

Training of Devil's Claw Traders and Exporters and MET Officials

Final Report

31 January 2011



**commissioned by the Millennium Challenge Account Namibia
with funding from the Millennium Challenge Corporation**



FINAL REPORT

CONTRACT DETAILS

Contract Name: Training of Devil's Claw Traders and Exporters and MET Officials

Contract ID: MCAN/CIF/RCQ P3.3.4-100

Project Sponsor: Commissioned by the Millennium Challenge Account Namibia with funding from the Millennium Challenge Corporation

Consultant: Karen Nott

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Acronyms

CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CP	Conditions Precedent
DC	Devil's Claw (<i>Harpagophytum procumbens</i> and <i>H. zeyheri</i>)
DC Policy	The National Policy on the Utilization of Devil's Claw (<i>Harpagophytum</i>) Products
DSS	Directorate of Scientific Services, MET
ICEMA	Integrated Conservancy Ecosystem Management Project within MET
ID	Namibian identity document
INP	Indigenous Natural Products
KNECS cc	Karen Nott Educational Consultancy Services (Namibian close corporation)
MCA-N	Millennium Challenge Account Namibia
MCC	Millennium Challenge Corporation
MET	Ministry of Environment and Tourism
NBC	National Broadcasting Corporation
NGO	Non-governmental organisation
PS	Permanent Secretary
TORs	Terms of reference

Executive summary

This report refers to all the activities undertaken by the consultant for the implementation of the 'Training of Devil's Claw Traders and Exporters and MET Officials' (MCAN/CIF/RCQ P3.3.4-100) during the period November 2009 to January 2011. The report reviews the various processes followed in the implementation of this contract. The main activities can be summarised as follows:

- Supporting the MET to revise and approve 'The National Policy on the Utilization of Devil's Claw (*Harpagophytum*) Products' in order to meet the 'Conditions Precedent' (CP) for the MCA-N INP Activity;
- Developing training materials for Devil's Claw traders and exporters as well as MET staff to ensure that the approved DC Policy is understood and implemented;
- Providing training to traders, exporters and MET staff on the approved DC Policy.

All of the above activities were successfully completed within the required timeframe in consultation with the various stakeholders.

9 February 2010	DC Policy approved by Committee for Policy and Research Development
19 April 2010	DC Policy approved by Permanent Secretary, MET
23 April 2010	Training materials approved by DSS, MET
23 April 2010	Revised permit application forms and report back forms approved
1 June 2010	Application for waiver of CP
9 July 2010	Approval of DC Policy by Cabinet
30 July 2010	Final approval of DC Policy by MET Minister

At the end of the report, a list of recommendations is made. These are essentially recommendations to MET that follow on from the activities undertaken as part of this consultancy. The recommendations are:

- To follow-up on the addition of *H. zeyheri* to protected species list

In the revised DC Policy both species are treated together as simply *Harpagophytum* spp. In order to make this possible, *H. zeyheri* would have to be placed on the MET 'Protected Species List'. It is important that this process is followed up within the MET to ensure that all the required actions to place *H. zeyheri* on Schedule 9 of the Nature Conservation Ordinance have taken place.

- To place a record book at each of the regional offices

All submissions of report back forms to MET offices will be recorded in a book at reception so that the submission of this documentation can be verified. The system is simple and involves a hardcover exercise book in which the date, type of document, the name of the applicant and the name of the MET official receiving the document is recorded. The MET needs to supply each of the regional offices with a record book at the start of the harvest season, and ensure that this recording system is implemented. All permit applications submitted to a particular regional office as well as all report back forms received need to be recorded in this book by the official receiving the documentation.

- To create a database of registered traders and exporters

For the effective implementation of the registration process as outlined in the approved DC Policy, a database of the registered traders and exporters will need to be developed and maintained. Applications for permits by the registered individual will need to be checked against the database to see if the registration is still valid before 'Buy and Sell' or export permits are issued. This database will need to be kept updated at all times for the implementation of the permits to be accurate and effective.

- To encourage harvesters, traders and exporters to form organised groups

Rationalizing the supply chain and creating more effective linkages should be actively encouraged between harvesters, traders and exporters in order to establish themselves as organised groups and better negotiate contracts and prices.

- To use the permit data to improve resource management

The permit application and issuance systems have been revised so that traceability of harvested and traded material is improved. However, for this to become a reality, the data generated by this system needs to be monitored and evaluated and then applied to an adaptive management process. Increased awareness of road block officials of the permit requirements will support this system. Where contracts exist between organised harvester groups and traders, 'Buy and Sell' permits for that area should only be issued to the contracted trader.

1. Background

1.1 Introduction

At the end of October 2009, the consultant (KNECS cc) was contracted to undertake the 'Training of Devil's Claw Traders and Exporters and MET Officials' (MCAN/CIF/RCQ P3.3.4-100). The contract period was originally from 13th November 2009 to the 31st March 2010, although this was subsequently amended to the end of January 2011 and this 'Final Report' therefore covers the period November 2009 to January 2011. The work covered under the terms of this revised contract included:

- Consultation with key stakeholders;
- Preparation of a plan of implementation;
- Preparation of a proposed media plan;
- Supporting the MET to review, update and amend the existing MET policy in respect to *Harpagophytum*;
- Preparation of revised protocols to implement the activities contained within the revised policy framework (including activities in support of data collection and Devil's Claw monitoring and evaluation);
- Preparation of training materials for MET officers and Devil's Claw traders and exporters;
- Delivery of five training workshops (two in Windhoek and three regionally).

In terms of the Millennium Challenge Account-Namibia (MCA-N) 'Program Implementation Agreement', no funds under the Indigenous Natural Products (INP) Activity could be disbursed until certain 'Conditions Precedent' (CP) had been met in respect to amending and improving the existing policy in respect to the trade in Devil's Claw, especially aspects to do with permit regulations and the provision of Devil's Claw trader and exporter training.

