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[www.czasopisma.uni.lodz.pl/foe/](http://www.czasopisma.uni.lodz.pl/foe/)**2(334) 2018**DOI: <http://dx.doi.org/10.18778/0208-6018.334.09>**Paweł Jan Folfas**Warsaw School of Economics, Institute of International Economics, [pfolfa@sgh.waw.pl](mailto:pfolfa@sgh.waw.pl)**Joanna Garlińska-Bielawska**Cracow University of Economics, Global Economics Research Unit, Department of International Economic Relations, [garlinsj@uek.krakow.pl](mailto:garlinsj@uek.krakow.pl)

## Can the Tripartite Free Trade Area (TFTA) Agreement Become a Breakthrough Arrangement in Regional Integration on the African Continent?<sup>1</sup>

**Abstract:** Concluded in 2015, the Tripartite Free Trade Area (TFTA) agreement between three regional trade arrangements in Africa (COMESA, SADC, EAC) is the first step towards creating the Continental Free Trade Area (CAFTA), planned for 2017. This article attempts to assess the importance of the TFTA agreement for the process of regional integration in Africa. The article uses an analytical and descriptive method on the basis of domestic and foreign literature sources and statistics of the United Nations Conference on Trade and Development (UNCTAD). Empirical studies were also conducted with the use of the Regional Trade Introversion Index (RTII). The analysis performed leads to the conclusion that the broad scope of both subjects and countries covered by the Tripartite agreement indicates that it may be a step towards a new development strategy for regional integration in Africa. However, the authors' own study results suggest that the position of the agreement in world trade will remain unchanged.

**Keywords:** Regional trade agreements (RTAs), Tripartite Free Trade Area (TFTA), Continental Free Trade Area (CFTA), Regional Trade Introversion Index (RTII)

**JEL:** F14, F15

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# 1. Introduction

Africa is a continent where the most groups and regional economic communities were established (relative to the number of states). The majority of these arrangements were created in a short period of time, soon after African states gained their independence. The integration was modelled on the neoclassical structure popular in developed countries. However, after half a century of enacting this model, it has become clear that it does not fulfil its purpose – it has not helped African countries with their development and integration. The 21<sup>st</sup> century brought with it a visible change, mainly in Africa's economic surroundings, but also in the integration schemes, previously not adopted on this continent, such as the Tripartite Free Trade Area (TFTA). This article aims at a preliminary assessment of the significance of this agreement, concluded between the Common Market for Eastern and Southern Africa (COMESA), the Southern African Development Community (SADC) and the East African Community (EAC) in 2015, for further development of regional integration on the African continent. It seems particularly important to pre-assess the functioning of the TFTA in the context of another agreement planned by the African Union, to be signed in 2017, with a view to creating a Continental Free Trade Area (CFTA). The following is the research hypothesis presented in this paper: despite the merger of the forces of the three communities, the new grouping still has a weak position in the world economy.

The article uses an analytical and descriptive method on the basis of domestic and foreign literature sources and statistics of the United Nations Conference on Trade and Development (UNCTAD). The authors' own empirical studies with the use of the Regional Trade Introversion Index (RTII) were also conducted.

## 2. Regional trade agreements in Africa

In theory, there are various arguments for the creation of regional trade agreements between low-income countries. Those are the so-called general arguments, concerning all groups of countries irrespective of their development level, as well as ones directly related to the economic development level of partner countries. The latter are presented broken down into arguments regarding agreements only between countries characterised by similar (low) development levels (South–South agreements) and those referring to agreements entered into by countries differing in their development level (North–South agreements), (for more see: Levy, 1999: 141–146).

The rich body of theoretical knowledge is reflected in practical regional integration. Since the mid–20<sup>th</sup> century, the world economy has seen the so-called proliferation of regional trade agreements, understood as a dynamic development

of economic and trade regionalism (Michalski, 2014: 33). At the turn of the 20<sup>th</sup> and 21<sup>st</sup> centuries, the number of agreements entered into by low-income countries increased dramatically. In 1990–2003, the countries concerned signed 70 new preferential trade agreements, accounting for over 50% of all new agreements of that type (Mayda, Steinberg, 2009: 1362). As a consequence, various signatories of preferential trade agreements are parties to more than one such an agreement, which – as demonstrated by empirical studies – may lead to measurable economic losses caused by reduced internal trade (Chacha, 2014: 538–539; Sandrey, 2015: 51).

