Tanzania Civil Society Guide on Influencing World Bank Country Strategy
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Introduction

As one of the world’s largest sources of funding and technical assistance for developing and transitioning countries, World Bank projects and policies affect the lives and livelihoods of billions of people. The World Bank has two goals it aims to achieve by 2030: to end extreme poverty and to boost shared prosperity. But despite these ambitious and laudable targets, the Bank has repeatedly been exposed for its involvement in problematic projects and policies in developing and transition countries. This can lead to disastrous impacts, such as forced displacement, destruction of livelihoods and environmental degradation.

Civil society plays an important role in holding the World Bank accountable to its mission, as a publicly funded bank. One way to do this is by monitoring specific investments and tracking the social and environmental effects of its projects, programmes and policies on local communities. Where harm occurs, civil society can use tools, such as the Bank’s accountability watchdogs - the Inspection Panel or the Compliance Advisor Ombudsman - to seek redress and systemic change. Another way is to try to influence World Bank investments ‘upstream’—or before they happen— to ensure that the Bank’s priorities align with those of civil society, such as protecting the environment and addressing the needs of the most marginalised groups.

This briefing introduces the World Bank’s Country Engagement process, a vital opportunity to influence how the Bank positions its activities in a given country for the next four to six years. Since all projects and investments made by the World Bank Group must follow this agreed country strategy, ensuring that the strategy reflects development priorities and excludes harmful activities is a crucial way of tackling bad investments and encouraging good ones.

WORLD BANK GROUP GLOBAL COMMITMENTS FY2022

The briefing focuses specifically on Tanzania where the World Bank is currently developing its new strategy.
The World Bank Group
The World Bank was established in 1944 and today consists of five arms, together called the World Bank Group. The Bank's low-income country arm, the International Development Association (IDA) and its middle-income country arm, the International Bank for Reconstruction and Development (IBRD), both lend to governments. The International Finance Corporation (IFC) provides investment and advice to the private sector and the Multilateral Investment Guarantee Agency (MIGA) is the Bank's political risk insurance arm. Finally, ICSID - the International Centre for Settlement of Investment Disputes – is an international arbitration institution for legal dispute resolution and conciliation between international investors.

The Bank is governed by a Board of Directors made up of the Bank's President and 25 Executive Directors (EDs), representing the Bank's 189 member countries. Only the six largest shareholders (US, Japan, Germany, France, UK and China) have their own ED, the rest are organised in constituencies.

Tanzania is represented in the Africa Group 1 constituency, EDS14.1

World Bank Group commitments (including short-term finance, mobilization and Recipient-Executed Trust Funds) rose to $115 billion in fiscal year 2022, $5.3 billion or 5% higher than FY21. IBRD’s net commitments increased 8% to $33.1 billion in FY22. In FY22, IDA net commitments were $37.7 billion, the highest annual level in IDA’s history. IDA’s gross disbursements were $21.2 billion in FY22. IFC’s total commitments in FY22 reached $32.8 billion, an increase of 4% from the previous year. Long-term finance commitments were $23.2 billion, of which $12.6 billion was for IFC’s own account and $10.6 billion for core mobilization. MIGA’s commitments totaled $4.9 billion.

Box 1: World Bank Group Lending Instruments

The World Bank Group employs several lending instruments to provide financial support and assistance to its member countries. The main lending instruments used by the World Bank Group include:

- **Investment Project Financing**: This instrument provides financial resources to support specific projects in sectors such as infrastructure, health, education, agriculture, and others. The funds are typically used for capital investments, such as building roads, schools, or hospitals.

- **Development Policy Financing**: This instrument offers budget support to countries implementing policy reforms and development programs. The funds are provided as budgetary support to help governments achieve their policy objectives and strengthen their institutional capacity. Policy lending remains by far the most problematic form of lending of the World Bank when it comes to funding the climate crisis.

- **Program-for-Results Financing**: This instrument links disbursements directly to the achievement of specific program results or outcomes. It provides financial support to countries based on their progress in implementing policy reforms and achieving predetermined development targets.

