

ISSUE 8 2025 AUGUST - SEPTEMBER



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## Executive Director's Message

Esteemed Members,

I am delighted to extend the 08th issue of 2025 UFEA Newsletter with updates from the secretariat on issues of great relevance to your businesses and activities done during the month.

The months of August and September marked 2 main engagements with government and agencies; MAAIF, DCIC, NEMA and URA. We extend great appreciation to you members for turning up for the meetings to show strength of the sector and unity.

Main challenge faced was on implementation of fiscalization of exports on EFRIS for the financial year 2025/2026. This caused a lot of confusion, back and forth with URA on what to register on EFRIS and ASCYUDA. UFEA is following up to make sure adequate training is received by farms.

UFEA following up with optimism the commitments made by government during the engagements and will keep you informed on outcomes and improvements in service delivery to members.

Sincerely,

Esther Nekambi

## 1.0 Regulatory Compliance

### 1.1 Phytosanitary compliance: *Xylella* Surveillance

#### MAAIF Takes on Part of *Xylella* Surveillance Costs – bit of relief for Flower Exporters

Positive news for UFEA members! The Ministry of Agriculture, Animal Industry and Fisheries (MAAIF) has stepped in to pay 70% of the 2025 *Xylella fastidiosa* surveillance exercise, easing the financial burden on exporters. Promise is government will pay 100% in the next year(s).

*Xylella fastidiosa* surveillance is an annual requirement to maintain Uganda's export certification under **EU Regulation 2020/1201**.

Following planning meetings held in September, surveillance will run from **13th to 17th October 2025**.

#### Key Update

following UFEA's continued engagement with MAAIF and discussions on **shared responsibility, cost reduction, and stronger compliance** with export standards, MAAIF will for 2025 cover **inspectors' allowances and fuel** cost for *Xylella* surveillance accounting for about **one-third** of previous costs borne by UFEA members. Ministry is **procuring test kits** for next year's exercise meaning **members won't pay** for them going forward.

#### Next Steps

- Control sites to be surveyed: **Uganda Hortec** and **Oasis Nursery**
- Plan to shift from annual surveys to **quarterly import testing to build data** which informs annual surveillance.
- Important to note that Rosa species is listed among hosts, need to be proactive.

## 2.0 Voluntary standards compliance

### 2.1 Adherence to Intellectual Property Rights (IPR) in the flower industry:

Recently European customs authorities have intercepted and destroyed several shipments of roses particularly from Latin America, a global powerhouse in flower production and export. The reason for interception was that the flowers had been cultivated without the authorization of their rightful breeders. The incident has potential for legal action against the buyers, significant financial losses, and sent a powerful signal across the global flower industry:

The crackdown triggered a wave of enforcement pressure. International buyers now demand proof that every rose variety is properly licensed and up to date on royalty payments. Growers operating outside the law are being blacklisted, while those who come

into compliance are being welcomed back into the supply chain.

For Uganda, where over 50% of UFEA members grow and export roses, this development carries critical implications. Intellectual Property Rights (IPR) compliance is not optional—it is a key requirement under certification standards, including MPS GAP, and a fundamental condition for continued access to premium export markets.

### **What MPS GAP Requires on Intellectual Property Rights (IPR)**

All UFEA member farms subscribe to the MPS GAP standard, which explicitly requires proof that the choice of variety or rootstock meets the relevant regulations and complies with intellectual property rights as stipulated by UPOV (International Union for the Protection of New Varieties of Plants – [www.upov.int](http://www.upov.int)).

Farms must be able to provide documentation upon request showing that cultivated varieties were obtained legally. Acceptable documents include:

- A contract with the legal owner of the variety.
- A plant passport (if applicable).
- If no plant passport is required, a document or empty packaging showing:
  - Name of the variety
  - Lot number
  - Supplier of the material
  - Packing list/invoice showing the size and identity of propagation material used within the past 24 months.

Failure to provide such documentation risks both certification status and market access.

### **Why This Matters for Ugandan Rose Growers**

- Risk of Market Loss – Unauthorized varieties can result in entire shipments being confiscated.
- Severe Penalties – Buyers, exporters, and even retailers can all face liability.
- Reputational Damage – A single violation can harm not only your farm but Uganda’s image as a trusted flower exporter.
- Certification Risk – Non-compliance with IPR obligations can result in losing MPS GAP certification, further limiting market access.

### **UFEA’s Call to Action**

- Audit your rose varieties: Confirm all are licensed and royalty obligations are up to date.
- Maintain documentation: Ensure contracts, plant passports, and invoices are well-kept and available for inspection.

