

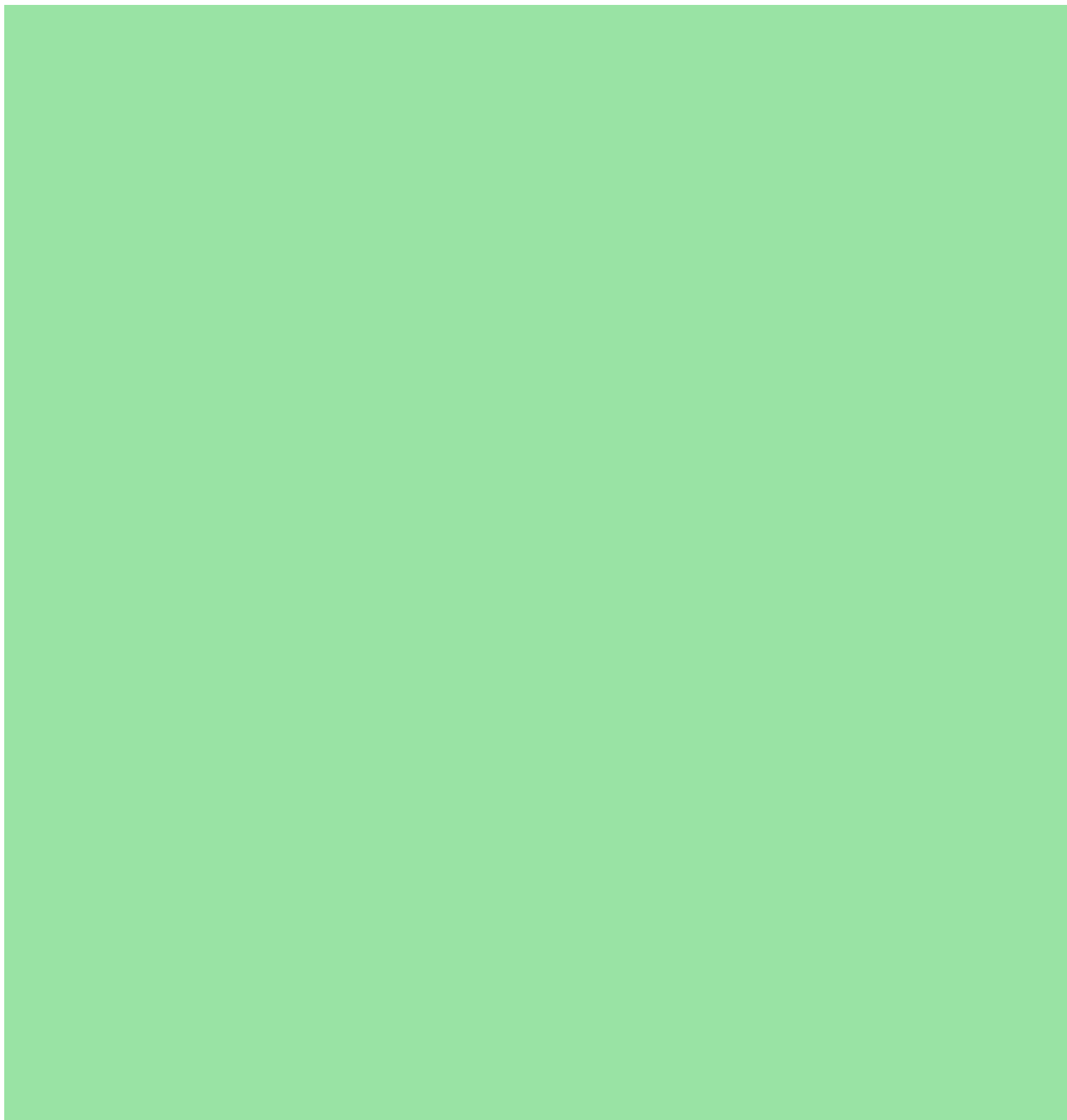


COMESA COMPETITION AND
CONSUMER COMMISSION

2026 - 2030 STRATEGIC PLAN

— OF THE —
COMESA COMPETITION AND
CONSUMER COMMISSION

January 2026



2026 - 2030
STRATEGIC PLAN
— OF THE —
**COMESA COMPETITION AND
CONSUMER COMMISSION**

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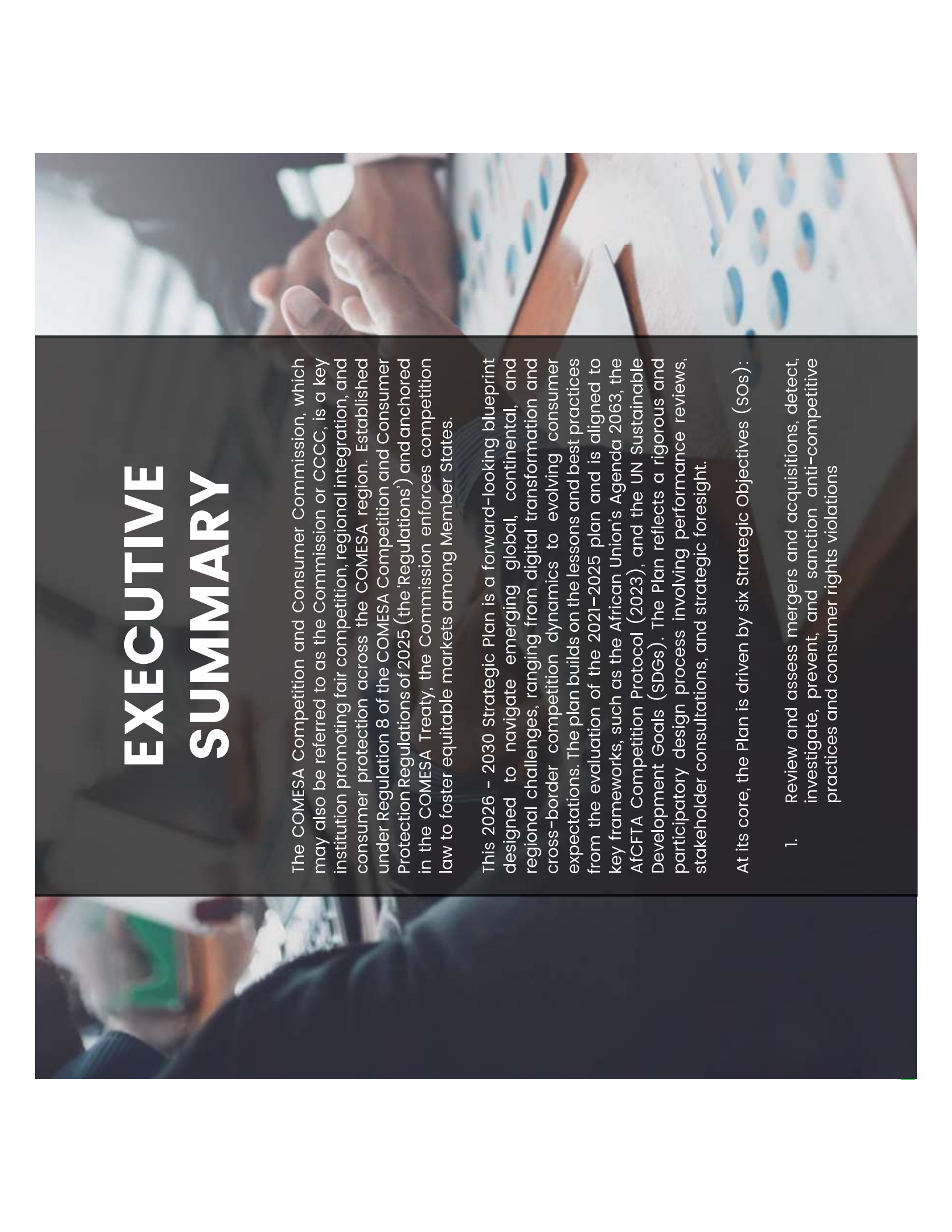
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LIST OF ACRONYMS

ACF	African Competition Forum
AfCFTA	African Continental Free Trade Area
AFDB	African Development Bank
AI	Artificial Intelligence
AWPs	Annual Workplans
CCJ	COMESA Court of Justice
CEO	Chief Executive Officer
COMESA	Common Market for Eastern and Southern Africa
CSFs	Critical Success Factors
CSR	Corporate Social Responsibility
DAC	Develop Assistance Committee
DMA	Digital Markets Act
EAC	East African Community
EACCA	East African Community Competition Authority
ECOWAS	Economic Community of West African States
ERM	Enterprise-Wide Risk Management
EU	European Union
FTA	Free Trade Area
GATS	General Agreement on Trade in Services
GATT	General Agreement on Trade and Tariffs
GIZ	German Agency for International Cooperation.
HRMIS	Human Resource Management Information System
ICN	International Competition Network
ICT	Information Communication Technology
IMF	International Monetary Fund

ISO	International Standards Organization
KPIs	Key Performance Indicators
M&E	Monitoring and Evaluation
MEL	Monitoring, Evaluation & Learning
MOUs	Memorandum of Understanding
MSMEs	Medium and Small Enterprises
NCAs	National Competent Authorities
OECD	Organisation for Economic Co-operation and Development
PEST	Political, Economic, Social, and Technological
PFM	Public Financial Management
PR	Public Relations
RBM	Results-Based Monitoring
RECs	Regional Economic Communities
SADC	Southern African Development Community
SDGs	Sustainable Development Goals
SOs	Strategic Objectives
SP	Strategic Plan
SWOT	Strengths, Weaknesses, Opportunities, and Threats
TFEU	Treaty on the Functioning of the European Union.
TRIPS	Trade-Related Aspects of Intellectual Property Rights
UNCTAD	United Nations Conference on Trade and Development.
UNEG	United Nations Evaluation Group
UNESCCA	United Nations Economic and Social Commission for Western Asia.
USD	United States Dollar
WTO	World Trade Organisation



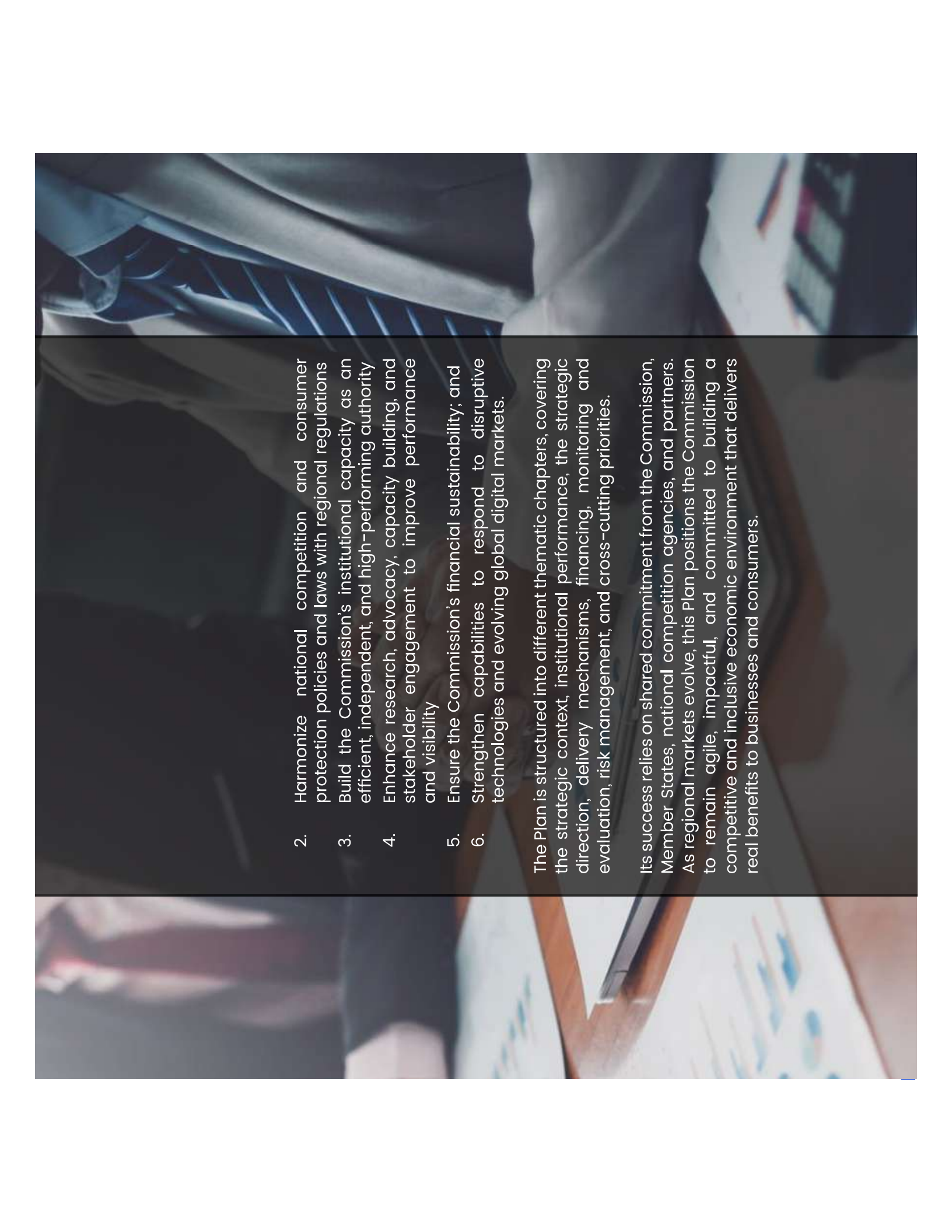
EXECUTIVE SUMMARY

The COMESA Competition and Consumer Commission, which may also be referred to as the Commission or CCCC, is a key institution promoting fair competition, regional integration, and consumer protection across the COMESA region. Established under Regulation 8 of the COMESA Competition and Consumer Protection Regulations of 2025 (the 'Regulations') and anchored in the COMESA Treaty, the Commission enforces competition law to foster equitable markets among Member States.

This 2026 - 2030 Strategic Plan is a forward-looking blueprint designed to navigate emerging global, continental, and regional challenges, ranging from digital transformation and cross-border competition dynamics to evolving consumer expectations. The plan builds on the lessons and best practices from the evaluation of the 2021-2025 plan and is aligned to key frameworks, such as the African Union's Agenda 2063, the AfCFTA Competition Protocol (2023), and the UN Sustainable Development Goals (SDGs). The Plan reflects a rigorous and participatory design process involving performance reviews, stakeholder consultations, and strategic foresight.

