



Additional Financing Appraisal Environmental and
Social Review Summary
Appraisal Stage
(AF ESRS Appraisal Stage)

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BASIC INFORMATION

A. Basic Project Data

Country	Region	Borrower(s)	Implementing Agency(ies)
Tanzania	EASTERN AND SOUTHERN AFRICA	United Republic of Tanzania	Tanzania Social Action Fund
Project ID	Project Name		
P179701	Tanzania - Productive Social Safety Net Project II - Additional Financing		
Parent Project ID (if any)	Parent Project Name		
P169165	Tanzania Productive Social Safety Net Project II		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Social Protection & Jobs	Investment Project Financing	3/31/2023	6/9/2023

Proposed Development Objective

To improve access to income-earning opportunities and socio-economic services for targeted poor households while enhancing and protecting the human capital of their children.

Financing (in USD Million)	Amount
Current Financing	883.31
Proposed Additional Financing	0.50
Total Proposed Financing	883.81

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

Country context: Tanzania has seen strong economic growth in recent years. Growth averaged 7 percent on the Mainland and 6.6 percent in Zanzibar during the implementation of their respective Five-Year Development Plans



(FYDP 2011/12 – 2015/16 and MKUZA II 2010/11 – 2014/15), making the United Republic of Tanzania (URT) one of the stronger performers in Sub-Saharan Africa. In recent years, poor people have significantly benefitted from the economic growth the country achieved. The percentage of the population living in poverty (below the basic needs poverty line) on the Mainland reduced from over 34 percent in 2007 to 28 percent in 2011/12; and those living in extreme poverty (below the food poverty line) decreased from 12 percent to 10 percent in the same period (THBS 2011/12). Despite these achievements, the numbers of people living in poverty and extreme poverty remain high. Approximately 4.3 million people continue to live in extreme poverty across the United Republic of Tanzania (4.1 million on the Mainland and 0.2 million in Zanzibar).

Sectoral and institutional context: The Government of the United Republic of Tanzania (URT) has important policies in place to address poverty and vulnerability. The Tanzania Social Action Fund (TASAF) has evolved into a national Productive Social Safety Net system. Since 2012, the Government has been implementing the first phase of the Productive Social Safety Net (PSSN I). The objective of PSSN I is to enable poor households to increase incomes and opportunities while improving consumption. It targets 15 percent of the total population of URT, including all households living under the food poverty line (approximately 650,000 households) plus those at-risk of falling under the food poverty line in case of a shock affecting their income (approximately 350,000 households).

Relation to CPF: PSSN II is also aligned with the Country Partnership Framework (CPF) for the United Republic of Tanzania FY18 – FY22 (World Bank, 2018). The PSSN will contribute strongly to focus area 2 of CPF: it is cited as the main instrument for realizing the social inclusion objective under this focus area; and will support other focus area 2 objectives, notably investment in the early years, and strengthening job-relevant labor force skills.

Project description: Building on PSSN I, the PSSN II will achieve its objectives through the implementation of combined and integrated interventions. The project has two major components i) Productive Household Support (Benefits and Services) which includes, Cash Transfer, Public Works and Livelihood Support and ii) Institutional capacity and integrated delivery system. It is envisaged that the combination of the proposed livelihood activities and cash transfers will increase household income through building household level assets, enhancing risk management, and facilitating a shift to more productive types of employment. Public works will create productive assets at community level and provide temporary employment opportunities to beneficiary households, further contributing to household income to mitigate food shortage during lean season; and cash transfers will build human capital of children to ensure that they become productive members of society over time, and that beneficiary households can meet their consumption needs during the livelihood strengthening process. This will also strengthen household level resilience and diminish their vulnerability to shocks over time. It is envisaged that providing households with an integrated support will enable a significant number of currently supported households to exit PSSN over time. It is recognized, however, that not all households will make progress in the same way and some may not succeed, but most households are expected to significantly improve their situation and move towards more sustainable livelihoods.

Coverage:

- CTs, already operational in all PAAs, are expected to scale up to villages not yet covered (30 percent of villages), reaching 1.4 million households at full scale.



- PW, currently operational in 44 PAAs, will scale up to all 187 PAAs and all villages; as will the new basic livelihoods sub-component.
- Enhanced livelihoods, currently at pilot stage in 8 PAAs, will scale-up to 200,000 households in 44 PAAs.

Project components:

Component 1: Productive Household Support (Benefits and Services) (Total US\$738.00 million – IDA US\$261.00 million)

This component will provide beneficiary households with an integrated package of support, including a foundational package and livelihoods support.