Africa is a perfect example of such activities in practice. The continent is covered by a fine net of overlapping agreements resulting from successive waves of regionalism in the world economy. However, most of those agreements were concluded within the first wave, shortly after the African countries concerned regained independence. An inspiring role was played by institutions such as: the United Nations Economic Commission for Africa (ECA) and the Organisation of African Unity (OAU). In particular, for years the ECA actively promoted regionalism as a development strategy for the part of the world concerned. The approach was based on the assumption that integration groups in Africa should cover most of African countries in order to create large markets for industries developed in accordance with the anti-import strategy, thus increasing the self-sufficiency of the continent. However, the proposed solutions were not necessarily suitable for the specific characteristics of Africa (Foroutan, 1998: 438).

It is now common knowledge that the implementation of the strategy in question has led many countries to develop largely inefficient industries protected by high customs barriers and market players to have no confidence in market forces and expect public subsidies instead. However, African countries are still willing to belong to integration groups, although not always to truly integrate and to realistically assess their capabilities. As a result, after various transformations such groups are bound, under the treaties signed, to achieve deep forms of integration, which in specific conditions and too short implementation periods has proved to be (with few exceptions) very ineffective. Therefore, it leads to the conclusion that the effect of regionalism on either the development of intra-region trade (ca. 12%) or the economic position of the continent in the world has not been very impressive. Despite its spectacular economic growth, in the 2010s Africa does not account for more than 3% of world trade and investment (*UNCTAD Handbook of Statistics*, 2015: 10).

Undoubtedly, the reasons for this state of affairs are very complex and affected by numerous internal, external and institutional determinants. As regards the last type of factors, for years there was basically no institutional cooperation between individual groups of countries focusing on the developing of internal links. The breakthrough year was 1991 when the Abuja Treaty was signed under the auspices

of the African Union, implementing the idea of the African Economic Community (AEC). The plan assumed the creation, by 2028, of an economic community of African countries based on the selected existing African integration agreements (Regional Economic Communities, RECs), the so-called pillars of the AEC<sup>2</sup>. In the timetable adopted, the year 2017 is of special importance as it ends the third stage (2007–2017) and begins the fourth stage (2017–2019) of the implementation of the concept of transcontinental integration in Africa. Both stages are oriented towards trade integration; the third stage concerns the creation of free trade areas and customs unions within particular groups of countries, whereas the fourth stage is intended as a period of coordination and harmonisation of tariff and non-tariff systems of the economic communities, leading to the creation of a continental customs union.

As an actual measure towards the achievement of the integration objectives, in June 2015 the Tripartite Free Trade Area (TFTA) agreement was signed, a basis for the creation of a free trade area between the following three African groups of countries: the Common Market for Eastern and Southern Africa (COMESA), the Southern African Development Community (SADC) and the East African Community (EAC). The TFTA covered a total of 26 African countries<sup>3</sup>, accounting for ca. 57% of the population of the African Union (AU) member countries and 57% of its GDP (Shmieg, 2015: 6).

The adoption of the TFTA constitutes the first step towards the Continental Free Trade Area (CFTA) agreement, planned to be signed at the end of this year (2017); at the same time, African countries will follow the global trend of creating Mega Regional Trade Agreements (MRTAs). Examples of such arrangements include the Trans-Pacific Partnership (TPP), the Transatlantic Trade and Investment Partnership (TTIP), with the United States as a party, and the less well-known, negotiated since 2012, Regional Comprehensive Economic Partnership (RCEP) between the ASEAN countries and China, India, Japan, South Korea as well as Australia and New Zealand, to a certain degree

<sup>2</sup> Those are as follows: the Economic Community of Central African States – ECCAS, the Common Market for Eastern and Southern Africa (COMESA), the East African Community (EAC), the Southern African Development Community (SADC), the Economic Community of West African States (ECOWAS), the Community of Sahel-Saharan States (CEN-SAD), the Intergovernmental Authority for Development (IGAD), and the Arab Maghreb Union (AMU); the last community is not a signatory to the protocol concerning relations between the RECs and the African Union. For more on the subject: Oppong, 2010: 92–103; Garlińska-Bielawska, 2013: 113–122; *African Union Handbook*, 2014: 119–130.

