AUTHORIZED ECONOMIC OPERATOR (AEO) PROGRAMME IN THE EAST AFRICAN COMMUNITY: CHALLENGES, IMPACT AND OPPORTUNITIES



2026

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Acronyms and Abbreviation

AEO	Authorized Economic Operators
EAC	East African Community
AMS	Americas
AP	Asia Pacific
COMESA	Common Market for Eastern and Southern Africa
ESA	East and Southern Africa
EUR	Europe
FEAFFA	Federation of East African Freight Forwarders Association
KRA	Kenya Revenue Authority
MENA	Middle East and North Africa.
MRAs	Mutual Recognition Agreements
NAEO	National Authorized Economic Operator
NTFC	National Trade Facilitation Committee
OIC	Organization of Islamic Countries
PIN	Personal Identification Number
PGAs	Partner other Government Agencies
REC	Regional Economic Community
SACU	Southern African Customs Union
SOP	Standard Operating Procedure
TIN	Tax Identification Number
TRA	Tanzania Revenue Authority
WCA	West and Central Africa
WCO	World Customs Organisation
WTO TFA	World Trade Organisation Trade Facilitation Agreement

Executive Summary

The Authorized Economic Operator (AEO) programme is a key initiative designed to enhance trade facilitation and supply chain security by providing accredited businesses with treatment such as expedited customs procedures and other trade facilitation benefits. The programme aims to create a more efficient and secure trading environment by recognizing and accrediting businesses that meet high standards of compliance and supply chain security both at Regional and National level. AEOs, through their enhanced status, contribute to regional integration, increase competitiveness, streamline cross-border operations and reduce delays and ultimately benefiting the entire supply chain. Despite its objectives and continued efforts, the regional and national AEO programmes across the East African Community (EAC) still face significant challenges.

The study finds that while the AEO Programme, both regional and national, has made significant progress as a trade facilitation initiative, its performance and uptake remain uneven across Partner States, reflecting differences in institutional maturity, implementation capacity, and private sector engagement. Overall compliance levels among accredited operators are strong particularly in the EAC AEO programme, demonstrating growing trust-based cooperation between Customs administrations and traders; however, incentive structures and consistent delivery of benefits at border crossings remain insufficient to drive wider participation. Limited integration of Partner Government Agencies (PGAs) continues to constrain realization of full trade facilitation gains of the programme, as controls remain fragmented beyond Customs administrations. In addition, automation and digital processing of AEO procedures are still evolving, slowing accreditation timelines and operational efficiency.

Despite these challenges, the programme shows strong potential for regional and international recognition, positioning regional AEO Accreditation as an important mechanism for advancing EAC Customs Union objectives, strengthening risk-based border management, and enhancing regional competitiveness in global trade.

In addition, the study's findings highlight several priority areas requiring policy attention to strengthen the effectiveness and impact of the EAC AEO Programme as well as State Partners national AEO programmes. Uneven uptake of the EAC AEO programme across Partner States and limited integration of Partner Government Agencies (PGAs) indicate the need for stronger inter-agency collaboration and harmonized delivery of AEO benefits. Weak incentive structures and perceptions regarding strong penalties underscore the importance of enhancing firm-level benefits and ensuring proportional enforcement mechanisms to sustain voluntary participation. Low MSME participation further points to the urgency of introducing a liberalized MSME AEO package and expanding awareness and capacity-building efforts to broaden inclusivity. Dedicated AEO sections within Customs at national level, will provide focused support and better coordination while improving service delivery. In the longer term, establishment of an AEO Coordination Office at the EAC Secretariat and pursuing Mutual Recognition Agreements (MRAs) will be critical to enhancing international recognition and positioning AEO Accreditation as a strategic instrument of the EAC Customs Union.

Collectively, these policy priorities support broader trade facilitation and the EAC customs unions objectives while deepening regional and global integration of EAC economies.

Introduction and Background

Global context: The World Customs Organization and the AEO Programme

In June 2005, the World Customs Organization (WCO) Council adopted the SAFE Framework of Standards to Secure and Facilitate Global Trade (SAFE Framework). The SAFE Framework has emerged as the global Customs community's concerted response to threats to the supply chain security, equally supporting facilitation of legitimate and secure businesses. The SAFE Framework consists of the three pillars of Customs-to-Customs network arrangements (Pillar 1), Customs-to-Business partnerships (Pillar 2) and Customs-to-other Government Agencies co-operation (Pillar 3). The Pillars sets forth the standards and presents them for adoption as a minimal threshold of what should be done by WCO Members.

The Authorized Economic Operator (AEO) Programme, the WCO's flagship initiative for Customs-business collaboration, was introduced in 2007. The AEO programme is a Trade Facilitation Programme that forms an important partnership between Customs administrations and the business community.

The programme is a deterrent to international terrorism, to secure and facilitate global trade while contributing to socio-economic development through revenue collection. The WCO AEO Programme is widely acknowledged as a key driver for a solid Customs-Business Partnership; a secure, transparent, and predictable trading environment; and, in a wider context, enhanced economic prosperity.

The World Trade Organisation Trade Facilitation Agreement (WTO TFA) article 7.7 underscores the importance of AEO programmes as a key enabler of trade facilitation. AEOs are businesses involved in international trade that meet specific criteria and standards set by Customs authorities.

The WCO defines an AEO as a party involved in the international movement of goods in whatever function that has been approved by, or on behalf of, a National Customs Administration as complying with WCO or equivalent supply chain security standards. AEOs may include manufacturers, importers, exporters, brokers, carriers, consolidators, intermediaries, ports, airports, terminal operators, integrated operators, warehouses, distributors and freight forwarders.



Being recognized as an AEO provides certain privileges and benefits to businesses/operators, such as accreditation to use the blue channel which is an express Customs clearance, pre-arrival clearance, priority documentary clearance and utilization of the Post Clearance Audit procedures as part of compliance checks and risk management. These operators must comply with specific requirements, such as a demonstrated compliance record, a satisfactory system for the management of commercial records, financial solvency, security concerning cargo, transport conveyances, premises, personnel and trade partners[2].

Governments, too, benefit from the AEO programme with improved supply chain security, enhanced compliance measures, streamlined clearance procedures and enhanced revenue collection. AEO participation enhances risk management, allowing a proactive approach to mitigating threats. The programme fosters collaboration between governments and businesses, contributing to a secure and efficient international trade environment.

These benefits highlight the AEO programme's pivotal role in promoting efficiency, security, and collaboration in the global supply chain. The AEO status is aimed at enhancing the efficiency and security of the global supply chain by fostering cooperation between Customs authorities and trustworthy businesses.

Over the years, there has been a consistent increase in the number of operational AEO programmes, indicating a growing global recognition and adoption of these initiatives (Figure 1). In 2016, there were 70 operational AEO programmes by WCO Members while in 2026 the number has risen to 92 while 7 are under development. This suggests a sustained interest and engagement by businesses and Customs authorities in the benefits offered by AEO programmes as well as commitment to further enhance trade facilitation and security measures in various regions.

Figure 1: Worldwide Trends in the Growth of Authorized Economic Operator (AEO) Programs/Initiatives (2016-2026)

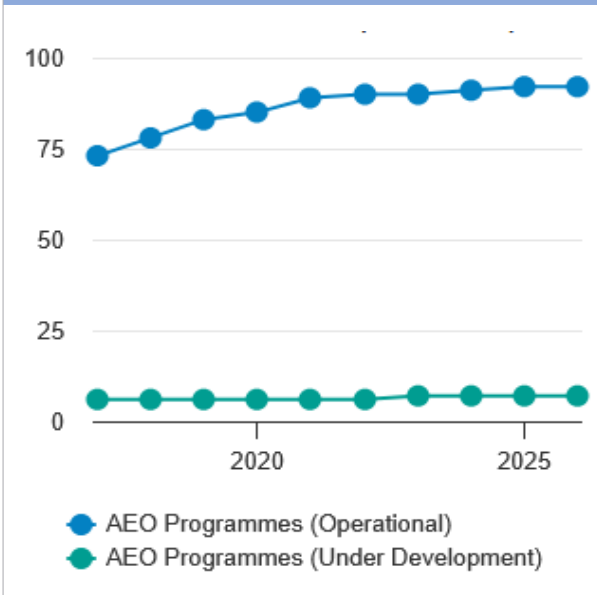
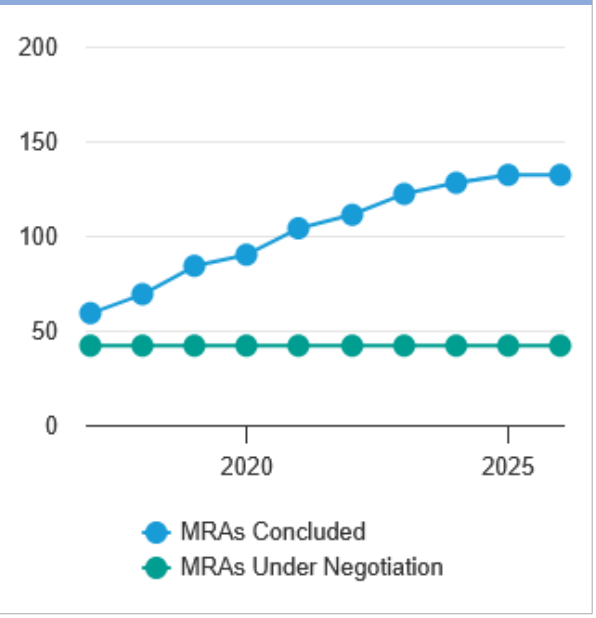


Figure 2: Mutual Recognition Arrangements/ Agreements (MRAs) (2016 - 2026)



Source: https://aeo.wcoomd.org/ World Customs Organizations 2026

2 World Customs Organization Authorized Operators Scheme, Article 7.7 of the WTO Agreement on Trade Facilitation. authorised-operator-scheme-flyer.pdf (wcoomd.org)

Mutual Recognition Arrangements/Agreements (MRAs) provide a platform for AEO programmes to provide additional benefits to their members and broadens the scope of AEO programmes beyond national borders through international recognition with partner countries[3]. The landscape of MRAs in the global AEO framework has shown steady growth over recent years, reflecting an increasing commitment to facilitate secure and efficient trade (Figure 2). Since 2016, the number of concluded MRAs has risen from 48 to 126 as of 2026 while 42 are under negotiation. This steady increase highlights the dedication of customs administrations worldwide to recognize and trust the security standards of each other's AEO programmes. Further, the latest data from WCO indicate that MRAs under negotiation have been stable over the years (Figure 2).

The WCO's analysis of operational AEOs Programmes shows consistent growth of operational AEOs Programmes across the various WCO regions between 2016 and 2026[4], reflecting a favorable regulatory environment and increased participation from businesses (Figure 3). Europe (EUR) has the highest number of operational AEOs Programmes while West and Central Africa (WCA) has maintained only 1, the least among the WCO regions. The low number in (WCA) may indicate challenges or a slower adoption rate in this region.

In the Eastern and Southern Africa (ESA) region, several countries have been actively adopting or considering the implementation of AEO Programmes with the goal of improving trade effectiveness, mitigating Customs-related risks, and fortifying the security of supply chains. In some of the ESA countries the AEO Programmes is called the Preferred Trader Programme (PTP). The region demonstrates a generally positive trajectory over the years (Figure 4). Beginning with a stable range of 3 to 4 operational AEOs Programmes in 2016 to 9 in 2026 reflecting stability in AEO participation. Moreover, an additional 3 ESA countries have partially implemented or in the process of implementation[5].

