

Reforming sugar regulation proposals

A public relations strategy for SUCAM

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Reforming sugar regulation proposals: a public relations strategy for SUCAM

1 The sugar sector today

Kenya's sugar industry has struggled to achieve commercial viability in recent years, to the point, by 2019, that the industry has substantially disintegrated. Its future existence is now in question.

Issues of yields, farmer productivity, and mill efficiency have all played out into high pricing and disrupted delivery, with the sector suffering successive protectionist policies and quotas to ensure market dominance at prices far higher than global sugar prices.

Currently, Kenyan sugar trades at an average \$800 per tonne, compared with a global price of \$280 per tonne. However, with production costs, particularly in the western Kenyan sugar belt, now far higher than those of competitor nations, Kenya is coming to the end of a final extension of the waiver on trade protection for the sector under the country's membership of COMESA.

Thus, it faces a final opportunity to resolve its competitiveness, cost and processing issues to achieve globally competitive pricing or, from 2020, its market will disappear in the face of cheaper imported sugar. Such imports have already threatened the industry as an 'infill' when the domestic sector's weak linkages and commercial breakdowns have led to local sugar shortages.

Indeed, the problems that beset the industry's productivity have become so deep seated that in terms of comparative advantage, it is difficult to make a business case for sugar: it would be better in terms of wealth creation and farmer livelihoods for farmers to grow alternative crops.

However, transiting to other crops represents a cultural and methodological transition of enormous proportions, presenting its own issues of productivity, which have not, to date, been factored into comparative assessments of potential crop earnings from the same land.

Sugar cane farmers who become tea farmers have no knowledge of growing tea, but they do have a broader base of experience in sugar. On balance, the disruption is lesser in raising the existing skills versus developing an entirely new knowledge set.

The challenge, therefore, lies in defining and executing at speed the ideal set of actions to raise sugar productivity and reduce the cost base.

To this end, the regulation driving the sector's structure and support is being redrawn. A radical overhaul was implemented in 2013, driven partly by the requirements of Kenya's

COMESA membership, but also by other factors that have brought substantial regulatory and institutional consolidation under the 2010 constitution. This set of changes saw the abolition of the sugar levy for industry development, sugar research consolidated into general research, and an unintended suspension in research and extension services to the sector as the responsible parties and channels were redefined.

This has exacerbated the underlying problems of poor productivity. The industry's travails of low yields and inefficient mills have thus played out, since 2013, into multiple shortages and the substantial breakdown of the country's largest sugar producer, Mumias. In this environment, farmers have also been left unpaid for sugar they have delivered, with arrears amounting to Sh2.6bn (\$26m) by early 2019.

As a result, there has been some farmer flight from the sector, but far more devastation in rising poverty and anger in a politically sensitized region of the country.

Moves have been made to clear the arrears owed to farmers and, in an effort to re-stimulate the sector, a new set of sugar agreements was drawn up and was due to be promulgated in 2018.

However, the sugar industry brings together multiple interests, across political considerations, the processing industry, end-producers, and sugar farmers, and this has seen the inclusion in the draft sugar agreement of rules that were considered detrimental to farmers, notably zoning, which dictates the designated buyer/miller for farmers in each area.

The regulations also conflict with COMESA rules and there is no evidence that COMESA will accede to such exceptions. Kenya runs a substantial trade surplus within COMESA and its leverage for further or extended support for its sugar sector is now weak.

Against this backdrop, SUCAM is seeking to achieve the rehabilitation of the sugar sector in an alliance of several farmers' groups. It does not have the support of all sugar farmers. But it does represent a majority in the sector.

The proposed regulations lay out a multifaceted structure of agreements across the sugar industry, with a pricing formula based on volume, instead of sugar content, which is the global norm, and an undefined average price; zoning of farmers so that they must sell to a specific mill; and compulsory membership of apex organisations for all stakeholders.