<sup>3</sup> Those are as follows: Angola, Botswana, Burundi, the Democratic Republic of the Congo, Djibouti, Egypt, Eritrea, Ethiopia, Kenya, the Comoros, Lesotho, Libya, Madagascar, Malawi, Mauritius, Mozambique, Namibia, the RSA, Rwanda, the Seychelles, Swaziland, Sudan, Tanzania, Uganda, Zambia, and Zimbabwe. Thus far, the agreement has been signed by 18 of the countries in question, the last signatory was Libya, on 19 October 2016. The agreement will enter into force after its ratification by the 14 member countries, which is yet to be implemented.

seen as a counterweight for the two above-mentioned partnerships (for more see: Pera, 2016: 181–182; Żołądkiewicz, 2016: 335–344).

Simultaneously, such an approach is consistent with arguments for the need to change the African integration model, put forward by researchers worldwide, in response to mostly poor effects of the many years of activities of various African economic communities (McCarthy, 2007; Draper, 2013). Africa has witnessed no success in the implementation of the European integration model, assuming the achievement of deep integration stages. The continent is characterised by permanent underdevelopment, in both economic and social terms, as well as by political instability. In such a situation, it is desirable to seek solutions better suited to the special African conditions.

### 3. The Tripartite Free Trade Area (TFTA) agreement as a new formula of cooperation between the COMESA, EAC and SADC

The proposed formula of cooperation between the COMESA, EAC and SADC (adopted during a tripartite summit in June 2011) was based on three pillars: market integration, infrastructure development and industrial development. The creation of the TFTA implements the first pillar. The free trade area between the economic communities adopted for implementation has rather specific, deep integration objectives, characteristic of the common market, i.e. the free movement of goods, services and persons travelling on business<sup>4</sup>. An emphasis is also placed on the elimination of non-tariff barriers, with a special mechanism for their removal (Mechanism for Reporting, Monitoring & Eliminating Non-Tariff Barriers, NTBs). Owing to the diversity of the member countries of the TFTA<sup>5</sup>, and thus various capabilities concerning the implementation of the agreement, the principle of variable geometry was adopted. The TFTA Agreement will introduce uniform rules of the origin of goods. Those previously applied by the COMESA and EAC are relatively similar, whereas the rules of origin employed by the SADC differ significantly<sup>6</sup>. Within the TFTA, products originating in the member countries are

<sup>4</sup> The creation of a customs union was not included as an obligatory integration stage, it was left as an option.

<sup>5</sup> In the 2000s, the economic growth rates in Angola and Eritrea were 13% and 0.19% respectively; the latter country ranked very low in terms of the HDI, as one of the countries characterised by the lowest human development levels according to the UN criteria (for more see: Bombińska, 2016: 223–228; Czermińska, Garlińska-Bielawska, 2016: 131–133).

<sup>6</sup> The rules of origin within the COMESA require a product imported from partner countries to meet one of the following criteria: 1) to be a product wholly produced in a member country, 2) to have an imported value added content not exceeding 60% of the ex-factory value of the product

considered to be those wholly produced or sufficiently processed or transformed there. Sufficient processing or transformation means that the value of inputs from third countries used in the manufacture of a product does not exceed 70% of its ex-works price or the value of inputs from the member countries of the area (treated as a single territory) used in production accounts for at least 30% of the ex-works price of the product concerned (TFTA Annex 04, Rules of Origin: 2–3).

## 4. An attempt to assess potential trade effects of the creation of the TFTA

At present, one of the main effects of the existence of regional trade agreements (RTAs) is the intensification of merchandise trade between member countries. This intensification can be assessed with the use of various trade intensity indicators (Czarny, Folfas, 2015: 1–2). The Regional Trade Introversion Index (RTII) was selected to evaluate potential effects of the existence of the TFTA. The main advantages of the RTII include its independence from the size of the RTA (or of the region whose trade is covered) and the fact that it is normalised to zero – it takes on values from the range  $[-1; 1]$ . The RTII is computed according to the formula (1).