Figure 3: Operational AEO Programs by World Customs Organization (WCO) Regions in 2026

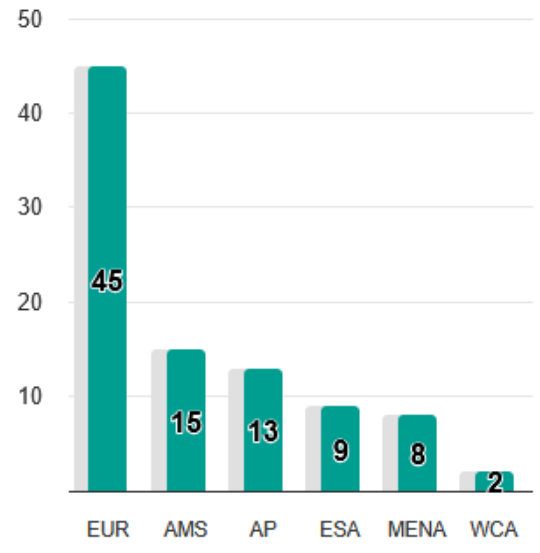
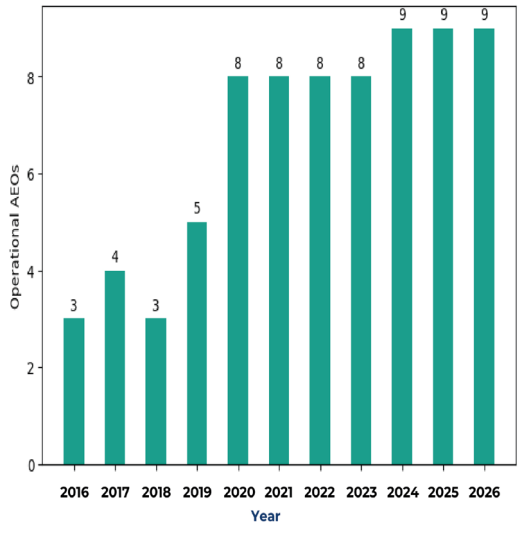


Figure 4: Trends in Eastern and Southern Africa (ESA) Operational AEO Programs



Source: https://aeo.wcoomd.org/ World Customs Organization 2024

3 *2021. Mutual Recognition Arrangement/Agreement Strategy Guide. World Customs Organization.*
4 *https://aeo.wcoomd.org/*
5 *World Customs Organization (WCO). (2023). Outcomes of the Survey on Reforms & Modernization in ESA.*



AEOs exists both at Regional and National level. Regional AEO programmes are designed to enhance trade facilitation and cooperation across multiple countries within a defined region such as a territory or Regional Economic Community (REC). This is aimed to promote and strengthen economic integration and increase efficiency in cross-border and international trade. National AEO programmes focus on benefits within a specific Country. Distinct differences for National and Regional AEOs are as shown in Table 1.

Table 1: Features of National and Regional AEOs

Aspect	National AEOs	Regional AEOs
Scope and Geographical Coverage	Specific to individual countries	Covers multiple countries within a region/ territory/ REC
Recognition and Mutual Recognition	Recognized at the National level	Mutual recognition among participating states within a region
Trade Facilitation and Benefits	Benefits confined to the National territory	Benefits extend to multiple countries within the region
Examples	National Authorized Economic Operator (NAEO) within a specific country	EAC AEO Programme
Objective	Enhance trade facilitation within a country	Promote efficiency and cooperation in cross-border and international trade within a region
Implementation	Implemented by individual Customs authorities in each country	Implemented through Customs co-operation and agreements among participating countries within a region

Regional Context: EAC Authorized Economic Operator Programme

The EAC was established in 2000 through the Treaty for the Establishment of the East African Community. The EAC is a regional bloc with 8 Partner States including Burundi, Kenya, Rwanda, South Sudan, Tanzania, Uganda, and the Democratic Republic of the Congo (DRC) and recently Somalia. The EAC is dedicated to achieving integration through a phased approach, beginning with a Customs Union in 2005, followed by the establishment of a Common Market in 2010.

Currently, the EAC is actively working towards the implementation of a Monetary Union by 2031. Committed to regional economic integration, the EAC has emerged as a prominent force in Africa, fostering collaboration and economic growth among its Partner States. The EAC's initiatives, including Customs Union and Common Market Protocols, aim to harmonize trade policies, reduce barriers, and promote the free movement of goods, services, people and factors of production. These efforts, guided by shared economic objectives, seek to create a seamless and dynamic business environment, enhancing competitiveness and fostering sustainable development.

The regional EAC AEO Programme was initiated in 2006 by the Commissioners of Customs from Burundi, Kenya, Rwanda, Tanzania, and Uganda, following the World Customs Organization (WCO) Council's adoption of the SAFE Framework of Standards in 2005. It operates by certifying businesses that meet specific compliance, security, and financial solvency criteria, granting them preferential treatment in customs procedures. The EAC AEO certified traders benefit from expedited clearance, reduced inspections, priority processing and mutual recognition across EAC Partner States- Burundi, Kenya, Rwanda, Tanzania and Uganda. South Sudan is at the commencement of AEO programme. An AEO certificate remains valid for three years, after which a compliance review is conducted.

Under the regional framework, the EAC AEO Programme promotes seamless trade by harmonizing customs procedures and fostering trust between customs administrations and the private sector. This reduces trade costs, enhances supply chain predictability, and improves competitiveness for businesses operating within the region. The programme remains valid as part of the EAC's broader trade facilitation strategy and aligns with international standards, including the World Customs Organization (WCO) SAFE Framework, ensuring continued relevance in promoting secure and efficient regional trade (EAC Secretariat, 2021; WCO, 2023). **To guide the implementation of the AEO regional Programme, the EAC Secretariat developed an AEO Standard Operating Procedure (SOP) Manual. This manual outlines the processes and procedures for the EAC AEO Programme as envisioned in the WCO SAFE Framework, including guidelines related to application, validation, approval, and post-authorization management of AEO status.**

Within the EAC AEO programme, the AEOs are identified with the Personal Identification Number (PIN) or with the Tax Identification Number (TIN) which are identifiers issued by the Revenue Authorities for tax purposes.





Container operations at the Port of Mombasa on 15 October 2026. Photo-TMA)

Rationale of the study

Despite the numerous benefits of the AEO programme both at national and regional level, its adoption has been slow, particularly among EAC Partner States compared to jurisdictions such as EU, China etc. Furthermore, there has been limited research on the impact of the programme since its inception. This study aims to analyze the status, challenges, impact and opportunities of EAC AEO Programme and the National AEO programmes for each Partner State for several reasons. The EAC is a dynamic regional economic bloc with significant potential for trade growth. However, the low adoption of the regional and national AEO programmes raises concerns about its effectiveness in enhancing trade facilitation and security.

By identifying the status, implementation challenges, impact and opportunities this study will provide critical insights to strengthen the regional and national AEO programme, promoting regional economic integration and improving customs processes and supply chain security across the EAC. Additionally, the findings will support more targeted and effective implementation at the regional and national level. The findings are essential for policymakers, ensuring its full potential is realized in fostering trade efficiency and economic growth within the region.

While existing research provides limited comparative assessment across Partner States this study goes beyond earlier AEO analyses by introducing a more comprehensive and updated analytical perspective. Specifically, the study utilizes recent EAC AEO dashboard to generate evidence-based insights on programme performance at regional and national level. It undertakes a comparative analysis of national AEO programmes alongside the EAC AEO programme. By combining quantitative performance data with institutional analysis, the study makes a new analytical contribution by moving beyond efficiency-focused evaluations toward understanding why implementation outcomes differ across countries and how regional coordination can strengthen the overall effectiveness of the EAC AEO programme.



Study Objectives

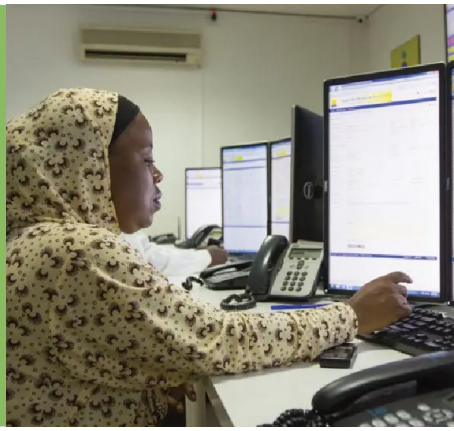
General Objective

This analytical study seeks to provide insights into the implementation of the EAC AEO Programme and the National AEO programmes in the EAC Partner States. It aims to identify the status, challenges, assess impact and explore opportunities at both regional and national levels, and to make recommendations for improving the uptake of the programme.

Specific objectives

Specifically, the study aims to achieve the following objectives:

I. To assess the status of the EAC AEO Programme and Partner States National AEO programmes;
II. To identify the key challenges and gaps in the EAC AEO Programme and Partner States National AEO programmes;
III. To assess the impact and identify specific areas for prioritized intervention of EAC AEO Programme and Partner States National AEO programmes;
IV. To identify opportunities for improving the EAC AEO Programme and Partner States National AEO programmes; and
V. To provide policy recommendations for the effective implementation of the EAC AEO Programme and Partner States National AEO programmes.



Organization of the report

This report begins with an introduction and background, outlining the significance of the AEO programme globally and within the EAC context. It sets the study objectives and outlines the report's structure.

The methodology section describes the approach, including desk reviews, secondary data analysis and stakeholder insights. Section 3 provides an in-depth analysis of the status of the regional and national AEO programme in the EAC. It first highlights key institutional and strategic developments at the regional level, followed by a detailed assessment of the EAC AEO Programme. It then presents the National AEO programme status for each Partner State, offering insights into progress.

Section 4 discusses the challenges and gaps facing both the EAC AEO Programme and National AEO programmes. Evidence is drawn from existing literature and interviews with Revenue Authorities, identifying operational, institutional, and policy-related constraints. Section 5 examines the impact and benefits of AEO accreditation across the five EAC Partner States, including its influence on clearance time, cost of doing business, trade value, revenue performance, and broader facilitation outcomes. Section 6 outlines opportunities to enhance the effectiveness of the EAC AEO Programme and the National AEO programmes for the partner states while presenting lessons learned from stakeholder perspectives.

These opportunities reflect areas where targeted interventions could strengthen uptake, performance, and sustainability. The report concludes with Section 7, which provides key lessons and a set of recommendations and conclusion of the findings.



Methodology

Desk Review and Secondary Data Collection

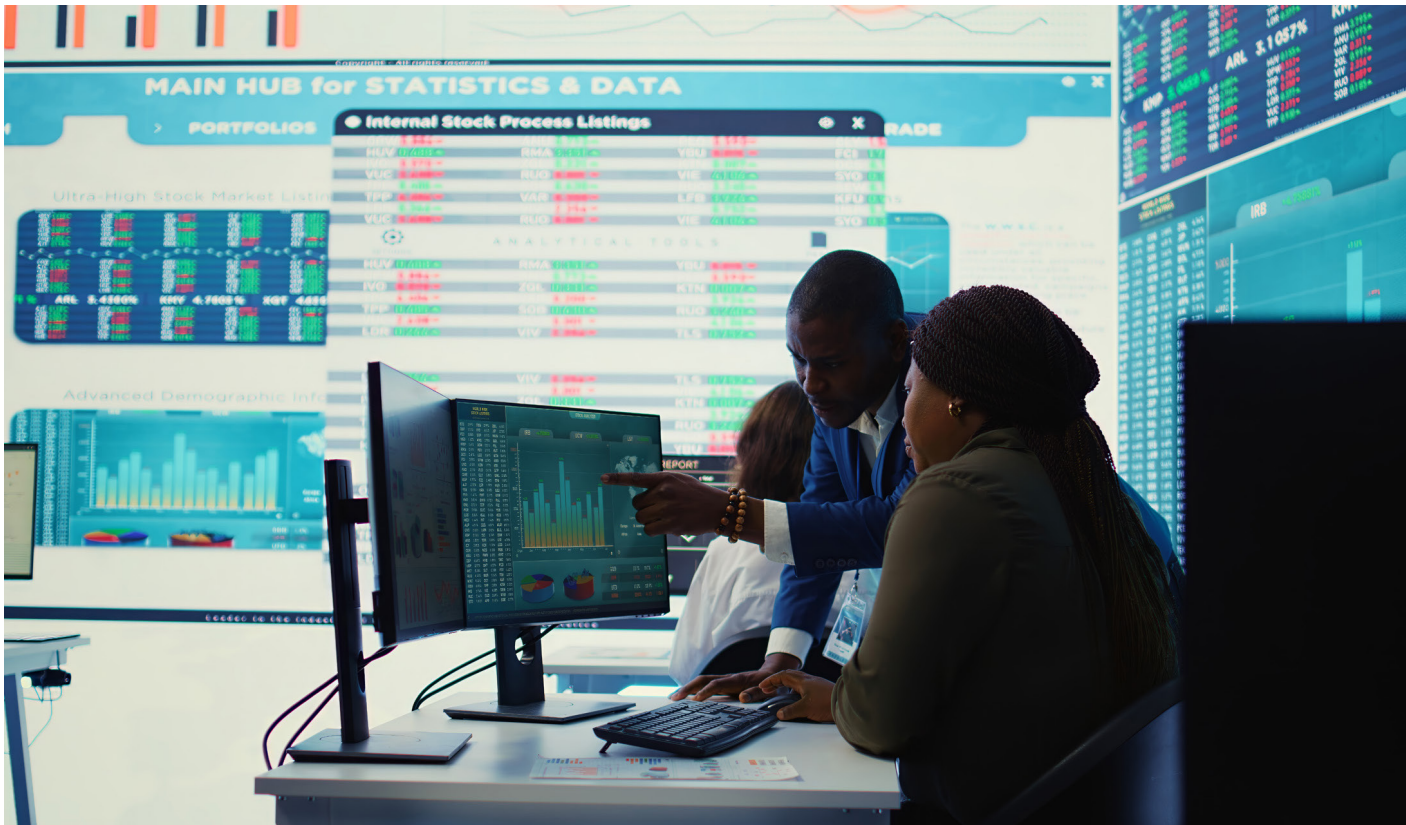
Desk review and secondary data collection was employed to unearth key concepts and the status of AEO programme globally, regionally and at national level. The desk review included conducting a comprehensive desk research and literature review on existing studies on AEO, reports and recent developments. Additionally, existing secondary data on EAC AEO Programme and NAEO programmes on recent developments and implementation status across EAC Partner States was analyzed to highlight trends in the number of AEOs in the five EAC Partner States.