- **Financial Intermediary Funds**: The World Bank Group manages several financial intermediary funds, which are multi-donor funds that support specific sectors or themes. These funds provide financing to intermediary entities, such as financial institutions or specialized agencies, which then channel the resources to the end beneficiaries.
The World Bank introduced its Country Engagement approach in 2014, as a new model for how the Bank plans its development activities in a borrower country. It consists of four steps, resulting in two key documents: the Systematic Country Diagnostic (SCD) and the Country Partnership Framework (CPF). The SCD assesses the country context, which then feeds into the development of the CPF – the actual strategy, which replaced the previous Country Assistance/Partnership Strategy (CAS/CPS). These two steps should result from consultative processes with the government and key stakeholders, including civil society. The last two steps in the process review progress mid-way, the Performance and Learning Review (PLR), and look at lessons learned at the end, the Completion and Learning Review (CLR).

We will examine the first two steps of the Country Engagement process in more detail, followed by a guide on how civil society can engage, since the Bank is obliged to consult and involve civil society through the different stages.

**Systematic Country Diagnostic (SCD)**
The SCD seeks to identify the most important constraints and opportunities for accelerating progress towards the Bank's twin goals in a given country. It looks at broader development challenges, rather than the World Bank's work. According to the Bank, it should outline "a clear set of priority focus areas that ... the country should address in order to accelerate progress toward [reducing absolute poverty and boosting shared prosperity] in a sustainable way."

The World Bank's directive on Country Engagement stipulates that the SCD serves as a reference point for the CPF consultations. While it is World Bank led, consultation with stakeholders is required: “SCD teams will also elicit the inputs of citizens regarding their priorities and preferences through consultations with various stakeholders, including civil society and the private sector.”

**Country Partnership Framework (CPF)**
The CPF is a four-to-six year strategy document which guides World Bank Group activities in a borrower country. All projects and programmes in a given country should be aligned with the
CPF. It builds on the SCD, but the CPF focuses specifically on the World Bank’s added value in the country. This can include identification of specific sectors that the Bank plans to focus on, for example agriculture, or broader objectives, such as fiscal reforms. It also indicates the expected lending volume. According to its own mandatory policies on country engagement, the Bank should develop the CPF in close coordination with counterparts in the government, and should also consult other stakeholders, including civil society.

On occasion, when the context is uncertain, a Country Engagement Note (CEN) can replace the CPF, while the Bank develops long-term activities. These generally last one to two years, and while consultation is recommended it is not compulsory.

**Consultation requirements and best practice**

The World Bank is required to consult with stakeholders, including civil society, on the first three steps of the Country Engagement process. The World Bank Group Directive on Country Engagement details this mandatory requirement: “To better inform the CPF, the PLR, the SCD, and, to the extent possible, the CEN, the WBG engages through consultations with the private sector, civil society and other stakeholders.”

The need for consultation on the CPF specifically is also outlined in the non-binding World Bank Group Guidance Note on “Country Partnership Framework Products”: “Throughout the preparation of the CPF (and, to the extent possible, the CEN), the team engages in consultations and appropriate collaborative processes with the government, the private sector, civil society, development partners, and other stakeholders in the country.”

Despite this, experience suggests that World Bank staff are often unfamiliar with these requirements, in particular to include civil society in consultations. It is therefore essential that civil society knows its rights and demands to be involved.

Another important aspect is access to documents, and the World Bank’s Access to Information Policy requires disclosure of the CPF’s predecessor, the CAS, before Board discussion – but only if the country consents. This is problematic, not the least in countries with limited or non-existent civil society space. Since the SCD is a World Bank product, there is no reason why this should not be disclosed before approval.

The 2014 Strategic Framework for Mainstreaming Citizen Engagement in World Bank Group Operations highlights the benefits of stakeholder consultations and best practice. This document emphasises the importance of feeding back on the input received through the consultations: “Documenting consultations and closing the feedback loop (that is, informing those consulted how their feedback has been used) is an important guiding principle.”
Box 2: Enacting Transparency and Accountability in World Bank’s CPF Processes

While the World Bank’s Country Partnership Framework (CPF) is designed to guide its engagement with member countries, there have been concerns regarding transparency and accountability in its implementation. Some of the main problems associated with the CPF in these areas include:

**Lack of Consultation**: The CPF is expected to reflect the priorities and needs of the country it pertains to. However, there have been instances where consultations with relevant stakeholders, including civil society organizations, local communities, and marginalized groups, have been limited or inadequate. This lack of meaningful consultation can undermine transparency and accountability.