## 2.2 Important Update on MPS Color Coding for Crop Protection Products

MPS has recently announced an update to the color-coding system for active substances used in crop protection products under the MPS-ABC certification scheme. This development is important as it will directly influence how the use of certain products is scored, and therefore may affect your qualification results.

What has changed?

- MPS regularly reassesses the environmental impact (color coding) of active substances in crop protection products.
- In the most recent review, 23 active substances were reassessed.
- Based on new data, some substances have been reclassified into different categories.

Active substance	Current situation						Active substance	New situation <b>period 11</b>					
	EZ 1	EZ 2	EZ 3	EZ 4	EZ 5	EZ 6		EZ 1	EZ 2	EZ 3	EZ 4	EZ 5	EZ 6
Bromacil	Red	Red	Red	Red	Red	Red	Bromacil	Amber	Amber	Amber	Red	Red	Red
Bromoxynil octanoate	Amber	Amber	Amber	Green	Green	Green	Bromoxynil octanoate	Amber	Amber	Amber	Amber	Amber	Amber
Bromuconazole	Amber	Amber	Amber	Red	Red	Red	Bromuconazole	Amber	Amber	Amber	Amber	Red	Red
Bupirimate	Amber	Amber	Amber	Red	Red	Red	Bupirimate	Green	Green	Green	Green	Green	Green
Butachlor	Green	Green	Green	Green	Green	Green	Butachlor	Amber	Amber	Amber	Amber	Amber	Amber
Butamifos	Green	Green	Green	Green	Green	Green	Butamifos	Green	Green	Amber	Green	Green	Green
Calcium polysulphide	Green	Green	Green	Green	Green	Green	Calcium polysulphide	Red	Red	Red	Red	Green	Green
Captan	Amber	Amber	Amber	Amber	Amber	Amber	Captan	Green	Green	Amber	Amber	Amber	Amber
Carbendazim	Amber	Amber	Amber	Amber	Amber	Amber	Carbendazim	Green	Green	Amber	Amber	Amber	Amber
Carboxin	Green	Green	Green	Amber	Amber	Amber	Carboxin	Green	Green	Green	Green	Green	Amber
Cartap	Green	Green	Green	Green	Amber	Amber	Cartap	Green	Green	Green	Green	Green	Green
Chinomethionat	Amber	Amber	Amber	Red	Red	Red	Chinomethionat	Green	Green	Green	Amber	Amber	Amber
Chlorfenapyr	Red	Red	Red	Red	Red	Red	Chlorfenapyr	Amber	Amber	Amber	Amber	Amber	Amber
Chlormequat chloride	Green	Green	Green	Green	Green	Green	Chlormequat chloride	Green	Green	Green	Green	Amber	Amber
Chlorpyrifos	Red	Red	Red	Red	Amber	Amber	Chlorpyrifos	Red	Red	Red	Amber	Amber	Amber
Chlorthiamide	Amber	Amber	Amber	Amber	Amber	Amber	Chlorthiamide	Green	Green	Green	Green	Green	Green
Chlortoluron	Green	Green	Green	Amber	Amber	Amber	Chlortoluron	Green	Green	Green	Green	Green	Amber
Chlorantraniliprole	Amber	Amber	Amber	Amber	Red	Red	Chlorantraniliprole	Amber	Amber	Amber	Amber	Amber	Amber
Chlorfluazuron	Amber	Amber	Amber	Amber	Amber	Amber	Chlorfluazuron	Green	Green	Amber	Amber	Amber	Amber
Chloridazon	Red	Red	Red	Red	Amber	Amber	Chloridazon	Green	Green	Green	Green	Green	Green
Chloroneb	Red	Red	Red	Amber	Green	Green	Chloroneb	Red	Red	Red	Amber	Amber	Amber
Chlorphonium chloride	Amber	Amber	Amber	Amber	Amber	Amber	Chlorphonium chloride	Amber	Amber	Amber	Amber	Green	Green
Chromafenocide	Green	Green	Green	Green	Green	Green	Chromafenocide	Amber	Amber	Amber	Amber	Amber	Amber

Why does this matter?

- The color-coding system (MPS-MIND) assigns environmental scores to crop protection products.
- If a product you use has changed category, this will alter the number of points awarded when you submit your usage records.
- As such, your MPS-ABC qualification could be affected depending on the products in use on your farm.

When does it take effect?

- The new categorization takes effect on 6th October 2025 (Period 11).
- From this date, you will see the updated colors reflected in your online record-keeping environment.