Stakeholder engagement

The study began by identifying the core stakeholders involved in the EAC AEO Programme and respective NAEO programmes, focusing on institutions central to its implementation and day-to-day operations. Engagement efforts focused primarily on the EAC Secretariat, which oversees and manages the EAC AEO Programme framework.

In addition, the Revenue Authorities of five EAC Partner States Kenya, Uganda, Tanzania, Rwanda, and Burundi were contacted to provide information on both the EAC AEO Programme and their respective NAEO programmes. Data collection was carried out through online survey questionnaires structured around a 5-point Likert scale, targeting officials working directly with the AEO programmes within each Revenue Authority.

Respondents were requested to evaluate the EAC AEO Programme and their NAEO programmes by rating the challenges faced, the impacts realized, and the opportunities identified, as well as to share key lessons learned from implementation. EAC Secretariat provided latest dashboard data on AEO and recent developments on the regional AEO programme.



Limitations of the Study

The study faced limitations that should be considered when interpreting the findings. First, the scope of available data was largely confined to administrative information provided by customs authorities and AEO focal institutions and did not fully capture all programme implementers and beneficiaries along the supply chain, such as truck drivers, transport operators, and other logistics actors registered under the AEO framework. Second, there were uneven response levels across EAC Partner States, resulting in variations in data completeness and depth of analysis between countries.

In addition, the study relied significantly on self-reported programme data, whose quality and consistency varied depending on national reporting systems, documentation practices, and data verification mechanisms. These data gaps and quality differences limited the ability to undertake fully standardised cross-country comparisons and may underrepresent the broader operational and trade facilitation impacts of the AEO programme across the region.



Status of the AEO Programme in the EAC

Key Institutional and Strategic Developments in the EAC AEO Programme

The EAC AEO Programme has achieved substantial institutional and strategic milestones across the region providing a strong foundation for enhanced trade facilitation and regional integration. Ongoing discussions for MRAs with India aim to extend reciprocal benefits to accredited operators, facilitating cross-border trade and aligning the programme with international standards. These agreements are expected to expand the reach and benefits of the AEO programme once finalized.

The EAC AEO Programme, with support from TradeMark Africa (TMA), has also developed and piloted a comprehensive AEO automation system to enhance operational efficiency and transparency. The system is awaiting deployment and is expected to reduce cargo clearance times and administrative burdens, improving efficiency for both traders and revenue authorities. To further enhance private sector involvement, an AEO Association is being established, supported by a Regional Consultative Group and an Executive Committee to guide the process. These initiatives aim to institutionalize private sector engagement, promote knowledge sharing, and strengthen ownership of the Programme.

Additionally, EAC-led visibility and advocacy campaigns have complemented these efforts, increasing stakeholder awareness and encouraging broader uptake of the programme. Sensitization efforts for other government agencies have also been conducted, alongside the development of interagency cooperation guidelines and the incorporation of criteria for Partner Government Agencies (PGAs).



Further, several critical Programme frameworks have been developed and are awaiting funding for implementation. These include the interagency cooperation guidelines to foster coordinated border management, the MSME inclusion framework to expand programme accessibility to micro, small and medium enterprises and women; and the proposed EAC AEO Association framework designed to institutionalise private sector engagement and promote programme self-management and ownership.

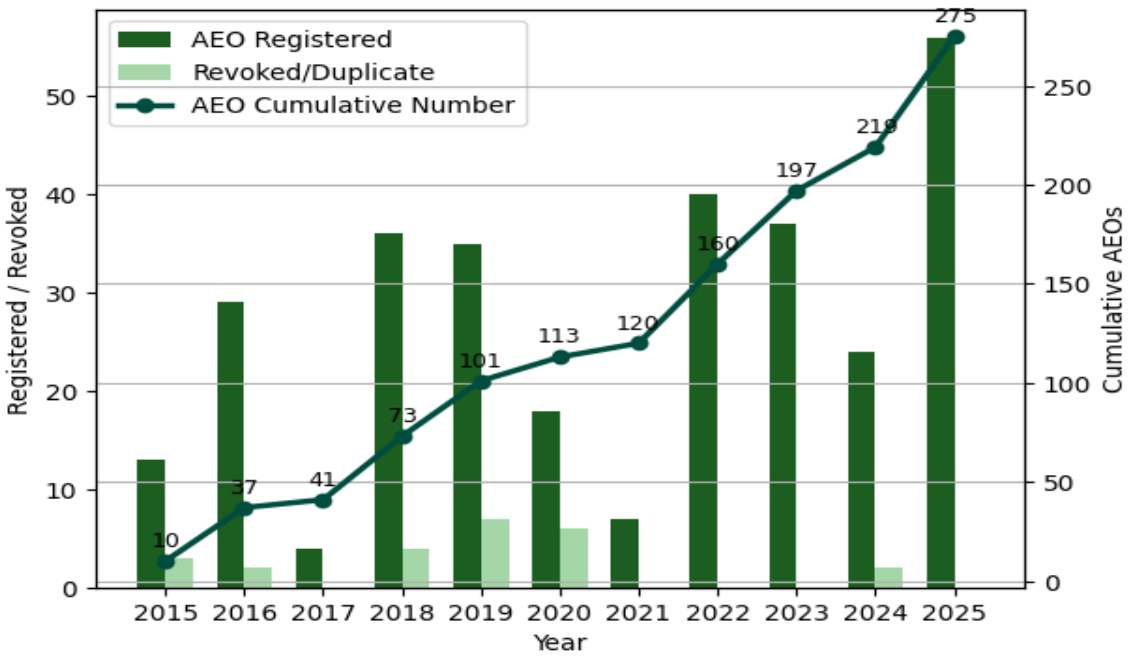
Overview of the EAC AEO Programme

The growth of the EAC AEO Programme between 2015 and 2025 reflects a clear progression from initial programme introduction to institutional maturity. Analysis of registration trends shows that expansion occurred alongside strengthening customs systems, increasing private sector confidence, and improved compliance management rather than through rapid growth alone. During the **pilot phase (2015–2017)**, the programme focused on establishing the AEO framework and testing certification procedures. Private sector participation remained limited as customs authorities refined operational processes and compliance requirements. AEO participation increased from 13 operators in 2015 to a cumulative 41 by 2017, with early revocations reflecting system calibration and institutional learning.

The **institutionalization phase (2018–2020)** marked consolidation of the programme within customs operations. Formal procedures became embedded, stakeholder engagement improved, and trader confidence strengthened. Cumulative AEO numbers expanded significantly from 73 in 2018 to 113 by 2020, demonstrating the programme's transition from a pilot initiative into an operational trade facilitation tool.

Between **2021 and 2023**, the programme entered a **digitalisation and expansion phase**, supported by integration with risk management systems and automation of clearance processes. Improved monitoring enhanced programme credibility, enabling accelerated growth from 120 AEOs in 2021 to 197 in 2023, while minimal revocations indicated stronger compliance screening. As of October 2025, the AEO Programme reached **external recognition and maturity**, achieving 275 active operators and recording the highest annual registration increase. Stable participation levels and very low revocations demonstrate a mature trusted trader scheme aligned with international best practice and positioned to support regional cooperation and Mutual Recognition Agreements

Figure 5: Growth in EAC AEO Certifications (2015–2025)



Source: EAC AEO Dashboard 2025

Figure 6: Evolution of the EAC AEO Programme Maturity Pathway (2015–2025)

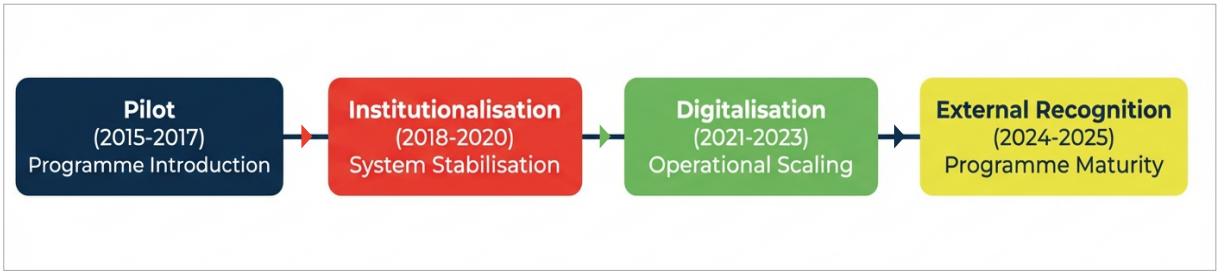
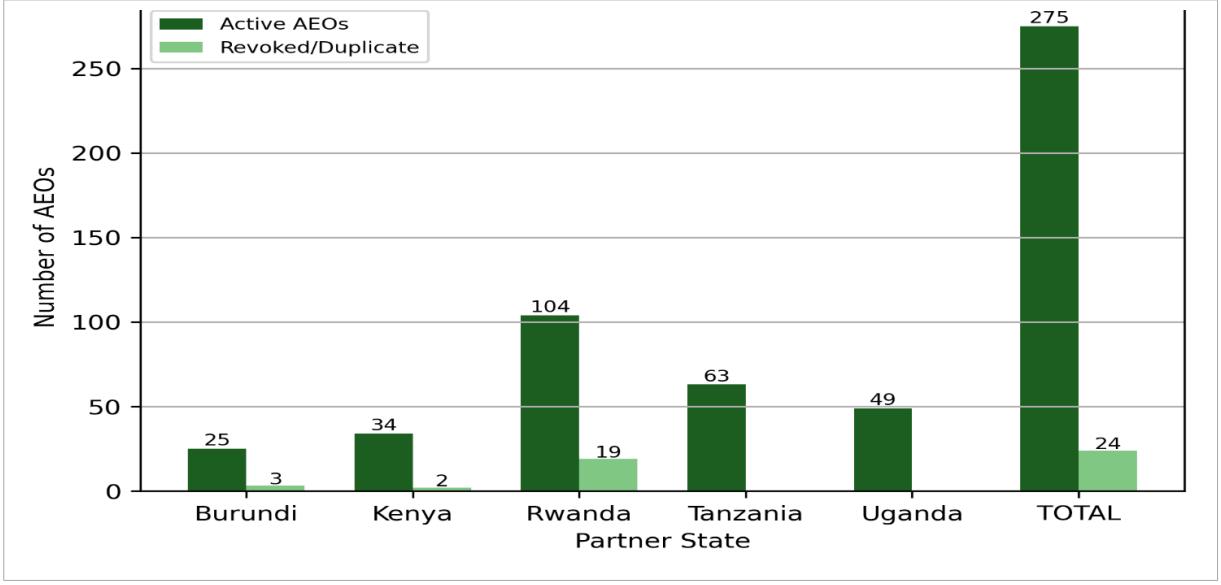


Figure 7 illustrates the distribution of regional EAC AEOs across the five EAC Partner States highlighting variations in programme uptake as well as certification integrity across countries. Rwanda records the highest participation, with 104 active regional AEOs alongside 19 revoked or duplicate certifications. The high number of active operators reflects strong programme institutionalisation and private sector engagement, while the relatively higher revocation figures may indicate rigorous compliance monitoring and periodic system cleansing as the programme expanded rapidly.

In Tanzania, the programme shows steady growth with 63 active regional AEOs and no recorded revocations, suggesting stable implementation and effective pre-certification screening processes that ensure sustained compliance among participating traders. Uganda similarly demonstrates consistent programme performance, registering 49 active regional AEOs with no revoked certifications. This indicates strong compliance management and effective collaboration between customs authorities and the private sector, contributing to programme stability. Kenya has 34 active regional AEOs and 2 revoked or duplicate cases while Burundi has 25 active regional AEOs and 3 revoked or duplicate certifications.

Figure 7: Regional EAC AEOs by Category by Country



Source: EAC AEO Dashboard 2025



Women traders crossing the Busia border. File photo-TMA.