**Limited Disclosure of Information**: Transparency is crucial for ensuring accountability. There have been cases where the World Bank’s disclosure of information related to the CPF, including its design, implementation plans, and monitoring mechanisms, has been insufficient. Limited access to information hampers the ability of stakeholders to understand and engage with the CPF process.

**Weak Monitoring and Evaluation**: Effective monitoring and evaluation mechanisms are essential for assessing the progress and impact of the CPF. However, there have been instances where the World Bank’s monitoring and evaluation systems have been criticized for lacking rigor, independence, and transparency. Inadequate monitoring and evaluation can impede the identification of issues and the course correction needed for achieving desired outcomes.

**Limited Grievance Redress Mechanisms**: Meaningful accountability requires effective grievance redress mechanisms through which affected communities or individuals can raise concerns and seek remedies. In some cases, the World Bank’s CPFs have been criticized for not adequately establishing or strengthening such mechanisms, making it difficult for affected parties to address their grievances.

**Weak Linkages to Country Systems**: The World Bank often utilizes country systems for project implementation and financial management. However, concerns have been raised about weak linkages between the CPF and country systems, which can undermine transparency and accountability. Inadequate integration can result in parallel processes, duplication of efforts, and weakened oversight.

HOW TO INFLUENCE THE WORLD BANK’S COUNTRY ENGAGEMENT PROCESS

A CPF outlines what will become the rationale for World Bank projects in a borrowing country in the coming years. Influencing a CPF can therefore help to stop ‘bad’ projects already in process or before they happen and push for ‘good’ projects that, for example, support efforts to protect the environment or to provide energy access. Engaging in this way is also an entry point for influencing national governments as the Bank is a highly influential player in low- and middle-income countries, whether as a major donor or a behind-the-scenes adviser on government programmes and policies, for example on issues such as Public Private Partnerships.

Here are some important steps for civil society organisations to consider when engaging in this process:
Find out about the process
> When is it time for the next consultation?

Raise awareness and build capacity
> Get up to speed and work together with other CSOs.

Get the messages right
> Make sure the World Bank listens! What do you need to raise on the consultations? What do you need to raise on the strategy content?

Coordinated advocacy efforts
> Work with others to influence the country engagement process in-country and internationally.

Follow up
> How is the new strategy implemented – monitor and hold the World Bank to account

Find out about the process
CPFs are updated every four to six years, so the first step is to find information on when the next update will be and the timing of the consultation processes in the country of interest. Given that the SCD sets the context for the CPF, it is important civil society engages in these consultations, too. The Bank is also obliged to consult on the PLR – the mid-term review – which is a chance to raise problems or opportunities related to the CPF and push for the Bank to change direction where needed.

Finding out about the process should be straightforward, but unfortunately the information on the World Bank’s website is often incomplete or out of date, and most is only accessible in English. Civil society can point out this lack of transparency and diligence in updating public information by writing to or meeting with the World Bank. The responsibility for the development and coordination of SCDs and CPFs falls mainly to the World Bank’s country offices, but not all are responsive or even aware of the requirement to consult – so in any meetings or letters, it is important to reiterate that this is compulsory.

In the event that no clear information is available online and attempts to get information from the country office fail, email consultations@worldbank.org for assistance.

Raise awareness and build capacity
The World Bank normally takes at least a year to draft, consult on and finalize a CPF (including the time it takes to complete the SCD). During this time international, national and local civil society organisations (CSOs) can form partnerships and coalitions to find the best ways of providing analysis and communicating the importance of the process to others. For example, CSOs can present this as an opportunity for citizens and civil society to elevate local and national-level agendas. A good way is to organize a workshop that brings a diversity of perspectives together. This can serve as a forum for building capacity on the inner-workings and politics of World Bank activities, as well as for brainstorming collective actions to influence the country engagement and providing space for communities and CSOs to speak up on issues that matter to them.

In preparation for these activities, it is useful to map World Bank activities in the country, with specific attention to projects that have been particularly good or bad. The World Bank Group’s accountability mechanisms are good sources of information on ‘problem projects’ – the Inspection Panel\(^\text{10}\) that covers IBRD and IDA and the Compliance Advisor Ombudsman\(^\text{11}\), which covers IFC and MIGA. Local communities, sometimes supported by NGOs, can approach these
accountability mechanisms when they believe World Bank projects have caused them harm or breached its policies, and details on the complaints are available on their websites.