At its core, the Plan is driven by six Strategic Objectives (SOs):

1. Review and assess mergers and acquisitions, detect, investigate, prevent, and sanction anti-competitive practices and consumer rights violations

- 
2. Harmonize national competition and consumer protection policies and laws with regional regulations
 3. Build the Commission's institutional capacity as an efficient, independent, and high-performing authority
 4. Enhance research, advocacy, capacity building, and stakeholder engagement to improve performance and visibility
 5. Ensure the Commission's financial sustainability; and
 6. Strengthen capabilities to respond to disruptive technologies and evolving global digital markets.

The Plan is structured into different thematic chapters, covering the strategic context, institutional performance, the strategic direction, delivery mechanisms, financing, monitoring and evaluation, risk management, and cross-cutting priorities.

Its success relies on shared commitment from the Commission, Member States, national competition agencies, and partners. As regional markets evolve, this Plan positions the Commission to remain agile, impactful, and committed to building a competitive and inclusive economic environment that delivers real benefits to businesses and consumers.

FOREWORD



It is with pride and optimism that I present the 2026–2030 Strategic Plan of the CCCC, on behalf of the Board of Commissioners.

This plan reflects our shared aspirations, built on careful analysis, honest reflection, and wide-ranging consultations. It charts a path toward deeper regional integration, stronger consumer protection, and more competitive markets across COMESA.

We drew key lessons from the 2021–2025 Strategic Plan through a rigorous evaluation based on the OECD-DAC framework. These insights helped us refine our focus and respond more effectively to the evolving landscape of competition law and policy.

The world around us is changing rapidly. Digital economies are expanding, cross-border competition and consumer concerns are becoming more complex, and global economic shocks are reshaping national priorities. In this context, we took a bold and innovative approach, guided by thorough situational,

SWOT, and PESTLE analyses, to ensure the Commission remains responsive and future-ready. At the heart of this Strategic Plan is the voice of our stakeholders. We deeply appreciate the contributions from NCAs, policymakers, regulators, businesses, civil society, and our development partners. Your perspectives ensured that the plan is both practical and visionary; anchored in reality but ambitious in intent.

As the Board, we reaffirm our commitment to provide strong governance oversight and strategic support. We will champion resource mobilization, institutional capacity building, and regional policy coherence to enable the Commission to deliver on its mandate.

We also recognize that success will require more than just planning; it will demand partnership. We stand ready to work closely with Member States and all stakeholders to create an enabling environment for implementation.

To the Secretariat and all those who shaped this Plan, we thank you. With renewed determination, we look ahead to a future where fair competition is a driver of prosperity, innovation, and inclusive growth for all people in the COMESA region.



.....
Commissioner Vipin Naugah
Board Chairperson
COMESA Competition Commission

PREAMBLE



As we unveil the 2026–2030 Strategic Plan, the CCCC stands at a defining moment in its institutional journey and regional impact. This plan is more than a roadmap; it is a renewed commitment to advancing fair competition, economic efficiency, and consumer protection across the COMESA region and beyond.

Since the commencement of the operations of the CCCC in 2013, the institution has grown from a start-up regulator into a trusted regional institution. We now operate in a fast-changing environment shaped by digital transformation, cross-border trade, and global economic shifts. In this context, the Commission serves both as an enforcer of competition rules and a facilitator of inclusive markets.

This Strategic Plan builds on the lessons and achievements of the past five years. Developed through wide consultation with Member States, competition authorities, policymakers, the private sector, and development partners, it is informed by evidence, grounded in regional realities, and guided by shared ambition.

The CCCC's 2026–2030 Strategic Plan is anchored on five interconnected pillars:

- 1 Integrating Markets and Regulatory Harmonization: Promoting alignment of competition and consumer protection frameworks across COMESA, AfCFTA, and other regional blocs (EAC) to reduce regulatory fragmentation, foster legal

certainty, and advance Africa's integration goals under Agenda 2063.

- 2 Effective Enforcement and Compliance: Enhancing enforcement by strengthening enforcement tools and skills, and compliance mechanisms, deepening coordination with national authorities, and ensuring timely delivery of the Commission's decisions to uphold market fairness and institutional credibility.
- 3 Institutional Innovation: Modernize the Commission's operations through emerging technologies, data analytics, and capacity development to improve agility and regulatory effectiveness in both digital and traditional markets.
- 4 Contextual Leadership: Championing competition and consumer protection as enablers of inclusive and sustainable development by aligning enforcement efforts with national and regional priorities.
- 5 Strategic Partnerships and Stakeholder Engagement: Fostering partnerships and expanding outreach to businesses, consumers, and national and international actors through targeted advocacy, multilingual communication, and evidence-based engagement

These priorities align with COMESA's integration goals, the African Union's Agenda 2063, and the UN Sustainable Development Goals.

I am particularly proud of the inclusive and consultative process that shaped this Strategic Plan. Through rigorous evaluations, stakeholder engagement, and strategic reflection, we have developed a bold yet practical agenda for the years ahead.

Delivering on this strategy will require strong partnerships, sustained commitment, and shared ownership. The Commission remains dedicated to transparency, innovation, and responsiveness in fulfilling its mandate.

To all our stakeholders, thank you for your continued trust. Together, we can build dynamic and competitive markets that drive growth and benefit the people of our region.



.....
Dr. Willard Mwemba
Chief Executive Officer
COMESA Competition and Consumer Commission



CHAPTER 1: INTRODUCTION



1.1. OVERVIEW

The Commission occupies a central place in the region's journey toward economic integration, inclusive growth, and consumer protection. Anchored in the COMESA Treaty, the Commission was established not merely as a regulatory authority but as a guardian of fair play in regional markets. Its mandate to promote and enforce competition and consumer protection laws goes beyond curbing anti-competitive behaviour and consumer violations. It is about fostering equity and innovation in the way markets operate across the Common Market, ultimately enhancing consumer welfare.

As the economic and technological landscape of the globe, continent, and region shifts, with, among others, geo-economic and political factors, digital transformation, cross-border mergers, and evolving consumer patterns reshaping traditional business models, the Commission's role has grown even more consequential. In this context, the Commission's ability to serve as both a watchdog and a developmental partner becomes vital. The task is not just enforcement, but enabling the emergence of markets that are competitive, transparent, and responsive to the needs of consumers and enterprises alike.

This Strategic Plan for 2026–2030 presents a thoughtful and forward-looking framework to guide the Commission's work over the next five years. It articulates strategic choices aimed at strengthening the Commission's enforcement capacity, deepening cooperation with NCAs, and ensuring that regulatory

responses remain aligned with both global best practices and the unique realities of the region. Crucially, it recognizes the imperative of legal and policy coherence in addressing complex challenges such as digital market dominance, sustainability-linked competition issues, and the vulnerabilities of consumers.

The Strategic Direction of the Commission must elevate the institution as a regionally grounded, technologically empowered, and continentally aligned authority. This strategy will enable the Commission to respond effectively to Africa's dynamic economic landscape and play a central role in shaping competitive, fair, and development-driven regional markets. The Strategic Plan reaffirms the Commission's commitment to shaping an economic environment where innovation flourishes, investment is safeguarded, and consumers are treated with fairness and respect. By harmonizing legal frameworks and fostering stronger institutional collaboration across Member States, the Commission contributes meaningfully to COMESA's broader aspirations for deeper regional integration, resilience, and prosperity.

The success of this strategy will depend not only on robust implementation but also on sustained dialogue, political will, and collective action. As markets continue to evolve, so too must our institutions. The Commission, guided by this Strategic Plan, stands ready to navigate that evolution, grounded in principle, enriched by experience, and driven by a shared vision of a more competitive and inclusive regional economy.

1.2. MANDATE AND LEGAL BASIS OF THE COMMISSION

The Commission, established under Regulation 8 of the Regulations, is a specialized institution mandated to promote and enforce fair competition and protect consumers across the COMESA region. By ensuring that businesses compete fairly, the Commission supports economic efficiency, trade liberalization, innovation, and consumer welfare, all essential pillars of regional integration and inclusive growth.

The Commission's legal foundation is based on Article 55 of the COMESA Treaty. This Article empowers the Council of Ministers (the 'Council') to make Regulations to regulate anti-competitive behaviour in the Common Market. In response, the repealed COMESA Competition Regulations were adopted in 2004, enabling the Commission to oversee mergers and acquisitions, investigate restrictive practices, and safeguard the rights of consumers across

Member States. The Commission became operational in January 2013, with jurisdiction over cross-border economic activities that impact competition within the region, and thus it plays a critical role in maintaining competitive markets and protecting consumers.

Following the repeal of the COMESA Competition Regulations, the Council, in December 2025, approved the COMESA Competition and Consumer Protection Regulations (the 'Regulations') giving the Commission continued and expanded mandate to among others conduct merger reviews, investigate and sanction anti-competitive conduct, any consumer violations, issue binding decisions, and work closely with NCAs, Economic Regulators, and relevant stakeholders. Beyond enforcement, the Commission promotes advocacy, research, policy, and capacity building to strengthen competition and consumer regimes, contributing meaningfully to COMESA's wider objectives of economic transformation and sustainable development.

1.3. PROCESS OF DEVELOPING THE STRATEGIC PLAN

The development of the Commission's 2026–2030 Strategic Plan followed a structured, inclusive, and evidence-based process to ensure alignment with institutional priorities and the evolving regional context.

It began with an inception phase, where the leading consulting specialist reviewed key documents and terms of reference, resulting in an inception report detailing the methodology, stakeholder engagement plan, data collection tools, and proposed structure for both the evaluation report and the Strategic Plan. This was followed by an evaluation of the 2021–2025 Strategic Plan using OECD-DAC criteria (relevance, coherence, effectiveness, efficiency, sustainability, and impact), along with a specific performance review of the Board's oversight role, resource mobilisation trends, and financial performance. The findings were consolidated in a Strategic Plan Performance Review Report, which was presented to the senior management and staff of the Commission for validation. Relevant implications for the strategic planning for the next five years were extracted alongside the key lessons and best practices.

A situational analysis using SWOT, PESTLE, and McKinsey's 7-S frameworks assessed institutional capacity and readiness. This analysis identified key strengths, weaknesses, opportunities, and threats to the Commission. Stakeholder mapping and engagement followed, with inputs gathered through interviews, focus groups, and workshops, documented in Stakeholder Reports.

This supplemented the situational assessment report. An aggregate report that synthesized qualitative and quantitative data was generated. A visioning workshop with the senior leadership of the Commission led to a revised mission, vision, and strategic objectives aligned with COMESA, AU, and global priorities. A Theory of Change, results framework, and M&E system were subsequently developed, integrating cross-cutting themes such as digitalization, gender, youth inclusion, and sustainability. A validation workshop refined the Draft Strategic Plan, which, eventually, along with the final evaluation report, was submitted to the Board, discussed, and endorsed. The process concluded with a formal handover, ensuring institutional ownership and readiness for implementation.

1.4. STRUCTURE AND ORIENTATION OF THE STRATEGIC PLAN

The 2026–2030 Strategic Plan provides a clear roadmap to guide the Commission in advancing its mandate of enforcing competition law across the region. Informed by both regional market realities and global competition trends, the Plan outlines strategic priorities, institutional reforms, and partnerships to enhance market regulation, protect consumer rights, and support regional integration.

Balancing ambition with practicality, the Plan aligns with the Commission's mission, Member State expectations, and broader development frameworks, including the African Union's Agenda 2063 and the UN Sustainable Development Goals. It translates long-term vision into implementable strategies.

Organized into ten thematic chapters, the Plan follows a logical, results-oriented structure, from contextual analysis to vision, implementation, and accountability. This structure ensures strategic goals are translated into action, with strong systems for monitoring, learning, and continuous improvement.

1. **Introduction:** Presents the background, rationale, and context for the development of the Strategic Plan, highlighting its alignment with regional and global development frameworks.
2. **Context analysis:** Provides an assessment of the global, continental, regional, and commission context operating landscape.
3. **Situational Assessment and Performance Review:** Provides an in-depth analysis of the Commission's performance for the 2021–2025 period and an assessment of the

internal and external operating environment, including a review of past performance, stakeholder expectations, and key strategic challenges.

4. **Strategic Direction and Framework:** Articulates the Commission's vision, mission, and core values, and outlines the strategic objectives, outcomes, and priority areas for the 2026–2030 period. The plan's theory of change and impact pathway framework is also presented.
5. **Implementation Arrangements:** Describes the governance, coordination, institutional roles, and operational mechanisms required to effectively deliver the Strategic Plan.
6. **Financing Systems and Resources:** Outlines the financial requirements, funding strategies, and resource mobilization mechanisms necessary to support the implementation of the Plan.
7. **Monitoring, Evaluation, and Learning (MEL):** Details the framework for tracking progress, assessing impact, and integrating learning into the implementation cycle to enhance accountability and performance.
8. **Risk Management:** Identifies potential risks to successful implementation and outlines mitigation strategies to safeguard the achievement of strategic results.
9. **Critical Success Factors:** Highlights the essential internal and external conditions that must be in place for the effective execution and sustainability of the Strategic Plan.
10. **Appendices:** Includes the Monitoring and Evaluation Indicator Tracking Matrix to support the implementation of the Strategic Plan.



A person wearing a dark suit and a white shirt is sitting at a wooden desk. They are holding a black pen and writing on a document. In the background, there is a spiral-bound notebook with a pie chart and some text. The pie chart has three segments: a blue segment labeled '20%', a green segment labeled '30%', and a red segment labeled '50%'. The text on the notebook includes 'Eid' and 'Lid'. The overall scene suggests a professional or academic setting.

CHAPTER 2: CONTEXTUAL ANALYSIS AND OPERATING ENVIRONMENT

2.1. GLOBAL AND REGIONAL IMPERATIVES

The Commission enters its 2026–2030 strategic period amid a rapidly evolving global competition policy landscape. As market dynamics grow more complex, competition authorities worldwide are recalibrating their enforcement tools, mandates, and alliances in response to digital transformation, rising geopolitical tensions, and increasing regulatory interdependence. New challenges, ranging from data-driven economies and algorithmic pricing to platform dominance, have prompted stronger regulatory interventions, particularly in the digital economy. In recent times, global antitrust penalties have dramatically soared, underscoring the resolve of authorities around the world to restore market contestability. The Commission is very cognizant of this reality, and for this reason, in December, 2025, the COMESA Competition Regulations of 2004 were repealed and replaced with the COMESA Competition and Consumer Regulations of 2025. This is supported by the preamble of the 2025 Regulations, which states that:

“CONSIDERING THAT: It has become necessary to revoke the COMESA Competition Regulations of 2004 in line with new developments”

Multilateral instruments such as the United Nations Set of Multilaterally Agreed Equitable Principles and Rules for the Control of Restrictive Business Practices (the ‘Set’), The United Nations Guidelines for Consumer Protection (UNGCP), the United Nations principles for consumer product safety, General Agreement on Tariffs and Trade (GATT), the General Agreement on Trade in Services (GATS), and the Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPS), inter alia, form the foundation of global competition and consumer norms. These frameworks introduced key competition principles like non-discrimination and fostered cooperation among jurisdictions, especially critical for developing economies. Recent reports, such as the Digital Trade for Development (2023) Report, co-published by the IMF, OECD, UNCTAD, World Bank, and WTO, have reaffirmed the role of competition in advancing inclusive digital economies. They advocate for strong institutional capacity, equitable regulatory environments, and fair data governance to bridge digital divides.