$$RTII_i = (HI_i - HE_i) / (HI_i + HE_i),$$

$$HI_i = (T_{ii}/T_i) / (T_{oi}/T_o), \quad (1)$$

$$HE_i = (1 - (T_{ii}/T_i)) / (1 - (T_{oi}/T_o)),$$

concerned, 3) to have the local value content of at least 35% of total production cost, 4) to be considered a product of special importance to economic development and to have a minimum local value added content of 25%, 5) to have been substantially processed in production, which means changing its tariff heading after production. The EAC requirements are as follows: 1) a product must be wholly produced in a member country, 2) a product must have a minimum value added content of 35%, 3) the share of imported raw materials absorbed in production must not exceed 60%; no change in tariff heading is required, 4) to have the local value content of at least 30% of total production cost. The SADC rules of origin were modified during the term of the agreement to better protect the national markets of its member countries. The new rules are product-specific, thus more complicated. Duty-free treatment in the territory of the SADC concerns goods wholly produced there or having an import value added content of 53–65%. If products are not wholly produced within the community, they must be sufficiently processed. Materials originating in non-SADC countries may be used in the manufacture of a product subject to preferential treatment if its value does not exceed 10% of the factory price of the product. Those rules are particularly restrictive to textiles as they have a combination of single- and double-stage transformation (UNECA, 2012: 82).

where:

$RTII_i$  – the Regional Trade Introversion Index for RTA (region)  $i$ ,

$T_{ii}$  – the sum of exports from RTA (region)  $i$  to RTA (region)  $i$  and imports to RTA (region)  $i$  from RTA (region)  $i$ ,

$T_i$  – the sum of total exports from RTA (region)  $i$  and total imports to RTA (region)  $i$ ,

$T_{oi}$  – the sum of exports from RTA (region)  $i$  to the rest of the world and imports to RTA (region)  $i$  from the rest of the world,

$T_o$  – the sum of total exports and imports of the rest of the world.

If the RTII is above zero, the trade of the RTA (region) concerned is internally oriented. However, if the index is below zero, the RTA's trade is externally oriented, thus trade with the rest of the world is relatively more intensive than within the RTA. The index equal to zero means the geographic neutrality of trade (Iapadre, 2006: 65–85).

Undoubtedly, the drawback of the RTII is the lack of its ideal (model) value to be used in comparisons with actual values. In such a situation, the benchmark must be the RTII values for integration groups representing model communities – the EU and the NAFTA. For the past decade, the RTII values for the two communities have fallen within the range 0.65–0.75. As a result, values significantly lower than 0.65 can be treated as a sign of insufficient relative trade intensity within the RTA concerned. At the same time, values considerably higher than 0.75 (especially close to 1) may reflect insufficient competitiveness of the RTA's member countries in the global market and an attempt to use trade only with the closest neighbouring countries as an instrument of economic growth. Such values usually do not reflect a tremendous success of the integration group in eliminating barriers to intra-RTA trade or exceptionally strong economic cooperation between the RTA's member countries.

The RTII values for total trade were computed for each of the communities within the TFTA as well as the Tripartite Free Trade Area and then compared to those for groups of countries regarded as model communities – the NAFTA and the EU. The values obtained are presented in Table 1.

In the first year of the validity of the TFTA, the RTII for the communities in Africa ranged from 0.85 to 0.98, which indicates a very strong intra-group orientation of trade. Nevertheless, it is no proof of major integration success; rather, it serves as information that despite its integration, the community concerned plays an insignificant role in international trade in comparison with the rest of the world. Bearing in mind the results obtained, the intra-TFTA orientation of trade was analysed with regard to groups of processed goods (manufactures) and unprocessed articles (natural raw materials, products of agriculture, forestry, fisheries). The results are presented in Tables 2 and 3.



Table 1. RTII for total trade within the TFTA, COMESA, EAC, SADC and the EU and NAFTA in 2015

	<b>TFTA (2015)</b>	<b>COMESA (2015)</b>	<b>EAC (2015)</b>	<b>SADC (2015)</b>	<b>EU (2015)</b>	<b>NAFTA (2015)</b>
$T_{ii}$ USD billion	79.5	18.9	5.3	65.1	6,417.4	2,201.3
$T_i$ USD billion	518.9	242.0	49.9	314.0	10,731.7	5,414.7
$T_{oi}$ USD billion	439.4	223.1	44.6	248.9	4,314.3	3,213.4
$T_o$ USD billion	32,658.0	32,934.9	33,127.0	32,862.9	22,445.2	27,762.2
$T_{ii}/T_i$	15.32%	7.81%	10.62%	20.73%	59.80%	40.65%
$T_{oi}/T_o$	1.35%	0.68%	0.13%	0.76%	19.22%	11.57%
<b>RTIIi</b>	<b>0.86</b>	<b>0.85</b>	<b>0.98</b>	<b>0.94</b>	<b>0.72</b>	<b>0.68</b>