- **Get the messages right**

To be effective, messages to the World Bank must be clear and concise. There are two areas of concern these messages can address:

- **Consultation process** - There are two key aims here. First, to ensure that the World Bank upholds the consultation requirements for the development and evaluation of the SCD and CPF. Second, civil society can push for best practice, including asking for information and draft documents to be shared in local languages and in advance of the consultations; for consultations to be run in multiple regions; and for adequate representation of rural communities and those who may be otherwise marginalised or disadvantaged. The Bank should advertise all consultations in an open, transparent and timely manner, and in relevant languages. Follow up is also important - civil society should ask for feedback on how their input into the consultations has been used in the final document, and for the Bank to translate drafts and final outputs into major local languages.

- **SCD/CPF content** - Messages on content should seek to influence how the Bank shapes the strategy, including the analytical context and the strategic priorities. The main issues that civil society chooses to raise will vary from country to country, depending on priorities and concerns. This could be from a positive or negative perspective, for example encouraging the Bank to promote and scale-up best practice where investments have proven beneficial, or to state a clear ‘no’ to projects which are causing harm. A key role for civil society is to ensure the Bank listens to voices of marginalised groups.

It is also worth emphasising the World Bank’s global commitments, which should be reflected in the SCD and CPF priorities. For example, the Bank has made several commitments about the 2030 Agenda and the Sustainable Development Goals (SDGs), including on a country level: “The SDGs and twin goals help us focus our conversations with country clients around shared goals.”12 On climate change, the Bank’s Climate Action Plan says that the SCDs and CPFs “will consider the risks and opportunities created by climate change and countries’ climate priorities.”13 In this regard, World Bank has started commissioning Country Climate and Development Reports (CCDRs) that inform its SCD and CPF processes wherever they are available.14 The Bank’s Gender Strategy states that the CPF must draw on a country gender assessment, and in addition the SCD should: “take as standard practice the application of a gender lens to the main constraints and priorities they identify.15

- **Coordinated advocacy efforts**

Advocacy at multiple levels - local, national and international - is vital for influencing the Country Engagement process. At the local and national level, in-country organizations can lead, for example, by organizing information sessions and workshops; by maintaining consistent contact with the Bank's country office; and by ensuring that local voices are included and amplified throughout the SCD/CPF processes. Alliance building can form a key part of this, benefitting from the strength, experience, skills and contacts of the members.

International organizations can play a role by developing links to the World Bank headquarters in Washington DC and feeding information back to national and local organizations. This interaction should build on information about the local context and implications of World Bank activities in country, so it is essential to work closely together. International organisations can also help to foster cross-regional interaction to highlight how the Bank’s engagement on the
SCD/CPF varies around the world. For example, successful advocacy on the process in one country can help CSOs in other countries be more effective in their engagement, or to pressure the Bank to scale up good practice.

Working together, international and national organisations can put pressure on the World Bank, jointly raising critical issues as they arise, for example through letters to the World Bank to highlight flaws in the consultation process or by communicating key demands and advocacy points in public statements, for which the Bank can later be held to account. Sometimes World Bank staff in country and in Washington DC are not responsive, and in these cases it is important to go to the next level and contact the World Bank Executive Director representing the country in question to reiterate the demands.

Follow up
It is essential to allow time for follow up once the SCD and/or CPF has been released. CSOs can scrutinize the final documents for evidence of where the Bank has - and has not - included recommendations from civil society or where the document contradicts civil society demands. They can then communicate this analysis through letters to the World Bank, public statements or media releases. It is also important for civil society to share these findings with other stakeholders, in particular project affected communities and marginalised groups.

This final step is crucial in order to hold the Bank accountable for its commitments to take civil society voices into account. This includes any follow up conversations and processes, such as the PLR mid-term review and the CLR final assessment, and ultimately for the next SCD/CPF process. For these engagements to be effective, it is important to keep monitoring World Bank related projects, programmes and policies during the implementation of the CPF.
Box 3: A New Approach to Country Strategies of the World Bank Group

The World Bank Country Partnership Framework (CPF) process needs to become more human-centered and focused on sustainable development. In order for this to be the case, several key steps need to be taken:

**Inclusive Stakeholder Engagement:** Meaningful and inclusive stakeholder engagement is crucial. The World Bank should actively involve a wide range of stakeholders, including civil society organizations, local communities, indigenous groups, and marginalized populations. This involvement should take place at all stages of the CPF process, from design to monitoring and evaluation, ensuring that their perspectives, needs, and priorities are taken into account.