Competition and consumer authorities are shifting from reactive enforcement to more

anticipatory approaches. Traditional instruments, such as investigations into cartels, are being complemented by forward-looking tools, including ex-ante regulation, comprehensive market studies, and enhanced merger notification systems. Authorities increasingly rely on leniency programs, public interest assessments, and cross-border coordination to bolster regulatory effectiveness. These developments highlight the growing importance of institutional agility, innovation, and collaboration in modern competition enforcement. Competition and consumer authorities are also investing more in technology to help address competition and consumer conduct like algorithmic collusion and dark patterns that are becoming more widespread but difficult to detect.

In the evolving global environment, international (and regional) cooperation has become indispensable. Instruments such as the UNCTAD Set of Multilaterally Agreed Principles on Competition provide normative benchmarks, while UNCTAD's technical support and peer reviews have continued to help align national regimes with global best practices. The OECD's Competition Toolkit, merger guidelines, and the initiatives of the Global Forum on Competition all offer further capacity-building and policy harmonization tools. In parallel, the International Competition Network (ICN) facilitates convergence through peer learning and technical working groups. Together, these initiatives foster a more coordinated and adaptive global competition regime.

Regionally, the European Union's legal architecture, anchored in the Treaty on the Functioning of the European Union (TFEU), remains a leading model, influencing many African frameworks, including COMESA's. African regional economic communities (RECs) such as EAC, ECOWAS, SADC, and COMESA have made important strides toward building harmonized competition regimes, contributing to regulatory integration and cross-border coherence.

For the Commission, the 2026–2030 strategy presents an opportunity to reimagine its institutional role in regional economic governance. The next five years will require bold, adaptive, and collaborative action to address current enforcement challenges while preparing for future disruptions. By leveraging global insights, aligning with continental aspirations, and deepening strategic regional cooperation, the Commission can advance a fair, competitive, and integrated market across the region, protecting consumers, empowering businesses, and driving inclusive economic growth.

2.2. AFRICA'S EVOLVING COMPETITION LANDSCAPE

Africa's competition policy environment is evolving rapidly, with over 20 countries now having operational competition authorities, a reflection of growing commitment to fair markets and inclusive growth. Reforms in countries such as Burundi, Botswana, Ethiopia, and Mozambique underscore a continental push for stronger regulatory institutions. Egypt's recent adoption of a mandatory pre-merger notification regime illustrates a shift toward proactive and structured market regulation. The launch of the African Continental Free Trade Area (AfCFTA) is a major leap in economic integration, offering significant opportunities but also posing challenges such as regulatory overlaps. The foregoing notwithstanding, the adoption of the AfCFTA Protocol on Competition Policy in 2023 sets the stage for harmonized enforcement across Africa.

As a regional authority and given that it has laid the foundation for multi-state competition enforcement in Africa, the Commission is strategically placed to support the operationalization of the AfCFTA Protocol through promoting legal coherence, minimizing regulatory fragmentation, and building enforcement synergies within COMESA and beyond. Institutional overlaps, such as with the East African Community Competition Authority (EACCA) in dual-Member States like Kenya and Uganda, raise risks of fragmented enforcement and forum shopping. In response, the Commission and EACCA signed a Memorandum of Understanding in June 2025, fostering joint investigations, mutual recognition of decisions, and coordinated market surveillance. Beyond formal agreements, further collaboration through shared advocacy and capacity building can turn challenges into opportunities for innovation, particularly in digital markets and public procurement.

The African Competition Forum (ACF) complements the above efforts through technical assistance and peer learning, while the proposed African Competition Commission under the AfCFTA is expected to provide continental policy guidance. Yet, enforcement remains uneven, with many authorities constrained by limited capacity and political will. New challenges such as digital platform dominance and algorithmic collusion require modern, adaptive strategies. The Strategic Plan must respond decisively, positioning itself as a regional enforcer and thought leader in Africa's inclusive, digital, and sustainable market transformation.

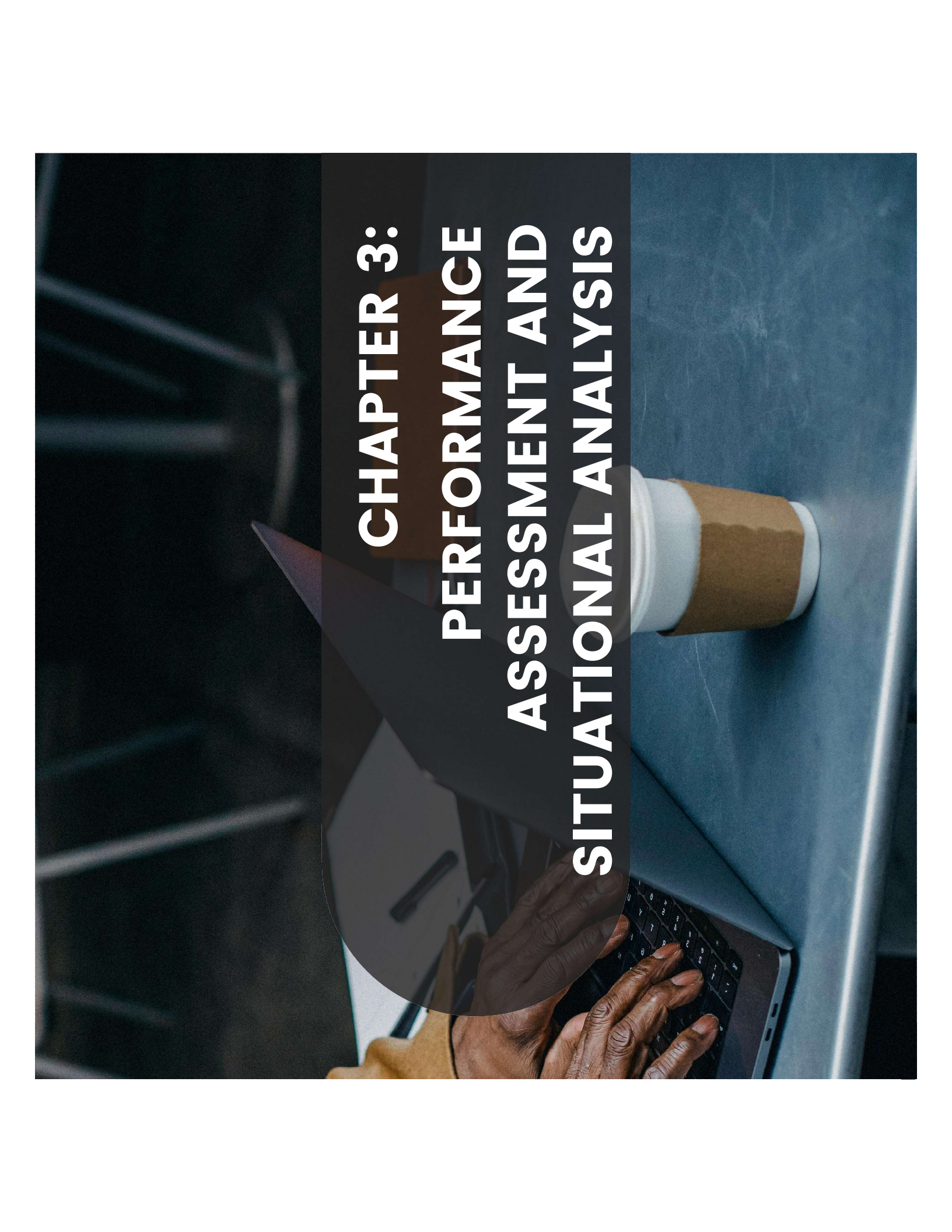
2.3. COMMISSION'S REGIONAL OPERATING CONTEXT

Operating in a dynamic regional market of 21 member states, over 640 million people, and a GDP (PPP) nearing USD 1 trillion, the COMESA Competition Commission is the central supranational authority mandated to safeguard competition and consumer welfare. Since its establishment in 2013, the Commission has made significant institutional progress, particularly in merger control, investigations, and policy advocacy. As COMESA advances its integration agenda, customs union implementation, market liberalization, and digital trade, the Commission must transition from reactive enforcement to a strategic role that embeds competition and consumer policy into broader development goals. To support this shift, the Commission should align with regional priorities in industrialization, infrastructure, and digital markets, positioning itself as both regulator and integration enabler.

Effective enforcement hinges on Member States harmonizing their national laws with the Commission's legal framework. However, outdated laws, institutional fragmentation, and capacity disparities weaken compliance and create enforcement gaps. The Commission must promote regulatory coherence through legal harmonization, joint investigations, and peer learning, establishing a seamless regional enforcement ecosystem.

Despite progress, the Commission faces persistent challenges: regulatory divergence, tariff and non-tariff barriers, and weak political commitment continue to undermine integration. Many NCAs remain under-resourced, limiting effective enforcement. As anti-competitive conduct becomes more cross-border and digital, the Commission must reposition as a proactive policy leader. A forward-looking strategy grounded in risk-based enforcement and public interest regulation is essential. Aligning with Agenda 2063, the Commission must champion fair, transparent, and development-oriented competition governance to support Africa's economic transformation.



A photograph of a person's hands typing on a laptop keyboard. The laptop is on a dark blue desk. A white and brown paper coffee cup is next to the laptop. The background is dark and out of focus. A semi-transparent dark grey circle is overlaid on the image, containing the chapter title in white text.

CHAPTER 3: PERFORMANCE ASSESSMENT AND SITUATIONAL ANALYSIS

3. 1. PERFORMANCE REVIEW (2021-2025)

3.1.1. KEY ACHIEVEMENTS

In the 2021-2025 Strategic Plan, the Commission had planned to undertake a total of 109 initiatives spread across four strategic issues, with each issue having a set of strategic objectives. The evaluation findings overall revealed that of the 109 strategic initiatives, 62% (68 initiatives) were fully implemented, 29% (32 initiatives) were partially executed, and 8% (9 initiatives) were not implemented. This reflects a strong commitment but highlights areas requiring improved execution and continuity. A review of performance for each strategic issue followed.

Strategic Issue 1: Enhancing Competition and Consumer Protection

The Commission achieved 68% of planned actions, with enforcement activities, including investigations and merger assessments, increasing in volume and efficiency. The review of merger assessments, which have a statutory time limitation, improved from 75% to 85%. Technical assistance and enforcement cooperation with Member States expanded. Consumer protection advanced through the establishment of operational consumer helplines, product recalls, and the creation of a regional Consumer Protection Committee. Case resolution timelines remained moderate at 45-50%, indicating a need for faster case management. Notably, thematic areas such as digital markets and consumer information dissemination gained traction.

The promotion of due process saw achievements such as the adoption of hearing guidelines and confidential information policy, increased support for undertakings, and procedural developments. Although complaints against the CCC's decisions remained minimal, this trend suggests a largely accepted process. Under this strategic issue, the establishment of the research unit enhanced data-driven policymaking, supported by some operational market databases, and increased publication outputs. During this period, the Commission also reviewed the Regulations and Rules. The COMESA Competition and Consumer Protection Regulations and Rules were approved and adopted by the Council on 4 December 2025 and immediately became enforceable.

Strategic Issue 2: Compliance and Legal Framework Enhancement

Progress was steady in the review of the Regulations and Rules, legal harmonization, and compliance promotion. Although adoption of the Regulations at the national level stagnated, significant milestones included the rollout of legal guidelines, the Judiciary capacity building,

and the expansion of legal support to Member States. MOUs concluded rose from one in 2021 to five in 2024, and renewed engagement with national courts supported ongoing harmonization efforts.

Strategic Issue 3: Visibility of the Commission

Under this strategic issue, CCC achieved 69% of its targets, surpassed 13%, and kept 19% in progress. Notably, the failure to establish a dedicated PR Unit limited early digital engagement. However, media visibility improved markedly from 2023 onward, with increased training for advocates, translation of some official documents into COMESA languages, and enhanced digital platforms, including the launch of an interactive website. Social media growth was substantial, particularly on Facebook, which rose from 1.2K to nearly 30K engagements between 2024 and 2025. Partnerships grew from 8 to 14, and international event participation increased from 10 to 19, including stronger ties with AfCFTA and the Tripartite FTA.

Strategic Issue 4: Organizational Capacity and Systems.

Significant institutional progress included the implementation of a revised organizational structure, enhanced recruitment, and regular performance appraisals supported by skills and job evaluations. Capacity development reached 100% by 2024, alongside the efforts for the establishment of a regional training center. A fully operational automated M&E system was not achieved as had been planned. Resource mobilization advanced from strategy formulation to some level of implementation. Donor engagement remained limited, with only four grant proposals in the four years assessed. However, the performance on these four proposals was indicative of the potential of the Commission to attract donor support. Corporate governance reforms covered Board procedures, staff rules, risk and disciplinary policies, and code of conduct enforcement. ICT modernization was delivered on the implementation of an electronic accounting system (SUN Systems) and some efforts on case management, disaster recovery, and business continuity systems. Full automation of internal processes was not fully achieved by 2024, but efforts were made on some processes, positioning the Commission for improved service delivery and resilience.

3.1.2. STRATEGIC PLAN REVIEW AND LESSONS LEARNT

While ambitious and action-oriented, the 2021–2025 Strategic Plan had several weaknesses that limited its overall strategic impact. Implementation targets were too broad and insufficiently detailed by year, weakening alignment with annual planning and budgeting processes. The

mid-term review primarily used qualitative assessments, missing the opportunity to apply quantitative indicators for timely course corrections.

Further challenges arose from weak performance measurement frameworks, including poorly designed indicators and the absence of a comprehensive monitoring and evaluation (M&E) tracking indicator matrix for the plan, which hindered effective oversight. Risk management was inadequately integrated, leaving vulnerabilities unaddressed. However, at a Board Level, a Risk and Audit Committee was institutionalised. Crucial strategic elements, such as a theory of change, clear impact pathways, and a resource mobilization strategy, were missing, undermining the Commission's ability to measure impact and secure financial sustainability. Addressing these gaps is critical to strengthening the Commission's strategic foresight, operational coherence, and institutional resilience in the next planning cycle.