The CP for the INP Activity originally required that MCA-N provide evidence that:

"a) The Devil's Claw (Harpagophytum spp.) "Buy and Sell" permit document issued by MET has been amended to require information specifically indicating where the applicant intends to buy the Devil's Claw from;

b) The Devil's Claw "Buy and Sell" and "Export" permit documents issued by MET have been amended to require both a registration process as well as semi-annual reports detailing geographical origin of Devil's Claw material, harvesters providing this material, and actual quantities bought and exported; and

c) The Devil's Claw "Buy and Sell" and "Export" permit documents issued by MET have been amended to require a sustainability training program for permit applicants that must be completed prior to issuance of said permits."

Steady progress was made towards meeting the CP as is demonstrated in the summary that follows.

9 February 2010	DC Policy approved by Committee for Policy and Research Development
19 April 2010	DC Policy approved by Permanent Secretary, MET
23 April 2010	Training materials approved by DSS, MET
23 April 2010	Revised permit application forms and report back forms approved
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In early June 2010, MCC waived the CP as it could be demonstrated that sufficient progress was being made. This waiver allowed the funding for the INP Sub-activity to be released.

1.2 The Devil's Claw Policy revision component

In order to meet the 'Conditions Precedent' described above, the consultant worked with MET to assist in the process of adapting the existing DC Policy in order that the MET could submit evidence to the MCC (through MCA-N) that the various prerequisites had been met. This component of the contract included:

- Providing technical support to MET to revise the DC Policy document and submit it to the Committee for Policy and Research Development;
- Providing suggested changes to the existing 'Permit Issuance Protocol' for Devil's Claw;
- Providing suggested changes to the existing permit application forms, permits and 'Report Back' forms;
- Providing guidelines for the incorporation of mechanisms for training and assessing trader and exporter permit applicants into the normal duties of relevant MET staff;
- Providing recommendations for a suitable validity period for the 'Registration Number';
- Making recommendations with respect to the planning and implementation of the training events in 2010 and the design of the materials to be developed.

1.3 The training component

In support of compliance with the 'Conditions Precedent', it was initially decided that a Devil's Claw traders and exporters training programme – to include a 'registration test' – would be designed and implemented by the consultant in Windhoek before the training materials were finalised. (Through this single training event, Devil's Claw traders and exporters in Namibia would be apprised of the amended policy and the regulations pertaining to Devil's Claw sustainable harvesting, trading and exporting; Windhoek MET officials would be trained in order that they could administer the future registration of permit applicants; and officials from selected regions would be trained to facilitate

the improved collection of harvester data from the regions.) This training event was originally mooted to take place in early March 2010, i.e., at the start of the Devil's Claw harvest season, so that traders and exporters would be officially registered (and therefore in position to apply for their permits to begin trading) by the start of the harvest season.

However during the course of November 2009, the consultant's research into the numbers of traders currently active indicated that numbers were far greater than initially anticipated. Therefore – after consultations with the principal stakeholders – it was decided to hold the Windhoek training event for exporters and MET staff; training would be in the English language. There would then be three subsequent regional training events in Rundu, Kongola and Otjiwarongo specifically targeting traders (with provision made for translation of the assessment material, as well as translation services at the workshops), as well as a further training event for traders at Windhoek.

- This training effort was designed not only to contribute to the sustainable use of the Devil's Claw resource but also to lead to enhanced data collection and record-keeping for improved management of the resource in the future.
- Successful completion of the training (including a formal assessment) will grant the trader or exporter a 'Registration Number', which will be valid for a three-year period (or until the policy changes again).¹
- Once a trader or exporter has been assigned this registration number, his/her permit application can be processed.
- Traders and exporters who do not attend a training event in 2010 can nevertheless source an illustrated and simplified 'Understanding the Policy' pamphlet from their local MET office, and complete the assessment activity there.
- All the paperwork (form containing his/her particulars; copy of ID; registration test; and application for permit) will then be sent to MET Windhoek Permit Office for processing.

2. Issues that arose

2.1 Consonance between the Policy revision timetable and the development of the training materials

The primary issue that was given careful consideration at the initiation of the contract was the need for consonance between the DC Policy revision work of the officials at MET in Windhoek and the efforts of the consultant in completing the draft training materials in time for the training events. During a preliminary meeting (28th October 2009) it was agreed that whilst it would be most desirable for the revised DC Policy to be finalised prior to the completion of the training materials, this might not be achievable in practice.

¹ Previous documentation referred to the issuance of a 'Certificate of Compliance' but after discussions with MET it was decided that this terminology was unsuitable.

However, as the scale of the training activity grew and the original timeframe for the contract was adjusted, it became apparent that the training materials (and therefore the training itself) could be best tailored to the needs of the end users if production of the materials awaited the formalisation of the revised DC Policy. The consultant, in providing additional technical support to MET to accelerate the process of revising and approving the DC Policy, therefore activated the 'options provision' clause of three extra 'logistical days' and three extra 'technical inputs days' allowed for in the budget for this contract. Payment for these extra days was subject to approval by MCA-N on receipt of supporting evidence.

2.2 Lack of current data on active traders and exporters

One of the activities that the consultant undertook was to cross-reference the most recent list of Devil's Claw exporters in Namibia with the list at the MET Permit Office in Windhoek. Exporters were also approached to supply information relating to the traders from whom they purchase their Devil's Claw raw materials for export (i.e., those with 'Buy and Sell' permits) and further research at the Permit Office was done on Devil's Claw traders listed there for the most recent year. Out of this process it emerged that there are a great many more Devil's Claw traders in Namibia than was initially anticipated, and so a new round of discussions was initiated to resolve the issue of how to reach all these traders effectively.