In response to these proposals, the farmers alliance has developed a common position, which includes opposition to the introduction of zoning on the grounds that it would impair and even remove competition within the sugar sector by inflicting dictated pricing and sole buyers on farmers.

Similarly, across the current pricing formula, and the compulsory apex organisations, the farmers' alliance argues that the proposed regulations are anti-competitive and restrictive. It seeks, instead, the reassertion of market principles.

It also opposes the proposed merger of three of the country's existing mills on similar grounds, which is not laid out in the proposed regulations, but to which the Ministry of Agriculture has committed.

Finally, SUCAM and the farmers' alliance seek to raise issues that have not been addressed in the proposed regulations, but which arguably should have been.

The Crops Act 2013 committed the government to delivering research and extension services to the sector, as well as to the development of an industry structure and infrastructure to enable farmers to thrive. These have never been delivered.

The proposed regulations have sought to impose a reduced sugar levy, which could be interpreted as a commitment to the government's Crops Act obligation, in so far as it raises funds 'for the industry'. But this has been left open to interpretation. The proposal does not address historical issues around the levy's lack of transparency and tracking. It also fails to define the aims or parameters for the use of levy funds, thus leaving them open to misuse, or co-option by any party.

In sum, the proposed regulations militate against the development of market forces, remove rewards for improved competitiveness, and further support a processing infrastructure that cannot currently meet market demand at lower costs.

It is SUCAM's position, therefore, that none of these measures will restore the sector to commercial success within the required timeframe.

Yet, despite this opposition, farmers were until late last year facing the prospect of a fait accompli, with the regulations queued for promulgation.

The loss of this final opportunity to create a robust framework for the repair of the sugar sector threatened to bring to an end a livelihood with which many are familiar and to trigger extended hardship in the western region.

2 The regulatory process

The initial process intended for the 2018 sugar regulations was a period of public consultation, from August 2018, followed by compilation by the Ministry of Agriculture, and then gazetting.

The regulations, in that they are covered by existing legislation and are a policy execution, are not subject to any formal passage through parliament or any process of legislative review. They are covered by the AFA, however, which lays out the need for impact assessments and a cost benefit analysis to be prepared with the regulations. These were not carried out as per this legislation on due process.

The regulatory passage took a new turn, however, when the President visited Kakamega in western Kenya on 12 December, Mashujaa Day (Heroes Day). Western Kenya is the heartland of the opposition in Kenya. While there the President faced an outcry about the sugar regulations and the state of the sugar industry.

The president, who tends to be reactive to public opinion, immediately announced a task force that would be charged with finding permanent solutions to the challenges facing the sugar sector. There is no fixed outcome to this process.

The task force has already taken all submissions and remains only to tour the sugar belt, which it will do once the arrears to the farmers have been settled. That was promised by 18 January, but has yet to happen as at 18 February.

Once the arrears are settled, the task force will take up to two weeks to tour the sugar belt and up to two weeks to report. It is now, therefore, unlikely to report before its new deadline of mid-March.

In the passage of this regulatory process that is considering the proposed sugar regulations for promulgation, Kenya's substantial sugar sector, which is a key supplier of livelihoods in western Kenya, has a final window to achieve enhanced productivity and commercial success before protection of the sector is removed. The current regulations, based on previous near-identical failed policies, are unlikely to deliver a solution, meaning that the sector will be opened to foreign competition that will capture the Kenyan market, and, furthermore, that the country's current account deficit will be further loaded by the shift from domestic to foreign sugar production.

Overall, SUCAM seeks sugar regulation geared to supply-side remedy rather than demand-side proscription.

3 Drivers and restrainers

We have analysed both the driving the restraining forces, from the point of view of SUCAM's objectives, so drivers are those that would see government decide not to introduce zoning, or requiring membership of specified organisations or forcing farmers to sell at specified prices to specified customers. Restrainers are those that are likely to militate against SUCAM's objectives.