3.1.3. KEY CHALLENGES

The Commission faced some interrelated challenges that undermined its effectiveness in promoting fair competition and protecting consumer welfare across the Common Market. A key concern was the lack of harmonization in competition laws and enforcement mechanisms among Member States, resulting in inconsistent application of rules and weakening cross-border enforcement. This legal and institutional fragmentation was compounded by variations in political commitment and institutional capacity, limiting the Commission's ability to carry out its mandate effectively. Addressing these issues requires stronger regional coordination, sustained legal reform, and enhanced technical assistance to create a more cohesive and predictable regulatory environment.

The emergence of digital and platform markets introduced new complexities, as dominant global players raised concerns around data monopolies, algorithmic collusion, and platform neutrality. The Commission did not build analytical capacity and invest in tools and partnerships to effectively regulate these evolving markets. The Commission continued to face some resource constraints, which limited its operational expansion and responsiveness to emerging issues. Securing sustainable and diversified funding sources is essential to support its broader mandate and adapt to fast-changing regional and global market dynamics.

Enforcement challenges were exacerbated by limited public awareness and weak institutional frameworks in several Member States. Many businesses and consumers remained unaware

of their rights, while NCAs often faced underfunding and political interference. Cross-border mergers, regulatory loopholes exploited by multinationals, and competition-distorting practices by state-owned enterprises and public procurement systems further complicated enforcement.

3.2. SITUATIONAL ASSESSMENT

3.2.1 INTERNAL ENVIRONMENT

Possessing an international legal personality, the Commission engages effectively with global governance structures and administers a centralized merger control mechanism that facilitates regulatory efficiency and reduces compliance burdens for businesses.

Institutionally, the Commission benefits from a multidisciplinary professional team, with sound governance mechanisms including an active Board and robust financial and procurement controls supported by regular audits. Its regional and international standing has been bolstered through expanded enforcement actions, a growing portfolio of merger reviews, and the development of key regulatory instruments. Strategic partnerships, especially with development partners such as the European Union and investments in some digital infrastructure, have further enhanced institutional performance.

The Commission is confronted with some internal challenges. Financial constraints and increasing case complexity strain operational capacity. The foregoing, coupled with limited donor funding, raises concerns about long-term sustainability. Technological gaps, particularly in regulating digital markets, inhibit agility in responding to emerging competitive threats. Additionally, marked disparities in capacity among NCAs, coupled with divergent legal and institutional frameworks across Member States, impede coherent and consistent enforcement. These issues underscore the imperative for enhanced regional harmonization, strengthened collaboration mechanisms, and targeted capacity-building to cultivate an integrated and resilient competition regime.

3.2.2 EXTERNAL ENVIRONMENT

3.2.2.1 Political and Legal Context. The Commission's mandate is anchored in the Regulations, providing a unified legal foundation for regional enforcement. However, effective implementation depends on the political commitment of Member States, which varies considerably. While some jurisdictions, such as Kenya, Zambia, Egypt, and Mauritius,

exhibit advanced competition frameworks, others face legislative and institutional gaps, undermining enforcement uniformity, especially concerning cross-border mergers and cartel activity. Overlapping national and regional regulatory regimes may generate legal ambiguities and procedural delays.

3.2.2.2 Economic Environment. The economic landscape within COMESA is characterized by significant heterogeneity. While several Member States report steady growth, structural challenges such as high youth unemployment and large informal sectors persist. Accelerated regional trade integration, coupled with the proliferation of e-commerce and digital platforms, introduces complex regulatory challenges. Dominant digital market players, often transnational in scope, raise critical competition concerns, including algorithmic collusion, data monopolization, and platform neutrality. Recent global shocks further disrupt market dynamics and supply chains, highlighting the urgency for regulatory frameworks that are both adaptive and resilient.

3.2.2.3 Social and Consumer Dynamics. Consumer awareness of rights and protections is increasing, yet disparities in economic literacy and information access remain widespread across the region. Informal sector participants and vulnerable populations cannot frequently engage effectively with competition enforcement mechanisms. Rising demand for consumer protection in critical sectors, such as food safety, digital services, and pricing transparency, necessitates robust advocacy, education, and targeted outreach. Moreover, the growth of youth-led informal enterprises presents nuanced compliance and regulatory challenges requiring innovative and tailored engagement strategies.

3.2.2.4 Technological Transformation. The rapid pace of digitalization is reshaping competition policy and enforcement. The expansion of e-commerce, artificial intelligence, and big data analytics introduces both regulatory challenges and opportunities. To remain effective, the Commission must develop advanced capabilities to monitor and regulate digital markets, necessitating strategic investments in surveillance technologies, data analytics, and staff expertise. Concurrently, technological innovation can be leveraged to enhance enforcement efficiency through automation, predictive analytics, and data-driven decision-making. Future-proofing the Commission's regulatory capacity hinges on sustained investment in digital infrastructure and continuous professional development.

3.2.2.5 Competitive and Market Environment. The regional market landscape is increasingly complex and characterized by heightened competition. The entry and expansion of multinational corporations, ongoing industry consolidation through mergers and acquisitions, and the dominance of key sectors, including telecommunications, transport, and agriculture, are redefining market power structures. Persistent anti-

competitive practices such as bid-rigging, collusion, and abuse of dominance, especially in procurement and state-owned enterprises, pose significant enforcement challenges. Furthermore, regulatory arbitrage by multinational entities exploiting disparities in national legal frameworks complicates effective oversight. Strengthening cross-border coordination, particularly in merger control and cartel investigations, remains a strategic priority to safeguard market integrity.

3.2.3. SUMMARY OF THE SWOT ANALYSIS

TABLE 1: SWOT ANALYSIS

STRENGTHS	WEAKNESSES
• Strong legal mandate under the COMESA Treaty with a supranational authority for cross-border cases	• Financial and staffing constraints
• Robust institutional framework with binding decisions and international legal personality	• Limited capacity in digital market regulation and a lack of advanced analytical tools
• Skilled and multidisciplinary staff supported by a competent Board	• Uneven enforcement across Member States due to varied legal and institutional capacities
• Effective merger control and enforcement systems; operational case management IT tools	• Delayed finalization of updated regulations and guidelines hampers enforcement
• Strategic partnerships with international, regional and national bodies	• Limited public awareness and insufficient grassroots outreach; low consumer reporting
• Functional research, advocacy and policy unit with recognized thought leadership	• Insufficient multi-language publication of decisions affects accessibility
• Strong governance structures, accountability frameworks, and routine audits	• Gaps in Monitoring & Evaluation (M&E) systems and limited ICT integration
OPPORTUNITIES	THREATS
• Increasing regional integration through COMESA and AfCFTA enhances scope for coordinated enforcement	• Political instability, interference and lack of uniform political commitment across Member States

OPPORTUNITIES	THREATS
• Digital transformation allows the development of smart regulatory tools and digital market regulation • Rising consumer activism and demand for fair competition can strengthen enforcement legitimacy • Donor and partner support for capacity building and technical assistance to NCAs • Scope for policy innovation, judiciary engagement, and forward-looking regulatory reforms • Opportunities to enhance internal governance, ICT infrastructure, and M&E systems • Strengthened Collaboration and Policy Harmonisation	• Divergent national legal frameworks and incomplete domestication of COMESA rules • Complex, fast-evolving digital markets strain investigative capacity and case resolution • Reliance on limited funding sources makes program continuity vulnerable to funding volatility • Low consumer awareness limits the effectiveness of consumer • protection enforcement • Fragmented ICT systems and poor coordination with national agencies and courts • Poor competition culture • Regulatory Fragmentation and Overlapping Mandates

3.3. IMPLICATIONS OF THE ENVIRONMENTAL ANALYSIS

The performance trends and contextual dynamics of the Commission offer valuable lessons and strategic signals that should shape the 2026–2030 Strategic Plan. These implications reflect the Commission’s notable achievements while identifying emerging priorities that demand a recalibration of focus, capacity, and resources to sustain impact within an increasingly complex and fast-evolving regional and global environment.

First, the steady growth in merger reviews points to an increasing demand for the Commission’s regulatory oversight. This trend, by implication, underscores the urgent need to strengthen enforcement capacity by investing in advanced market intelligence, digital surveillance tools, and cross-border investigative protocols. Building technical staffing and legal expertise, particularly in digital competition, data analytics, and artificial intelligence (AI), will be critical to ensuring the Commission can effectively handle complex mergers, cartels, emerging digital market abuses, and consumer cases.

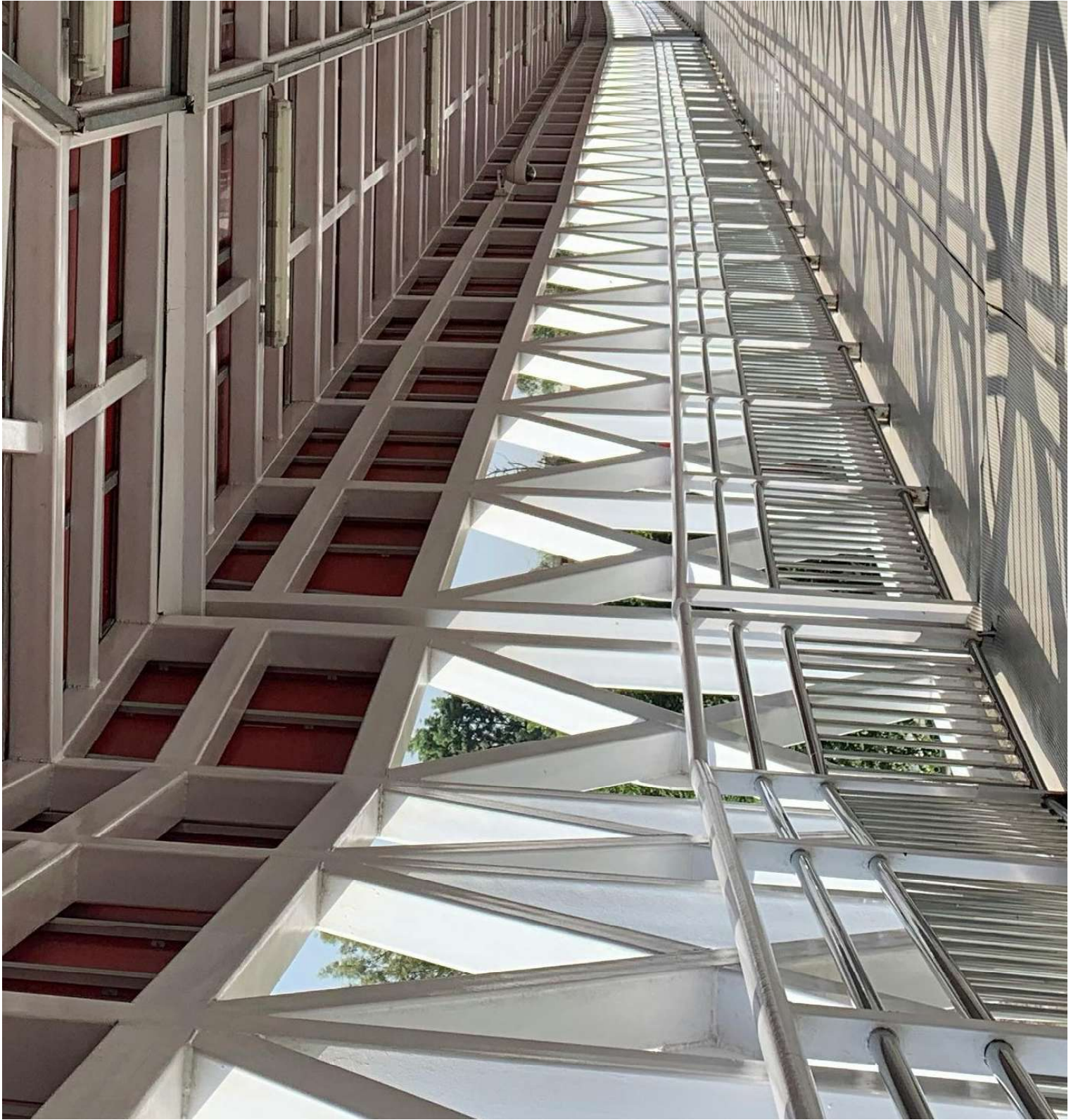
Second, while the Commission has made significant strides in supporting NCAs, with 90% of Member States having received technical assistance, disparities in enforcement capacity

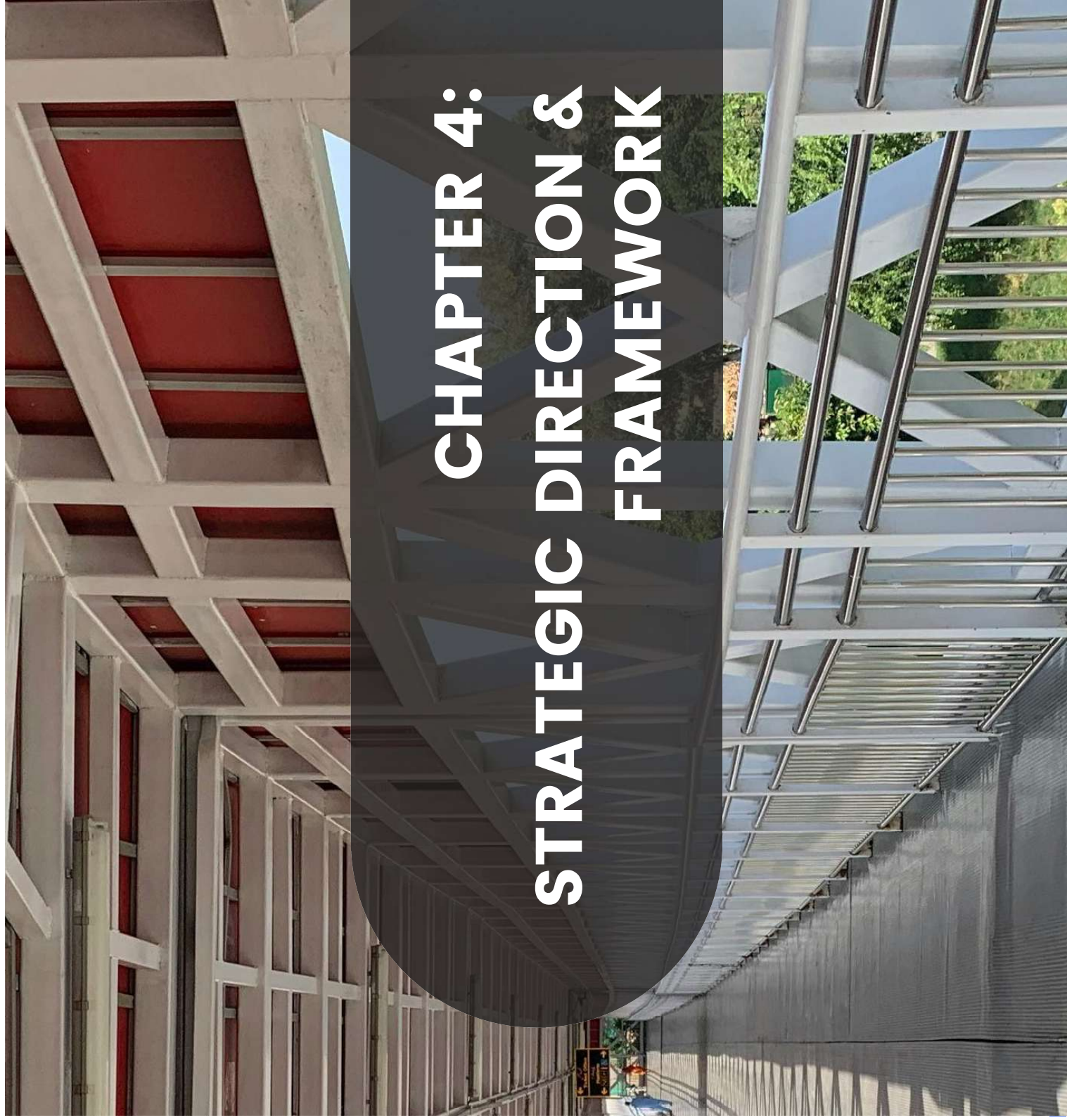
and legal frameworks persist across the region. The new Strategic Plan must deepen regional integration by prioritizing the harmonization of competition laws, finalizing cooperation agreements, and institutionalizing binding protocols for cross-border case handling.