**Human Rights-Based Approach:** The World Bank should adopt a human rights-based approach in the CPF process. This means integrating human rights principles and standards into the design, implementation, and evaluation of the CPFs. This approach emphasizes the rights and dignity of individuals and communities, ensuring that development interventions respect, protect, and fulfill human rights.

**Environmental and Social Sustainability:** The CPFs should prioritize environmental and social sustainability. This includes conducting robust environmental and social impact assessments for projects, promoting climate resilience, and addressing social and environmental risks. It is essential to ensure that development interventions do not harm the environment, exclude any and all fossil fuels interventions, exacerbate social inequalities, or compromise the well-being of present and future generations.

**Gender Equality and Social Inclusion:** The CPFs should explicitly address gender equality and social inclusion, including of the LGBTI communities. This involves identifying and addressing gender-based disparities and discrimination, promoting women’s empowerment, and ensuring that vulnerable and marginalized groups have equal access to and benefit from development interventions. Gender and social inclusion considerations should be mainstreamed throughout the CPF process.

**Transparency and Accountability:** Enhancing transparency and accountability is crucial for a human-centered and sustainable CPF process. The World Bank should improve information disclosure, provide accessible and understandable information to stakeholders, and establish effective grievance redress mechanisms. Robust monitoring and evaluation systems should be in place to track progress, assess impacts, and hold all actors accountable.

**Alignment with Sustainable Development Goals (SDGs):** The CPFs should align with the global Sustainable Development Goals. By integrating the SDGs into the CPF process, the World Bank can ensure that its interventions contribute to the broader development agenda and address key social, economic, and environmental challenges in a comprehensive manner.

**Capacity Building and Knowledge Sharing:** The World Bank should support capacity building efforts within countries to strengthen their ability to design, implement, and monitor sustainable development interventions. Additionally, fostering knowledge sharing and learning across countries and regions can promote best practices and innovative approaches to sustainable development.

By incorporating these elements, the World Bank can foster a more human-centered and sustainable CPF process that addresses the diverse needs and aspirations of people and contributes to long-term inclusive and sustainable development.
CASE STUDY: TANZANIA

Tanzania is regarded as one of the safest and most politically stable on the continent. However, domestic stability has not translated into economic prosperity for Tanzanians. Many of its people live below the World Bank poverty line, although the country has had some success in wooing donors and investors. Tanzania is home to two renowned tourism destinations - Africa's highest mountain, Kilimanjaro, and wildlife-rich national parks such as the Serengeti - but has become a target for poachers.

Tanzania is regarded as one of Africa's fastest growing economies, however, widespread poverty persists. Almost half of its population is living on less than $1.90 per day. High population growth and low productivity in labor-intensive sectors like agriculture, which employs 75 percent of the population, limit broad-based economic growth. While Tanzania's natural resources are an asset to the country, helping to support the livelihoods of many individuals, unsustainable use of these resources threatens to perpetuate the cycle of poverty.

While the country's offshore gas reserves have luckily remained undeveloped, new political leadership since 2021 has raised hopes it may become an exporter of liquid natural gas (LNG) by 2030.

The state of human rights in the country remains very challenging. According to Amnesty International, as of 2022, the government of Tanzania maintained its blanket ban, introduced by the late president in 2016, on political parties organizing rallies and other political activities. The state continued to target online media outlets, using repressive regulations despite earlier promises to reform media laws. Security forces used excessive force in Loliondo division, in the northern Arusha region, during forced evictions of the Indigenous Maasai community while intimidating human rights defenders and journalists.

The pledge to lift the discriminatory ban on pregnant girls and young mothers from attending school was not implemented.

Plans to construct the East African Crude Oil Pipeline continued despite its potential threat to the environment and the livelihoods and health of local people. Individuals and organizations failed by the national legal system were blocked from seeking justice directly at the African Court on Human and Peoples’ Rights.