3.1 Driving forces

There are four forces driving the president's move towards market forces in Kenya's sugar industry:

- The farmers' residual determination to grow sugar and to make a viable livelihood from growing sugar
- COMESA membership and the forming of a COMESA committee to oversee the move to COMESA rules adherence
- Some resistance within government to allowing a complete switch to foreign sugar imports
- Vocal western opposition to the proposed market controls

3.2 Restraining forces

The greatest restraining force is the current conventional wisdom. As expressed by the Trade CS, Chris Kiptoo, after achieving the two-year extension by COMESA of Kenya's sugar protection: "It is very unlikely that the sector would have implemented the conditions set by COMESA at the end of the two years because of the structural problems facing the sugar millers."

It is this perception, in a prevailing and all-pervasive misdiagnosis of the source of the sugar industry 'problem', that has driven repeated rounds of industry-damaging policies, driven the latest sugar agreement, and driven Kenya's repeated requests for exceptions in protecting the sugar industry.

Policy makers have been 'persuaded' by the misinformed public narrative of the need to protect sugar millers, in a co-option of government that has become seemingly impregnable. The space remaining for critical thinking or a counter-case is limited. The task force has, further, been made up of forces already fixed into this analytical framework, whereby their task is not actually to reinvigorate the sugar industry, but to address 'the structural problems facing the sugar millers'. Their problem is already, and too narrowly, defined.

From this perspective, the counterclaims of farmers that supporting the millers through anticompetitive regulation will harm the industry, and that the core problem is borne of low yields caused by multiple factors, has been characterized as the case of a 'cartel'. It holds no logical appeal when the problem is clearly understood as the millers' structural problems.

This has created a disjuncture between the stated aim of the taskforce as discovering the source of the sugar industry's woes, and its composition and understanding of the parameters of that task. It believes the problem is solving the needs of the millers, but the actual problem has been caused by government interventions driven by millers seeking commercial support.

Underlying this restraining force is a broader perception gap. In Kenya, protectionism has never been argued out as damaging to consumers and industries, so it holds populist appeal.

Thus, overall, in an environment where the media, public messaging, political speeches and all public space are dominated by a shared understanding that the millers need aiding and this will revive sugar, and that lifting protection is bad for all, all efforts at a counter perspective become over-ridden by that existing view.

In countering this conventional wisdom, a further restraining force is the media itself, which has scant track record in interrogating issues or tracking the winners and losers from any policy.

4 Purpose of the PR strategy

SUCAM is aiming for the abandonment of the current zoning and pricing 'agreements', the reintroduction of the sugar levy to enhance research and extension services, and thus yields, and the development of market information and channels, as well as roads, to enable market access. They have an over-arching objective to encourage and support the government to develop a national policy for the development of a world class competitive sugar sector in Kenya.

The PR strategy focuses on influencing the thinking and understanding of targeted stakeholders in relation to the proposed sugar regulations.

This presents an unusual advocacy challenge, in that the influential allies are not that influential. In the context of Kenyan policy making there is deep seated resistance to external perspectives. Foreign organisations and bodies, in particular, are discounted almost automatically as hostile to the interests of Kenyans. The few academics and journalists who are allies help. But the balance of allies versus opponents is heavily skewed towards opposition.

Where the public consensus or balance of opinion is contrary to the advocacy targets, the ideal approach would be journalist education and a sturdy media campaign. In this case, that would mean educating stakeholders on the proven success of market liberalisation in sugar. That would normally be achieved through piecemeal but pervasive case building to deliver a shift in understanding that is complementary to the private lobbying efforts. It is not clear, however, that public opinion needs to be shifted. However, it is clear that the views of some specific stakeholders does need to be addressed.

We will, therefore, work on the basis of direct lobbying to urge stakeholders to adopt a counter-orthodox and maverick position in the existing climate of thinking. With this in mind, we see the over-arching objective of the PR campaign as:

To raise awareness amongst key policy makers that poor competitiveness is the source of the sugar industry's inability to compete with foreign producers.