It was ultimately decided by MCA-N, MET and the consultant that the best solution would be to hold three regional training events for traders in addition to the initial pilot Windhoek training event – which would now primarily target exporters and MET officials – as well as a subsequent extra Windhoek training event. The consultant was therefore asked to submit revised budgets to include this extra training provision, and to also make provision in the budget for translation of two of the assessment tests into local languages (Otjiherero, Silozi, and Rukwangali) and possible translation support at the workshops themselves (depending on the English language skills of the participants). In addition, an Afrikaans translation of the assessment tests was undertaken by the consultant. Although such test translations were undertaken at the specific request of MET Windhoek it was later decided, at the pilot Windhoek training and in consultation with Windhoek and regional MET officers, that all traders and exporters would be tested in English alone.

2.3 Revising the 'Permit Issuance Protocol' in line with the new Devil's Claw Policy

The MET had developed protocols to support staff in implementing the issuance of permits effectively, accurately and according to the existing policy and legislation; the original protocol document therefore provided a very useful tool. Whilst the updating of the 'Permit Issuance Protocols' was not included in the initial Terms of Reference for this contract, it was agreed that the consultant make recommendations to update the protocol document in accordance with the changes in DC Policy. This would facilitate the effective implementation of the 'Conditions Precedent'.

2.4 Reinstating the registration process

It transpired that this registration process was not taking place in practice, and how this could best be addressed therefore had to be considered during the course of this work. Relevant registration process recommendations were consequently incorporated into the draft 'Permit Issuance Protocols' contained in the 'Inception Report' and finalised for this 'Final Report'. The principal amendment has been the issuance of a registration number after successful completion of a written test on the DC Policy.

2.5 Distinguishing between products from the two species of Devil's Claw

The existing policy required that persons dealing (purchasing, transporting, selling, exporting or importing) in *Harpagophytum* spp. would be required to clearly distinguish between the two *Harpagophytum* spp. in reporting. This specification was problematic and the consultant, in consultation with MET staff, therefore recommended that in the revised DC Policy both species should be treated together as simply *Harpagophytum* spp. In order to make this possible, *H. zeyheri* would have to be placed on the MET Schedule 9 'Protected Species List' of the Nature Conservation Ordinance. The consultant therefore prepared a revised Schedule 9 (protected plants list) that included *H. zeyheri*.

2.6 The 'Conditions Precedent' semi-annual reporting requirement

The final issue was the 'Conditions Precedent' requirement that reporting on Devil's Claw trading and exporting must occur on a semi-annual basis. Initially there was some confusion over the meaning of the term "semi-annual" and after discussion it was agreed that the term "semi-annual" implied that reports should be submitted twice a year. Again, this regulation would be difficult for traders and exporters to fulfil in practice. The only way reporting can be enforced is for it to be linked to the period for which the permit is issued. Due to the implementation processes of MET (documentation being sent between the regional offices and the Windhoek Permit Office), semi-annual reporting would result in a period in the middle of the harvesting season, during which no trade could legally take place.

The consultant, after discussions with MET, recommended that in the revised DC Policy this stipulation be removed and replaced with a modified reporting scheduled (which was provisionally approved by MCA-N on 3rd December 2009). The recommendation was that reporting (the 'Report Back') takes place once a year (annually) and that during the training events, time should be dedicated to ensuring that traders, exporters and MET officials fully understand both the reporting requirements and the details that they are required to submit.

3. Workplan

This workplan is a summary of the final iteration of the 'Implementation Plan', a working document compiled by the consultant that was amended and revised throughout the progress of this contract, in consultation with MCA-N.

Component	Activities	Deliverables	Timeframe
<i>A. Implementation planning and 'Inception Report' delivery</i>	<ol style="list-style-type: none"> 1. Research and review existing DC documentation. 2. Plan consultation process with stakeholders. 3. Liaise with all stakeholders (ongoing). 4. Review data on permits ('Buy and Sell' and 'Export'). 5. Submit proposal for Phase 1 of media campaign and initiate. 6. Initiate consultations with MET stakeholders on DC Policy change and 'Permit Issuance Protocol'. 7. Write and submit 'Inception Report'. 	<ol style="list-style-type: none"> 1. Develop Phase 1 of media campaign (radio and print). 2. 'Inception Report'. 3. Proposed changes to: DC Policy, application for a permit forms, permits and reporting forms as well as 'Permit Issuance Protocol'. 	13 th November – 9 th December 2009.
<i>B. Training (mechanism and package + registration)</i>	<ol style="list-style-type: none"> 1. Develop draft training package and mechanism for delivery of training. 2. Submit training package for feedback (MCA-N and MET). 3. Finalise draft training package. 4. Continue consultations with MET on DC Policy change and harvester data. 5. Initiate consultations with MET stakeholders on registration process. 6. Develop registration process mechanism (ongoing). 7. <i>Phase 1 of media campaign (not implemented at this time but is included in D below).</i> 	<ol style="list-style-type: none"> 1. Training materials package and mechanism. 2. 'Registration Number' mechanism for issuance. 3. <i>Implement Phase 1 of media campaign: radio, print, text and e-mail invitations (not implemented in the end).</i> 4. Revised DC Policy (including protocols). 	<p>10th December 2009– 10th March 2010 (DC Policy and protocols).</p> <p>10th December 2009– 26th April 2010 (training package).</p>
<i>C. Training course (pilot materials and review)</i>	<ol style="list-style-type: none"> 1. Print draft training materials. 2. Prepare PowerPoint presentation. 3. <i>Phase 2 of media campaign (not implemented at this time).</i> 4. Invite participants to Windhoek training and receive RSVPs. 5. Organise logistics of Windhoek training (venue, refreshments, and facilities). 6. Present Windhoek training and collate participants' feedback. 7. Consultation with stakeholders regarding harvester data. 	<ol style="list-style-type: none"> 1. Draft training materials (hardcopy). 2. <i>Implement Phase 2 of media campaign: radio, print, text and e-mail follow-up on RSVPs (not implemented in the end).</i> 3. Windhoek Training Course event 3.6.10. 4. Training review. 	26 th April – 3 rd June 2010.
<i>D. Regional and Windhoek training</i>	<ol style="list-style-type: none"> 1. Translation of assessments. 2. Implement one-phase media campaign, liaise with MET on arrangements for workshops x 4. 3. Organise logistics of regional training events (translators, venues, refreshments, and facilities). 4. Present 4 x training events and collate participants' feedback. 	<ol style="list-style-type: none"> 1. Implement one-phase media campaign. 2. Regional training events. 3. Windhoek training event. 	4 th June – 25 th November 2010.
<i>E. Finalized training materials and 'Final Report' delivery.</i>	<ol style="list-style-type: none"> 1. Review training materials, print and deliver to MET Windhoek office. 2. Finalise proposals for harvester data collection, collation and management. 3. Write and submit 'Final Report'. 	<ol style="list-style-type: none"> 1. Final training materials (hardcopy and possibly electronic). 2. 'Final Report'. 	Due by 31 st January 2011.