As of March 2023, the World Bank-financed portfolio in Tanzania is comprised of 23 national projects with a commitment of over $7.05 billion and 5 regional projects with a commitment of approximately $750 million, a total portfolio of about $7.8 billion. Key sectors in the national portfolio are transport (20.8%); education (20.2%); energy (15.7%); water (11.2%) and urban resilience (10.0%). Other projects cover social protection, governance, digital development, human development, and poverty. Tanzania regional projects are focused on energy, education and poverty and equity.
The country engagement process
The World Bank commenced development of Tanzania’s next strategy for Tanzania in 2023 with consultations on the Systematic Country Diagnostics planned for May and June 2023. The Bank is expected to hold initial consultations on the CPF in the summer of 2023, with the aim of finalizing the new country strategy before the end of 2023.

The previous World Bank country strategy for Tanzania covering FY 2018 - 2022 was aligned with the priorities identified in Tanzania’s Second Five-Year Development Plan and Zanzibar’s Third Strategy for Growth and Reduction of Poverty, supporting three focus areas: (1) enhance productivity and accelerate equitable and sustainable growth, (2) boost human capital and social inclusion, and (3) modernize and improve the efficiency of public institutions. The work program focused on deepening investments in transport, information, communication technology, and energy to support spatial transformation and inclusive growth.
Tanzania’s Systematic Country Diagnostic – brief observations

The Systematic Country Diagnostic (SCD) for Tanzania for FY 2018 – 2022 identifies three pathways to leverage the country’s advantages to achieve the national development goals:

- Structural transformation to leverage Tanzania’s natural assets and capture latent comparative advantage to create more jobs.
- Spatial transformation to build on Tanzania’s geographic advantages and maximize benefits from spatial integration and aggregation.
- Upgrading public institutions and organizations, underpinned by expanding human capital, gender equity, and macroeconomic stability.

The previous Country Partnership Framework (CPF) addresses the challenges of carving a growth path that is more inclusive and sustainable. The CPF recognizes the close nexus between climate change and poverty reduction in Tanzania and places a strong emphasis on addressing the effects of climate change.

However, unemployment remains a huge problem for the country. As reported by the World Bank, the unemployment rate in Tanzania during the last CPF period 2018-2022 has grown massively from 2.2% to 2.8%. Unemployment among women increased from 13.6% to 16% for those residing in other urban areas and from 9% to 9.6% for those residing in rural areas in the same period.

Additionally, despite the reform measures envisioned in the CPF FY2018-2022, access to electricity in rural Tanzania remains very low with only 33% of rural households connected to electricity. The rural poor still depend overwhelmingly on charcoal and fuel wood from forests to meet their energy needs where access to electricity is still minimal. Tanzania faces a major barrier to clean energy access due to limited investments and financing.

On the positive side, Tanzania made significant strides in terms of mainstreaming gender in national legislation and policy, including the incorporation of key gender equality principles in cross-cutting laws and in sectoral policies. It remains to be seen if such policy interventions will result in positive development outcomes too that mainstream gender inclusion.
INFORMATION AND ANALYSIS ON THE WORLD BANK’S COUNTRY ENGAGEMENT APPROACH


World Bank Systematic Country Diagnostic for Tanzania: https://openknowledge.worldbank.org/entities/publication/3914b040-d0c8-53b2-8d8d-08ac0aac1bc7


WORLD BANK IN TANZANIA

## APPENDIX

### WORLD BANK GROUP ACTIVE PROJECTS IN TANZANIA (as of May 2023)

Environmental risk category:
- A, FI1 – high risk
- B, FI2 – moderate risk
- C, FI3 – low risk

#### World Bank Group projects

<table>
<thead>
<tr>
<th>Project</th>
<th>Sector</th>
<th>USD(M)</th>
<th>Investment Type</th>
<th>Status</th>
<th>Environmental and social risk</th>
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<td>Public Financial Management and Procurement Systems for Service Delivery</td>
<td>Public Administration</td>
<td>150</td>
<td>IDA</td>
<td>Pipeline</td>
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<td>Tanzania Second Inclusive and Resilient Growth Development Policy Financing</td>
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Endnotes

15. https://documents1.worldbank.org/curated/fr/266371468124780089/071652160_201411345001305/additional/929570WP0Box38ateticFrameworkforCE.pdf
17. https://documents1.worldbank.org/curated/fr/266371468124780089/071652160_201411345001305/additional/929570WP0Box38ateticFrameworkforCE.pdf