Analysis by category reveals that importers and exporters form most accredited operators, making up 66.3% of all regional AEOs. Customs brokers accounts for 29.3%, indicating substantial engagement among clearing and forwarding agents. Logistics-sector actors account for a very small share, with transporters at 4.1% and warehouse operators at 0.4%, revealing limited participation from downstream supply-chain players and highlighting areas where further engagement and capacity building may be required.

Country-level profiles show additional differences in programme uptake. In Burundi, regional AEOs are divided between importers/exporters (62.5%) and customs brokers (37.5%), with no representation from transport or warehousing. Kenya distribution is concentrated among importers/exporters (52.9%) and customs brokers (41.2%) while transporters account for 5.9%. Similarly, Rwanda's regional AEOs is concentrated among importers/exporters (81.4%), while customs brokers represent 17.5% and transporters 1%. Tanzania has the most diverse profile, with 56.5% importers/exporters, 26.1% brokers, 15.2% transporters, and a small share of warehouse operators (2.2%). Uganda's structure consists of 55.6% importers/exporters and 44.4% customs brokers with none under warehouse operators or transporters.

Overall, the current distribution suggests that while the Regional EAC AEO Programme has successfully secured uptake among core trade actors, there remains significant potential to broaden participation across the logistics value chain to maximise end-to-end supply chain security and trade facilitation benefits.

Table 2: Distribution of Regional AEOs by Category and Country in the EAC AEO Programme

AEO Profile	Burundi	Kenya	Rwanda	Tanzania	Uganda	Regional Total
Importers / Exporters	62.5%	52.9%	81.4%	56.5%	55.6%	66.3%
Customs Brokers	37.5%	41.2%	17.5%	26.1%	44.4%	29.3%
Warehouse Operators	0.0%	0.0%	0.0%	2.2%	0.0%	0.4%
Transporters	0.0%	5.9%	1.0%	15.2%	0.0%	4.1%

Source: EAC AEO Dashboard 2025

Other EAC Partner States such as South Sudan has started activities relating to joining the AEO programme. A readiness assessment has been undertaken with support from development partners which evaluated the institutional, legal, procedural, human resource, and ICT capacity of the South Sudan Revenue Authority to implement a national AEO scheme aligned with the EAC regional AEO Framework and the WCO SAFE Framework of Standards. While these partner states were not member states when the EAC AEO programme began, their membership allows them to join the initiative.

In comparison, the Southern African Customs Union (SACU) Regional AEO programme has shown substantial progress across its five member states, with the number of accredited operators rising to 531 according to the 2023/24 Integrated Annual Report. South Africa remains the most advanced, being the only SACU country to secure Mutual Recognition Arrangements (MRAs) with the United States, the United Kingdom, and India.

In contrast, COMESA regional AEO programme is still at initial stages compared to the EAC and SACU regions.As of September 2021, the AEO Programme had been rolled out in 14 Member States including Burundi, Eswatini, Egypt, Ethiopia, Kenya, Malawi, Mauritius, Rwanda, Sudan, Tunisia, Madagascar, Uganda, Zambia and Zimbabwe according to COMESA Annual Report 2021.

Box 1: Factors Explaining Variations in AEO Uptake Across EAC Partner States

i. Institutional Capacity
Differences in customs administrative capacity, programme maturity, and implementation readiness influence AEO uptake across Partner States.

ii. National Incentive Structures
Variations in the scope and practical application of AEO privileges affect the perceived value of certification to traders.

iii. Integration of Partner Government Agencies (PGAs)
Levels of coordination and integration of regulatory agencies beyond customs determine whether AEO benefits are consistently recognised across the border management system.

iv. ICT Systems and Operational Alignment
Inconsistent transmission and display of AEO identifiers across national systems can limit automatic recognition of certified operators and reduce programme effectiveness.

v. Trader Awareness and Private Sector Engagement
Differences in outreach programmes, awareness creation, and stakeholder engagement influence private sector participation in the AEO programme.



Internationalisation of the EAC AEO Programme through Mutual Recognition Arrangements

The EAC is progressively advancing the internationalisation of its AEO Programme through the pursuit of Mutual Recognition Agreements (MRAs) with key global trading partners aimed at extending trusted trader benefits beyond the regional market. In this regard, the EAC Secretariat has operationalised Joint Action Plans with both India and China to facilitate mutual recognition of AEO programmes and strengthen secure and efficient cross-border trade.

Negotiations with the Central Board of Indirect Taxes and Customs (CBIC) of India have reached an advanced stage, with the draft EAC–India AEO MRA text adopted by the Sectoral Committee on Customs and technical negotiations successfully concluded. Following consultations with Partner States, the absence of further comments enabled the Committee to authorize the Secretariat to proceed toward formalisation and signature of the arrangement. Once concluded, the EAC–India MRA is expected to significantly enhance market access opportunities for certified regional traders by granting reciprocal facilitation benefits in one of the EAC's major external trading partners.

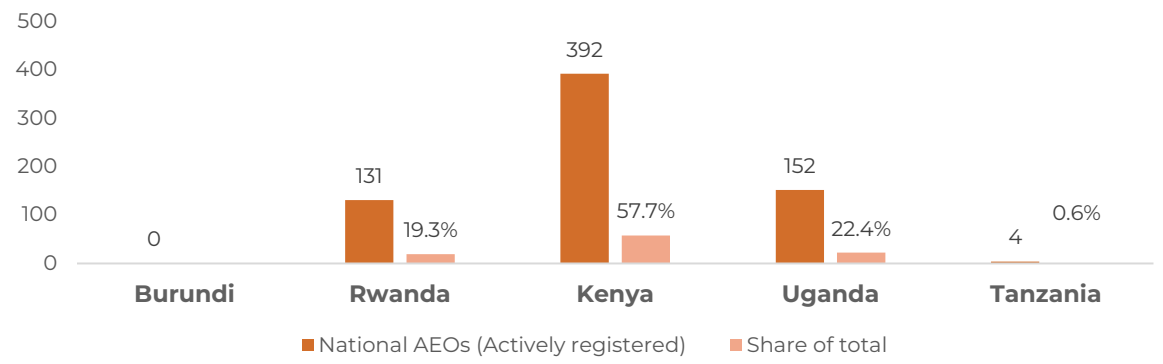
Parallel progress has been made toward an AEO MRA with China, where continued technical engagement and validation processes are underway, including joint working group discussions and planned on-site validation missions. These developments demonstrate the EAC's strategic shift from a purely regional trusted trader framework toward global integration of its AEO scheme.

National AEO Programmes Across EAC Partner States

The data on actively registered National AEOs across the EAC Partner States reveals significant disparities in participation levels of the national programme among the countries (Figure 8). According to these findings, a total of 679 NAEOs exist across the five Partner States. Kenya has the highest number of accredited NAEO operators, accounting for 57.7% of the total number of registered NAEOs, indicating a strong commitment to enhancing trade facilitation and compliance with customs regulations at national level. Uganda also has a high number of NAEOs accounting for 23.1% of the total NAEOs in the five countries. Rwanda has 131 NAEOs, constituting 19.9% while Tanzania has only 4 registered NAEOs, making up only 0.6% of the total, which highlights challenges in its engagement with the AEO programme at national level. Notably, Burundi has no registered NAEOs. This indicates that regional integration efforts may be advancing faster in Tanzania and Burundi than domestic programme establishment.



Figure 8: Distribution of National AEOs across the EAC partner states



Source: Survey data 2024

A comparative assessment across the EAC Partner States reveals distinct cross-country patterns in the development of national AEO programmes. Countries with earlier programme institutionalisation and stronger customs administrative capacity, particularly Kenya and Uganda, demonstrate higher participation levels and more diversified operator categories, reflecting deeper integration of the AEO framework into national trade facilitation systems. Rwanda shows steady programme expansion supported by consistent implementation, although its international engagement relies mainly on regional recognition rather than bilateral MRAs. In contrast, Tanzania and Burundi exhibit limited national uptake despite participation in regional AEO arrangements, suggesting that regional integration initiatives may, in some cases, be progressing faster than domestic programme operationalisation. Overall, the comparison highlights uneven institutional readiness across Partner States, indicating that while the EAC AEO framework is regionally established, national implementation maturity remains differentiated across countries.

A broader African comparison shows that despite internal disparities, the region still performs relatively well in expanding national AEO programmes. Several countries in the ESA region including Botswana, Eswatini, Lesotho, Malawi, Mozambique, Namibia, and Zimbabwe continue to exhibit low levels of national AEO programme maturity, according to the WCO AEO Compendium. However, some African countries such as Morocco are advancing more rapidly, with 681 companies holding AEO status as of 2024. Globally, even more mature programmes exist, such as Turkey's, which has accredited 709 AEO entities.



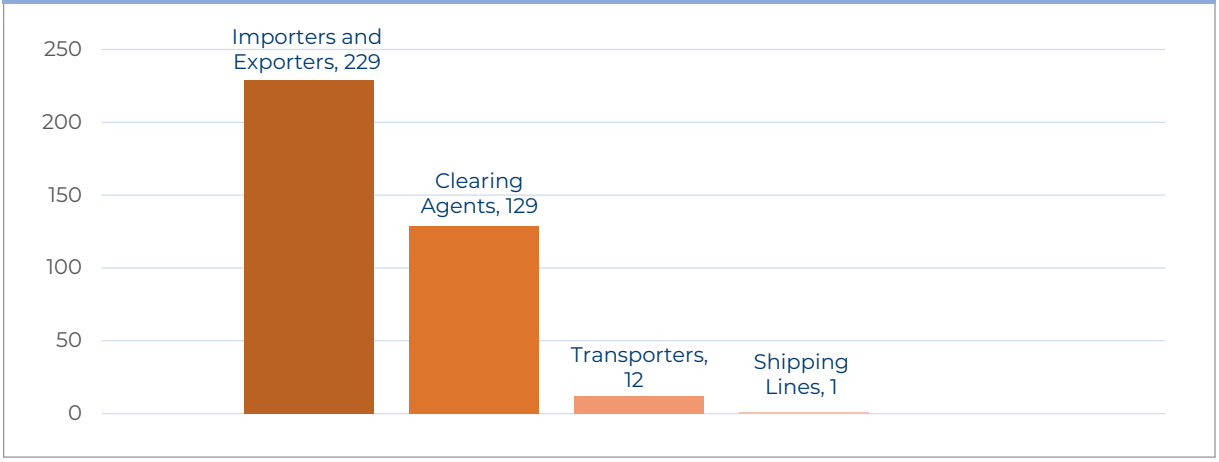
A Uganda Revenue Authority officer explaining the Regional Electronic Cargo Tracking System for monitoring logistics along the Northern Corridor. Photo-TMA.

Kenya National AEO Programme

The Kenya NAEO framework boosts trade facilitation of AEOs in Kenya. Initiated in 2007 as a pilot project in Kenya, the NAEO Programme started with the participation of 11 companies. The programme was then rolled out in 2010 which saw many other compliant businesses onboarded. Currently overseen by the Kenya Revenue Authority (KRA), the AEO Programme operates under the Customs and Border Control (C&BC) Department within the Trade Facilitation Division. The Kenya AEO programme is being implemented by Customs and is looking into enhancing this by engaging with Partner Government Agencies (PGAs) and other members of the National Trade Facilitation Committee (NTFC) by forming working groups with a view to develop a common framework for joint recognition of AEOs by other government agencies.

According to the study findings, Kenya had accredited 371 national AEOs, representing an approximately 8% increase compared to 2023. Among the NAEOs, 229 are importers and exporters, 129 are clearing agents, 12 are transporters and 1 is a shipping line company (Figure 9). There are no operators in the category of manufactures and warehouses. Regarding Mutual Recognition Agreements (MRAs), South Africa has initiated negotiations for an MRA with Kenya, though it has not yet been signed.