Third, the Commission's ability to generate revenues beyond Member States' contributions to cover its administrative and technical expenses and disburse over USD 26.1 million in merger fees to Member States (including USD 1.9 million in 2023 alone) is commendable and reflects its role in providing resources for Member States. However, reliance on merger fees and member state contributions poses sustainability risks. The Strategic Plan should therefore embed clear resource mobilization strategies aimed at diversifying income sources, including through compliance certification services, advisory programs, technical training, and cost-sharing models.

Fourth, the rapid emergence of digital markets, e-commerce platforms, and AI-driven business models presents both challenges and opportunities for competition regulation. The Strategic Plan must establish digital market regulation as a core pillar of the Commission's work, with specific goals for addressing digital mergers, data monopolies, platform dominance, and algorithmic fairness. The Commission should spearhead the building of internal capacity to engage effectively with the technological complexities shaping regional and global markets.

Finally, while the Commission has improved data availability and performance monitoring, future regulatory effectiveness will hinge on the Commission's ability to adapt to fast-changing market dynamics. The 2026–2030 Strategic Plan should embed a robust, integrated Monitoring, Evaluation, and Learning (MEL) system that combines quantitative performance indicators with qualitative impact measures. This system should support real-time evidence-based decision-making, enable annual strategic reviews, and facilitate scenario-based planning. Such an approach will ensure the Commission remains agile, responsive, and future-ready in fulfilling its mandate.





CHAPTER 4: STRATEGIC DIRECTION & FRAMEWORK



VISION

To be a centre of excellence
for competition regulation and
consumer protection



MISSION

To promote competitive
and inclusive markets in the
Common Market by regulating
competition and safeguarding
consumer rights, thereby
fostering regional integration
and sustainable development.



CORE VALUES

- Professionalism: Upholding the highest standards of integrity and ethical conduct in all operations
- Integrity: Upholding fairness and transparency.
- Efficiency: Delivering timely and cost-effective services.
- Effectiveness: Demonstrating high levels of competence and commitment. Accountability: Ensuring responsibility to stakeholders.
- Independence: Maintaining autonomy in executing mandates.
- Continuous Improvement: Embracing innovation, best practices, and responsiveness to change.
- Cooperation: Collaborating closely with Member States and stakeholders.

4.4 STRATEGIC PLAN PILLARS

In response to the evolving global competition landscape, Africa's integration agenda, and the growing complexity of cross-border markets, the Commission will anchor its 2026–2030 Strategic Plan on the following five interlinked strategic pillars:

CCCC STRATEGIC PILLARS

1

INTEGRATING MARKETS AND REGULATORY HARMONIZATION

Promoting alignment of competition and consumer protection frameworks across COMESA, AfCFTA, and other regional blocs (EAC) to reduce regulatory fragmentation, foster legal certainty, and advance Africa's integration goals under Agenda 2063.

2

EFFECTIVE ENFORCEMENT AND COMPLIANCE

Enhancing enforcement by strengthening compliance mechanisms, deepening coordination with national authorities, and ensuring timely delivery of the Commission's decisions to uphold market fairness and institutional credibility.

3

INSTITUTIONAL INNOVATION

Modernize the Commission's operations through emerging technologies, data analytics, and capacity development to improve agility and regulatory effectiveness in both digital and traditional markets.

4

CONTEXTUAL LEADERSHIP

Championing competition and consumer protection as enablers of inclusive and sustainable development by aligning enforcement efforts with national and regional priorities.

5

STRATEGIC PARTNERSHIPS AND STAKEHOLDER ENGAGEMENT

Fostering partnerships and expanding outreach to businesses, consumers, and national actors through targeted advocacy, multilingual communication, and evidence-based engagement.

4.5. STRATEGIC OBJECTIVES

SO1:

To review and assess mergers and acquisitions, detect, investigate, prevent, and sanction anti-competitive practices and consumer rights violations in the Common Market

GOAL: To promote competition and safeguard consumer rights in the Common Market.

STRATEGIC ACTIONS: The Commission will pursue the following strategic actions to achieve this strategic objective:

- 1.1 Assess applications and notifications, investigate and remedy reported or detected violations of competition and consumer laws.
- 1.2 Prioritize sectors and develop early warning indicators for high-risk industries.
- 1.3 Establish tools to monitor market conduct, pricing, bid rigging, and cross-border trends.
- 1.4 Implement a leniency and whistleblower program to detect cartel conduct and other anti-competitive behavior.
- 1.5 Develop a centralized case-tracking database containing information relating to investigations and repeat offenses.
- 1.6 Develop and operationalise consumer helplines and digital complaint platforms.
- 1.7 Develop a framework to prioritize investigations based on potential competition and consumer harm.
- 1.8 Development and review legal instruments relevant to enforcement.
- 1.9 Develop investigation procedures and internal manuals for case handling.
- 1.10 Building capacity for the Commission, NCAs, and stakeholders.
- 1.11 Collaborate with national enforcement and judicial bodies through joint training, technical exchanges, and joint investigation.
- 1.12 Determine competition and consumer protection cases by the panel.
- 1.13 Monitor compliance with Commission decisions and institute legal action to ensure enforcement and deterrence.
- 1.14 Engagement of academic institutions to integrate competition and consumer law into academic and professional curricula and host policy dialogues.
- 1.15 Provide compliance guidelines and training for businesses and legal professionals.
- 1.16 Collaborate with academia to produce studies and briefs for preventive advocacy.

SO2:

Strengthen the Harmonization of National Competition and Consumer Protection policies, and laws with the Regulations

GOAL: Foster harmonization of national competition and consumer laws, with the regulations to achieve unified and effective enforcement.

STRATEGIC ACTIONS: The Commission will undertake the following activities during the strategic planning period to achieve the above objective:

- 2.1 Negotiate, draft, and implement cooperation agreements with NCAs to support the enforcement of competition and consumer protection laws.
- 2.2 Engage Member States in domesticating the Regulations
- 2.3 Facilitate peer reviews to assess national compliance with the Regulations.
- 2.4 Provide advisory opinions and impact assessments on the competition and consumer protection policy to Member States.
- 2.5 Establish a regional forum for aligning/harmonising national, regional, and continental competition and consumer policies and laws.
- 2.6 Enhance cooperation with the COMESA Secretariat, AfCFTA, and other RECs to promote policy coherence and synergy.
- 2.7 Assist Member States in the enactment or review process of their National Competition and Consumer Protection Laws and operationalising NCAs

SO3:

Strengthen the Commission's Institutional Capacity as an efficient, independent, and high-performing regional authority

GOAL: Position the Commission as a high-performing autonomous authority committed to sound governance principles and practices.

STRATEGIC ACTIONS: The commission will undertake the following activities during the strategic planning period to achieve the above objective:

- 3.1 Attract, develop, and retain a highly skilled and motivated workforce.
- 3.2 Design and implement continuous staff training and capacity-building programs to enhance skills, improve service delivery, and strengthen institutional performance.

-
- 3.3. Upgrade and realign the Commission's ICT infrastructure for effective delivery of its mandate.
 - 3.4. Develop and operationalise a comprehensive risk and compliance management system.
 - 3.5. Strengthen internal processes by reviewing and updating institutional policies.
 - 3.6. Establish and operationalize a Centre of Excellence in Competition and Consumer Law.
 - 3.7. Finalize the construction and operationalization of the Commission Headquarters.
 - 3.8. Institutionalize strategic foresight and planning mechanisms using Result-Based Performance Management, including the generation of annual workplans, annual strategic reviews, scenario analyses, and mid-term evaluations to promote agility and responsiveness.
 - 3.9. Attain ISO Certification or other institutional quality benchmarks to enhance service delivery, institutional credibility, and international competitiveness.
 - 3.10. Promoting gender by mainstreaming equity across institutional policies, programs, and workforce representation.
 - 3.11. Strengthen the audit and quality assurance functions, ensuring regular compliance assessments, performance audits, and accountability across all operational units.
 - 3.12. Streamline governance framework by enhancing Board Secretariat coordination, and conducting a comprehensive review and modernisation of institutional policies to reinforce internal accountability and operational efficiency.
 - 3.13. Ensure provision of high-quality legal support and services to strengthen the Commission's legal and procedural, regulatory, and operational effectiveness.
 - 3.14. Develop and implement an integrated Monitoring, Evaluation, and Learning (MEL) framework.

SO4:

Strengthen research, advocacy, capacity building, and stakeholder engagement to enhance the performance and public visibility of the Commission.

GOAL: To enhance the visibility, credibility, and impact of the Commission by advancing research, inclusive public awareness, informing policy, participatory advocacy, and stakeholder engagement

STRATEGIC ACTIONS: The commission will undertake the following activities during the strategic

planning period to achieve the above objective:

- 4.1 Conduct market studies and inquiries in priority sectors to inform enforcement, advocacy, and policy.
- 4.2 Conduct joint monitoring and investigations with NCAs, AfCFTA, and international authorities.
- 4.3 Develop and implement an integrated Advocacy Strategy.
- 4.4 Conduct multilingual awareness and education campaigns on competition law, consumer rights, and compliance.
- 4.5 Enhance the use of digital platforms and mobile tools for information dissemination.
- 4.6 Host the Annual COMESA Consumer Awareness Week and other flagship events to promote dialogue and visibility.
- 4.7 Produce and distribute simplified, user-friendly materials on consumer protection, competition law, and complaints processes.
- 4.8 Publish an Annual Report on Competition and Consumer Welfare to highlight trends, risks, and policy recommendations.
- 4.9 Participate in regional, continental, and global events.
- 4.10 Monitor and evaluate outreach initiatives using surveys, analytics, and stakeholder feedback.
- 4.11 Conduct empirical studies to assess the impact of competition and consumer interventions.
- 4.12 Provide technical support to Member States on national competition and consumer protection.
- 4.13 Negotiate and implement cooperation frameworks (MOUs) with relevant institutions.

SO5:

Enhance the Commission's Financial Sustainability.

GOAL: Secure the Commission's long-term financial sustainability by enhancing revenue generation mechanisms and fostering fiscal discipline.

STRATEGIC ACTIONS: The commission will undertake the following activities during the strategic planning period to achieve the above objective:

- 5.1 Develop and deploy a digital service platform that integrates automated billing,

invoicing, arrears tracking, and self-service access, while creating new revenue streams.

- 5.2. Generate revenue by leasing out office space upon completion of the construction of the Commission's premises.
- 5.3. Review and implement a Resource Mobilization and Partnerships Strategy aligned with competition, consumer protection, governance, and integration agendas.
- 5.4. Package flagship initiatives for targeted donor funding and technical support.
- 5.5. Implement a Financial Governance Framework to manage internal revenue, donor funds, and cost recovery mechanisms transparently.
- 5.6. Upgrade financial systems for budgeting, expenditure tracking, reporting, and compliance with accounting standards.
- 5.7. Strengthen internal controls and audit readiness to ensure timely and clean audit outcomes.
- 5.8. Conduct periodic internal audits of financial, procurement, and operational systems.
- 5.9. Implement robust procurement plans and controls to promote transparency and regulatory compliance.
- 5.10. Deploy an integrated inventory and asset management system to ensure accountability and optimal use.
- 5.11. Streamline administrative processes and digitize operations to improve workflow efficiency and internal service delivery.

SO6:

Strengthen institutional capabilities to anticipate and adapt to disruptive technologies and shifts in global digital markets, ensuring responsive and future-ready regulatory interventions.

GOAL: To build the Commission's capacity for responsive, future-oriented enforcement and policy innovation through advanced digital tools, inclusive regulatory frameworks, and proactive engagement with emerging market dynamics such as digital platforms, green transitions, and equitable access to markets.

STRATEGIC ACTIONS: To effectively implement this strategic objective, the Commission will undertake the following actions during the strategic planning period:

- 6.1. Operationalize an automated case management system featuring workflow tracking,

data visualization, and resolution dashboards.

- 6.2 Design and deploy a real-time predictive market monitoring dashboard using big data and early-warning indicators to anticipate anti-competitive threats and consumer risks.
- 6.3 Expand the Commission’s internal ICT infrastructure, both software and hardware, to support the digitization agenda.
- 6.4 Strengthen the Commission’s capacity to address emerging market dynamics including digital platforms, Artificial Intelligence, green transitions, and equitable access to markets.