1.1. Cash Transfers (CT)

CTs will comprise three types of benefits, layered as follows:

- i. A fixed transfer offered to all PSSN households. This transfer will be unconditional only for households with no labor capacity and will be referred to as Direct Support. Households with labor capacity will instead receive a time-limited Productive Transfer, which will be accompanied by soft-conditions in the form of community sessions and savings promotion; these households will receive the productive transfer only until they enroll in public works - once they start receiving PW transfers, the productive transfer will stop.
- ii. A fixed transfer for vulnerable groups provided to all households that include a child aged 0-18 years old (Child Grant) and to those that include a person with a disability (PWD) (Disability Grant). Households that include both a child and a PWD will receive both types of grant.
- iii. A variable Human Capital Transfer (HCT) offered to households with children, subject to compliance with health or education conditionalities, and varying depending on the number of children and the children's ages / educational stages.

1.2. Public Works (PW): Participation in PW will be open to PSSN-eligible households with labor capacity and willing to participate. Households with labor capacity will be defined as those including at least one adult aged 18-65 years who is able to work. Households with multiple working age members will have the opportunity to send to public works any adult who is neither pregnant nor the lead caregiver of an infant (aged 0-2 years). Moreover, eligible households that have only one adult able to work who is pregnant or caring for an infant will continue to receive PW wages but will be granted a temporary waiver from the need to work and will be linked with nutrition services. These special provisions are made to avoid over-burdening women and to promote the nutrition and development of young children. They will ensure that the household receives income without compromising the availability of the lead caregiver to ensure appropriate nutrition, care and early stimulation. Options for supporting childcare at PW sites for children aged over 2 years will also be explored. The roll-out of Public Works will be gradual. Currently only 44 PAAs are implementing Public Works. In PSSN II, the existing 44 PAAs plus an additional 72 PAAs will implement PW starting from the second year; and the remaining 71 PAAs will commence PWs implementation during the third year.



The PW subprojects will continue to be selected through a participatory community-based planning approach. PSSN PW sub-projects with the potential to adapt to and mitigate climate change risks and those that promote livelihood activities of beneficiary households and the community at large will be encouraged. These will include, but not be limited to, soil and water conservation measures such as terracing, afforestation, sea water protection structures, small scale irrigation, water supply for human and livelihood consumption etc. The participatory approach will be gender-sensitive, so as to ensure that projects respond to the priorities of women as well as men in the community.

1.3. Livelihoods Support (Productive Inclusion):

To enhance the productive impacts of the foundational packages, livelihoods support will also be rolled out. This will consist of: (i) basic livelihood support for all PSSN beneficiary households with labor capacity, and (ii) an enhanced livelihoods support package for 200,000 households. As in the case of PW, livelihoods support will be targeted to households with labor capacity (at least one member aged 18-65 years).

Basic Livelihoods Support: The basic livelihood support package aims at promoting self-employment (farm and off-farm income generation activities) and wage employment opportunities through: (i) awareness-raising sessions that encourage households to invest their transfers productively and inform them about all available livelihoods services in the locality, including vocational education, apprenticeships, agricultural extension, and financial, small business and livestock services; (ii) support to household participation in savings groups; and (iii) linking households to available ward-level extension services by inviting extension agents to deliver community sessions.

Enhanced Livelihoods Support: The enhanced livelihood support package will provide a more comprehensive set of livelihood support activities to beneficiary households. It will be targeted to households with labor capacity resident in the 44 poorest PAAs where PW is implemented for at least three-years. Enhanced livelihoods support will consist of a carefully sequenced set of activities, designed based on international experience with graduation programming. Attention will be given to ensuring that this support is appropriate to the needs of both women and men in beneficiary households.

Component 2 - Strengthening Institutional Capacity and Integrated Delivery Systems (Total US\$110.20 – IDA US\$39.00)

The effective delivery of the benefits and services detailed above will be underpinned by the Strengthening institutional capacity and integrated delivery systems component.

2.1 Institutional Capacity Enhancement - This includes, (i) capacity building of program implementers (ii) strengthening of inter-sectoral coordination (iii) program management support

2.2 Systems Development - This includes (i) strategies for targeting, re-certification and exit; (ii) the National Social Registry (NSR) and ICT/MIS tools; (iii) citizen engagement; (iv) M&E; and (v) payments and (vi) a revamped development communication strategy and (vii) gender mainstreaming.