Figure 9: Number of National AEOs by category in Kenya



Source: Survey 2024 and KRA website

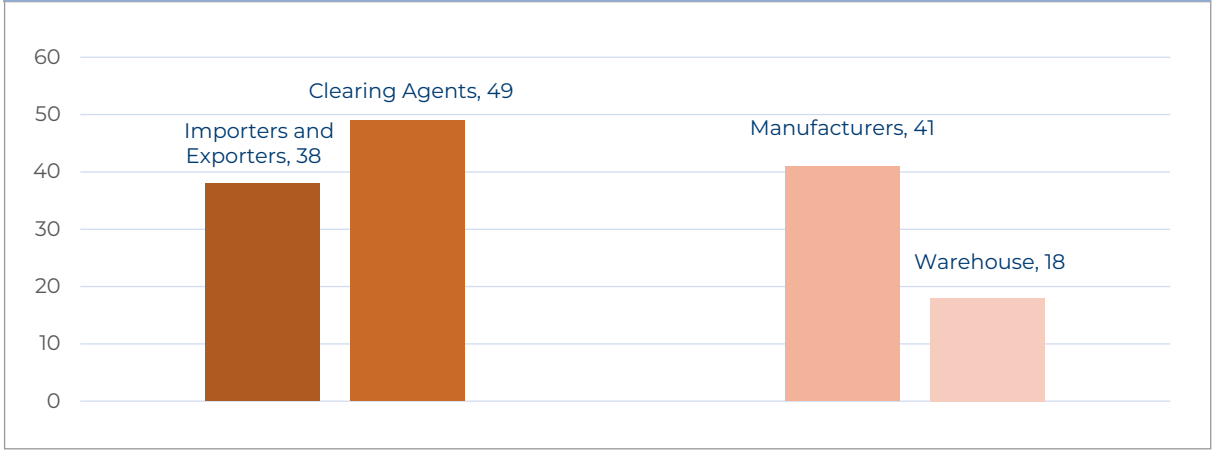


Regional Electronic Cargo Tracking System (RECTS) monitoring centre at the Kenya Revenue Authority HQ in Nairobi in 2022. Photo-TMA.

Uganda AEO Programme

In Uganda, the NAEO programme commenced in 2008 with an initial pilot involving 10 operators and was formally institutionalised in 2013. Currently, Uganda has 152 actively registered NAEOs according to the insights from the Uganda Revenue Authority (Figure 10). In contrast to Kenya, where importers and exporters dominate the NAEO, Uganda has a different distribution of categories. Clearing agents lead with 49 AEOs, followed by manufacturers with 41 AEOs. Additionally, there are 38 AEOs in the importers and exporters category and 18 in the warehouse category. Notably, there are no registered NAEOs in the transporters and shipping line categories. Uganda is advancing Mutual Recognition Agreements (MRAs) for its AEO programme as part of broader regional and international trade facilitation efforts. To date, operational agreements have been concluded with South Africa and China, while discussions toward a bilateral MRA with India are ongoing.

Figure 10: Number of AEOs by Category in Uganda



Source: Survey 2024

Tanzania AEO Programme

Tanzania Revenue Authority (TRA) NAEO programme started in 2008 and from 2019 onwards, gained more importance. According to TRA as of March 2025, Tanzania currently has only four registered NAEOs. Of these, two are importers, while the remaining two are bonded warehouse operators (Figure 11). Unlike other Partner states, Tanzania has more registered AEOs under the EAC AEO programme compared to NAEOs. This implies possible challenges at implementing the programme at national level. Tanzania currently has no MRAs that have been initiated or are in progress.

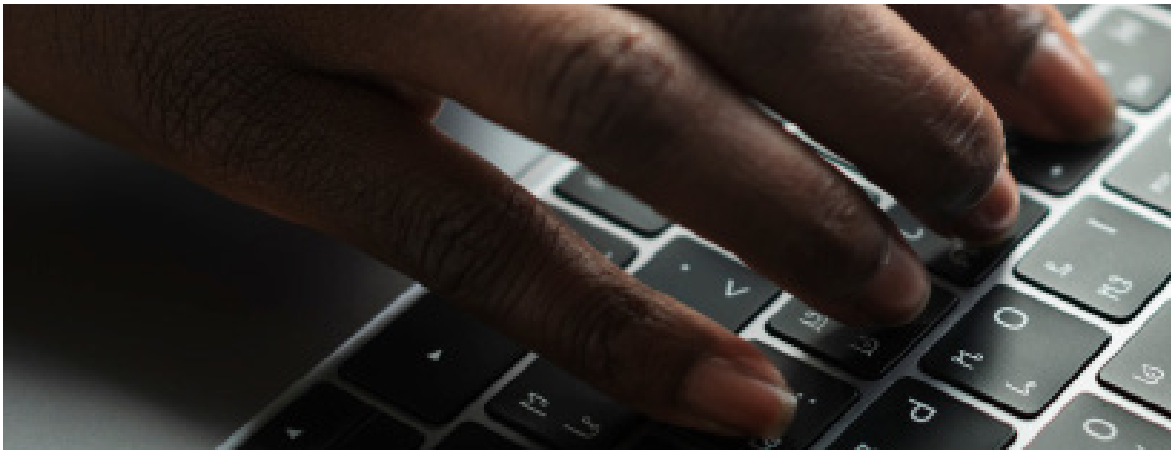


Figure 11: Number of AEOs by Category in Tanzania

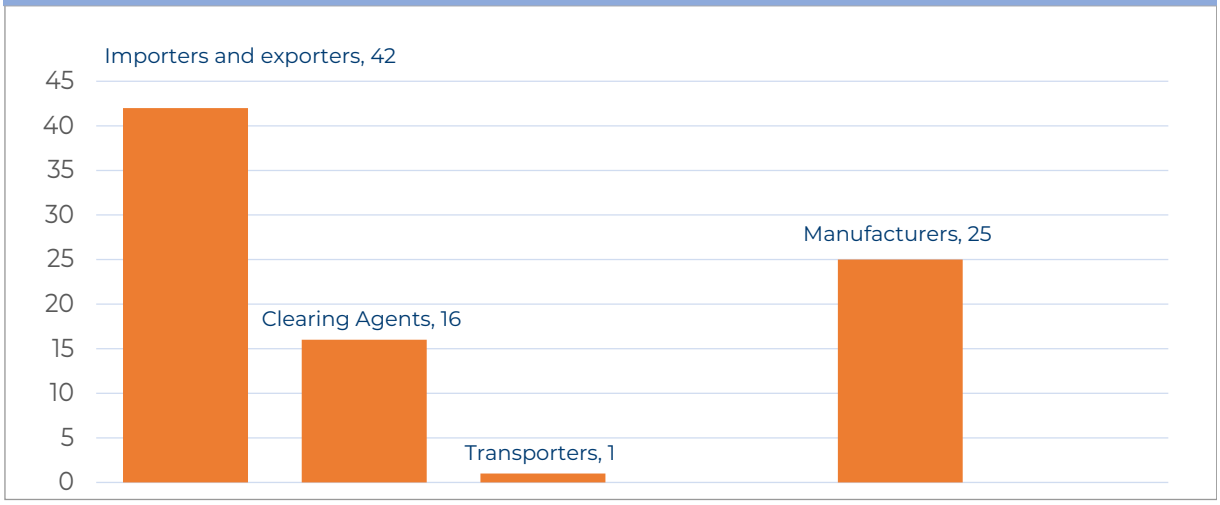


Source: Survey 2024 and TRA

Rwanda AEO Programme

Rwanda completed the full implementation of the NAEO Programme in 2016. In 2023, Rwanda had a total of 124 NAEOs. The current study reveals that the total number of registered NAEOs in Rwanda has increased to 131 in 2024. Most of the NAEOs are categorized as importers and exporters (42) and manufacturers (25), clearing agents (16) while transporters consist of just 1 (Figure 12). Rwanda does not currently have standalone bilateral Mutual Recognition Agreements (MRAs) under its national AEO programme and currently relies on the regional mutual recognition within the EAC.

Figure 12: Number of AEOs by Category in Rwanda



Source: Survey 2024

Burundi AEO Programme

Currently, Burundi does not have any NAEOs as reported from the findings of this survey. It has established a National AEO (NAEO) Programme, but it is not yet operational in terms of accredited operators. This indicates a significant participation at the Regional level with no NAEOs. However, the country has made significant strides in MRA, with Burundi recently signing an AEO mutual recognition agreement with China in May 2024[6].



A truck holding yard at the Kobero border in Burundi with Tanzania (Kabanga) in April 2024. Photo-TMA.

6 *6th World Customs Organization (WCO) Global Authorized Economic Operator (AEO) Conference*



An aerial view of the Port of Dar es Salaam, Tanzania. Photo-TMA.

Challenges and Gaps of the EAC AEO and National AEO Programmes

Evidence from Existing Literature

Challenges affecting the EAC AEO programme

The implementation of the EAC AEO programme is a commendable initiative aimed at streamlining customs procedures and fostering efficient cross-border trade. However, this initiative is not without its share of challenges. In 2021, the Federation of the East African Freight Forwarders Association (FEAFFA) conducted a comprehensive study on factors for slow uptake of the EAC AEO programme. The study highlights several impediments to the programme's success among the private sector players as follows:

Operational Challenges

EAC Partner States operate within diverse regulatory frameworks and maintain differing capacities, which create obstacles to the harmonized adoption of AEO standards. The programme also faces complex and time-consuming application processes that lack predictable guarantees of accreditation. Limited resources, poor collaboration among implementing agencies, and inadequate training materials further slows down operational efficiency.

Institutional Challenges

The EAC AEO programme experiences limited recognition beyond customs and, in some countries, the Bureau of Standards. Weak cross-border cooperation, concerns about information-sharing, and a perceived lack of transparency undermine institutional trust. Furthermore, the absence of harmonized and standardized application and accreditation procedures across EAC Partner States contributes to inconsistent implementation and hinders regional uniformity. Also, the absence of dedicated AEO sections within customs departments in some Partners States leads to weakened programme implementation, resulting in inconsistent delivery of benefits and unclear points of contact for businesses.

Private Sector Perceptions and Awareness Gaps

The FEAFFA study further revealed that businesses often perceive the regional AEO programme benefits to be unclear and insufficient. The lack of awareness, inadequate sensitization, and insufficient communication on the value proposition of AEO status have discouraged private-sector participation. Fear of exposure, doubts about fairness, and a perception that the process offers low value for money continue to undermine confidence among operators.

Technological Challenges

Variations in technological infrastructure across Partner States limit the ability to implement uniform digital systems and information-sharing frameworks. These technological disparities hinder seamless data exchange, validation, and coordinated risk-management processes that are essential for a harmonised regional AEO programme.

Inclusion of MSMEs

MSMEs, which make up the bulk of the region's trading community, face unique barriers. Many struggle to meet the high compliance standards set by customs, are cost-disadvantaged, and lack the resources required to complete the application process. As a result, smaller operators often feel excluded from the programme. Their limited participation significantly contributes to the overall low uptake of the AEO programme.



Rwanda's fresh produce enterprises seek new export markets. Photo-Courtesy.

Challenges Affecting National AEO Programmes

Existing literature highlight persistent operational, institutional, and awareness-related barriers that continue to affect national AEO programmes uptake and effectiveness. The table below summarizes the key issues identified for each Partner State.

Table 3: Summary of National AEO Programmme Challenges by Partner State

Partner State	Key Challenges
Kenya	i. Lack of awareness and sensitization (especially among traders)[7] ii. AEO benefits not fully implemented or consistently applied iii. Limited capacity and staffing at border points iv. Low recognition by Partner Government Agencies (PGAs) v. High compliance and operational costs vi. Delays and inefficiencies during border processes vii. Heavy penalties
Uganda	i. High degree of informality experienced in the country [8] ii. Skepticism on programme benefits among firms. iii. Inadequate staff at Customs areas, reducing operational speed iv. URA officers at Uganda's border points fail to recognize AEOs. v. Limited availability of benefits: bond guarantee waiver unavailable, AEO benefits not extended to other Partner Government Agencies (e.g., Bureau of Standards, National Drug Authority, Immigration)
Tanzania	i. Low participation due to clearing agents' challenges in obtaining/retaining accreditation ii. Lack of awareness and understanding of AEO benefits iii. High costs of accreditation (time, financial investment, technology) iv. Ongoing compliance requirements (audits, technology upgrades, training)



7 Analytical Report on Implementation of Pre-Arrival Processing (PAP) & AEO Programmes in Kenya. Shippers Council of Eastern Africa (SCEA), 2022. Available at: /mnt/data/Final-Analytical-PAP-AEO-Report-1.pdf.
8 N. Nergiz Dincer† and Ayça Tekin-Koru‡ November 2018

Challenges Identified Through Interviews with Revenue Authorities

Stakeholders' perspectives are crucial for understanding the challenges of the regional and national AEO programmes across EAC Partners States. To gather these insights, views were sought from officials of relevant authorities and agencies. Specifically, input was sought from National Revenue Authorities of Kenya, Uganda, Tanzania, Rwanda and Burundi. Respondents were asked to rank various key challenges in the implementation of the EAC AEO programme and their National AEO programmes. The summary of these rankings is presented in Table 5 and 6.