4.6. THEORY OF CHANGE

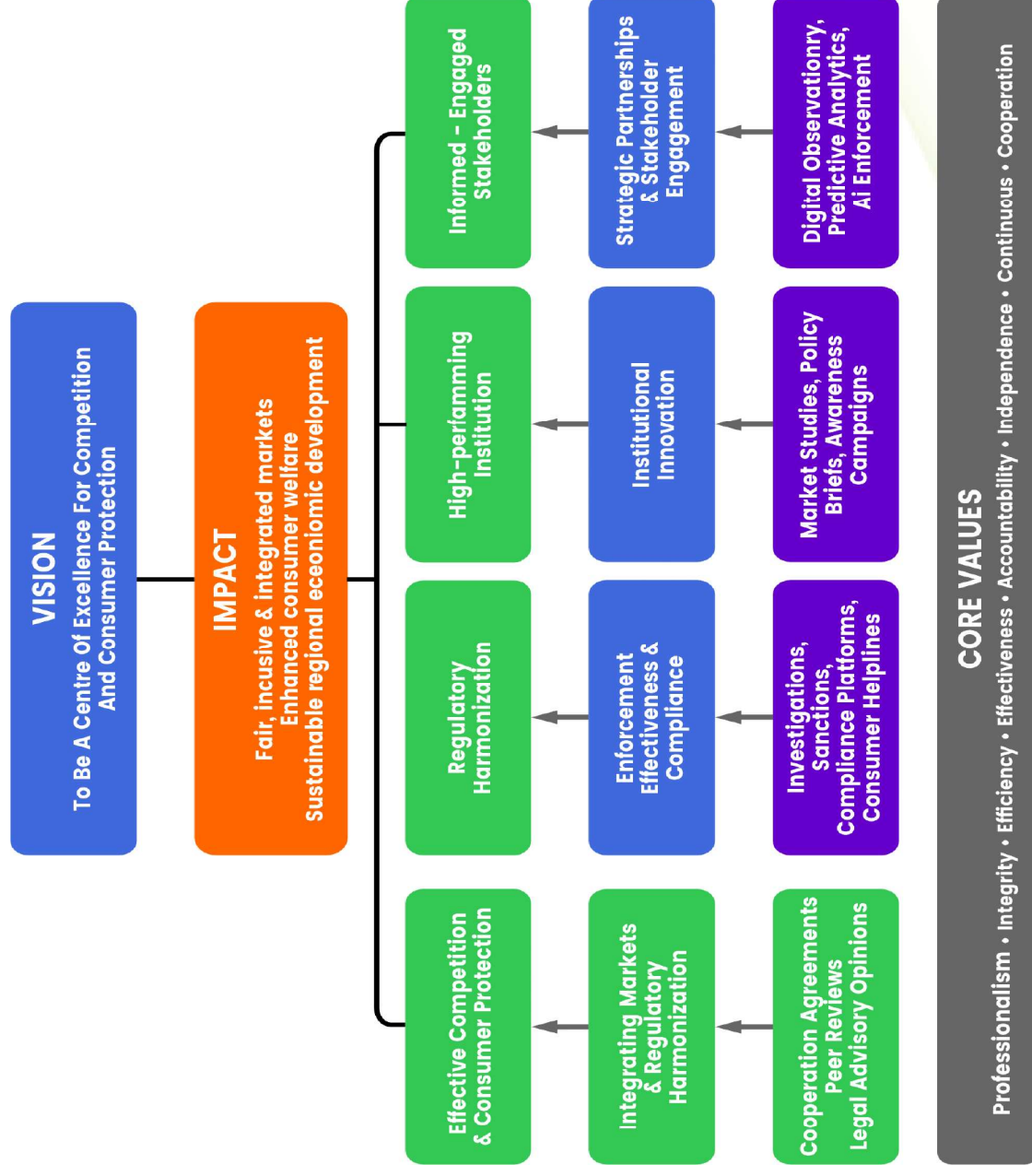
If the Commission strengthens enforcement, harmonizes regulations, modernizes its institution, provides leadership, builds partnerships, ensures financial sustainability, and embraces digital innovation → then competition and consumer protection will improve across COMESA → leading to fair, inclusive, and integrated markets, consumer welfare, and sustainable regional development. This entails the following elements:

LEVEL	ELEMENTS/DESCRIPTION
Impact (Long-Term Change)	1. Fair, inclusive, and integrated markets across the COMESA region and beyond. 2. Enhanced consumer welfare, business competitiveness, and regional economic integration aligned with Agenda 2063 and SDG targets
Outcomes (Medium-Term Results by 2030)	1. Effective Competition & Consumer Protection – Anti-competitive practices deterred, consumer rights safeguarded, and compliance strengthened. 2. Regulatory Harmonization – Member States’ laws and practices aligned with COMESA regulations, reducing fragmentation. 3. High-Performing Institution – the Commission operates as an efficient, independent, and future-ready authority. 4. Informed & Engaged Stakeholders – Businesses, consumers, and governments actively support and comply with competition and consumer law. 5. Financial Sustainability – the Commission is fiscally self-sufficient, leveraging diversified funding and innovative service delivery. 6. Digital Readiness & Innovation – the Commission effectively regulates digital markets and leverages emerging technologies for enforcement.

LEVEL	ELEMENTS/DESCRIPTION
Intermediate Results (Pillars Driving Change)	Pillar 1: Integrating Markets & Regulatory Harmonization – National laws domesticated; regional cooperation frameworks operational; peer review and policy alignment mechanisms in place. Pillar 2: Enforcement Effectiveness & Compliance – Robust case-tracking, whistleblower, and leniency systems; increased joint investigations and sanctions; functional market monitoring tools. Pillar 3: Institutional Innovation – Future-fit organizational structure; upgraded ICT and automated case management; ISO certification and risk frameworks adopted. Pillar 4: Contextual Leadership – Competition and consumer protection mainstreamed in development agendas; the Commission as thought leader via research, policy briefs, Centre of Excellence. Pillar 5: Strategic Partnerships & Engagement – Multilingual awareness campaigns; strengthened partnerships with academia, businesses, civil society; influence through regional/global advocacy platforms.
Activities & Outputs	1. Enforcement: Investigations, sanctions, compliance guidelines, consumer complaint platforms, joint task forces. 2. Harmonization: Cooperation agreements, peer reviews, legal advisory services, and regional fora. 3. Institutional Capacity: Staff training, ICT upgrades, governance reforms, HQ construction, MEL system. 4. Advocacy & Research: Market studies, policy briefs, multilingual campaigns, flagship awareness events. 5. Financial Sustainability: Resource mobilization strategy, fee-based services, donor partnerships, digital revenue platforms. 6. Digital Transformation: Predictive analytics, digital market observatory, AI-assisted case management, digital literacy toolkit.
Inputs	1. Skilled staff and technical expertise. 2. Partnerships with NCAs, AfCFTA, COMESA Secretariat, and global agencies. 3. Adequate financial resources and donor support. 4. Political will and cooperation from Member States. 5. Digital infrastructure and innovation tools

4.7. STRATEGY MAP

Figure 1: Strategy Map for the 2026–2030 SP







CHAPTER 5: IMPLEMENTATION ARRANGEMENTS

5.1 GOVERNANCE STRUCTURE

The effective implementation of the Commission's (2026–2030 Strategic Plan will be anchored in a coherent and participatory governance framework, grounded in the provisions of the COMESA Treaty.

At the top of this framework is the Council, which provides high-level policy and political oversight. The Council is responsible for endorsing key regional decisions, including the approval of part of the Commission's budget funded by COMESA Member States and major policy directions. Its support ensures that the Commission operates within the broader vision and priorities of the COMESA integration agenda.

Working closely with the Council is the COMESA Secretariat, which provides technical and administrative support across COMESA institutions, including the Commission. It ensures strategic coherence, facilitates coordination, and supports policy implementation to enhance the effectiveness of the Commission's work.

Beneath this layer, the Commission Board of Commissioners plays a pivotal role in providing strategic guidance and governance oversight. The Board regularly reviews progress on the Strategic Plan, approves annual work plans and budgets, and ensures that the Commission's initiatives are aligned with COMESA's treaty obligations and regional commitments.

To enhance effectiveness and accountability, the Board operates through specialized committees, each with a defined mandate:

- **Audit and Risk Committee** - Oversees financial management, internal controls, and risk mitigation frameworks.
- **Finance and Administration Committee** - Reviews budget proposals, monitors resource utilization, including work plans, and ensures financial sustainability.
- **Building committee (Adhoc)¹** - Provides oversight and strategic guidance on the planning, design, procurement, and implementation of infrastructure projects, including the construction of the Commission's Headquarters and the Regional Competition and Consumer Law Training Centre.

¹ This Committee will disband upon the completion of the construction of the Commission's offices.

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- **Technical and Strategy** – Provides strategic guidance on technical, policy, and institutional matters that affect the Commission's operations and long-term positioning.
 - **Contracts committee:** Oversees all procurement processes and contract awards to ensure compliance with established procurement laws and guidelines.
 - **Recruitment Committee (Adhoc).** Proposed to be established on a needs basis to oversee high-level or sensitive recruitments within the Commission.
 - **Panel Responsible for Determinations** – responsible for adjudicating and making determinations on Competition and Consumer protection cases

The day-to-day implementation of the Strategic Plan shall be led by the CEO. The CEO shall be supported by technical departments and support units responsible for executing activities, ensuring internal compliance, monitoring performance, and maintaining robust communication with partners and stakeholders.

Complementing the work of the commission shall be the Competent Authorities of COMESA Member States. These authorities shall play a crucial role in implementing competition and consumer protection policies at the national level. The Commission shall work in close partnership with these to promote regulatory consistency, share information, build capacity, and coordinate cross-border investigations.

5.2 OPERATIONAL FRAMEWORK

The operationalization of the Strategic Plan will be achieved through a structured and results-oriented framework. Each strategic objective will be translated into Annual Work Plans (AWPs) with defined outputs, responsible units, timelines, and resource requirements. These work plans will serve as the primary instruments for ensuring strategic alignment and the timely delivery of the Commission's goals.

The Commission will also adopt a Results-Based Management (RBM) approach, ensuring that all activities are linked to measurable indicators and tracked using a robust Monitoring, Evaluation, and Learning (MEL) system. Quarterly and annual performance reviews will assess progress, identify bottlenecks, and recommend corrective actions. A mid-term review will be conducted at the halfway point (2028) to assess the overall direction of the plan and make necessary adjustments in line with emerging trends and priorities.

To ensure operational efficiency, the Commission will leverage digital platforms and tools for data management, reporting, and stakeholder engagement. Moreover, internal coordination mechanisms will be enhanced through regular inter-departmental meetings, knowledge-sharing forums, and performance tracking dashboards. Risk management strategies will be embedded across all implementation stages to address uncertainties and maintain operational resilience.

5.3 RESOURCE MOBILIZATION AND PARTNERSHIPS

Successful implementation of this Strategic Plan requires predictable and sustainable funding. The Commission will pursue a diversified resource mobilization strategy, including increased efficiency in merger filing revenues, financial support from the COMESA Secretariat, and strategic partnerships with development partners and donor agencies.

Partnerships with NCAs, consumer protection agencies, academic institutions, and international regulatory networks will also be deepened to enhance technical cooperation, share best practices, and develop innovative solutions to emerging competition challenges.



CHAPTER 6: FINANCING SYSTEMS AND RESOURCES

6.1 RESOURCE MOBILIZATION

To successfully implement the 2026–2030 Strategic Plan, the Commission will diversify its funding streams through a mix of Member State contributions, merger notification fees, donor support, strategic partnerships, and capacity-building service fees.

The Commission will actively engage with development partners and international financial institutions to secure multi-year funding agreements aligned with its strategic objectives. In addition, efforts will be made to strengthen relationships with the private sector and philanthropic organizations that have an interest in promoting fair and competitive markets across the region.

A Resource Mobilization Action Plan will be developed to operationalize these efforts, setting out clear targets, stakeholder engagement strategies, and timelines. The Commission will also establish a dedicated internal function or designate a focal point within the Secretariat to coordinate all resource mobilization activities and monitor performance against set benchmarks.

The Commission currently finances its operations from three main sources:

- Member State Contributions
- Regulatory Income
- Cooperating Partner Support (donor grants and technical assistance)

Regulatory income has emerged as the financial backbone of the Commission, showing steady and significant growth over the past five years. From \$2.98 million in 2020, it rose to \$5.58 million in 2025, representing an average contribution of over 75% to the Commission's total income. This trend underscores the importance and reliability of regulatory fees, particularly from merger assessments and notifications. However, this source is inherently sensitive to fluctuations in merger activity, changes in regional economic dynamics, and shifts in regulatory policy. While dependable, the Commission must guard against over-reliance by expanding and diversifying its fee-generating services.

Member State contributions have been volatile and inconsistent, despite slight increases in 2022 and 2024. The pattern of contributions has been erratic and frequently below the projected targets, making it difficult for the Commission to plan and implement its activities effectively. This fiscal unpredictability increases the risk of delayed or underfunded strategic initiatives.

To mitigate this risk, the Commission must advocate for structured, multi-year commitments from Member States, supported by transparent reporting, value demonstration, and political engagement.

Partner and donor funding remains significantly underutilized. External funding was first recorded in 2024 and 2025, representing less than 10% of total income despite the Commission's expansive regional mandate. This limited donor engagement presents a missed opportunity, especially given the alignment between the Commission's objectives and the development priorities of key international and continental institutions. There is considerable potential to unlock support from bilateral, multilateral, and philanthropic partners such as the AfDB, GIZ, UNCTAD, ITC, and the EU, provided the Commission develops a clear and compelling resource mobilization strategy.

6.2 RECOMMENDATIONS FOR FINANCING THE 2026–2030 STRATEGIC PLAN

The Commission must adopt a multifaceted financing strategy built on four pillars: diversification of regulatory income, predictable Member State contributions, expanded donor engagement, and institutional strengthening.

First, regulatory income should be diversified and expanded. The Commission should introduce new fee-based services such as compliance certification, advisory support, and training programs, to broaden its revenue streams. Furthermore, automating billing and revenue collection will reduce administrative delays and minimize arrears, thus improving financial predictability.

Second, the Commission must significantly scale up its donor and partner engagement. A dedicated resource mobilization strategy should be reviewed and aligned with Strategic Objective 5 of the Strategic Plan. Flagship programs such as the regional competition and consumer law training centre, digital market surveillance systems, and regional consumer awareness initiatives should be packaged for targeted donor funding. The Commission should also formalize cooperation with other regional bodies through Memoranda of Understanding.

6.3 FINANCIAL MANAGEMENT

To support the efficient use of resources and maintain trust of the stakeholders, the Commission will strengthen its financial management systems in line with international best practices. A robust Public Financial Management (PFM) framework will guide budgeting, expenditure control, financial reporting, and audit functions.

The Commission will also implement modern financial information systems to improve the accuracy, timeliness, and accessibility of financial data. These systems will enable real-time budget tracking and facilitate compliance with both internal controls and COMESA financial regulations. Periodic internal and external audits will be conducted to ensure integrity and provide assurance on the prudent use of resources.

In addition, the Commission will promote a culture of financial accountability and performance-based budgeting, where resource allocation is closely tied to strategic priorities and measurable outcomes. Capacity building for financial staff and regular policy reviews will further enhance institutional readiness to manage increased and diversified funding. Transparent financial reporting and disclosure will remain central to building stakeholder confidence and sustaining future investments.