We believe that achieving this PR aim will support the success of the overall advocacy campaign in achieving COMESA-compliance for the Kenyan sugar industry and serve to support the development of an alternative, more market-oriented regulatory and policy environment.

5 Target audiences

5.1 Stakeholder analysis

In the table we set out all the likely stakeholders in this issue together with their views, where they are known.

Table 1: Stakeholder views

Audience segment	Sub-segment	Views on issue
Head of State and Government	Office of the President – H.E, Uhuru Kenyatta	Seeks political expedience and advantage across competing and conflicting lobbies
Ministry of Agriculture	Agriculture (CS) Mwangi Kiunjuri	Seeks a continuation of historical market control policies, but for privatised mills
Ministry of Agriculture	Sugar Industry Taskforce	Presumed to support CS
	Principal Secretary, Eng. Peter K. Tum, and Chief Admin. Secretary Agriculture, Dr Rashid Abdi Aman	Presumed to support CS
Ministry of Finance		Seeks low-cost policies, and no further deterioration in the trade account
Members of Parliament	Hon. Emmanuel Wangwe. representing the National Assembly (STF)	Unknown. But Western MPs favour state support of sugar
COMESA		Seeks an end to protection, quotas, tariffs, and state support and subsidy of Kenyan sugar industry
Millers	Government owned: Chemelil Sugar Factory Muhoroni Sugar Company Mumias Sugar Company Nzoia Sugar Factory South Nyanza Sugar Company Privately owned: Butali Sugar Mills Kibos Sugar and Allied Industries Limited Sukari Industries Limited Transmara Sugar Company West Kenya Sugar Limited	Seek state support and subsidy

Audience segment	Sub-segment	Views on issue
Other sugar farmer associations	KESGA, KASAP, KNFSF, KNAFSO	Aligned with SUCAM in seeking extension, research, choice, and liberalisation
Economists & academics with interest in sugar		Most are against any further public investment in sugar as without comparative advantage. A few see some hope from liberalisation
Sugar farmers	Cane farmers	Want choice & state support
Importers of sugar		Want liberalisation and the shift to imports

5.2 Target audiences

We have analysed the views of the stakeholders and divided them into four groups as follows:

5.2.1 Allies

Allies are those organisations or individuals who have a high positive alignment with SUCAM’s views on the issue and who might be expected to have a high level of influence with government.

- Ministry of Finance
- International bodies, notably COMESA and the COMESA committee charged with Kenyan sugar compliance
- Economists – e.g. David Ndi
- Academics and agricultural economists
- Global experts

5.2.2 Adversaries

Adversaries are those organisations we have a high negative alignment, that is, they oppose SUCAM’s views, and might be expected to have a high level of influence with government. Under some circumstances, it can make sense to avoid the adversaries. In this case, given that the Ministry of Agriculture and the Sugar Task Force are perceived not to share the farmers’ views, and will likely carry the day, it is important to engage with them and aim to change their views.

- Sugar mills
- Agriculture Ministry
- Cabinet Secretary for Agriculture
- Government sugar task force

5.2.3 Prospects

Prospects are those organisations with a high positive alignment with SUCAM's views but a relatively low level of influence with government.

- The Kenya National Alliance of Sugarcane Farmers' Organizations (Incorporating KESGA, KASAP, KNFSF, and farmers)
- Farmers
- Members of Parliament (nb, included here not because they have a low level of influence but because their views are still not clear)
- AFA Sugar Directorate (nb, also included here because their views are still not clear though should be expected to want to support a thriving agricultural sector)

5.2.4 Opponents

Opponents are those that have a negative alignment of interests and a relatively low level of influence.

- Importers of sugar

5.3 Communicating to the audiences

Given resources constraints, it is not possible to reach all the possible target audiences so a number have been prioritised, as shown in the table below, together with the objectives in communicating with them, the key messages to be communicated, the channels that will be used to reach them and the necessary actions.

