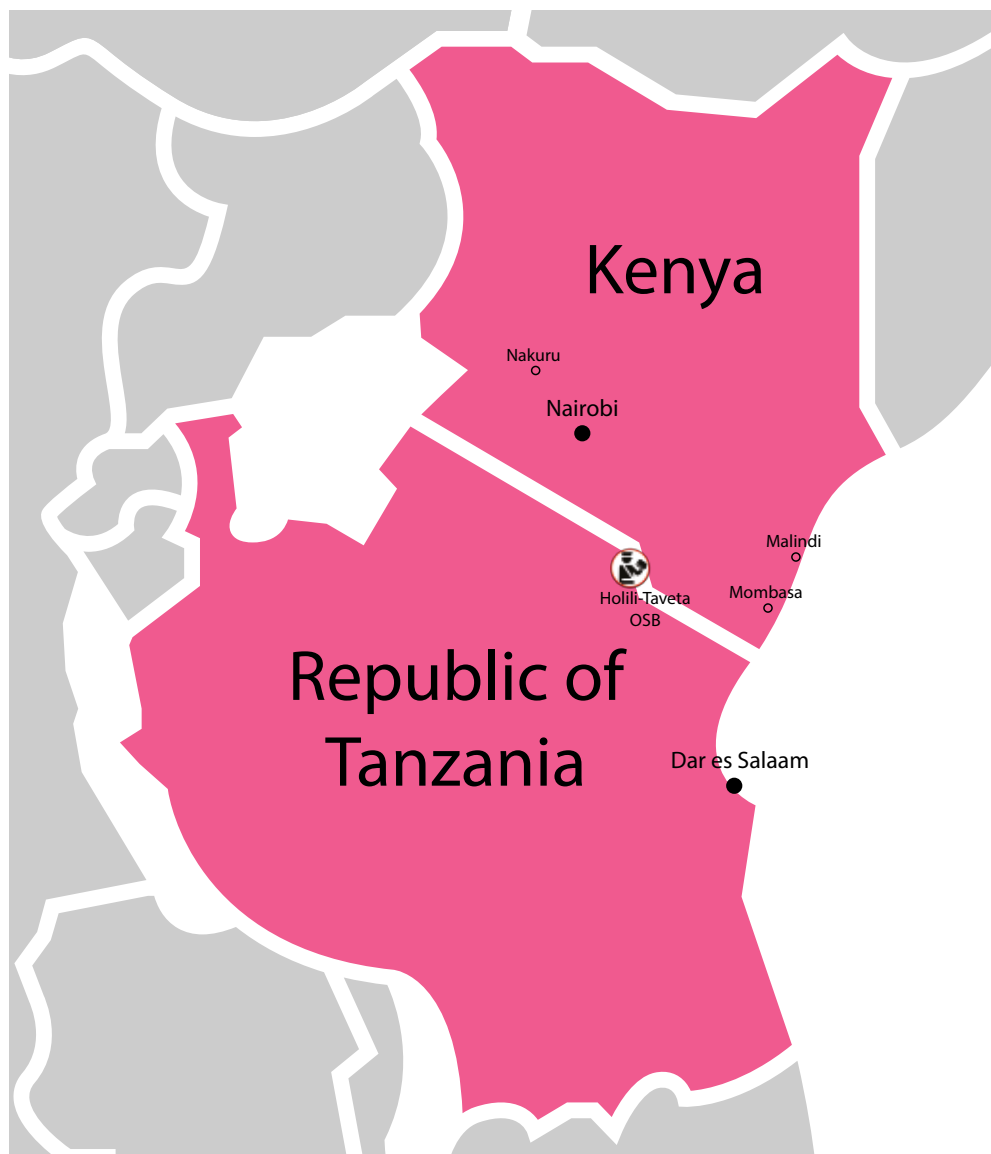
¹³ The COMESA member states implementing the STR include Burundi, Kenya, Malawi, Rwanda, Uganda, Zambia and Zimbabwe.

¹⁴ Countries like Kenya, Madagascar, Malawi, Mauritius, Rwanda, Eswatini, Seychelles, Uganda, Zambia, and Zimbabwe are to a large extent implementing the Visa Protocol; providing ninety-day visa access and access to visa on arrival to at least half of the COMESA Member states. Mauritius, Rwanda, Seychelles have totally waived visa requirements to all COMESA citizens.

ANNEXES

1. Regional maps





Source: UNCTAD secretariat based on Adobe Stock.

Note: Lake Malawi is also known as Lake Nyasa in the United Republic of Tanzania, and as Lago Niassa in Mozambique.

2. Authorities present at the border

- KENYA DEPARTMENT OF IMMIGRATION
- MINISTRY OF AGRICULTURE - KENYA PLANT HEALTH INSPECTORATE SERVICE (KEPHIS).
- KENYA BUREAU OF STANDARDS (KEBS)
- MINISTRY OF FISHERIES DEVELOPMENT
- MINISTRY OF LIVESTOCK DEVELOPMENT
- MINISTRY OF PUBLIC HEALTH