CHAPTER 7: MONITORING AND EVALUATION FRAMEWORK

Morris Charts



Sparkline Charts

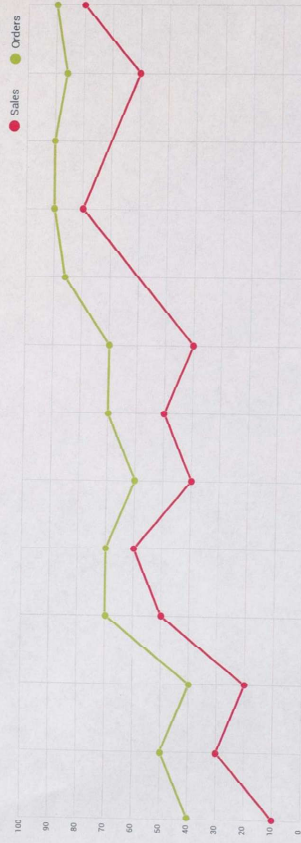


Line Chart

Bar Chart

Pie Chart

Easy Pie Charts



7.1 PURPOSE AND OBJECTIVES OF THE M&E FRAMEWORK

The Monitoring and Evaluation (M&E) Framework is designed to provide a structured and results-oriented approach for tracking the implementation of the Commission's Strategic Plan (2026–2030). It aims to:

- Monitor progress towards strategic objectives and outputs;
- Evaluate outcomes and impact in promoting fair competition, consumer welfare, and regional integration;
- Strengthen institutional accountability and learning across the Commission;
- Support evidence-based decision-making for resource allocation, program adjustment, and policy development.

The M&E framework will be integrated into the Commission's operational processes through annual work plans, performance reviews, and periodic evaluations. It will utilize both quantitative and qualitative tools to track inputs, outputs, outcomes, and impacts across all strategic objectives.

7.2 M&E FRAMEWORK MATRIX (ALIGNED TO STRATEGIC OBJECTIVES)

SOI:

To review and assess mergers and acquisitions, detect, investigate, prevent, and sanction anti-competitive practices and consumer rights in the Common Market

Action Code	Strategic Action	Annual Activity	Indicator	Frequency	Responsible Unit
1.1	Investigate and remedy reported or detected violations of competition and consumer laws.	Conduct investigations throughout the year.	Number of investigations conducted	Ongoing	Competition, Consumer and Legal Division
		Maintain investigation logs and evidence chains.	Logs and evidence available	Continuous	Competition and Consumer Division

Action Code	Strategic Action	Annual Activity	Indicator	Frequency	Responsible Unit
1.2	Prioritize sectors and develop early warning indicators for high-risk industries.	Undertake annual sectoral risk assessments.	Number of assessments conducted	Annual	RPA/ Technical Division
		Publish a list of priority sectors and potential red flags.	Number of priority sector reports published	Annual	RPA/ Technical Division
1.3	Establish tools to monitor market conduct, pricing, bid rigging, and cross-border trends.	Design and deploy market anomaly detection systems.	Availability of anomaly detection systems	Annual	RPA/ICT Unit
		Maintain dashboards for pricing trends and suspected bid rigging.	Number of dashboards maintained and updated	Quarterly	RPA/ICT Unit
1.4	Implement a leniency and whistleblower program to detect hidden anti-competitive behavior.	Develop and promote the leniency and whistleblower program	leniency and whistleblower program in place	Annual	Legal Services and Compliance Division
		Conduct annual briefings and reports on the leniency cases to promote the program.	Number (one) of briefings/ reports held	Annual	Legal Services and Compliance Division
1.5	Develop a centralized case-tracking database covering investigations and repeat offenses.	Implement and update the case management database on a quarterly basis.	Database developed and frequency of database updates	Quarterly	ICT Unit and all Divisions
1.6	Develop and operationalise consumer helplines and digital complaint platforms.	Develop multilingual helplines.	Number of helplines and platforms operational	Annual	Consumer Division
		Operationalise multilingual helplines	Number of users of the system	Continuous	Consumer Division
		Train partner associations to triage and forward complaints.	Number of training conducted	Annual	Consumer Unit
1.7	Develop a framework to prioritize investigations based on potential market and consumer harm.	Apply a structured assessment tool to all complaints.	Tool applied to number of complaints	Ongoing	Competition and Consumer Divisions
		Revise prioritization criteria based on enforcement trends.	Revised prioritization tool available	After every two years	Competition and Consumer Divisions

Action Code	Strategic Action	Annual Activity	Indicator	Frequency	Responsible Unit
1.8	Development and review of legal instruments.	Undertake the development and review of legal instruments.	Legal instruments developed and reviewed	Biennial	Legal Services and Compliance Division
		Propose regulatory amendments based on enforcement gaps.	Number of amendments proposed	Biennial	Legal Services and Compliance Division
1.9	Develop investigation procedures and internal manuals for case handling.	Finalize standard operating procedures (SOPs) for investigators.	SOPs finalized	Once-off	Competition & Consumer Division
		Conduct periodic internal reviews for procedural compliance.	Number of reviews conducted	Annual	Registrar / RPA
1.10	Building capacity for NCAs, and stakeholders.	Host regional capacity-building events and e-learning programs.	Number of events hosted	Annual	RPA
		Offer certification or continuous professional development credits.	Number of certifications issued	Annual	RPA
1.11	Collaborate with national enforcement and judicial bodies through joint training, technical exchanges, and joint investigation	Hold at least one regional training per year for enforcement agencies, prosecutors, judicial bodies, or regulators.	Number of trainings held	Annual	Legal Services and Compliance Division Technical Divisions
		Develop joint investigation protocols.	Number of protocols developed	One-off	Legal Services and Compliance Division
		Participate in joint enforcement task forces.	Number of task forces participated in	Annual	Enforcement Unit
1.12	Determine cases of competition and consumer protection cases by the panel.	Convene the panel.	Number of cases determined by the panel	Quarterly	Competition and Consumer Divisions
		Publicize final decisions.	Number of decisions of the panel published	Quarterly	Registrar
1.13	Monitor compliance with Commission decisions and institute legal action to ensure enforcement and deterrence	Undertake post-decision compliance checks. Cases concluded before the CCJ / National courts	Percentage of compliance checks Percentage of Litigations	Annual	Competition, Consumer and Legal Division

Action Code	Strategic Action	Annual Activity	Indicator	Frequency	Responsible Unit
		Issue warning notices or follow-up measures.	Number of warnings issued	Biannual	Competition and Consumer Division
1.14	Engagement of academic institutions to integrate competition and consumer law into academic and professional curricula and host policy dialogues.	Partner with universities to integrate content into law, economics, and business programs.	Number of engagements with academic institutions	Annual	RPA
		Conduct dialogue with policymakers.	Number of policy dialogues conducted	Annual	RPA
1.15	Provide compliance guidance and conduct training for businesses and legal professionals.	Develop compliance toolkits.	Number of toolkits developed	Once off	Legal Services and Compliance Division
		Conduct at least one training per year for businesses, legal practitioners, and associations.	Number of trainings conducted	Annual	Legal Services and Compliance Division
1.16	Collaborate with academia to produce studies and briefs for preventive advocacy.	Co-publish empirical studies and policy briefs with research institutions.	Number of studies and briefs published	biannual	RPA
		Support academic-led conferences and journals on competition and consumer law.	Number of conferences supported and papers published	Bie-Annual	RPA

SO2:
Strengthen the Harmonization of national Competition and Consumer Protection policies, and laws with the Regulations

Action Code	Strategic Action	Annual Activity	Indicator	Frequency	Responsible Unit
2.1	Negotiate and implement cooperation agreements with NCAs	Draft and review of MOUs with NCAs	Number of signed and reviewed MOUs	Annual	Legal Services and Compliance

Action Code	Strategic Action	Annual Activity	Indicator	Frequency	Responsible Unit
		Implementation of cooperation agreements with NCAs	Number of MOUs implemented	Annual	RPA
2.2	Engage Member States in domesticating the COMESA Competition Regulations	Engage Member States on domestication	Number of Member States engaged	Annual	Legal Services and Compliance
		Develop model law templates and guidelines	Number of model law templates developed	Once-off	Legal Services and Compliance
2.3	Facilitate peer reviews to assess national compliance	Coordinate peer review exercises	Number of peer reviews	Biennial	RPA
		Publish peer review assessment reports	Number of published reports	Biennial	RPA
2.4	Provide advisory opinions and impact assessments on competition and consumer protection policy to Member States	Issue advisory reports on competition and consumer protection policy	Number of advisory reports published	Biannual	RPA
2.5	Establish a regional forum for aligning policies and laws	Convene forums	Number of forums convened	Annual	RPA
		Publish forum proceedings	Number of forum proceedings published	Annual	RPA
2.6	Enhance cooperation with COMESA Secretariat, AfCFTA, and RECs	Participate in inter-institutional coordination meetings	Number of meetings attended	Annual	RPA
2.7	Provide Assistance to Member States in the enactment or review process of their National Competition and Consumer Protection Laws and operationalising NCAs	Support drafting, review, and operationalisation of national laws and NCAs	Number of laws reviewed or enacted; Number of NCAs operationalised	Annual	Legal Services and Compliance / RPA

SO3:

Strengthen the Commission's Institutional Capacity as an efficient, independent, and high-performing regional authority

Action Code	Strategic Action	Annual Activity	Indicator	Frequency	Responsible Unit
3.1	Attract, develop, and retain a highly skilled and motivated workforce	Conduct annual skills gap analysis	Number of skills gap assessments conducted	Annual	Corporate Services
		Develop a staff retention policy	Retention policy adopted	Once-off	Corporate Services
		Implement a staff retention policy	Retention policy implemented	Annual	Corporate Services
3.2	Design and implement continuous staff training and capacity-building programs to enhance skills, improve service delivery, and strengthen titutional performance	Deliver annual training based on individual and team needs assessments	Number of staff trained annually	Annual	Corporate Services
		Organize internal or external staff training sessions.	Number of trainings conducted	Biannual	RPA
		Engage specialists in digital markets and forensics to train staff.	Number of specialists engaged	Annual	Corporate Services (HR Unit)
3.3	Upgrade and realign the Commission's ICT infrastructure for effective delivery of its mandate	Upgrade internal MIS, network, and data backup systems	ICT infrastructure upgrade completed (Yes/No)	As needed (annual review)	ICT Unit
		Develop an intranet and staff portal	Staff portal operational (Yes/No)	Annual maintenance	ICT Unit
3.4	Develop and operationalise a comprehensive risk and compliance management system	Operationalize internal audit and risk management functions	Internal audit and risk management reports produced	Annual	Corporate Services (Finance)
		Develop, review, and update HR, finance, procurement rules, policies, and other relevant instruments	Policies developed, reviewed, and aligned with best practices	Once	Corporate Services

Action Code	Strategic Action	Annual Activity	Indicator	Frequency	Responsible Unit
3.5	Strengthen internal processes by reviewing and updating institutional policies	Conduct institutional and organizational assessment	OAR recommendations adopted (Yes/No)	Once-off (2027)	RPA
		Adopt SOPs and guidelines for core operations	Number of new or revised SOPs adopted	Annual	Corporate Services
3.6	Establish and operationalize a Centre of Excellence in Competition and Consumer Law	Establish Centre of Excellence	Centre established and launched	2026–2030	RPA
3.7	Finalize the construction and operationalization of the Commission Headquarters	Construct and operationalize Commission HQ	Construction & operational reports	2026–2030	Internal Building Committee (IBC)
3.8	Institutionalize strategic foresight and planning mechanisms using Result-Based Performance Management	Develop annual work plans	Annual work programs developed	Annual	RPA
		Conduct periodic review meetings (Pause-and-reflect sessions)	Periodic review meetings undertaken	Quarterly	RPA
		Conduct mid-term evaluation (MTR)	MTR report produced	Once-off (2028)	Internal Review / Independent Consultants
		Institutionalize staff performance appraisal linked to deliverables	Number of performance reviews conducted	Annual	Corporate services
3.9	Attain ISO Certification or other institutional quality benchmarks to enhance service delivery, institutional credibility, and international competitiveness	Establish a quality management system	QMS developed	Once-off	RPA / Registrar
		Undertake internal and external assessment	ISO audit reports	Annual	Corporate Services
		Apply for ISO certification	ISO certification obtained	Annual	Corporate Services

Action Code	Strategic Action	Annual Activity	Indicator	Frequency	Responsible Unit
3.10	Promoting gender and youth inclusiveness by mainstreaming equity across institutional policies, programs, and workforce representation	Develop a gender policy	Gender policy developed	Once-off	Registrar
		Implement the gender policy	Gender policy implemented	Annual	Registrar
3.11	Strengthen the audit and quality assurance functions	Commission external audits	External audits undertaken	Annual	Corporate Services
3.12	Streamline governance framework by enhancing Board Secretariat coordination	Hold Board and committee meetings	Annual review reports	Quarterly	Registrar
		Review Board Charter and Terms of Reference	Board charter and TORs reviewed	Once-off	Registrar
		Undertake Board trainings	Board trainings undertaken	Biannual	Registrar
		Undertake Board evaluation	Board evaluation undertaken	Annual	Registrar
3.13	Ensure provision of high-quality legal support and services to strengthen the Commission's legal and procedural regulatory and operational effectiveness	Deliver legal opinions and guidance on enforcement, mergers, compliance, and governance	Number of legal opinions issued	Annual	Legal Services and Compliance Division
		Monitor regional and international legal developments	Legal monitoring reports produced	As required	Legal Services and Compliance Division
		Recommend updates to legal and policy frameworks	Number of legal proposals submitted	As required	Legal Services and Compliance Division
		Conduct benchmarking with regional and international bodies	Number of benchmarking reports completed	Annual	Legal Services and Compliance Division

Action Code	Strategic Action	Annual Activity	Indicator	Frequency	Responsible Unit
		Refine legal frameworks and enforcement tools based on benchmarking outcomes	Number of revised legal instruments/ tools proposed	Annual	Legal Services and Compliance Division
		Develop and disseminate compliance protocols and tools	Number of compliance tools developed	As required	Legal Services and Compliance Division
		Negotiate, review, and draft the Commission's contracts and MOUs	Number of legal documents drafted or reviewed	Ongoing	Legal Services and Compliance Division
		Provide legal support for institutional policies and reforms	Legal input provided	As required	Legal Services and Compliance Division
3.14	Develop and implement an integrated Monitoring, Evaluation, and Learning (MEL) framework	Implement the MEL framework	MEL framework is integrated and functional	Annual	RPA

SO4:
Strengthen research, advocacy, capacity building, and stakeholder engagement to enhance the performance and visibility of the Commission

Action Code	Strategic Action	Annual Activities	Indicators	Frequency / Timeline	Responsible Parties
4.1	Conduct market studies and inquiries in priority sectors to inform enforcement, advocacy, and policy	Identify priority sectors	Sectors identified	Annually	RPA
		Undertake sector studies/ market inquiries	Reports produced	Annually	RPA
		Publish study/inquiry reports	Reports published	Annually	RPA