What you should do

1. Check your products – Review whether any of the crop protection substances you commonly use are among the reassessed 23.
2. Adjust your planning – Where necessary, consider alternatives or adjustments to align with best practices under MPS certification.
3. Monitor your scores – Keep a close eye on how your submissions affect your overall MPS ABC qualification from October onwards.

For details on the specific substances and the updated categorization, members are encouraged to log in to their MyMPS record-keeping environment.

UFEA will continue to keep you informed on any updates that impact compliance and certification.

### 2.3 EU Sustainability Rules: What Uganda's Flower Exporters Need to Know

*Advisory from Uganda Flowers Exporters Association (UFEA)  
Source: FloralDaily.com, "Sylvie Mamias on navigating EU sustainability legislation"  
(22 Sept 2025)*

With the EU introducing stricter sustainability laws, flower exporters in Uganda must prepare for changes that affect **packaging, labor practices, reporting, and supply chain transparency**.

Speaking at the AIPH Industry Conference, **Sylvie Mamias**, Secretary General of **Union Fleurs**, urged the global floriculture sector to treat sustainability not as a cost—but as a **competitive advantage**.

#### What's Changing?

The EU Green Deal aims for climate neutrality by 2050. It introduces **binding regulations** that directly affect flower exporters. Here are the key ones to watch:

1. **Packaging Waste Regulation (PPWR)**
  - a. Starts: **August 2026**
  - b. Focus: Reducing plastic use, requiring **recyclable or reusable packaging**
  - c. Action: UFEA advises members to begin exploring eco-friendly packaging options now.
2. **Corporate Sustainability Due Diligence Directive (CSDDD)**
  - a. Applies across the supply chain
  - b. Requires proof of **ethical labor practices and environmental safeguards**
  - c. Action: Exporters should assess current practices and document compliance.
3. **Sustainability Reporting (CSRD)**

- a. Requires **financial and environmental transparency**
- b. Even smaller companies may be asked for supporting data
- c. Action: Build basic data systems to track key sustainability metrics.

### Turning Compliance into Opportunity

These rules may increase costs—especially in areas like packaging, certifications, and greenhouse investments—but they also open up new opportunities:

- Access to **premium, sustainability-focused markets**
- Improved **efficiency** (e.g. cold chain, water use, energy savings)
- Increased trust from **international buyers and consumers**

**Tip:** Exporters who **act early** can become preferred suppliers for EU markets.

### UFEA Business Advisory: What You Should Do

- **Embed sustainability into your business strategy**  
Don't just comply—use it to stand out.
- **Start measuring** your social and environmental impact  
This will soon be expected in audits and reports.
- **Collaborate** with industry partners  
Join efforts like the **Floriculture Sustainability Initiative (FSI)** to share knowledge and stay aligned with global standards.

#### Source:

*Adapted from FloralDaily.com, “Sylvie Mamias on navigating EU sustainability legislation” by Elvira Oosterbaan (22 Sept 2025).*

## 3.0 Networking, Lobby and Advocacy

### 3.1 Strengthening Partnerships for a Resilient Floriculture Sector

UFEA continues to look out for opportunities to engagement with government to create awareness on the importance of the sector to the economy and build relationships for better services to members. During the months of August and Septemeber 2025; 2 main engagements were held:

On Friday 22nd August 2025, UFEA members' get-together, graciously hosted by Fiduga Farm in Mpigi District. The meeting brought together farm executives, the Hon. Minister of State for Agriculture, senior officials from the Ministry of Agriculture, Animal Industry and Fisheries (MAAIF), and representatives from the National Environment Management Authority (NEMA).

The gathering created a valuable platform for UFEA to present our relevance to the economy and to make 2 asks to MoSA -MAAIF; for government to pay for surveillance 100% and a proposal for cost sharing of 50:50 for the partnership fund. Letters sent through the Commissioner DCIC.

- NEMA: It was the first time, NEMA officials toured a flower farm and were impressed by members' investments in Integrated Pest Management (IPM) and sustainability. NEMA committed to:
  - Review audit costs and consultant delays.
  - Improve inspector conduct.
  - Appoint a sector focal person to strengthen communication with UFEA.



On 17th September 2025, the **Commissioner General (CG)** of the **Uganda Revenue Authority (URA)** met with members of the **Uganda Flower Exporters Association (UFEA)** at **Xclusive Cuttings Farm** to discuss **tax-related challenges** and explore ways to improve understanding and support for the flower export sector.

The meeting brought together UFEA member farms alongside URA's Commissioner General and his team.