In this array, we propose to take a multi-faceted approach, seeking to reduce the opposition of the adversaries, as well as to amplify the voices and thinking of the allies.

Table 2: Target audiences and means of communication

Target audience	Rationale	Objective	Key messages	Channels	Actions
Ministry of Finance	The Ministry of Finance is interested in all aspects of business and especially interested where businesses are subject to fees and levies and market distorting restrictions	Seek their support to encourage Min of Ag to address issue by opening up the market	<ul style="list-style-type: none"> ▪ Importing sugar is detrimental to balance of payments and foreign exchange earnings ▪ Kenyan farmers can be supported to develop a world class industry 	Via Economic Secretary	<ol style="list-style-type: none"> 1. Documentary evidence available 2. Policy position & arguments prepared (Presentation material including policy position, arguments and fact files) 3. Meet with key personnel
COMESA	The trade bloc is committed to free trade and has extended its waiver of industry protection for Kenya's sugar industry repeatedly, but now says Kenya must conform and open its market	Seek their support to encourage Min of Ag to address issue by opening up the market	<ul style="list-style-type: none"> ▪ Impending regulations are in breach of COMESA agreements ▪ Competition will drive reparative structural adjustment 	Via COMESA committee established to assure Kenyan compliance on sugar industry	<ol style="list-style-type: none"> 1. Documentary evidence available 2. Policy position & arguments prepared 4. Meet with key personnel
Economists & academics	These technical experts provide thought leadership and input to many of the primary target markets	Seek their engagement in sugar industry analysis and with policy formulators, principally in the Min of Ag	The scale of industry breakdown has been accompanied by too little analysis of the cause, which urgently needs to review the impact of price controls, miller subsidy and the levy	Direct contact and invites via email invites to a 'driving sugar thinking' initiative	<ol style="list-style-type: none"> 1. Documentary evidence available 2. Policy position & arguments prepared 5. Meet with key personnel 6. Develop website access to case-building proof

Target audience	Rationale	Objective	Key messages	Channels	Actions
Kenya National Alliance of Sugarcane Farmers' Organizations	These lobby groups are pushing for sugarcane farmers' interests	Persuade them to adopt common position with SUCAM and to work alongside	<ul style="list-style-type: none"> Sugar farmers and their associations need to collaborate and all promote a common message 	Direct contact with CEOs and chairs of sugar farmer associations	<ol style="list-style-type: none"> Documentary evidence available Policy position & arguments prepared Prepare memorandum for associations setting out activities asked of them Engage with farmers organizations
Ministry of Agriculture	The Ministry is responsible for steering proposals for revised legislation and regulation through Parliament and Cabinet	<ul style="list-style-type: none"> Persuade analysts and others to reflect on all options to deliver the policy imperative Persuade officials that SUCAM and other associations should meet with the CS Offer to assist Min of Ag to develop a comprehensive policy for the development of the sugar sector 	<ul style="list-style-type: none"> The sugar agreement is anti-competitive, and damaging to thousands of farmers A key problem with the sugar industry is poor sugar cane: poor cane makes expensive sugar No one thrives on expensive sugar Supporting mills and fixing markets will not make poor sugar cane competitive Kenya needs research, extension and open markets to improve its sugar industry 	<p>Via personal contact to key directors and special advisors.</p> <p>Reinforced through placing appropriate stories in the media</p>	<ol style="list-style-type: none"> Documentary evidence available Policy position & arguments prepared Meet with key personnel