Across the five EAC Partner States, compliance requirements emerge as the most significant cross-cutting challenge affecting implementation of the EAC AEO Programme, particularly relating to documentation demands, eligibility criteria, and ongoing audit obligations. While the programme is operational regionally, the administrative burden associated with meeting accreditation standards - especially pronounced in Tanzania and evident to some extent in Rwanda, Kenya and Uganda - continues to limit broader participation, particularly among MSMEs. The length of accreditation processes and uneven awareness levels further constrain uptake, while concerns regarding inconsistent realization of benefits at border crossings affect trader perceptions of programme value. In contrast, high operational costs and lack of harmonization were generally viewed as less critical challenges.

Other highlighted primary obstacles preventing effective implementation and uptake of EAC AEO programme include inadequate development of border infrastructure which is not aligned with the implementation of the regional programme, resulting in a lack of special lanes or other facilities at borders dedicated to AEOs. Overall, the findings indicate that the main constraint facing the EAC AEO Programme is operational accessibility rather than policy design.

Table 4: Assessment of EAC AEO programme challenges across EAC Partner States

Challenges	Burundi	Rwanda	Kenya	Uganda	Tanzania
Lack of harmonization and standardization	To no extent	To little extent	To little extent	To some extent	To some extent
Time (Lengthy process - audit, onboarding, accreditation)	To some extent	To little extent	To some extent	To some extent	To little extent
Compliance (Requirements, documentation, minimum criteria etc)	To little extent	To some extent	To some extent	To some extent	To a very large extent
Lack of awareness by public and private sectors	To no extent	To little extent	To little extent	To some extent	To a large extent
High operational costs	To no extent	To little extent	To little extent	To little extent	To no extent
Heavy penalties and the perception of minimal benefits at border crossings	To no extent	To little extent	To a large extent	To some extent	To some extent

Source: Survey 2024

The findings on the Partner States NAEO programme challenges reveal that lengthy processes, including audits, onboarding, and accreditation, are a shared key challenge in Kenya, Uganda and Tanzania, while Rwanda experiences relatively efficient procedures of their NAEO programme. Compliance requirements, such as documentation and meeting minimum criteria, present significant hurdles in Tanzania, Kenya, and Uganda. Inclusion of MSMEs remains a major challenge in Kenya, whereas Rwanda has made progress in integrating smaller enterprises. Additionally, awareness gaps among public and private sector stakeholders are notable in Tanzania but are relatively low in Rwanda and Kenya. Cooperation with Partner Government Agencies (PGAs) is inconsistent across the region, with Kenya and Uganda reporting the greatest difficulties, while Rwanda and Tanzania experience minimal challenges.

National AEO programmes also faces other challenges including issues related to the benefits versus exposure to tax administration. Some individuals suspect that the programme is a strategy by the revenue authority to gather information and hence lack of trust about the programme. Further complicating matters are the lack of funds from the budget and the programme not being established as a standalone section under Customs

Table 5: Assessment of National AEO programme challenges across each EAC Partner States

Challenges	Rwanda	Kenya	Uganda	Tanzania
Time (Lengthy process - audit, on-boarding, accreditation)	To little extent	To some extent	To some extent	To some extent
Compliance (Requirements, documentation, minimum criteria etc)	To little extent	To little extent	To some extent	To a very large extent
Lack of awareness by public and private sectors	To little extent	To little extent	To some extent	To a large extent
High operational costs	To no extent	To some extent	To little extent	To no extent
Lack of inclusion of MSMEs	To some extent	To a large extent	To little extent	To some extent
Lack of cooperation and mutual agreements with PGAs	To little extent	To some extent	To some extent	To little extent

Source: Survey 2024



Table 6: Comparative Challenges in EAC AEO Programme and National AEO Programmes

Category of Challenge	EAC AEO Regional Programme Challenges	National AEO Programme Challenges
1. Lengthy Audit, Onboarding & Accreditation Processes	A major challenge in Burundi; moderate in Kenya, Uganda, and Rwanda; minor in Tanzania. Slows regional implementation efficiency.	Shared challenge in Kenya, Uganda and Tanzania. Rwanda experiences relatively efficient processes.
2. Compliance Requirements (Documentation, Minimum Criteria, etc.)	Consistent challenge across countries. Most severe in Tanzania, Kenya, Uganda, and Rwanda; less significant in Burundi.	Significant burden in Tanzania, Kenya, and Uganda. Rwanda manages them more efficiently.
3. Awareness Gaps Among Stakeholders	Major in Tanzania; moderate in Uganda; minor in Kenya and Rwanda; no significant challenge in Burundi.	Notable in Tanzania. Less of a challenge in Rwanda and Kenya
4. Lack of Harmonization & Standardization	Reported to some extent in Kenya, Uganda, and Tanzania. Rwanda experiences limited challenges; Burundi reports none.	Not explicitly highlighted as a major national issue but inferred through inconsistent implementation practices across PGAs and borders.
5. Heavy Penalties & Perceived Low Benefits at Borders	Most severe in Kenya; moderate in Uganda and Tanzania; minor in Rwanda; insignificant in Burundi.	Major concern in Kenya and moderate in Uganda, where inconsistent recognition of AEO benefits at borders affects trader confidence. Minimal concern reported in Rwanda and Tanzania.
6. High Operational Costs	Generally a minor regional constraint. Low-level concern in Rwanda, Kenya and Uganda; not considered significant in Burundi and Tanzania.	Costs are a challenge especially for MSMEs in Kenya and Burundi; Rwanda reports minimal operational cost constraints.
7. Inclusion of MSMEs	Major regional challenge as MSMEs struggle to meet compliance standards, certification costs and administrative requirements.	Major national challenge in Kenya and Burundi. Rwanda performs better by integrating MSMEs more effectively.
8. Cooperation With Partner Government Agencies (PGAs)	Major regional institutional challenge due to limited recognition by Partner Government Agencies and weak cross-border cooperation mechanisms	Inconsistent across the region. Burundi reports the greatest difficulty; Tanzania and Kenya face moderate issues; Rwanda reports minimal challenges.

The above challenges reflect broader patterns across EAC region. Lessons from other regions can provide guidance for addressing these issues. For instance, SADC and COMESA have established regional frameworks and training programmes to harmonize AEO procedures and build capacity among customs staff. ASEAN has implemented MRAs to facilitate consistent treatment of certified operators across member states. The EU has dedicated AEO units within national customs, standardized procedures, and robust IT systems to streamline accreditation, improve compliance management, and enhance communication with businesses. Adopting similar mechanisms in the EAC such as regional standardization, dedicated AEO units, capacity building, and awareness campaigns could strengthen programme institutionalization, ensure consistent delivery of benefits, and support broader participation, including MSMEs.

Impact and Benefits of AEO Programmes in the EAC

Evidence from Literature on the Impact of AEO Accreditation

The impact of the AEO programme is substantial, particularly in enhancing trade facilitation and reducing costs. In 2020, AEOs accounted for 74% of total imports and 83% of total exports within the EU, highlighting their critical role in facilitating international trade[9]. In Turkey, AEO-accredited firms benefit significantly from expedited customs processes, achieving an average duration of customs clearance within the same day, compared to 7 to 15 days for non-AEO firms. Additionally, firms with AEO status report noteworthy business results, including a 65.87% reduction in bonded storage costs, 24.4% overall savings in logistics costs, an 11.7% improvement in inventory turnover rates, and a 6.2% enhancement in overall inventory management[10].

A diagnostic study showed that companies participating in AEO programme saved between 100 to $400 per consignment. Given that these companies handled over 10,000 consignments per month, the total estimated savings ranged between 1 and 4 million US dollars monthly[11]. This demonstrates the programme's effectiveness in reducing trade costs and enhancing efficiency, setting a strong foundation for the expansion of the AEO initiative across the region.

In 2017, EAC AEO accredited companies accounted for approximately 5.6% of all transactions within the EAC in terms of value, translating to an estimated 1 billion US dollars per month[12]. By 2018, the program experienced notable achievements increasing AEO participation to nearly 9% of regional trade, equivalent to 12 billion USD per year in trade volume according to the World Customs Organization reports. Additionally, AEOs contributed approximately 10% of total customs revenue, highlighting their critical role in trade facilitation[13]. The programme also resulted in significant time and cost reductions, benefiting businesses by improving Customs-Business relations and contributing to job creation.

Concurrently, in Uganda, the AEO programme has achieved various benefits including reduction of clearance times for AEOs from 4 days to just 1 day, compliance costs decreased by $100 per consignment, and the physical examination rate for AEO consignments has reduced from 60% to under 5%[14]. Similarly, in Kenya, AEOs account for up to 30% of revenue for the Customs and Border Control Department, playing a crucial role in positioning Kenya as a global investment destination[15]. These accomplishments underscore the tangible benefits and positive impact of the AEO initiative.

9 Commission Interim Evaluation of the implementation of the Union Customs Code, SWD (2022) 158.
10 6th WCO Global AEO Conference 2024
11 World Customs Organization
12 World Customs Organization
13 World Customs Organization
14 www.wcoomd.org/-/media/wco/public/global/pdf/topics/facilitation/instruments-and tools/tools/aeo/ugandas-aeo-programme-leads-trade-facilitation-in-the-region-wco-news-february-2015.pdf?db=web
15 www.wcoesarocb.org/the-authorized-economic-operator-aeo-annual-conference/

Further, priority clearance under the AEO framework led to an estimated 30% reduction in costs, allowing companies to expand operations. For instance, one AEO participant reported that cost savings enabled them to open new business lines and expand their workforce from 1,300 to 2,009 employees. Similarly, a Tanzanian transport company, saved USD 1.8 million annually, while a beverage producer from Burundi reported savings of USD 350,000 per year[16].

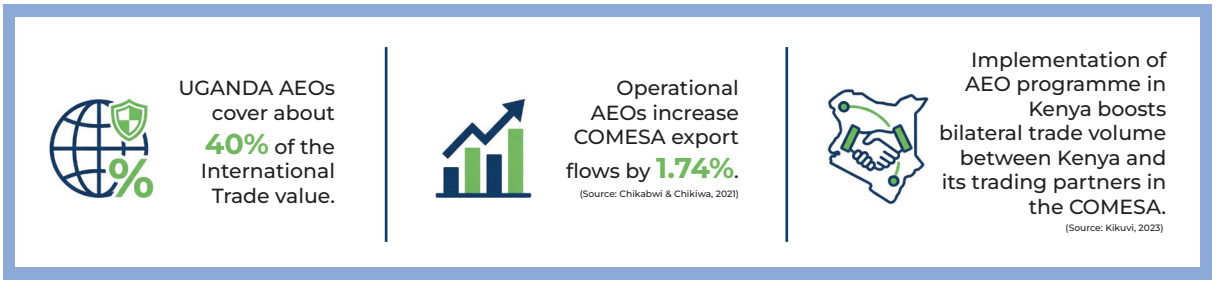
Equally, other studies have also shown impact of AEO on trade volume, costs and revenue. Okoboi & Kyanzi (2018) study shows that AEO firm accreditation in Uganda increases trade volume by 0.15%. The study further found that firms that became AEO accredited were associated with increasingly higher monthly trade volumes (turnover) and taxes paid on Customs bound goods compared to non-AEO accredited firms in Uganda.

Additionally, the Ugandan AEOs cover about 40% of the International Trade value[17]. Chikabwi & Chikiwa (2021) found that operational AEOs increase COMESA export flows by 1.74%[18]. Kikuvi (2023) examined the effect of AEO programme on bilateral trade between Kenya and trading partners in the COMESA. The findings show that implementation of AEO programme in Kenya boosts bilateral trade volume between Kenya and its trading partners in COMESA.

Impact of AEO Accreditation: Insights from Stakeholder Interviews and Data

Country-Level Perceptions of AEO Programmes Effectiveness and Regional Impact

The findings from the Revenue Authorities indicate an overall positive perception of both the EAC AEO programme and the NAEO programmes. The results show that **three out of the five Partner States** rated the success of AEO programme as *good*, while the remaining **two Partner States** rated performance as *average*. Regarding the programme's broader regional impact on trade facilitation, **Burundi** rated the AEO programme as *highly successful*, while **Rwanda, Kenya, and Uganda** rated its impact as *good*, reflecting recognition of improved customs efficiency and cross-border cooperation. **Tanzania**, however, rated the regional impact of the programme as *average* (Table 7).