3.1 The media campaign

An important challenge identified at the initiation of this contract was the lack of up-to-date information on the status of exporters and traders, as well as the issues involved in communicating with them. There was originally to be a three-phase media campaign to raise awareness of the forthcoming change in the DC Policy and its repercussions. However, the extended period of time required to assist MET in formalising the revised DC Policy meant that the planned process was revised (see 'Workplan' above).

The approach to the media campaign ultimately included the following aspects, in chronological order:

1. The consultant composed and sent a short information sheet to Windhoek MET for distribution to regional MET offices in order to inform them of the forthcoming DC Policy change, the subsequent intended amendments to the Policy, and the fact that eventually local DC traders and exporters would be contacting them for more information (distributed by MET on 4th December 2009).
2. The consultant cross-referenced the most recent list of Devil's Claw exporters (six appeared to be active in 2009) in Namibia obtained from MCA-N with the files at the MET Permit Office in Windhoek. The consultant made contact with all the exporters and compiled a list of all recent traders as well. During 2008, 239 'Buy and Sell' permits were issued whilst in 2009 a total of 167 were issued. This information was used to invite exporters to the pilot Windhoek training and to make sure that only recently active traders attend the Windhoek and regional training events.
3. Early in the contract, exporters were approached to supply information relating to the traders from whom they purchase their Devil's Claw raw materials for export (i.e., those with 'Buy and Sell' permits) in order that as many traders as possible be reached. A list of contact details (mobile phone numbers) for traders was compiled in order that they could receive information by text about the training events.
4. MET Windhoek compiled a list of relevant regional and central MET officials who were then approached to attend the Windhoek pilot training. All RSVPs were coordinated and followed-up by the MET. Other interested stakeholders were approached by the consultant to attend the training.
5. The consultant composed and sent a second information sheet to Windhoek MET for distribution to regional MET offices in order to inform them of the forthcoming DC Policy change and the fact that local DC traders would soon be contacting them for more information (distributed by MET in early September 2010). The information sheet contained two 'sign-up' sheets so that MET officers could collect information of potential participants; this information was then collated by MET Windhoek in early October 2010.

6. NBC radio service information inserts in the major languages of the Devil's Claw distribution area imparted relevant details (the DC Policy change and its ramifications for permit issuance) from 11th October through to the end of the month, leading up to the rollout (regional and Windhoek) training to be held in November 2010 (four versions were created by the consultant to provide details of the four different workshops). Traders were encouraged to contact their local MET office for further information and/or to confirm their interest in attending either the Windhoek or a regional training event. The final scripts for radio transmission are included on the CD-ROM generated by the consultant for MCA-N.
7. There were simultaneous advertorials in mid-September in the print media (*The Namibian*, *Republikein* and *Allgemeine Zeitung* daily newspapers), written to convey the same general information as the radio inserts. Readers were informed of the forthcoming policy change and were encouraged – if active traders – to contact their local MET office for details.
8. The consultant also prepared 4 individual MET invitations for MET Windhoek to distribute by post to traders who had expressed an interest in attending their local workshop.

3.2 Consultation with stakeholders

3.2.1 Windhoek Permit Office, Directorate of Scientific Services, MET

Ongoing consultation with the Windhoek Permit Office was carried out by means of regular meetings with the relevant officials during the course of this consultancy. Formal meetings were minuted. Regular contact was also maintained telephonically and by e-mail.

3.2.2 Regional Offices, MET

The Office of the Director: Parks and Wildlife Management compiled a list of the regional offices issuing Devil's Claw harvesting permits and also the names and contact details of the identified officials who should attend the pilot Windhoek training. Potential participants were invited by fax by MET and the invitations were followed up telephonically. During the pilot training course in Windhoek, a session was set aside to discuss the challenges and opportunities relating to the collection of harvester data, as well as reviewing the revised 'Permit Issuance Protocols'.

3.2.3 Devil's Claw exporters

Exporters were contacted telephonically by the consultant early in the contract in order to inform them of the impending changes to the DC Policy and to notify them about the forthcoming training opportunity. This opportunity was used to conduct a semi-structured interview relating to the policy changes. Exporters were invited to attend the training by e-mail and the invitations were followed up by MET.

3.2.4 Devil's Claw traders

Early in the contract, the consultant compiled a list from the files at the Windhoek Permit Office of currently active traders and their contact details. This list was intended be used to text information and an invitation to attend the post-pilot training events to all known traders (in the event, formal

written invitations were sent out). Exporters were also requested to provide information on traders with whom they deal in Devil's Claw.

3.2.5 MCA-N

Consultation with the Manager for the INP activity was done both formally and informally (telephonically and by e-mail) almost on a daily basis during the course of this consultancy. Formal meetings were minuted. The Manager was also copied in on important e-mail correspondence with the MET.

