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Committee on Safeguards

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**NOTIFICATION UNDER ARTICLE 12.1(A) OF THE AGREEMENT
ON SAFEGUARDS ON INITIATION OF AN INVESTIGATION
AND THE REASONS FOR IT**

ZIMBABWE

Pasta products

The following communication, dated 22 October 2026 is being circulated at the request of the delegation of Zimbabwe.

In accordance with Article 12.1(a) of the Agreement on Safeguards, Zimbabwe hereby notifies the Committee on Safeguards of the initiation of the investigation period in respect of imports of pasta.

1. Date of initiation

The investigation was initiated on 18 September 2026 through publication of a notice in the Zimbabwean Government Gazette, Vol. CIV, No. 69, General Notice 1787 of 2026. In accordance with section 12(1) of the Competition (Safeguards) (Investigation) Regulations, 2006 (Statutory Instrument 217 of 2006), publication of the notice marks the date of initiation of the investigation.

2. Product concerned

The Product Under Consideration (PUC) comprises pasta products imported into Zimbabwe. The PUC is classified under Harmonized System heading 1902, covering pasta, whether or not cooked or stuffed with meat or other substances, or otherwise prepared, including spaghetti, macaroni, noodles, lasagne, gnocchi, ravioli, cannelloni and couscous, whether or not prepared.

Tariff Code	Description
1902.11.00	Uncooked pasta, not stuffed or otherwise prepared, containing eggs
1902.19.00	Other uncooked pasta, not stuffed or otherwise prepared
1902.20.00	Stuffed pasta, whether or not cooked or otherwise prepared
1902.30.00	Other pasta

The tariff classification is indicative of the scope of the PUC and does not, by itself, determine the final scope of the product under investigation. The Commission will examine the precise product scope during the investigation, including any issues concerning tariff classification, product characteristics and product coverage raised by interested parties.

The domestic like or directly competitive product consists of pasta products manufactured in Zimbabwe. The imported and domestic products are used for substantially similar purposes and compete through comparable channels of distribution, including wholesalers, retailers, supermarkets and other food outlets. Based on the information available at initiation, the Commission considers

that the imported and domestically produced pasta products have sufficiently similar physical characteristics, end uses, channels of distribution and consumer applications to warrant treatment as like or directly competitive products for the purposes of this investigation. This issue will be examined further during the investigation

3. Exporting countries

The investigation covers imports of the PUC from all countries and territories from which pasta products are imported into Zimbabwe. The principal countries exporting the PUC to Zimbabwe are Botswana, Egypt, Mozambique, Namibia and South Africa

4. Duration of the investigation

In accordance with section 14 of the Safeguard Regulations, the investigation shall be completed within six months from the date of initiation and may be extended only once for a further period not exceeding two months.

5. Reasons for the initiation of the investigation

The Zimbabwean pasta industry has provided evidence indicating that it may be suffering from serious injury resulting from a significant and sustained increase in pasta imports between 2024 and 2025. The volume of imports grew by approximately 8.6 million kilograms over this period, an increase of 17.4%, while imports remained substantially higher than domestic production. This increase was significant, with imports rising from approximately 49.5 million kg. in 2024 to 58.1 million kg. in 2025. The upward trend in imports provides a sufficient basis for the Commission to investigate whether imports have increased in such quantities, in absolute terms and relative to domestic production, and under such conditions as to cause or threaten serious injury to the domestic industry within the meaning of Article 2.1 of the WTO Agreement on Safeguards.

Import penetration has consistently exceeded domestic production by a substantial margin. In 2024, pasta imports were approximately 6.7 times domestic production. By 2025, this figure had increased to approximately 7.0 times domestic production. Imported pasta products accounted for approximately 88% of the domestic market in 2024 and 87% in 2025. These figures demonstrate that imports are not merely supplementing domestic supply but dominate the Zimbabwean pasta market and compete directly with locally produced pasta products through wholesalers, retailers, supermarkets and other food outlets.

Key injury indicators confirm deterioration in the condition of the domestic industry. The domestic industry's financial performance deteriorated significantly during the period under consideration, including a substantial increase in losses and a marked deterioration in its return on net assets. Price undercutting by imported pasta products of up to 17.8% below the domestic product indicates adverse price effects that may have contributed to price depression or price suppression and may have adversely affected the ability of the domestic industry to compete.

The Commission notes that certain indicators, including production, sales, capacity utilisation, productivity and market share, showed improvement during the period under consideration. However, these developments must be assessed in the context of the commencement and subsequent expansion of domestic production from February 2024, following the applicant's transition from importing pasta products to domestic manufacture. Despite these improvements, the domestic industry continued to face substantial import competition, high import penetration and deteriorating financial performance. The Commission will examine whether the improvements in certain operational indicators were sufficient to offset the adverse effects of increased imports on the overall condition of the domestic industry.

The effects of increased imports have therefore placed the domestic pasta industry under considerable commercial and financial pressure. Taken together, the evidence provides a sufficient basis to investigate the causal relationship between increased imports and serious injury or threat of serious injury to the domestic industry, and to determine whether the requirements for application of a safeguard measure are met.

6. Unforeseen developments

The Applicant submitted that the increase in imports of pasta products was associated with a combination of developments that altered market conditions in Zimbabwe and internationally. These developments include changes in domestic consumption patterns, increased exports from preferential trade partners, and changes in regional trade conditions. The Commission has preliminarily considered these developments and will examine during the investigation whether they constitute unforeseen developments within the meaning of Article XIX of GATT 1994 and contributed to the increase in imports.