16 *World Customs Organization*
17 *www.ura.go.ug/wp-content/uploads/2023/12/URA_newsletter_December_2023.pdf*
18 *Chikabwi, D., & Chikiwa, R. (2021). Would Customs Trade Facilitation Programs stimulate COMESA intra-export flows?. African journal of economic review, 9(2), 188-203.*

Table 7: AEO Programme Success and Regional Trade Facilitation Impact Across EAC Partner States

Country	Success of the AEO programme in your country (Regional and National)	Overall Impact of the AEO programme on trade facilitation in the region (Regional and National)
Burundi	Average	Highly successful
Rwanda	Good	Good
Kenya	Good	Good
Uganda	Good	Good
Tanzania	Average	Average

Source: Survey 2024

Impact of AEO Accreditation on Value of Trade, Revenue, Clearance Time and Costs of doing Business

Trade Value and Annual Revenue

AEOs contributes to a bigger percentage of trade and revenue across EAC Partner States. The EAC AEO Programme has demonstrated varying impacts across partner states in terms of volume and value of trade and value of revenue (Table 8). During the third quarter of 2025, the Regional EAC AEO Dashboard shows that AEO-certified operators continued to contribute significantly to regional trade flows while sustaining customs revenue performance across Partner States. Kenya recorded the highest participation levels, with AEO trade volumes remaining consistently high at 18.5% in July, 18.8% in August, and 18.2% in September, corresponding to overall trade values of USD 554.6 million, USD 576.3 million and USD 549.5 million, while trade value shares ranged between 17.8% and 20.0% and revenue contributions stood at 16.5%, 17.5%, and 14.4%, respectively. Rwanda maintained strong performance, with trade volume increasing from 8.4% to 10.3%, trade value shares remaining high at 17.7%–19.9%, and overall trade values of USD 55.7 million in July, USD 70.2 million in August, and USD 67.1 million in September, alongside the strongest revenue performance in the region at 19.1% and 21.1%.



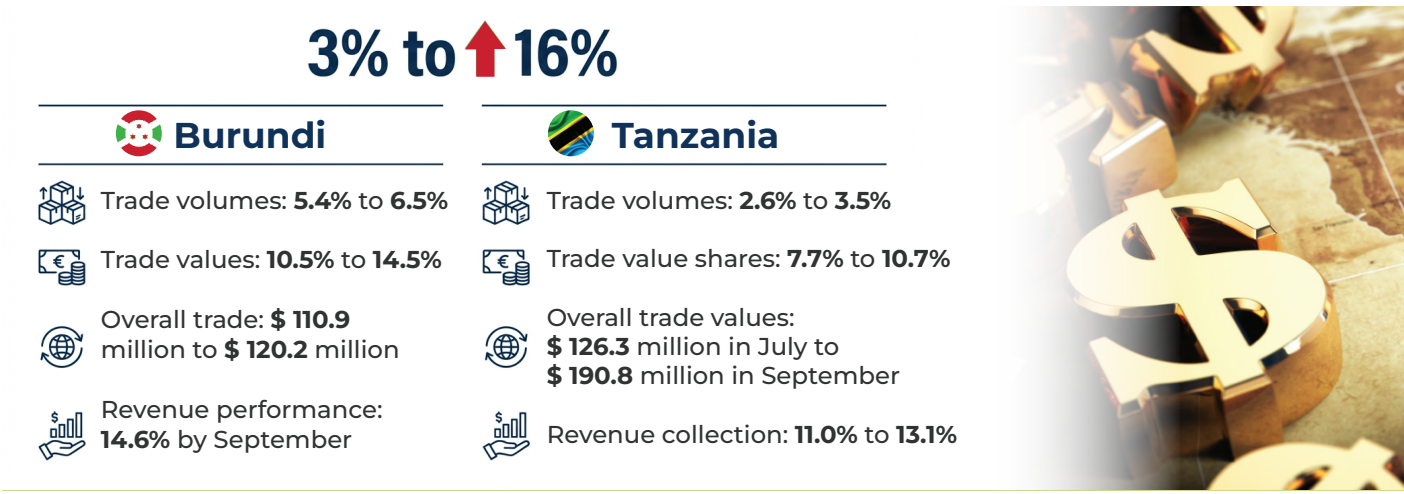
Uganda demonstrated moderate but stable performance, with trade volumes rising from 9% to 11%, trade value contributions between 10% and 12%, overall trade values increasing from USD 160.6 million to USD 200.9 million before stabilising at USD 191.1 million, and revenue shares ranging from 13% to 16%. Burundi showed gradual improvement, with trade volumes increasing from 5.4% to 6.5%, trade values fluctuating between 10.5% and 14.5%, and overall trade rising from USD 110.9 million to USD 120.2 million before slightly declining to USD 114.1 million, while revenue performance improved to 14.6% by September. In contrast, Tanzania recorded the lowest AEO contribution levels, with trade volumes between 2.6% and 3.5%, trade value shares ranging from 7.7% to 10.7%, and overall trade values increasing from USD 126.3 million in July to USD 190.8 million in September, accompanied by a gradual improvement in revenue collection from 11.0% to 13.1%.

Overall, the data confirms that AEO operators handle a substantial share of regional trade value while maintaining stable revenue performance, demonstrating that trade facilitation benefits are being achieved alongside effective customs compliance across the EAC.

Table 8: Regional EAC AEO Trade and Revenue Performance by Partner State: Third Quarter 2025

	JULY 2025				AUGUST 2025				SEPTEMBER 2025			
Partner State	**Vol %**	**Value %**	**Trade (USD Million)**	**Value of Revenue %**	**Vol %**	**Value %**	**Trade (USD Million)**	**Value of Revenue %**	**Vol %**	**Value %**	**Trade (USD Million)**	**Value of Revenue %**
Burundi	5.4	12.6	110.88	10.2	6.1	10.5	120.21	10.5	6.5	14.5	114.14	14.6
Kenya	18.5	18.0	554.55	16.5	18.8	20.0	576.25	17.5	18.2	17.8	549.46	14.4
Rwanda	8.4	17.7	55.67	19.1	8.6	19.9	70.23	21.1	10.3	19.1	67.08	20.9
Tanzania	2.7	7.7	126.31	11.0	2.6	9.5	150.49	11.3	3.5	10.7	190.76	13.1
Uganda	9.0	10.0	160.62	13.0	9.0	12.0	200.95	16.0	11.0	11.0	191.11	14.0

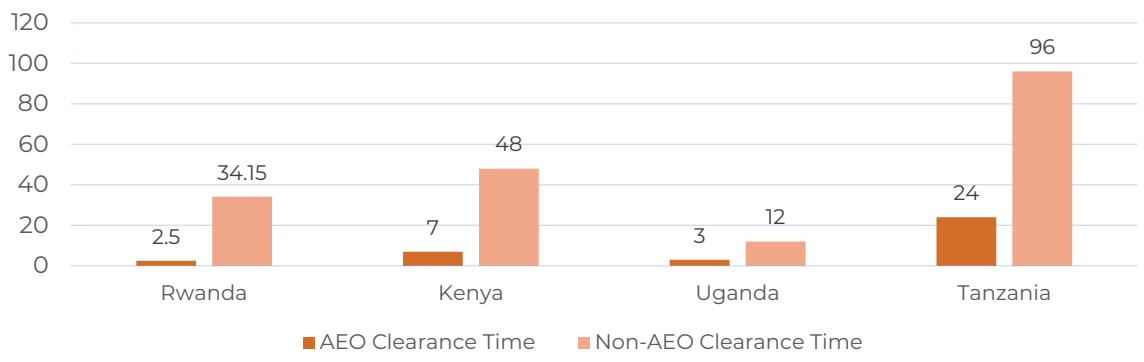
Source: EAC Dashboard 2025



Clearance Time for Cargo

Across countries, the key informants highlighted that AEO programme has made faster clearance of cargo (Figure 13). On average, across the specified countries, AEO accredited companies take approximately 9.1 hours to clear cargo, while non-AEO accredited companies take approximately 47.0 hours. In Rwanda the AEO take the minimum clearance time at the border with an average of 2.5 hrs. while Tanzania takes the longest clearance time of 24 hrs. Reduced clearance times influence the pricing of goods, supply reliability, and overall business costs by minimizing border delays, lowering transaction expenses for traders, and enhancing the competitiveness of EAC Partner States as a regional trading hub. Faster and more predictable clearance processes enable businesses to move goods more efficiently, reducing operational costs, strengthening supply chains, supporting employment opportunities, and contributing to more revenues.

Figure 13: Impact of AEO on clearance time (hours)



Source: Survey Data

Note: Burundi data on clearance time was not available.





Cross border traders, who belong to a cooperative, at the Busia Border in Uganda. Photo-TMA.

Cost of Doing Business

Countries have experienced significant reductions in the cost of doing business because of the AEO programme. In Kenya, insights from Key Informant Interviews (KIIs) indicate that businesses recorded cost reductions ranging between 71% and 90%, reflecting the substantial trade facilitation and operational efficiency gains associated with AEO participation. Significant reductions are also highlighted in Rwanda, with reported reduction in the cost of doing business ranging between 51% and 70% while moderate reductions are reported in Uganda and Tanzania, ranging from 31% to 50% reduction in the cost of doing business. The findings further reveal that AEO programme in Burundi has limited impact in the cost of doing business with decreases of between 11% to 30%, suggesting that the impact of the AEO programme on business costs is minimal, likely due to low uptake or operational challenges.

Other Benefits

Other benefits such as increase in compliance is evident with the AEO accreditation. Only one infringement was recorded during the assessment period, resulting in an overall compliance rate above 95%, with Kenya, Rwanda, Tanzania, and Uganda maintaining a full 100 % compliance level (Table 9). This consistently high compliance profile demonstrates the effectiveness of the AEO framework in promoting disciplined, rule-based trading practices and reinforces the credibility of the programme as a trusted-trader system.

Accreditation activity, however, shows mixed results across the region. Rwanda received the highest interest, with 15 new applications under the regional EAC AEO as of 2025, although none were forwarded for accreditation during the period. Burundi forwarded one applicant for accreditation, reflecting a small but active pipeline. This indicates an opportunity for targeted outreach and support to broaden regional uptake and create a more balanced pipeline of future Regional EAC AEOs.

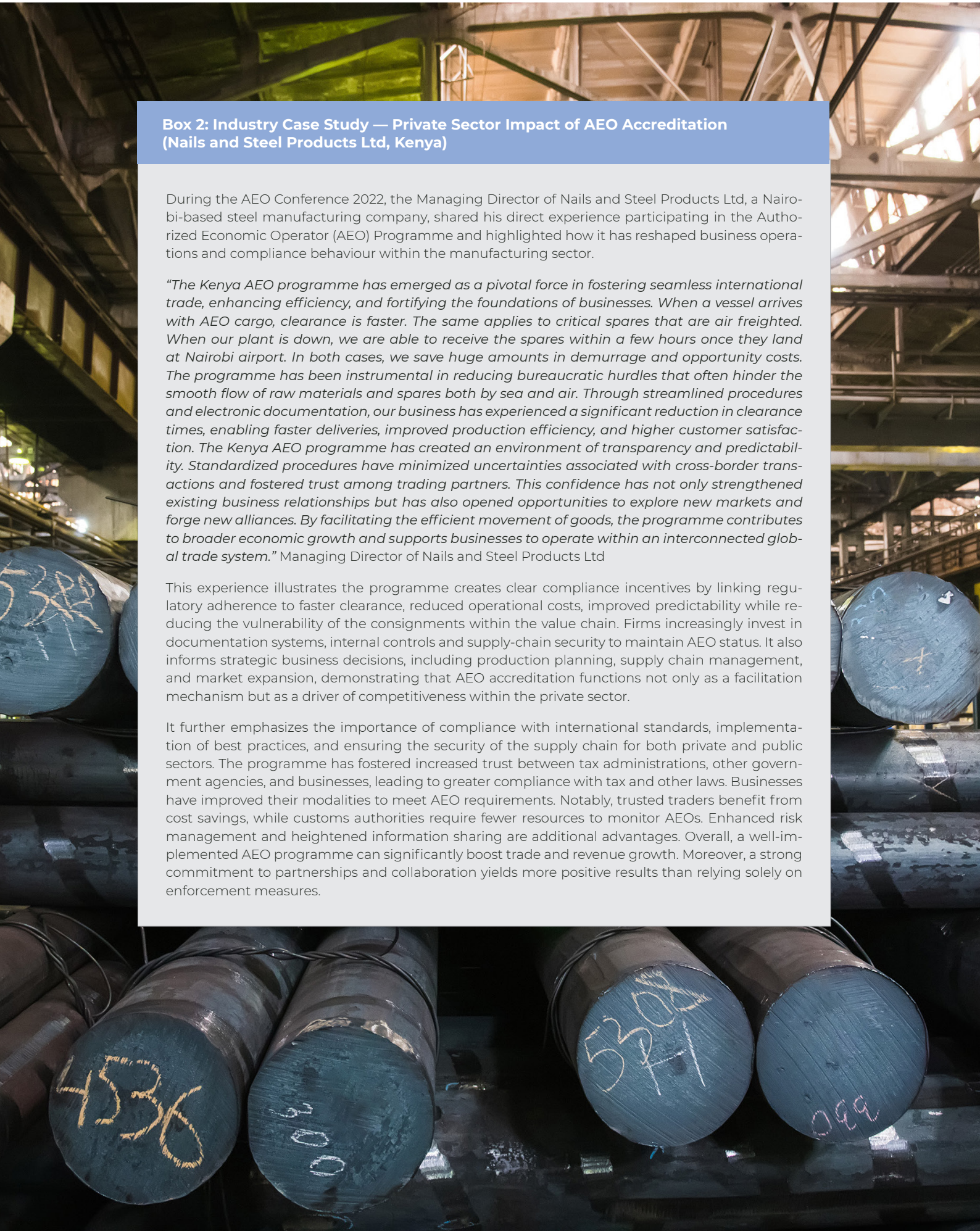
Table 9: EAC AEO Programme Compliance, Accreditation, and Identifier Status by Partner State as of June 2025