Target audience	Rationale	Objective	Key messages	Channels	Actions
Cabinet Secretary for Agriculture	The Cabinet Secretary is the chairman of the sugar taskforce. He will receive the report from the sugar taskforce under his ministry and forward it to the president for action on the recommendations made. He seeks to reduce costs/ commitments for the Ministry in a time of strained budgets, and facilitate the operation of the sugar industry.	<ul style="list-style-type: none"> ▪ Encourage to reflect on all options to deliver the policy imperative ▪ Offer to assist Min of Ag to develop a comprehensive policy for the development of the sugar sector 	<ul style="list-style-type: none"> ▪ The sugar agreement is anti-competitive, and damaging to thousands of farmers ▪ A key problem with the sugar industry is poor sugar cane & thus expensive sugar ▪ No one thrives on expensive sugar ▪ Supporting mills and fixing markets will not make poor sugar cane competitive ▪ Kenya needs research, extension and open markets to improve its sugar industry 	Via personal contacts in the Ministry of Agriculture Reinforced by placing appropriate stories in the media	<ol style="list-style-type: none"> 1. Documentary evidence available 2. Policy position & arguments prepared 10. Meet with CS
AFA – Sugar directorate	They participate in the formulation and implementation of overall policies, plans and programs of work for the development of the industry.	<ul style="list-style-type: none"> ▪ Demonstrate how regulations will damage all parties, including farmer. ▪ Convince them of free market merits so they can influence the CS's decision. ▪ Offer to assist in developing a comprehensive policy for the development of the sugar sector 	<ul style="list-style-type: none"> ▪ The sugar agreement is anti-competitive, and damaging to thousands of farmers ▪ A key problem with the sugar industry is poor sugar cane: poor cane makes expensive sugar ▪ Kenya needs research, extension and open markets to improve its sugar industry 	Through direct contact	<ol style="list-style-type: none"> 1. Documentary evidence available 2. Policy position & arguments prepared 11. Meet with key personnel

Target audience	Rationale	Objective	Key messages	Channels	Actions
Sugar task force	The sugar taskforce has been given the mandate to identify and propose lasting solutions to the challenges facing the industry.		<ul style="list-style-type: none"> ▪ The sugar agreement is anti-competitive, and damaging to thousands of farmers ▪ A key problem with the sugar industry is poor sugar cane & thus expensive sugar ▪ No one thrives on expensive sugar ▪ Supporting mills and fixing markets will not make poor sugar cane competitive ▪ Kenya needs research, extension and open markets to improve its sugar industry 	Through direct lobbying of individual members and in particular through lobbying the private sector representatives, who are: <ul style="list-style-type: none"> ▪ Mr Jayantilal Gopal Patel ▪ Dr Ken Ngumbau Mulwa 	<ol style="list-style-type: none"> 1. Documentary evidence available 2. Policy position & arguments prepared 12. Meet with selected members of task force to share findings of SUCAM on regulations and RIA. 13. Seek media exposure to coincide with meeting 14. Follow up meeting with regular communiques on different aspects of possible national sugar policy
Millers	The millers have representation on the government-led task force. The rationale, therefore, is to have them at the very least understand the farmers' perspective and better yet buy into farmers' pleas.	To gain the millers support for market liberalisation and supply chain co-operation and partnership versus history as adversaries	<ul style="list-style-type: none"> ▪ Working with farmers to achieve quality cane will transform the competitiveness of sugar mills ▪ Ample raw materials can be a game changer for the mills ▪ Development partnerships in the agricultural supply chain have created industry leaders 	Through direct lobbying of both the individual firms and the Kenya Sugar Cane Millers' Association that represents the millers	<ol style="list-style-type: none"> 1. Documentary evidence available 2. Policy position & arguments prepared 15. Meet with key personnel, private millers on task force