4. Component A: Implementation planning and 'Inception Report'

4.1. Completed Component A activities

The activities included in Component A in the final iteration of the 'Workplan' included in this 'Final Report' were completed on time (with some modifications when compared against the original 'Workplan' submitted in November 2009) and some of the products were included in the 'Inception Report'.

- The proposed approach to training was discussed at considerable length and revised. A memo recommending additional training events was drafted and approved by MCA-N on 17th December 2009. The budget was similarly revised to include the three recommended additional training events as well as provision for translators at the regional training events.
- Extensive ongoing consultation with stakeholders took place throughout the duration of Component A.
- A list of active exporters and traders was compiled.
- Recommended changes to the DC Policy were made after very prolonged communications (both formal and informal) with the Windhoek Permit Office and The Director: Scientific Services. The next steps involved submitting the changed policy for approval but the Committee for Policy and Research Development did not meet again in late 2009. Plans were subsequently made to submit the revised DC Policy to the committee for approval as soon as possible in the new year.
- Recommendations for changes to the 'Permit Issuance Protocol' were made in line with the recommended changes to the DC Policy.
- Some recommended changes to application forms for permits for traders and exporters were made.
- The draft scripts for radio transmission were compiled and submitted with 'Inception Report' for approval. The delay in formalising the revised DC Policy and the changes to the training schedule meant that, ultimately, these draft scripts were not used in the initial media campaign phase, as originally planned, but were revised again for use in the new, one-phase campaign in October 2010.

- The draft information sheet for MET officials and other stakeholders was also compiled, approved by MCA-N, and submitted to MET for distribution to relevant regional offices (this was done on 4th December 2009). However, again, circumstances linked to the lengthy process of getting the DC Policy formalised meant that, over time, the content of the information sheets became rather less relevant and it was revised once the regional training approached.

4.2 The need to widen the scope of the contract and revising the budget

While the Component A activities were getting underway, it became apparent that the original TORs for the work that the consultant was contracted to undertake were inadequate, given the obvious growing complexity of the tasks required to meet the policy revision and training development requirements. Please see the 'Inception Report' subsection 4.1. for a full description of the events and motivations that led up to the decision to widen the scope of the contract and increase the budget, as compared against the original contract and budget approved in November 2009. The consultant proposed the following (summarised) changes to the original 'Workplan' and these amendments, along with a revised budget, were approved in February 2010.

4.2.1 Additional regional training events

In the early stages of planning the training activity, the proposal was to hold one training event in Windhoek. It was estimated that all the relevant Devil's Claw stakeholders would comprise a total of about 50 people. Limited information about buyers and sellers was available at the time and the consultant was tasked with accessing better information. No register or summary of permit data was available so the consultant worked through the permit application files of the past two years. The files confirmed that there were only six exporters who were active. However, the data for the traders showed that there had been 239 issued 'Buy and Sell' permit in 2008, and 167 issued the same permits in 2009. The consultant therefore proposed the following changes to the original 'Workplan':

- Three additional regional training events at Otjiwarongo, Rundu and Kongola, as well as one in Windhoek.
- Each one-day event to start mid-morning and end mid-afternoon to allow participants travel time. Light catering to be provided.
- Provide translators for one translation per regional venue.
- Provide an opportunity for participants to do the registration test and provide assistance for those who need it.
- Ensure that the regional MET staff attend these events and assist with facilitation of the activities.

4.2.2 Revising the 'Permit Issuance Protocol'

At the time that the TORs for this contract were originally formulated, MCA-N and the consultant were unaware that a protocols document existed. The consultant had made recommendations for changing the permit application forms but Devil's Claw permits are written on a general permit form

and the wording on the permit is determined by the protocols. Thus, the revision of the protocols in line with the review of the Devil's Claw Policy, and the inclusion of these in the training for MET officials, was essential.

5. Component B: Training planning and Devil's Claw Policy review

5.1 Synthesising the Devil's Claw Policy review with the training materials development

Despite active and conscientious collaboration by the consultant with MET Directorate: Scientific Services staff, the process of getting the DC Policy revised, submitted, approved and signed proved to be a somewhat lengthy one. Although initial outlines of the various training materials were drawn up very early in 2010, their finalisation had to await the acceptance, by the Committee for Policy and Research Development, of the new 'National Policy on the Utilization of Devil's Claw (*Harpagophytum*) Products' on 9th February 2010 and the subsequent adjustment of the 'Permit Issuance Protocol'.

5.2 Supporting the MET in revising and formalising the Devil's Claw Policy

The process of getting the revised DC Policy finally approved by the Committee for Policy and Research Development on 9th February 2010 was a drawn out affair, given the time of year (the Christmas period) and the necessity for getting all the technical aspects watertight so that a policy was created that was unambiguous and framed in a way that would maximise the possibilities for sustainable utilisation of the Devil's Claw resources into the future. The revised DC Policy was finally submitted to the MET Undersecretary (Mr Negumbo) on 9th March 2010, and following some more revisions as per his instructions it was approved (but not signed) by the Permanent Secretary on 19th April.

5.3 Developing the training mechanism and training materials

Once it became clear that the DC Policy would not be signed by the Permanent Secretary and Minister in time for the start of the 2010 harvest season, MET were in a position to begin issuing Devils' Claw permits without the prerequisite of traders and exporters having to register first. This also meant that the timescale for the second Windhoek training event and the subsequent regional training events could be pushed back without affecting the ability of traders and exporters to carry out their trading activities. By the third week of February 2010, draft versions of all the training materials and test sheets (for the Registration Test) had been delivered to MCA-N for preliminary evaluation prior to approval by MET.

On 12th March draft versions of all the training materials were delivered to MET and they were all discussed at a meeting on 23rd April. Final revisions were then undertaken and translations of the scripts for Registration Tests #2 and #3 were contracted to KHV-S Translation Services CC, as originally requested by MET. Illustrations for the short-form pamphlet were commissioned from Dudley Viall.