6.1 Changes in domestic consumption patterns

The Applicant submitted that pasta consumption in Zimbabwe has undergone a structural change, with pasta products increasingly becoming an affordable and convenient staple food. This shift has been attributed to changes in consumer purchasing patterns, declining consumer purchasing power and increased demand for lower-cost food alternatives. The available information indicates that increased consumption has created additional demand for pasta products beyond historical consumption patterns. The Commission will examine whether these changes in consumption patterns were unforeseen and whether they contributed to the increase in imports of pasta products.

6.2 Expansion of regional exports under preferential trade arrangements

The Applicant submitted that the expansion of pasta exports from Egypt, benefiting from preferential market access arrangements under COMESA, contributed to increased import competition in Zimbabwe. The Commission notes that preferential trade arrangements may influence trade flows by improving market access for suppliers benefiting from such arrangements. The available information indicates an increased availability of pasta imports from preferential sources. The Commission will examine the extent to which changes in export capacity, trade flows and preferential market access contributed to the increase in imports and whether such developments were unforeseen at the time the relevant obligations were undertaken.

6.3 Regional trade diversion effects

The Applicant submitted that trade diversion effects arising from trade measures applied in other markets contributed to increased exports of pasta products into Zimbabwe. In particular the Applicant referred to trade measures affecting pasta products in other jurisdictions, including Madagascar and South Africa, which may have resulted in suppliers redirecting exports towards alternative markets. The Commission notes that trade measures applied in third-country markets may affect export patterns and competitive conditions in other markets. The Commission will examine whether such developments contributed to increased imports of pasta products into Zimbabwe and whether they constitute unforeseen developments within the meaning of Article XIX of GATT 1994.

6.4 Preliminary conclusion on unforeseen developments

Based on the information available at initiation, the Commission considers that the application contains sufficient evidence of developments that may have contributed to changes in the conditions of competition in the Zimbabwean pasta market. The Commission therefore considers that there is sufficient basis to further investigate whether these developments, individually or collectively, constitute unforeseen developments and contributed to the increase in imports of pasta products into Zimbabwe.

7. Preliminary assessment of serious injury and causal link

The information available to the Commission at initiation provides a sufficient basis to investigate whether there is sufficient evidence of serious injury or threat of serious injury to the domestic pasta industry within the meaning of Article 4 of the WTO Agreement on Safeguards. This preliminary assessment is based on an objective examination of the information available at initiation. The evidence indicates that imports increased significantly between 2024 and 2025, rising by 17.4% over the period, while remaining substantially higher than domestic production.

Imports increased from approximately 6.7 times domestic production in 2024 to approximately 7.0 times domestic production in 2025. Imported pasta products accounted for approximately 88% of the domestic market in 2024 and 87% in 2025. The level of import penetration demonstrates that imported products occupy a dominant position in the Zimbabwean pasta market and may be displacing locally produced pasta products in key distribution channels, including wholesalers, retailers, supermarkets and other food outlets.

The domestic industry's financial performance deteriorated significantly during the period under consideration. The domestic producer recorded a substantial increase in losses and a marked deterioration in return on net assets, despite improvements in certain operational indicators following the commencement and expansion of domestic production. This deterioration occurred concurrently with increased import volumes, continued import dominance and import prices that were below domestic selling prices.

Imported pasta products were observed to undercut the domestic product by up to 17.8%. The presence of lower-priced imports may have constrained the domestic producer's ability to increase prices, recover costs and achieve a reasonable return on investment. The combination of increased import volumes, high import penetration, adverse price effects and deteriorating financial performance provides a sufficient basis to investigate whether increased imports have caused or are threatening to cause serious injury to the domestic industry.

While factors related to the commencement of domestic production, including start-up, establishment and expansion costs, may have affected the condition of the domestic industry, the Commission considers that the principal issue requiring investigation is the relationship between increased imports and the deterioration in the financial condition of the domestic producer. The Commission will examine all other known factors affecting the domestic industry and ensure that injury caused by factors other than increased imports is not attributed to imports.

The pattern of rising imports, sustained import dominance, price undercutting and deteriorating financial performance provides a sufficient basis for the Commission to investigate whether increased imports are causing or threatening to cause serious injury to the domestic industry and whether the requirements for application of a safeguard measure are met.

8. Interested parties

Interested parties desiring to participate in the investigation shall have a period of 30 days from the date of initiation to indicate to the Investigating Authority in writing their interest in participating in the investigation. Comments from interested parties should be submitted within 30 days from the date of initiation of the investigation. Requests for an oral hearing should be submitted in writing to the Commission at the address below within 30 days from the date of the investigation's initiation, stating the reasons for not relying solely on written submissions. No request for an oral hearing will be considered more than 60 days from the date of this initiation notice.

At the time of the request for an oral hearing, parties must provide the Commission with a detailed agenda and a complete version of all information to be discussed, including a non-confidential version if the information contains a confidential component. In the case of non-responses or late submissions, decisions will be made based on the best available information. Public hearings may be held either at the request of interested parties or at the discretion of the Commission, allowing parties to present evidence and comments, respond to the presentations of others, and defend their interests.

9. Further information

Requests for further information and correspondence regarding the investigation must be sent to:

The Director
Competition and Tariff Commission
23 Broadlands Road, Emerald Hill
Harare
Zimbabwe

Email: traderemedies@competition.co.zw

Website: www.competition.co.zw