D. Environmental and Social Overview



D.1. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The AF will be used to mainly scale up relative to the current levels of PSSNII the public works and livelihoods enhancement activities. Therefore, it is expected that the bulk of the financing will be added to Component 1: Productive Household Support (currently totaling US\$ 731.90 million, of which IDA US\$ 373.70 million equivalent). The exact funding decisions will be taken during appraisal, and the financing will go towards all sub-components of Component 1 which involves Productive Household support that includes Cash transfers, Public Works Program and Livelihood Support. Through Conditional Cash Transfer the project aims at increasing consumption of the targeted group of households and investing in the education, health and nutrition of their children and pregnant women to reduce vulnerability and poverty in the mid- and long-term. The public works and livelihood support programs will provide temporary employment opportunities to eligible households during the lean season and promote self employment and wage employment respectively. The Project is expected to be implemented nationwide, covering all 186 Project Area Authorities (PAAs) with different cultural backgrounds and norms

D. 2. Borrower's Institutional Capacity

An assessment of the key implementing agency TASAF as PIU was conducted during the preparation of the safeguards instruments, mainly the Environmental and Social Management Framework (ESMF) and Resettlement Policy Framework (RPF) of the parent project (PSSNI) and review of implementation track record under existing project (PSSNII). TASAF has shown strong capacity in environmental and social risk management at national level. A unit specifically dedicated to safeguards has been created and has three permanent safeguard staff at the TASAF national level to oversee overall implementation of safeguard activities across the program. At the local level as well, there is a basic structure and capacity including the District Environmental Management Officer at the PAA level, Ward level Environmental Officer, Ward Community Development Officers and village level Environmental Committee and Social Welfare Committee. However, there is still a need to further strengthen capacity at Local and community levels. The capacity assessment conducted during implementation of PSSN I and during preparation of PSSN II has led to a preparation of a staffing and capacity building plan, which provides guidance to requisite training and other forms of capacity enhancement during project implementation. As proposed Public Works and Livelihoods sub-components up-scales, the demand for more capacity to effectively implement necessary safeguard measures will increase. The proposed Additional Financing (AF) will follow the structure of parent project (PSSN II) in terms of levels of implementing entities and their roles. The PIU environmental and social safeguard staff will continue to provide a central oversight role over safeguards implementation including environmental and social risk management training to enhance the local capacity at LGA level, specifically to the designated staff (District Environmental Management Officer, District Community Development officer; Ward Environmental officer, Ward Community Development Officer; Village Environmental Committees and Social Welfare Committees), who will continue to work in collaboration with the national team to address specific environmental and social risks and impacts issues at the local level. All the district level or Project Area Authorities (PAAs), District Environmental Management Officers and District Community Development Officers will be responsible for advising environmental management committees at community and ward level; and monitoring preparation, review screening forms, and approval of safeguards instruments. As part of capacity gap assessment a specific plan was prepared under PSSNII in which training of PAA facilitators and community on safeguards requirements for the implementation of public works was undertaken. So far, training has been conducted to 36 National facilitators, 3,938 PAA facilitators (including Environmental Officers and Community development officers from each PAA) belonging to 72 PAAs which implement Public Works (PW), 121 PAA facilitators from 33 PAA not implementing PW. As indicated above the training involved PAA and community level staff involved in safeguards monitoring and technical support during implementation of the project. Environmental and social screening will be done during micro-planning at the community level by the Community



Management Committee. At this stage PAA level experts will support the communities on the preparation of Environmental and Social Management Plans for the identified subprojects. The national team will have an overall responsibility for monitoring compliance with the agreed on mitigation measures and actions as per Environmental and Social Commitment Plan (ESCP).

II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Substantial

Environmental Risk Rating

Moderate

The project environmental risk rating is classified as moderate under the World Bank ESF, based on the type of project and nature of its activities which are primarily cash transfer and labor based public works program for which environmental risks and impacts are moderate. The PW program activities include soil and water conservation, e.g. soil bunds, community access roads, multi-purpose tree nurseries and woodlots, water supply points e.g. hand-dug well, spring protection, small-scale irrigation, environmental cleaning, gully control, sediment traps, and community ponds. Potential impacts expected from the implementation of these activities are envisaged to be site specific and largely during construction stage of the works, these will include erosion, noise, health and safety issues, solid waste management, etc. The nature of most of the proposed subprojects are also envisaged to enhance environmental and social risks and impacts management as well as social protection since they offer opportunities for work and earnings at the same time. The project implementing agency, TASAF has experience in impacts identification and implementation of mitigation measures from previous projects and the current phase of PSSNII. Other potential environmental risks and impacts that would need to be explored further during project implementation include, issues related to water and energy use efficiency, conservation and use of natural resources and cultural heritage. This project does not pose any indirect or long-term impacts.