### Key Issues Raised

Members highlighted the following major concerns:

- **EFRIS System Challenges:** Exporters are required to record **product weight**, which is irrelevant for flowers sold by **stems**, and to issue invoices **before shipment**, which is impractical given flight schedules.
- **Assessments & Audits:**

Repetitive document requests, **long audit delays**, and **misinterpretation** of accounting for **biological assets** (e.g. mother plants) under **IAS 41**.

- **VAT Refund Delays:**  
Some refunds have been **pending since 2022**, straining cash flow.
- **Investment Incentives:**
- **Certificates of Origin:**  
Current processing at **URA Nakawa** causes logistical challenges for exporters.

The **Commissioner General** appreciated the sector's organization and **admitted URA's need to be intentional in understanding** the flower sector unique operations.



### 3.3 World Bank launches report on Uganda Economic Update

The **Uganda Flower Exporters Association (UFEA)** attended the launch of the **25th Edition of the World Bank Uganda Economic Update** on **30th September 2025**, themed:

*“Increasing Uganda’s Fiscal Space through Improved Revenue Mobilization and Enhanced Efficiency of Spending and Service Delivery.”*

The report emphasized that Uganda’s **low tax-to-GDP ratio (14.3%)** and **inefficient spending** limit growth.

It called for:

- **Broadening the tax base** and improving compliance,
- **Revisiting tax exemptions** that reduce revenues, and
- **Making every shilling count** through efficient spending.

The World Bank urged **fair, inclusive, and data-driven reforms** that don't overburden compliant sectors.

### What This Means for UFEA Members

For flower exporters, the report signals:

- **Tighter enforcement** — more audits and emphasis on **EFRIS compliance**;
- **Possible review of incentives** — need to advocate for **export-focused tax holidays**;
- **Push for efficiency** — opportunity to demand **faster VAT refunds** and better support for exporters;
- **Fair reforms** — reinforces UFEA's call for **sector-specific understanding** within URA. "The World Bank's message supports our advocacy for fair, predictable taxation that sustains export growth." – *UFEA Secretariat*.

### 3.4 Gamma Irradiation Project Holds Promise for Flower Exporters

The Ministry of Energy and Mineral Development (MEMD) is advancing plans to establish a **Multipurpose Gamma Irradiation Facility** under Uganda's **National Development Plan IV (NDP IV)**. The facility aims to support agro-industrialization by using advanced technology to eliminate microorganisms and pests — including **False Codling Moth (FCM)**, a major cause of flower export interceptions.

Two stakeholder meetings have been held. The first, on **12th June 2025**, confirmed MEMD's leadership role and the need for a comprehensive needs assessment. The second, on **25th September 2025**, reviewed a draft report and highlighted the importance of **safety assurance, data availability, broad product inclusion, and lessons from other countries**.

Next steps include developing a **detailed needs assessment methodology** and forming a **project team** with clear Terms of Reference.

### 3.5 Strengthening Labor Relations for a Thriving Flower Sector

Strong labor relations are key to productivity and sustainability in Uganda's flower industry. As farms continue to employ hundreds and export globally, fostering trust and fairness between employers and workers remains vital.

To advance this goal, the **Uganda Flowers Exporters Association (UFEA)** joined a **two-day policy dialogue** (16–17 September 2025) hosted by the **Economic Policy Research Centre (EPRC)** at Makerere University. The meeting discussed issues that were pertinent in the review of the **National Tripartite Charter on Labor Relations (NTCLR)** — Uganda's

main framework for promoting decent work, social dialogue, and industrial harmony.

### Key Issues

- **Multiple unions per workplace:** Employers prefer a “**one union, one workplace**” approach for harmony.
- **Union membership eligibility:** Unions want inclusion of all staff except top management; employers propose excluding **middle managers** who also recruit or discipline staff.

### Takeaways from the Dialogue

- Low awareness of the Charter — more sensitization needed
- Weak enforcement due to limited institutional capacity
- Proposal for a **Tripartite Plus model** to include civil society and other key players that contribute significantly to conversations/initiatives concerning labor issues
- Call for stronger legal backing and political will

UFEA’s participation ensures that the voice of the floriculture sector shapes Uganda’s evolving labor governance — helping members maintain stable, productive, and globally competitive workplaces.

### 4.0 Upcoming Events for October 2025

- 1) Annual Xylella surveillance (13<sup>th</sup> – 17<sup>th</sup> October 2025)
- 2) UFEA CEOs - MTIC Permanent Secretary Breakfast Meeting (date TBC)
- 3) Engagement of chemical authorization between UFEA, Agrochemical Suppliers and UFEA member farms (Date TBC).

## Your Feedback column

<https://forms.gle/QgXyfNdwb9wMLibJ7>

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