2025	Burundi	Kenya	Rwanda	Tanzania	Uganda	Total
Regional AEOs - Compliance Level						
Nr. Of regional AEOs that committed an offense/ infringements	1	0	0	0	0	1
% of compliant regional AEOs	95.40%	100%	100%	100%	100%	%
AEO on-going accreditation process						
Number of New Regional AEO applicants	0		15	0	0	15
Number of regional AEO applicants put forward for accreditation	1		0	0	0	1
% of applicants put forward for accreditation	100%		0%	100%	0%	0%
AEO Programme - Benefits						
Nr. Of regional AEOs with a regional AEO identifier	24	34	97	46	45	246
% of regional AEOs with a regional AEO identifier	100%	100%	100%	100%	100%	100%

Source: AEO Dashboard June 2025

All accredited Regional EAC AEOs have been issued with an identifier, achieving 100% coverage in every Partner State. This full identifier rollout is a critical milestone for harmonized recognition, enabling seamless cross-border facilitation for accredited traders and enhancing interoperability of customs systems across the EAC. The uniform adoption of identifiers also supports stronger regional visibility of trusted traders, improves tracking within the AEO ecosystem, and strengthens the foundation for deeper integration of customs procedures.





Box 2: Industry Case Study — Private Sector Impact of AEO Accreditation (Nails and Steel Products Ltd, Kenya)

During the AEO Conference 2022, the Managing Director of Nails and Steel Products Ltd, a Nairobi-based steel manufacturing company, shared his direct experience participating in the Authorized Economic Operator (AEO) Programme and highlighted how it has reshaped business operations and compliance behaviour within the manufacturing sector.

"The Kenya AEO programme has emerged as a pivotal force in fostering seamless international trade, enhancing efficiency, and fortifying the foundations of businesses. When a vessel arrives with AEO cargo, clearance is faster. The same applies to critical spares that are air freighted. When our plant is down, we are able to receive the spares within a few hours once they land at Nairobi airport. In both cases, we save huge amounts in demurrage and opportunity costs. The programme has been instrumental in reducing bureaucratic hurdles that often hinder the smooth flow of raw materials and spares both by sea and air. Through streamlined procedures and electronic documentation, our business has experienced a significant reduction in clearance times, enabling faster deliveries, improved production efficiency, and higher customer satisfaction. The Kenya AEO programme has created an environment of transparency and predictability. Standardized procedures have minimized uncertainties associated with cross-border transactions and fostered trust among trading partners. This confidence has not only strengthened existing business relationships but has also opened opportunities to explore new markets and forge new alliances. By facilitating the efficient movement of goods, the programme contributes to broader economic growth and supports businesses to operate within an interconnected global trade system." Managing Director of Nails and Steel Products Ltd

This experience illustrates the programme creates clear compliance incentives by linking regulatory adherence to faster clearance, reduced operational costs, improved predictability while reducing the vulnerability of the consignments within the value chain. Firms increasingly invest in documentation systems, internal controls and supply-chain security to maintain AEO status. It also informs strategic business decisions, including production planning, supply chain management, and market expansion, demonstrating that AEO accreditation functions not only as a facilitation mechanism but as a driver of competitiveness within the private sector.

It further emphasizes the importance of compliance with international standards, implementation of best practices, and ensuring the security of the supply chain for both private and public sectors. The programme has fostered increased trust between tax administrations, other government agencies, and businesses, leading to greater compliance with tax and other laws. Businesses have improved their modalities to meet AEO requirements. Notably, trusted traders benefit from cost savings, while customs authorities require fewer resources to monitor AEOs. Enhanced risk management and heightened information sharing are additional advantages. Overall, a well-implemented AEO programme can significantly boost trade and revenue growth. Moreover, a strong commitment to partnerships and collaboration yields more positive results than relying solely on enforcement measures.



Opportunities to Enhance Effectiveness of the AEO programme and Lessons Learnt

National Revenue Authorities representatives across the five countries were asked to rank opportunities to enhance the uptake and effectiveness of the AEO programme. Findings reveal that awareness and education campaigns, collaboration and partnerships, enhancing risk-based approaches, transparency and consistency, and recognition of AEO-certified businesses rated as "Very Important" in demand, reflecting their critical importance for programme effectiveness. Other opportunities, including simplified application processes, technology integration, and continuous feedback mechanisms, were rated "Important" or "Less important", while longer-term initiatives such as mutual recognition agreements and harmonization of procedures were considered of moderate demand.

The identified key opportunities are grouped into short-term operational actions, medium-term institutional reforms, and long-term strategic expansion measures

Short-Term Opportunities

- **Awareness and Education Campaigns:** Expanded outreach through industry associations, border forums, and targeted trader education is necessary to address limited understanding of AEO benefits.
- **Recognition and Promotion of AEO-Certified Businesses:** Public recognition mechanisms and promotional platforms can quickly strengthen private sector interest and demonstrate the commercial value of accreditation.
- **Transparency and Consistency in Application and Benefits:** Predictable implementation of AEO benefits across border posts and Partner States is essential for building private sector trust.





Medium-Term Opportunities

- **Strengthening Collaboration and Partnerships:** Enhanced coordination between Revenue Authorities, Partner Government Agencies, border agencies, and private sector organizations is necessary to broaden programme ownership.
- **Enhancing Risk-Based Approaches:** Transitioning toward advanced risk management systems allows Customs administrations to fully operationalize trusted trader principles.
- **Simplified Application and Renewal Processes:** Streamlining accreditation procedures reduces administrative burdens and improves accessibility for businesses.
- **Continuous Improvement and Feedback Mechanisms:** Structured feedback platforms support evidence-based programme adjustments.

Long-Term Strategic Opportunities

- Technology Integration and Digitalisation: Investment in digital systems supporting application processing, monitoring, and information exchange enhances efficiency and interoperability.
- Harmonization of AEO Procedures: Alignment of national AEO frameworks reduces fragmentation and enables consistent regional implementation of benefits.
- Mutual Recognition Agreements (MRAs): Although ranked lower in immediate priority, MRAs represent a critical long-term objective for extending AEO benefits beyond the region and strengthening global supply chain integration.



Recommendations

Table 10 below presents recommendations for strengthening the EAC AEO Programme and National AEO Programmes.

Table 10: Policy Recommendations for AEO Programme

Recommendation	Responsible Institution	Suggested Timeframe	Expected Impact	Possible Funding / Support Mechanisms
Promote Inter-Agency Collaboration by including Partner Government Agencies (PGAs) into the AEO Framework	EAC Secretariat (regional coordination); Partner State Revenue Authorities; National PGAs	Medium Term	Faster clearance processes, reduced duplication of controls, greater recognition by government agencies	EAC Secretariat programmes, TradeMark Africa (TMA), AfDB Trade Facilitation Support
Liberalised MSMEs AEO Package to encourage private sector participation	Partner State Revenue Authorities; EAC Secretariat (regional guidelines); Ministries of Trade	Short Term	Increased MSME participation and inclusivity of AEO programme	SME support programmes, ITC, WTO,national MSME funds
Automate AEO Programme Processes (Application, Assessment & Monitoring)	Partner State Revenue Authorities (implementation); EAC Secretariat (regional interoperability standards)	Long Term	Reduced processing time, transparency, improved compliance monitoring	German Cooperation Agency(-GIZ), EU customs modernization funding, TMA
Review Manual Procedures and Reduce Assessment & Compliance Turnaround Time	Revenue Authorities; EAC Secretariat (process harmonization guidance)	Short Term	Faster certification timelines, improved trader satisfaction	TMA, German Cooperation Agency (GIZ)
Harmonize delivery of AEO Benefits Across Partner States	EAC Secretariat (policy coordination); Partner State Revenue Authorities	Short Term	Consistent trader experience across the region, increased programme credibility	Development Partners, TMA regional facilitation funds
Harmonize Training and Certification of AEO Experts in the region	EAC Secretariat (regional training framework); Revenue Authorities	Medium Term	Improved quality and consistency of programme implementation	German Cooperation Agency (GIZ)
Expand Awareness and Continuous Capacity Building of AEO	EAC Secretariat; Revenue Authorities Customs; Private Sector Associations	Short Term	Higher number of applicants and improved compliance culture	TMA, chambers of commerce partnerships, development partners
Ensure AEO penalties are proportionate and commensurate with the nature and severity of the offence	Partner State Revenue Authorities (Customs Departments); EAC Secretariat (for regional harmonisation guidance)	Short Term	Increased trader confidence in the AEO framework; strengthened perception of fairness and transparency; improved voluntary compliance; reduced risk of discouraging private sector participation	TradeMark Africa (TMA); National Customs Reform Budgets
Establish an AEO Coordination Office at the EAC Secretariat	EAC Secretariat	Long Term	Strong regional oversight, monitoring, and coordination of AEO implementation	EAC Secretariat, Partner state contributions, donor technical assistance
Create Dedicated AEO Units within National Revenue Authorities and increase staff	Partner State Revenue Authorities	Medium Term	Improved service delivery, faster application processing, sustained trader support	National customs reform budgets, WCO SAFE Framework implementation support
Pursue Strategic Development and Expansion of Mutual Recognition Agreements (MRAs)	EAC Secretariat	Long Term	International recognition of EAC AEO-accredited traders, reduced duplication of inspections, enhanced market access and stronger integration into global supply chains	TradeMark Africa (TMA), EU, German Cooperation Agency (GIZ)
Enhanced AEO incentive structures to provide clear, individual firm-level benefits for clearing agents, freight forwarders and transport operators	Partner State Revenue Authorities (Customs); EAC Secretariat ; Partner Government Agencies (PGAs)	Medium Term	Increased participation of logistics service providers in the AEO Programme; improved end-to-end supply chain efficiency; reduced border delays; strengthened compliance across transport and logistics actors	TradeMark Africa (TMA), EU, German Cooperation Agency (GIZ)

Conclusion

The EAC AEO Programme holds strategic importance for the EAC as a practical instrument for deepening implementation of the Customs Union, strengthening regional trade facilitation and enhancing integration into global value chains. Beyond its operational benefits at national level, the AEO framework functions as a regional trust architecture that enables risk-based customs controls, harmonised procedures and mutual recognition of compliant traders across Partner States. By promoting predictable and efficient cross-border trade processes, the programme contributes to building confidence among both customs administrations and the private sector, thereby supporting the broader objectives of regional economic integration.

Within the context of the EAC Customs Union, seamless movement of goods across internal borders requires consistent application of customs procedures, reduced duplication of inspections and coordinated border management. The recommended actions support these objectives by addressing operational and institutional gaps that currently limit full regionalisation of the EAC AEO Programme. Promoting inter-agency collaboration and integrating Partner Government Agencies (PGAs) into the AEO framework strengthens whole-of-government border management and reinforces the Single Customs Territory model. Similarly, harmonisation of AEO benefits, standardisation of expert training and establishment of a regional coordination mechanism under the EAC Secretariat enhance policy coherence, improve programme credibility and lay the foundation for effective regional mutual recognition and expansion of international Mutual Recognition Agreements.

The recommendations further promote inclusive regional trade participation by introducing a liberalised MSME AEO package and expanding awareness initiatives aimed at widening access to formal cross-border trade. Automation of AEO processes, improved monitoring systems and proportionate penalty frameworks strengthen risk-based customs management while maintaining revenue assurance. In addition, extending AEO incentives to clearing agents and transport operators improves corridor efficiency and aligns compliance incentives across the entire supply chain. Collectively, these measures reposition the AEO Programme from a nationally administered facilitation initiative into a fully integrated regional instrument supporting harmonised customs procedures, reduced non-tariff barriers, strengthened trust-based trade governance, increased private sector confidence in the Customs Union framework and deeper integration of the EAC into regional and global markets.

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