Source: own study based on UNCTAD data

Table 2. RTII for trade in manufactures within the TFTA, COMESA, EAC, SADC and the EU and NAFTA in 2015

	<b>TFTA (2015)</b>	<b>COMESA (2015)</b>	<b>EAC (2015)</b>	<b>SADC (2015)</b>	<b>EU (2015)</b>	<b>NAFTA (2015)</b>
$T_{ii}$ USD billion	41.5	8.0	3.3	35.3	4,817.8	1,568.2
$T_i$ USD billion	262.9	133.4	28.3	147.6	7,943.8	3,941.2
$T_{oi}$ USD billion	228.4	125.4	25.0	112.3	3,126.0	2,373.0
$T_o$ USD billion	22,968.3	23,097.8	23,202.9	23,083.6	15,287.4	19,290.0
$T_{ii}/T_i$	15.79%	6.00%	11.66%	23.92%	60.65%	39.79%
$T_{oi}/T_o$	0.99%	0.54%	0.11%	0.49%	20.45%	12.30%
<b>RTIIi</b>	<b>0.90</b>	<b>0.84</b>	<b>0.98</b>	<b>0.97</b>	<b>0.71</b>	<b>0.65</b>

Source: own study based on UNCTAD data

As regards unprocessed articles, the Regional Trade Introversion Indices for the African integration communities are slightly lower than those calculated for trade in processed goods. It means that the position of the African RTAs (particularly of the TFTA) in the global market is marginally better in the case of trade in natural raw materials and agricultural, forestry and fishery products in comparison with their position in trade in manufactures.

However, the position is still far from satisfactory; in addition, specialisation in exports of unprocessed articles is risky due to frequent and significant fluctuations in prices of such products.



For the purpose of deepening the analysis, the RTII values for the individual communities comprising the TFTA were also calculated over a ten-year period before integration. The results are presented in Table 4.

Table 3. RTII for trade in unprocessed goods (natural raw materials, agricultural, forestry and fishery products) within the TFTA, COMESA, EAC, SADC and the EU and NAFTA in 2015

	<b>TFTA (2015)</b>	<b>COMESA (2015)</b>	<b>EAC (2015)</b>	<b>SADC (2015)</b>	<b>EU (2015)</b>	<b>NAFTA (2015)</b>
$T_{ii}$ USD billion	37.7	10.8	2.0	29.6	1,384.8	548.7
$T_i$ USD billion	241.4	104.8	21.4	157.8	2,470.0	1,187.3
$T_{oi}$ USD billion	203.7	94.0	19.4	128.2	1,085.2	638.6
$T_o$ USD billion	8,804.3	8,940.9	9,024.3	8,887.9	6,575.7	7,858.4
$T_{ii}/T_i$	15.62%	10.31%	9.35%	18.76%	56.06%	46.21%
$T_{oi}/T_o$	2.31%	1.05%	0.21%	1.44%	16.50%	8.13%
<b>RTI<i>i</i></b>	<b>0.77</b>	<b>0.83</b>	<b>0.96</b>	<b>0.88</b>	<b>0.73</b>	<b>0.81</b>

Source: own study based on UNCTAD data

Table 4. RTII in previous periods (2000–2010)

	<b>COMESA</b>	<b>EAC</b>	<b>SADC</b>	<b>EU</b>	<b>NAFTA</b>
<b>Total trade</b>					
2000	0.83	0.99	0.94	0.68 (EU-15)	0.65
2005	0.82	0.99	0.90	0.73 (EU-25)	0.69
2010	0.81	0.99	0.90	0.73 (EU-27)	0.69
<b>Trade in manufactures</b>					
2000	0.82	0.99	0.96	0.67 (EU-15)	0.69
2005	0.82	0.99	0.95	0.73 (EU-25)	0.69
2010	0.81	0.99	0.95	0.73 (EU-27)	0.64
<b>Trade in unprocessed goods (natural raw materials, agricultural, forestry and fishery products)</b>					
2000	0.83	0.99	0.89	0.73 (EU-15)	0.57
2005	0.82	0.99	0.88	0.76 (EU-25)	0.62
2010	0.81	0.99	0.89	0.79 (EU-27)	0.57

Source: own study based on UNCTAD data

It is remarkable that the results obtained are very stable. The values for the EAC over a ten-year period have not changed completely either in terms of the total trade or in terms of individual commodity groups.