Action Code	Strategic Action	Annual Activities	Indicators	Frequency / Timeline	Responsible Parties
4.2	Conduct joint monitoring and investigations with NCAs, RCAs, AfCFTA, and international authorities	Undertake joint monitoring/ investigations	Number of joint investigations conducted	Annually	Competition and Consumer Divisions/RPA / NCAs /RCAs/ AfCFTA
4.3	Develop and implement an integrated Advocacy Strategy	Develop Advocacy Strategy	Approved strategy	Once-off	RPA / External Consultants
		Implement the strategy	Strategy implemented	Annually	RPA
4.4	Conduct multilingual awareness and education campaigns on competition law, consumer rights, and compliance	Plan campaigns	Campaign reports produced	Quarterly	RPA
		Engage stakeholders via different channels	Stakeholder feedback data	Quarterly	RPA
4.5	Enhance the use of digital platforms and mobile tools for information dissemination	Maintain website and social media	Updated digital platforms	Ongoing	ICT & RPA
		Launch apps and SMS services	Mobile tools developed	Ongoing	ICT & RPA
4.6	Host the Annual COMESA Consumer Awareness Week and other flagship events to promote dialogue and visibility	Organize flagship awareness events	Event reports produced	Annually	RPA & Consumer Affairs
		Engage media in events	Media coverage reports	Annually	RPA & Consumer Affairs
4.7	Produce and distribute simplified, user-friendly materials on consumer protection, competition law, and complaints processes	Create brochures and videos	Number of IEC materials created	Biannually	Consumer Affairs & RPA

Action Code	Strategic Action	Annual Activities	Indicators	Frequency / Timeline	Responsible Parties
		Translate materials into COMESA languages	Number of multilingual materials produced	Biannually	Consumer Affairs & RPA
4.8	Publish an Annual Report on Competition and Consumer Welfare to highlight trends, risks, and policy recommendations	Draft and disseminate the report	Published report	Annually	RPA
4.9	Participate in regional, continental, and global events	Attend forums and conferences	Participation reports produced	Ongoing	RPA / CEO
		Conduct exchange visits	Exchange visit records/reports	Ongoing	RPA / CEO
4.10	Monitor and evaluate outreach initiatives using surveys, analytics, and stakeholder feedback	Undertake outreach assessments/surveys	Assessment reports produced	Biennially	RPA
4.11	Conduct empirical studies to assess the impact of competition and consumer interventions	Undertake impact studies	Empirical reports produced	Biennially	RPA
		Produce policy briefs	Number of policy briefs	Biennially	RPA
4.12	Provide technical support to Member States on national competition and consumer protection	Undertake technical assistance missions	Number of TAS provided	Annually	RPA
4.13	Negotiate and implement cooperation frameworks (MOUs) with relevant institutions	Negotiate and review MOUs with NCAs and other institutions	Number of signed MOUs	As needed	Legal & RPA
		Implement cooperation agreements	Number of MOUs implemented	As needed	Legal & RPA

SO5:

Enhance the Commission's Financial Sustainability

Action Code	Strategic Action	Annual Activities	Indicators / Expected Outputs	Frequency / Timeline	Responsible Parties
5.1	Develop and deploy a digital service platform with automated billing, invoicing, arrears tracking, and self-service	Implement integrated e-invoicing & billing system	Functional billing & invoicing platform	Annually	Finance & ICT
		Develop and deploy a self-service portal for users	Operational online portal with monetization tools	Annually	ICT Unit
		Train staff/users on the platform	Training reports and user manuals	Annually	ICT & Finance
5.2	Generate revenue by leasing out office space	Market available office space	Number of campaigns conducted	Post-construction	Corporate Services (Admin & Finance)
		Manage lease agreements and payments	Lease agreements signed & rental income generated	Post-construction	Corporate Services (Admin & Finance)
5.3	Review and implement Resource Mobilization & Partnerships Strategy	Conduct donor/stakeholder mapping	Stakeholder mapping report	Annually	RPA (RMU)
5.4	Package flagship initiatives for donor funding and support	Identify flagship programs & projects	List of donor-ready flagship projects	Annually	Technical Divisions
		Submit proposals to partners & donors	Number of submitted proposals	Annually	Technical Divisions
5.5	Implement a Financial Governance Framework	Monitor policy implementation	Compliance reports/checklists	Annually	Finance & Legal
5.6	Upgrade financial systems	Implement modern accounting/financial software	Functional financial system operational	Annually	ICT & Finance

Action Code	Strategic Action	Annual Activities	Indicators / Expected Outputs	Frequency / Timeline	Responsible Parties
		Train staff on new systems	Number of staff trained	Annually	ICT & Finance
5.7	Strengthen internal financial controls & audit readiness	Conduct internal control audits	Audit reports generated	Annually	Finance and RPA
		Follow up on audit issues	Number of corrective actions implemented	Quarterly	Finance and RPA
5.8	Conduct periodic System audits of financial, procurement, and operational systems	Execute planned system audits	Systems audit logs & reports	Annually	Finance and RPA
		Report findings to management/board	Briefing reports submitted	Annually	Finance and RPA
5.9	Strengthen procurement controls	Develop/update procurement guidelines	Updated procurement manual	Annually	Procurement Unit
		Train procurement & user staff	Number of training sessions held	Annually	Procurement Unit
5.10	Deploy an integrated inventory and asset management system	Conduct periodic inventory checks	Asset register updated	Annually	Admin & Logistics
		Monitor asset usage & disposal	Usage & disposal reports	Annually	Admin & Logistics
5.11	Streamline & digitize administrative processes	Map and automate workflows	Documented digital workflows	Annually	ICT & Admin
		Implement Document Management system (DMS)	Functional DMS in place	Annually	ICT & Admin

SO6:

Strengthen institutional capabilities to anticipate and adapt to disruptive technologies and shifts in global digital markets, ensuring responsive and future-ready regulatory interventions.

Action Code	Strategic Action	Annual Activities	Expected Output	Frequency / Timeline	Responsible Parties
6.1	Operationalize an automated case management system	Design, procure, and deploy a case management system featuring workflow tracking, data visualization, and resolution dashboards	Functional automated case management system with dashboards	Year 1–2	ICT Unit / Case Management Division / Corporate Services
6.2	Deploy advanced digital enforcement tools	Procure and integrate predictive analytics, cartel screening software, market anomaly detection algorithms, digital intelligence platforms, and forensic auditing technologies	Enforcement tools are deployed and operational	Annual updates	Enforcement Directorate / ICT Unit
6.3	Expand internal ICT infrastructure	Assess ICT needs; procure and upgrade software, hardware, and servers to support digitization	Upgraded ICT infrastructure and support systems	Annual review & upgrade	ICT Unit / Administration
6.4	Strengthen capacity to address emerging market dynamics including digital platforms, Artificial Intelligence, green transitions, and equitable access to markets.	Organising training(s)	Number of staff trained annually	Biennial	Corporate Services

7.3 M&E GOVERNANCE AND REPORTING

The Commission will establish a dedicated M&E function under the Office of the CEO or assign a function of existing units to coordinate all monitoring and evaluation activities. Each Division and or departments will be required to submit quarterly performance reports, and an integrated Annual Performance Report will be published to communicate results to stakeholders. In addition:

- Mid-term review will be conducted in 2028 to assess implementation progress and

adjust strategies as necessary.

- End-of-term evaluation in 2030 will assess outcomes and long-term impact of the Strategic Plan, feeding into the design of the next strategy.
- The M&E framework will be supported by a digital Performance Dashboard, enabling real-time tracking and data visualization.

7.4 LEARNING AND ADAPTATION

The M&E system will prioritize adaptive management, with regular feedback loops built into planning and implementation processes. Lessons learned will be documented and disseminated through learning briefs, workshops, and policy roundtables. This approach will allow the Commission to remain responsive to dynamic market environments, particularly in the digital economy, and continue to align its interventions with regional development goals.

Effective implementation of the Commission's 2026–2030 Strategic Plan requires robust mechanisms to anticipate, prevent, and respond to potential risks that may impact the achievement of strategic objectives. Risk management is thus a core component of the Commission's institutional governance, operational performance, and stakeholder trust.



CHAPTER 8: RISK MANAGEMENT

8.1 RISK IDENTIFICATION

The Commission operates within a dynamic regional and global environment, which exposes it to a range of strategic, operational, financial, legal, and reputational risks. Key risks likely to affect the successful delivery of this plan include:

- **Regulatory and Legal Risks:** Inconsistent or delayed domestication of COMESA competition regulations by Member States; potential legal challenges to Commission decisions.
- **Funding Shortfalls:** Unpredictable or inadequate financial contributions from COMESA and development partners, affecting program delivery.
- **Technological Disruptions:** Cybersecurity threats, system downtime, or obsolescence of case management and digital enforcement tools.
- **Institutional Capacity Gaps:** High staff turnover, skills mismatches, or inadequate capacity in NCAs.
- **Political and Geopolitical Instability:** Fragile political commitment or regional instability may weaken enforcement cooperation or cross-border investigations.
- **Public Trust and Perception:** Low levels of public awareness or confidence in the Commission's work could hinder compliance and stakeholder engagement.
- **Data Protection and Privacy Risks:** Mishandling or breach of confidential data during investigations, especially in digital markets.
- **Market Complexity:** Emerging digital business models, algorithmic pricing, and cross-border e-commerce may outpace regulatory adaptation.
- **Retention of Skilled Staff:** Commission operates in a highly specialised and regulated environment where experienced economists, lawyers, and other technical professionals are increasingly sought after by the private sector and other regional, continental, and international organisations.

8.2 RISK ASSESSMENT AND PRIORITIZATION

The Commission will institutionalize periodic risk assessments to evaluate the likelihood and impact of identified risks. This will involve categorizing risks as low, medium, or high based on potential consequences and assigning mitigation responsibility across departments. Priority will be given to high-impact risks that threaten strategic delivery, institutional reputation, or legal compliance.

8.3 MITIGATION STRATEGIES

The following key strategies will guide risk mitigation during the strategic planning period:

- **Development of a Comprehensive Risk Management Framework:** Commission will establish and regularly update an enterprise-wide risk management (ERM) framework aligned with COMESA governance standards, international best practices (e.g., ISO 31000), and strategic priorities.
- **Business Continuity and Contingency Planning:** Clear contingency plans will be developed for critical functions particularly in enforcement, IT infrastructure, and financial operations to ensure uninterrupted service delivery during crises.
- **Regular Monitoring and Early Warning Systems:** Risk registers, early warning systems, and horizon scanning tools will be integrated into the Commission's Monitoring, Evaluation, and Learning (MEL) system for real-time tracking and responsiveness.
- **Internal Audit and Compliance Oversight:** Strengthened internal audit functions will monitor adherence to financial, legal, and ethical standards, supported by quarterly compliance reviews.
- **Cybersecurity and Digital Resilience:** Investment in secure digital platforms, regular security audits, staff training, and AI-powered safeguards will mitigate digital risks and ensure system reliability.
- **Diversification of Revenue and Resource Mobilization:** Strategic action will be taken to broaden funding sources, ensuring financial resilience against budget volatility.
- **Capacity Building and Human Capital Strategy:** Ongoing training, knowledge management, and strategic recruitment will address skill gaps and reduce turnover-related risks.
- **Stakeholder Engagement and Communication Strategy:** Enhanced visibility, outreach, and public awareness will build stakeholder trust and pre-empt reputational risks.

8.4 GOVERNANCE OF RISK MANAGEMENT

The implementation of the risk management framework will be overseen by a dedicated Risk and Compliance Committee under the Office of the CEO. Risk focal persons will be appointed across the Commission divisions to coordinate risk tracking, reporting, and capacity building. A bi-annual risk review report will be submitted to the Board and shared with relevant stakeholders for transparency and action.





CHAPTER 9: CRITICAL SUCCESS FACTORS FOR IMPLEMENTATION

9.1 INTRODUCTION

The successful implementation of the Commission's 2026–2030 Strategic Plan will depend not only on the quality of the strategies outlined but also on the environment within which these strategies are executed. While the Strategic Plan provides a clear roadmap for promoting fair competition, protecting consumer rights, and deepening regional integration, its realization will be significantly influenced by a set of critical enablers.

This chapter highlights the six key critical success factors (CSFs) that will determine the Commission's ability to achieve its strategic goals and mandates. These factors are interrelated and must be addressed holistically throughout the implementation period. Failure to adequately invest in or sustain these enablers could lead to inefficiencies, stakeholder disengagement, and missed opportunities for regional impact.

9.2 CRITICAL SUCCESS FACTORS

9.2.1. Political Will and Commitment – The sustained political will of COMESA Member States is fundamental to the success of the Commission's mandate. Strong commitment from national governments, regulatory bodies, and regional institutions will be necessary to ensure the domestication and enforcement of the COMESA Competition Regulations. Without high-level support, the Commission's decisions may lack traction or encounter implementation delays at the national level.

9.2.2. Stakeholder Engagement and Collaboration – The involvement of a diverse range of stakeholders, including NCAs (NCAs), consumer protection agencies, private sector players, civil society, media, and development partners, will be critical to embedding a culture of competition and consumer welfare across the region. Meaningful stakeholder engagement shall ensure that the Commission's interventions are context-sensitive, inclusive, and supported by those most affected by market dynamics.

9.2.3. Capacity Building and Institutional Strengthening – To execute its growing mandate effectively, the Commission must continuously strengthen both its human capital and institutional infrastructure. This includes investing in staff recruitment, retention, and upskilling, especially in emerging areas such as digital markets, artificial intelligence, and cross-border investigations. It also requires strengthening internal systems such as case management, knowledge management, and data analytics.

9.2.4. Resource Availability and Financial Sustainability – The availability of adequate and predictable financial, human, and technical resources shall be essential to implement the Strategic Plan’s ambitious agenda. The Commission will need to enhance its financial sustainability through diversified funding (including fee-based services and technical partnerships) while maintaining its autonomy and accountability.

9.2.5. Effective Communication and Visibility – The Commission shall need to ensure that its objectives, progress, decisions, and impacts are communicated to stakeholders and the wider public. Strategic use of digital platforms, multilingual campaigns, media partnerships, and knowledge products will raise awareness, build trust, and promote compliance.

9.2.6. Adequate and Competent Staff and Support Systems – The effectiveness of the Commission’s operations hinges on having sufficient, skilled, and well-motivated personnel supported by efficient institutional systems. This includes recruiting professionals with expertise in law, economics, data science, digital markets, and regional integration, as well as providing continuous learning opportunities. Equally important are the back-office systems, case management, financial systems, ICT infrastructure, and performance tracking tools that must be well-resourced and integrated to ensure responsive, transparent, and efficient service delivery.







COMESA COMPETITION AND
CONSUMER COMMISSION