Target audience	Rationale	Objective	Key messages	Channels	Actions
Parliamentary committee	The member of parliament in the government-led task force has a key role in proposing and seconding adoption/ amendments of the task force report when it is tabled in parliament.		<ul style="list-style-type: none"> There are thousands of sugar farmers and they all have votes Supporting farmers will lead to more affluent constituencies 	Through direct contact Reinforced by placing appropriate stories in the media	<ol style="list-style-type: none"> Documentary evidence available Policy position & arguments prepared Meet with key personnel
Farmers	They are directly affected by the laws as cane farming is their source of livelihood. They thus need to be part of the debate to drive the agenda.	<ul style="list-style-type: none"> Lobby own associations to ally with SUCAM with a single agenda If not already in an association, then join an association to demonstrate support 	<ul style="list-style-type: none"> There is strength in numbers but it needs to be obvious to government Write to MPs Write to press 	<ul style="list-style-type: none"> Prepare briefing notes for associations Encourage associations to talk to own members Place stories in the media 	<ol style="list-style-type: none"> Prepare memorandum for associations setting out activities asked of them. Engage farmers through SUCAM Arrange journalist field trip Develop/upgrade SUCAM website to keep farmers up to date on activities
Sugar importers	These importers, dominated by key politicians, stand to lose from protection being extended	<ul style="list-style-type: none"> Seek their engagement with Min of Ag in support of free market 	<ul style="list-style-type: none"> Protection is anti-competitive hinders foreign trade An open market favours the most competitive produce 	Personal contacts and meetings	<ol style="list-style-type: none"> Documentary evidence available Policy position & arguments prepared Meet with key personnel

6 The plan

The actions outlined above rest substantially on developing reports and evidence that is then disseminated. There are some interfaces where gaining access to make our case is likely to happen only once, thus, for these meetings, all the evidence needs to have been prepared.

There are other interfaces, however, where new findings can provide a new opportunity to engage in more of a dialogue and pulsing engagement. Research has shown that repeated engagements with smaller amounts of evidence produce a far deeper and more far reaching change in understanding than a single large presentation.

For this reason, we have structured the plan to work through the preparation of materials consecutively, interweaving the availability of documentation with key presentation moments.

The alternative would be to prepare all materials first without any interfaces, and then move into a single intensive round of presentations. The problem with that, however, is that key policy decisions are imminent, and then, once these are taken, there may be a lengthy policy formulation process, which it will be better to inform from the inception, rather than only latterly.

Thus, this plan is built to achieve early and then sustained engagement in securing the advocacy aims. (Note that actions that occurred prior to the preparation of this plan have not been included.) The plan covers four broad aims:

- Compiling key research, evidence and documented proof of case
- Seeding information across key stakeholders spanning the SUCAM sugar regulations report, RIA, supplementary research reports, fact sheets and infographics
- Engage decision makers and stakeholders with compelling analysis of the cause of the sugar industry woes, weakening adherence to the idea that is an issue of the 'structure of the sugar millers'
- Monitoring and evaluation of outputs and outcomes

African Laughter will be responsible for running the PR campaign, with Jenny Luesby as Account Director supported by Philip Okumu, Account Manager, and Grace Munyi, Account Executive.

Table 3: Target audiences and means of communication

Action	Description	Resp.	Days				Budget
			Mar	Apr	May	future	
1	SUCAM Taskforce Report	Ready					
	Prepare brief on sugar regulations and RIA – and use draft VC study to outline implications of an inadequate or poorly designed regulatory framework	AL/SUCAM	4				
	Review of VC study and proposed ToR for value chain study	BAF					
2	Develop infographics and fact file data sheets	AL/SUCAM	4				
3	Meet with Key personnel in Ministry of Finance	AL/SUCAM				*	
4	Meet with key personnel COMESA	AL/SUCAM				*	
5	Meet with key economists and academics	AL/SUCAM				*	
6	Develop website as case-building platform with content from academics	AL/SUCAM				*	
7	Draw up memorandum for farmers organisations	BAF					
8	Engage directly with farmer organisations through SUCAM (after memorandum preparation)	AL/SUCAM		1			
9	Meeting with key personnel from Ministry of Agriculture			1			
10	Meet with CS Agriculture			0.5			
11	Meeting with key personnel from AFA – Sugar Directorate	AL/SUCAM		1			
12	Meeting with Sugar Industry taskforce to share findings of SUCAM on regulations and RIA (including sharing of SUCAM report)	AL/SUCAM		1			
13	Media campaign to coincide with task force meeting	AL/SUCAM				*	
14	Share SUCAM report on regulations and RIA and all supplementary materials widely into Min of Ag and with all taskforce members			1			
15	Seek meeting with private mill task force members			0.5			
16	Meeting with Parliamentary Committee on Delegated Legislation to share findings of SUCAM on regulations and RIA (including sharing of SUCAM report)	AL/SUCAM		1			
17	Engage farmers through SUCAM	AL/SUCAM		0.5			
18	Journalists field trip to see causes of low productivity	GSMC					

