The Appendix I to the Annex 2 on Rules of Origin of the African Continental Free Trade Area (AfCFTA) Protocol on trade in goods states in the notes for completing an AfCFTA certificate of origin that an exporter's registration number "should"
be inserted
(this term indicates that it is not mandatory), "where applicable", in the Box 1 of such certificate. The AfCFTA
manual on Rules of Origin
, despite mentioning in its introduction that one of its objectives is to provide guidelines on the registration of exporters, does not give any indications about how this process should be conducted. In this situation of confusion, some African countries have introduced a specific "AfCFTA exporter's registration number" as a condition to apply for an AfCFTA certificate of origin - and therefore as a condition to trade under the AfCFTA - while others allow exporters to use their ordinary exporter's registration number in the box No 1 of the certificate. Other, again, do not require any exporter's registration number to be indicated in the form. Which one is the best solution?

An example of countries that have introduced a specific "AfCFTA exporter's registration number" is Ghana, who has made available the relevant application form to traders through its Integrated Customs Management Systems (ICUMS) – the form can be downloaded at this
link
. Was it really necessary to develop this AfCFTA exporters registration process?

In the Guidelines on Trader Identification Number , the World Customs Organization recommends its members to adopt a unique identifier for each economic operator (normally called "Trader Identification Number", TIN) that can be used as a reference/key to access a larger set of information relating to the trader, such as its name, address, contact details, director/partners, and legal status.

Most of African States have today already adopted such unique identifiers. In some cases, those that are member of some Regional Economic Community (REC) have adopted additional codes to identify operators that trade in their territory under regional trade preferential schemes. An example is the ETLS approval number (numéro d'agrément), a code that many customs administrations of the member States of such REC use for identifying operators who trade under the ECOWAS Trade Liberalization Scheme (ETLS) , i.e. the mechanism that ensures the free movement of goods within the ECOWAS region without the payment of customs duties and other charges having equivalent effect on imports originating in the Community. WAEMU (better known with its French acronym UEMOA) member states have a similar mechanism in place.

So, why to develop an additional AfCFTA exporter's registration number, considering that its indication in the AfCFTA certificate of origin appears as optional? If the purpose of the AfCFTA is to simplify formalities for intra-African trade, States should avoid the use of multiple identifiers for exporters. Hopefully, the AfCFTA Secretariat will clarify this issue in the next updated version of its Manual of Rules of Origin