6. Component C: Training workshop (pilot materials and review) and Devil's Claw Policy finalisation

6.1 Rescheduling and reconceptualising the Windhoek training event

Since the finalisation of the training materials only eventually took place some weeks after the initial date proposed for the training, it was decided to focus the pilot Windhoek training event on the exporters and MET staff and only provide training for Devil's Claw traders at the end of the year, once the draft training materials had been reviewed. (As traders would have already received their permits for the 2010 harvest season there was no real urgency regarding getting them tested and registered.)

Devil's Claw exporters and MET staff who would be tasked with implementing the new Devil's Claw protocols were therefore invited by MET to an event to take place on 3rd June 2010. At the conclusion of the training event, exporters were to be given the opportunity to sit the Registration Test and all participants were to be asked to complete a feedback form. Feedback obtained from these forms was then utilised to finalise the Devil's Claw training materials for use at subsequent training events for traders.

6.2 Windhoek Devil's Claw training event, 3rd June 2010

As the DC Policy had still not been finalised (signed by the Minister once it had been approved by the Parliamentary Committee) by the date of the one-day training, which was held at the Polytechnic of Namibia Hotel and Tourism School in Windhoek, it was decided not to invite representatives from ministries other than MET. Relevant MET staff who were unable to attend this training event would be invited to attend a subsequent regional or Windhoek training event in order to be apprised of the DC Policy and its protocol.

The workshop was formally opened by Louisa Mupetami (MET Directorate of Scientific Services Director: Scientific Services) and Dave Cole of (Manager: Indigenous Natural Products MCA-N), who gave an overview of the need for policy change with respect to Devil's Claw. The workshop was facilitated by Karen Nott and she was assisted by Mel Kelly (both of KNECS cc). Thirty-two people attended: five Devil's Claw exporters; six participants from relevant NGOs/organisations; and 21 invitees from MET Windhoek and regional offices.

The only significant decision taken at the training event was the agreement by MET Windhoek and regional officials that there was no need for traders and exporters to be assessed (i.e., take the Registration Test) in any other language than English.

6.3 Ongoing DC Policy finalisation process

After being approved by the Permanent Secretary, the DC Policy was submitted to the Minister on 20th May 2010 for her approval. It was then submitted to the Parliamentary Committee as the 'National Policy on the Utilization of Devil's Claw (*Harpagophytum*) Products' and given final Cabinet

approval on 22nd June 2010. It was then returned by MET to the PS and the Minister for signing (28th July and 30th July respectively). In the interim, MCA-N had received a letter from MET stating that the CPs in respect to the DC Policy had been met, and MCA-N conveyed this information to MCC. Subsequently, the finalised DC Policy was printed by Prime Press (500 copies). The printing was funded by the ICEMA project within MET.

7. Component D: Regional and Windhoek training

7.1 Revisiting the DC training materials

After the pilot training event, the completed Devil's Claw Registration Tests sheets were submitted to MET for marking. All five of the exporters who wrote the test were found to have passed the test and were informed of this by MET, and were also told that formal Registration Numbers and Certificates would be issued to them in 2011.

Although all five exporters got the same two questions wrong (specifically pertaining to whether or not harvesters need to register with MET), and one exporter got a single further question wrong, it was decided that the obvious confusion over whether or not harvesters need to register with MET could be dealt with by specifically emphasising during subsequent training events that harvesters are not required to register. In addition, exporters and traders wishing to write the test in the future who do not attend a training event will, presumably, make sure they read the relevant printed materials before they attempt the test – the information about harvesters not having to register is stated several times in the printed materials. (It was observed that at the Windhoek training of 3rd June 2010, none of the exporters who wrote the test read through all the printed materials before they began but just relied on their existing knowledge and the information they had picked up during the PowerPoint presentation.)

The workshop participants were given feedback sheets to complete at the end of the workshop. Seventy per cent of the 27 MET/NGO participants completed the form in some manner (i.e., 19 people), and expressed overall satisfaction with the presentation, materials and ease of understanding the Registration Test activities.

All five of the exporters completed their (slightly different) form; whilst they similarly expressed satisfaction overall with the training, materials and ease of understanding the Registration Test and testing process, they were slightly more guarded in their responses than the former group, answering 'Good' to more questions, as opposed to 'Very Good' expressed most often by MET/NGO participants. The results of these evaluations were summarized and submitted to MCA-N.

7.2 Preparation for the training workshops

Four traders' training workshops were planned, and were eventually held, at the following venues:

1. *Windhoek*: Tuesday 16th November 2010. Polytechnic of Namibia Hotel and Tourism School, corner of Beethoven and Brahms streets, Windhoek West
2. *Kongola*: Friday 19th November 2010. IRDNC Offices, Kongola.
3. *Rundu*: Monday 22nd November 2010. Omashare River Lodge, Maria Mwengere Road, Rundu.
4. *Otjiwarongo*: Wednesday 24th November 2010. Out of Africa Lodge.

A letter was prepared by KNECS cc and MET to inform all MET staff at the relevant offices that print media and radio announcements would soon alert traders to the forthcoming training events. This letter also included a 'sign-up' sheet so that MET officials could make a note of the details of traders who expressed an interest in attending and was sent out on 6th September 2010. A general notice announcing the workshops went out to the newspapers (*The Namibian*, *Republikein* and *Allgemeine Zeitung* daily newspapers) on 24th September 2010, and radio announcements were made in relevant local languages on the NBC regional stations throughout October, from 11th onwards and until 2nd November on the national broadcasting frequency.

7.3 The Windhoek DC training event

At the Windhoek Devil's Claw training event of 16th November 2010, Dr Eline van der Linden, MCA-N Deputy CEO: Implementation, formally handed over copies of the various training materials to Mr Negumbo, Undersecretary, MET. Members of the press were invited to this workshop.