Therefore, on the basis of the value of the Regional Trade Introversion Index in 2015, it is difficult to consider the creation of the TFTA to be a milestone in the history of African economic integration. An important indicator will be the trend of changes in the RTII in the following years.

## 5. Conclusions

The broad scope of both subjects and countries covered by the Tripartite agreement suggests that it may be a step towards a new development strategy for regional integration in Africa. The agreement is consistent with both the global trend of the third wave of regionalism and the arguments for changes in the integration model implemented in Africa from the 1960s. Basing the integration strategy on three pillars – market integration, infrastructure development and industrial development – seems justified and responsive to the needs of the continent. As the first stage of the implementation of the above strategy, the TFTA covers 26 African countries and creates between them a deep free trade area, with simplified and uniform rules of origin, which is undoubtedly a significant merit of the agreement.

However, although the new community will include economies of nearly half of African countries, they are very diverse and their national incomes combined represent a minor figure (comparable to that of Mexico). Furthermore, the TFTA plays an insignificant role in international trade in comparison with the rest of the world, as demonstrated by the values of the Regional Trade Introversion Index. In such a situation, the adopted principle of variable geometry seems both reasonable and conducive to delays in the TFTA implementation. The trend can be observed already as it is reflected in the lengthy process of signing and ratifying the agreement since 2015. In this context, the creation of the Continental Free Trade Area (CFTA) planned for this year seems very premature.

All this does not undermine the importance of the Tripartite Free Trade Area agreement. It is the first agreement of that type concluded in Africa and may well become a breakthrough arrangement in terms of solutions adopted. However, it is difficult to expect buoyant growth in intra-regional trade and the ensuing intensification of trade with the rest of the world in accordance with the principle of *learning by doing* – in this case: *learning by exporting*.

However, if we assume that arrangements made under integration agreements between low-income countries should mostly lead to accelerated economic growth and promoting long-term development (Rueda-Junquera, 2006: 4), an attempt to use trade with the closest neighbouring countries as an instrument for boosting economic growth may be a positive phenomenon, provided that it is reflected in greater trade with the rest of the world.

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### Czy Porozumienie Tripartite Free Trade Area (TFTA) może stać się przełomowe w procesie integracji regionalnej na kontynencie afrykańskim?

**Streszczenie:** Zawarte w 2015 roku trójstronne porozumienie o wolnym handlu Tripartite Free Trade Area (TFTA) między trzema regionalnymi porozumieniami handlowymi w Afryce (COMESA, SADC, EAC) jest pierwszym krokiem w kierunku utworzenia kontynentalnej, afrykańskiej strefy wolnego handlu Continental Free Trade Area (CAFTA), planowanej na 2017 rok. Celem artykułu jest próba oceny znaczenia zawartego porozumienia TFTA dla procesu regionalnej integracji w Afryce. W artykule zastosowano metodę analityczno-opisową z wykorzystaniem krajowych i zagranicznych źródeł literaturowych oraz danych statystycznych Konferencji Narodów Zjednoczonych ds. Handlu i Rozwoju (United Nations Conference on Trade and Development – UNCTAD). Przeprowadzone zostały również badania empiryczne z wykorzystaniem wskaźnika wewnętrznej orientacji handlu (RTII). Dokonana analiza prowadzi do wniosku, że zarówno szeroki zakres przedmiotowy, jak i podmiotowy porozumienia Tripartite wskazuje, że może być ono ważnym krokiem w kierunku nowej strategii rozwoju integracji regionalnej w Afryce. Natomiast wyniki badań własnych sugerują, że nie zmieni się pozycja porozumienia w handlu światowym.

**Słowa kluczowe:** regionalne porozumienia handlowe (RPH), Trójstronna Strefa Wolnego Handlu (TFTA), Kontynentalna Strefa Wolnego Handlu (CFTA), wskaźnik wewnętrznej orientacji handlu (RTII)

**JEL:** F14, F15

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