Action	Description	Resp.	Days	Budget
19	Work on the existing website (so white text readable and up-to-date)	AL/SUCAM	4	
	Import website CMS to add menu and repository space	AL/SUCAM	1	
	Develop and sign off new navigation and CSS	AL/SUCAM	2	
	Confirm content for uploading and upload	AL/SUCAM	0.5	
20	Meeting with sugar importers	AL/SUCAM		*
21	Monthly reporting on activities and outcomes	AL	1	1

7 Monitoring & evaluation

7.1 Media monitoring

African Laughter will monitor mentions of SUCAM, the sugar regulations and the sugar industry in mainstream and social media. The agency will share relevant coverage as daily alerts on the SUCAM PR WhatsApp group and prepare a full output and outcomes report at the close of each phase or milestone in the campaign, which will include all media coverage achieved or triggered.

Table 4: Evaluation methods

Objective	Methods
Newspapers	African Laughter will capture all the relevant keywords after which an updated monitoring summary will be generated and sent. Print articles will be scanned and sent on email and the Whatsapp group for ease of access and backtracking.
Radio	African Laughter will monitor more than Sixty (60) radio stations, which will include the mainstream and the regional stations in Kenya, using the keywords on land regulation, Ministry of Land, National Land Commission and ISK. The monitoring will capture the time and length of the coverage.
Television	African Laughter has the capacity to monitor more than 10 digital television stations, which include the mainstream and the vernacular. We will therefore send details on the coverage including time of reporting and the length of coverage.
Online/Social media	We will gather all the online coverage and provide details on the reach and the value of the blogs and the microblogs. On social media we will monitor the reach, engagement rate and link clicks

We shall use the following parameters when carrying out the content analysis of the media coverage:

- Date of the story aired
- Media type (internet, print, radio or TV)
- Media Name – Station where the story was aired (media used)
- Headline of the story/footage
- Brief summary /description of the story
- Time at which the story was aired
- Slot–positioning of the story e.g. Business, Main News, etc
- Duration (seconds) for on-air items, and column length for print and internet articles.
- Frequency of story – number of times the same story was repeated

- Tonality – we will make an assessment of the tone of the message content to establish if it is positive, neutral or negative. Assessing the tonality of the media content will help us know its value to the public.
- AVE - Advertising value of the stories covered that were not paid for e.g. news and non-news item

7.2 Evaluation

African Laughter will track, measure and evaluate the success of all research, workshops, press conferences, releases, one-on-one interviews and all media interactions and provide a detailed report on the impact to the community and the conversation or discussion it has sparked. In particular, we will aim to assess whether stakeholders have changed their views and indeed whether they have changed their actions in response to SUCAM's lobbying.

7.3 Reporting

African laughter will provide an analysis at the close of each milestone or phase, spanning all media coverage achieved, its nature and the impact of all the PR activities message based on the audience reactions, interest groups analysis, policy-makers reactions, trends in the industry and the journalists who carried the stories in the media.

We will provide a detailed report to show the success of the media and the key messages discussed covering:

- Audience reactions: we will analyse and track all media from online sources, newspapers, television stations and radio stations to get the actions taken by the audience which will spun from letters to the editor, phone calls to the respective media houses during discussions, etc
- Conversations: we will also gather all stories and discussions based on the sugar regulations by other interest groups, individuals and commentators on all media
- Decision makers reactions: we will monitor all media to get the reaction of policy makers, regulators, legislators and implementers and issue press releases if need be, based on the reactions they give.