7.4 Regional training events and feedback

Table 1: Attendance at the four regional training events

Venue/date	No. of traders invited	No. of traders who confirmed attendance	No. of traders who attended workshop		No. of traders who wrote the Reg. Test	No. of traders who passed the Reg. Test
Windhoek, 16 th November	10	10	9	Male = 7 Female = 2	9	9
Kongola, 19 th November	10	8	9	Male = 0 Female = 9	9	9
Rundu, 22 nd November	20	20	23	Male = 11 Female = 12	20	5
Otjiwarongo, 24 th November	17	14	14	Male = 11 Female = 3	12	10

Table 2: Feedback from 40 MET and other non-trader/non-exporter Devil's Claw workshop participants, including the pilot Windhoek workshop

MET Officers and NGOs	Number of respondents				
	Very good	Good	Average	Poor	Very poor
1. How do you rate the organisation of the Training you have attended today?	27	9	1	0	0
2. How do you rate the quality and usefulness of the printed 'Policy Information Booklet' that you received today?	25	11	1	0	0
3. How do you rate the quality and usefulness of the printed 'Understanding the Policy' pamphlet that you received today?	26	11	1	0	0
4. How do you rate the PowerPoint presentation that you saw today?	20*	19*	1	0	0
5. How do you rate the quality of the information, overall, that you received today?	23	13	0	0	0
6. How do you rate the organisation of the Registration Test today?	16	14	0	0	0
7. In terms of how easy you found it to understand the instructions, how would you rate the Registration Test that you assisted with today?	18	14	0	0	0

* One person at Kongola checked two boxes for this answer and it is impossible to tell which answer was the intended one.

Table 3: Feedback from 43 regional workshop trader participants and the 5 exporters

Traders/Exporters	Number of respondents				
	Very good	Good	Average	Poor	Very poor
1. How do you rate the organisation of the Training Course you have attended today?	34	13	0	0	0
2. How do you rate the quality and usefulness of the printed 'Understanding the Policy' pamphlet that you received today?	39*	10*	1	0	0
3. How do you rate the presentation that you saw today?	30	15	0	0	0
4. How do you rate the quality of the information, overall, that you received today?	27	20	1	0	0
5. How do you rate the quality and usefulness of the information about the Registration Test that you received today?	22	21	1	0	0
6. In terms of how easy you found it to understand the instructions, how would you rate the Registration Test that you wrote today (if applicable)?	25	12	3	0	0
7. In terms of how easy you found it to understand the questions, how would you rate the Registration Test that you wrote today?	22	12	4	0	0

*A number of traders at Kongola and Rundu checked two boxes in the case of these answers and it is impossible to tell which answer was the intended one.

8. Recommendations

8.1 Follow-up on addition of *H. zeyheri* to protected species list

The existing policy required that persons dealing (purchasing, transporting, selling or exporting) in *Harpagophytum* spp. would be required to clearly distinguish between the two *Harpagophytum* spp. in reporting. This was due to the fact that *Harpagophytum procumbens* was listed as a protected species while *H. zeyheri* was not, as a result of the early trade in Devil's Claw being focussed on *H. procumbens*. This specification was problematic since it is impossible to distinguish between the two species from the harvested material. The consultant, in consultation with MET staff, therefore recommended that in the revised DC Policy both species should be treated together as simply *Harpagophytum* spp. In order to make this possible, *H. zeyheri* would have to be placed on the MET 'Protected Species List'. The consultant therefore prepared a revised Schedule 9 (protected plants list) that included *H. zeyheri*. This revised schedule was provided to MET in December 2009. The revised schedule would need to go through various processes within the MET for this change to be approved and implemented.

Recommendation 1: Follow up this process within the MET to ensure that all the required actions have taken place.

8.2 Record book at regional offices

Review of the files of 'Buy and Sell' permits issued in the past few years revealed that although the policy required that the report back forms for 'Buy and Sell' permits should be submitted by the end of November (one month after expiry), in reality these were being submitted the following year – upon application for a new permit. This was discussed with MET officials as well as traders and it seems that the reason why this was happening was that there was no way of verifying that a report back form had been submitted the previous November when applicants came to apply for their new permits. The Windhoek Permit Office had instituted a system whereby all submissions to the office were recorded in a book at reception so that the submission of any documentation could be verified. The system is simple and involves a hardcover exercise book in which the date, type of document, the name of the applicant and the name of the MET official receiving the document is recorded. After discussions, MET staff decided that this system would be suitable for documenting the DC report back forms (for all DC permits) and could be easily implemented in all regional offices.

At the regional training events the details of recording the submission of the report back forms was discussed at length. Traders and exporters were encouraged to:

- Submit the report back form for 'Buy and Sell' permits to the MET office before the end of November each year;
- Make sure that the submission of the report back is recorded in the record book by the MET official receiving the report back;
- Bring a photocopy of the report back form to the MET office and ask the MET official on duty to place an official date stamp on the photocopy as proof of submission.

Recommendation 2: That each of the regional offices has a record book and that this recording system is implemented.

8.3 Create a database of registered traders and exporters

For the effective implementation of the registration process as outlined in the approved DC Policy, a database of the registered traders and exporters will need to be developed and maintained. This database will need to include the following information:

- Personal details of the trader or exporter;
- Date on which the trader or exporter was issued with a certificate;
- Registration number of the trader or exporter;
- Date on which the registration expires.

Applications for permits by the registered individual will need to be checked against the database to see if the registration is still valid before 'Buy and Sell' or export permits are issued. This database will need to be kept updated at all times for the implementation of the permits to be accurate and effective.

Recommendation 3: The Windhoek Permit Office needs to create and maintain a database of registered traders and exporters.

8.4 Encourage harvesters, traders and exporters to form organised groups

To rationalize the supply chain and create more effective linkages between harvesters and traders, harvesters should be actively encouraged to establish themselves as harvester groups and to negotiate a group contract with a single trader. The harvester permit application protocol makes provision for the harvester group entity and could facilitate the establishment of such groups and take an enabling role in linking them with single traders who would best market their Devil's Claw harvest. This is already taking place in several conservancies and community forests. These groups have accessed training and technical support from government and NGOs and improved resource management and harvester benefits are already being noted.

However, no such organisation of trader and exporter groups is currently taking place and all are operating as individuals in competition with each other. Traders and exporters could benefit greatly by organising themselves into groups (e.g. associations) and, for example, could be better able to negotiate prices with overseas buyers. MET, other ministries and support organisations should encourage and support this process whenever possible.

Recommendation 4: MET and support organisations should encourage and support harvesters, traders and exporters to form organised groups.

8.5 Use of permit data to improve resource management

The permit application and issuance systems have been revised so that traceability of harvested and traded material is improved. This was done with the ultimate goal of improved resource management, which is the mandate of the MET. However, for this to become a reality, the data generated by this system needs to be monitored and evaluated and then applied to an adaptive

management process. This responsibility needs to be assigned to a MET official who can access the data collected by the permit office, evaluate it, and support management actions to address emerging issues.

The issue of illegal traders (or ‘bakkie buyers’) was raised during several stakeholder discussions. One of the ways of addressing this would be to increase awareness of law enforcement officers at road blocks throughout the region. Anyone transporting DC material should be in possession of:

- A ‘Buy and Sell’ permit if the trader is transporting the material;
- A transport permit, as well as a copy of the ‘Buy and Sell’ permit if the material is being transported by anyone other than the trader.

Road blocks should also check that the trader is operating in the area indicated on his/her permit.

Several harvester groups have a contract (which is often for more than one year) with a certain trader/exporter. Copies of these contracts should be supplied to the Windhoek Permit Office. Before a ‘Buy and Sell’ permit for a certain area is approved and issued, the MET official should check to see whether the harvesters in that area are organised into a group and already have a contract with a trader/exporter. For example, if the Kyaramacan Association in Bwabwata National Park has a contract with trader A, and trader B applies to trade in West Caprivi, then trader B’s application **for that area** should not be approved. Most traders will be applying for eight different areas in which to trade and trader B can be issued a permit to trade in other areas. If a trader has a contract with an organised group of harvesters, then it usually is for a quota which has been determined as being sustainable. If the contracted trader comes into an area and buys the allocated quota and further sales then take place to another trader, it means that the additional material being sold is more than what is considered to be sustainably harvested.

Most of the organised harvester groups can be found in conservancies and community forests and are usually receiving support from MET and other support organisations. If copies of existing contracts are supplied to the Windhoek Permit Office, it should be possible to issue only one permit for trade in an area where a contract exists between the harvesters and a trader.

Recommendation 5: That the MET increase awareness of Officials at road blocks to check both the transporting as well as trading permits for anyone with DC material.

Recommendation 6: Where contracts exist between organised harvester groups and traders, ‘Buy and Sell’ permits for that area should only be issued to the contracted trader.

Annex 1. List of printed and other resources generated by this contract

Below is a list of all the printed and other resources generated by the consultant in the course of this contract. The materials listed have been copied to various CD-ROMs, which have been deposited with MCA-N. A CD-ROM containing the various training materials, forms and tests has also been deposited at MET.

Reports	'Inception Report'
	'Final Report'
Revised Devil's Claw Policy material	Draft 'Devil's Claw Policy' (in the 'Inception Report') – including many iterations
	Finalised 'National Policy on the Utilization of Devil's Claw (<i>Harpagophytum</i>) Products' (500 printed)
	Draft 'Permit Issuance Protocol' (in the 'Inception Report')
	Finalised 'Permit Issuance Protocol' (contained within the 'MET Booklet')
Media campaign materials/MET training events documents	Draft Phase 1 radio script (in the 'Inception Report')
	Draft Phase 2 radio script (in the 'Inception Report')
	Draft print media advertorials text (in the 'Inception Report')
	Information sheet for MET Regional Offices (in the 'Inception Report')
	One-phase radio script (4 different versions)
	Print media advertorials text
	Information sheet for MET Regional Offices, second version
	MET invitation to the training events (4 different versions)
MET Devil's Claw forms	'Harvester' permit application form
	Harvester 'Report Back' form
	'Buy and Sell' permit application form
	Trader 'Report Back' form
	'Export' permit application form
	Exporter 'Report Back' form
	Registration Certificate
Training Workshop materials	Draft 'Policy Information Booklet' for traders and exporters
	Draft MET Staff 'Policy Information Booklet'
	Draft 'Understanding the Policy' short-form pamphlet
	Finalised 'Policy Information Booklet' for MET, traders and exporters
	Finalised MET Staff 'Policy Information Booklet' (50 printed)
	Finalised 'Understanding the Policy' short-form pamphlet (750 printed)
	Seven x MET forms (see above), completed with examples of data to be inputted
	Workshop feedback form MET/NGOs
	Workshop feedback form traders/exporters
	Summarisation of exporters' feedback form, Windhoek
	Summarisation of MET/NGOs feedback form, Windhoek
	Regional/Windhoek workshop feedback form (MET/others)
	Regional/Windhoek workshop feedback form (traders)
	Summarisation, Regional/Windhoek of MET/others feedback form
	Summarisation Regional/Windhoek of traders' feedback form
PowerPoint Presentation Windhoek	
PowerPoint Presentation Regional	

Registration materials	Registration Test sheets #1 (including application form): English
	Registration Test sheets #2 (including application form): English, Silozi, Otjiherero and Rukwangali versions
	Registration Test sheets #3 (including application form): English, Silozi, Otjiherero and Rukwangali versions
	Registration Test sheets #1 marking rubric
	Registration Test sheets #2 marking rubric
	Registration Test sheets #3 marking rubric
Sundry others	'Workplan' (included in 'Inception Report' and revised in this 'Final Report')
	'Implementation Plan' working document with many iterations