Social Risk Rating

Substantial

The PSSN II social risk rating is classified as substantial under the World Bank ESF, based on the type of project and the nature of its activities which are primarily cash transfer and public works program for which potential social risks and impacts are substantial. Other risks relate to, the impacts and risks resulting from acquisition or restriction to land use and community labor conditions, child labor and elite capture. TASAF has strengthen its capacity in managing environmental and social risks in their programs, safeguards unit have been established at the national level, and local level there are committees responsible to oversee issues related to environment and social. As noted in PSSN II, there still a need to strengthen the capacity of LGAs and community level on application of ESF.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

An identification and assessment of environmental and social risks and impacts was carried out during the preparation of the safeguards instruments, specifically the Environmental and Social Management Framework (ESMF), the Resettlement Policy Framework (RPF) and the Vulnerable Groups Planning Framework (VGPF). During the



preparation of PSSN II, a comprehensive review of environmental and social instruments for PSSN I was carried out to validate if the implementation of the program was in compliance with ESF. The review included the following reports: completed Environmental and Social Screening Forms; ESMPs and VLD forms at the local level; numerous quarterly progress monitoring reports and safeguard specific review reports; and WB team supervision mission reports and Aide Memoires. A number of field visits were also conducted during identification, preparation and implementation mission to assess the effectiveness of the project implementation on the ground including safeguards monitoring. Various reviews and assessments have also looked at a number of social issues including effectiveness of targeting and identification of eligible beneficiaries as per the design; whether there has been any cases of discrimination associated with unconscious or conscious bias, gender, disability, albinism, social status; the functioning of grievance mechanism, etc.

Overall, it was found out that the project has handled environmental and social issues reasonably well and there were no major issues of significant concern. Environmental and social risk assessment and management will be required for the proposed subprojects under Component 1. The project is envisaged to implement multiple community based sub-projects including: soil and water conservation activities, community access roads, multi-purpose tree nurseries, water points, small-scale irrigation, environmental cleaning, gully control, woodlots, and community ponds. Implementation of these activities are likely to generate moderate environmental and substantial social impacts, which will need to be mitigated. Experience from implementing the parent project, impacts such as erosion, noise, health and safety issues, solid waste management have been observed especially during the construction stage of the project. This has been evident on dams and road where by no vegetation has been revegetated after the completion of the project causing soil erosion due to disturbance of soil during construction.

The ESMF has specified measures such as revegetation of the disturbed areas but this hasn't been implemented. As part of the project AF ESMF will be updated to accommodate challenges and gaps experienced during the implementation of the parent project so as to comply with the ESMF. Furthermore, the nature of most of the subprojects have positively contributed into enhancement of environmental and social risks and impacts management as well as social protection since they have offered opportunities for work and earnings at the same time. The due diligence process also identified Voluntary land donation (VLD) as one of the ways of getting land for small community based activities. The ESMF and RPF for the current project have been updated in line with the proposed project and provide guidance on the appropriate site specific safeguard instruments such as Environmental and Social Management Plans (ESMPs), and where necessary Resettlement Action Plans (RAPs) as well as documentation that is required if land for any activity is obtained through VLD. The documents that have been updated to be redisclosed prior to project appraisal as part of the Bank's due diligence include: Labor Management Procedures (LMP), Stakeholder Engagement Plan (SEP), and Environmental and Social Commitment Plan. According to the guidance in the VGPF during project implementation, some sub-projects may require preparation of Vulnerable Groups Plans (VGPs). Furthermore, the Vulnerable Group Planning Framework (VGPF) lays out the steps to be followed to promote sustainable development benefits and opportunities in a manner that is accessible, culturally appropriate and inclusive. This process will also include the stakeholder engagement plan and grievance redress mechanisms. All the relevant ESF instruments of the project will be finalized and disclosed in country and World Bank website prior to appraisal.

ESS10 Stakeholder Engagement and Information Disclosure



The project focuses on poor households and communities who will be the primary stakeholders. Other key stakeholders include the LGAs in the Tanzania mainland and Zanzibar as well as CSO, CBOs, and Development partners that will be actively involved in the design and implementation of the program. Therefore, application of ESS10 stakeholder engagement and disclosure of information is a central part of PSSN II that will be closely monitored through the implementation of the Stakeholder Engagement Plan (SEP). This will be complementing ESS7 through the implementation of the Vulnerable Groups Planning Framework (VGPF) with continuous culturally sensitive and inclusive consultations. The SEP has been updated and will be disclosed prior to appraisal, to take into consideration lesson learned from the current project on effective and efficient tracking and resolving grievances in order to improve the grievance mechanism.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

The ESMF screening process will refer to and pay special attention to any subproject that will need community labor. During PSSNII Public Works were carried out by community beneficiaries, and the AF will follow the same approach. The Borrower has prepared Labor Management Procedures (LMP) which have detailed information on the work terms and conditions including explicit prohibition of child labor. The LMP includes measures to ensure that community labor is provided on a voluntary basis, has established work hours, paid as agreed and in a timely manner, and further strengthen that the occupational health and safety of the community workers, especially women are given adequate attention. Terms and conditions of consultants and support staff who are working on contractual basis as part of the Tanzania Social Action Fund (TASAF) Management Unit (TMU) are guided by the Administrative Handbook and National Labour Legislations. In addition, the civil servants at the local government level, who will be involved in the project implementation on full time or on part time basis will follow Government procedures and be guided by the Tanzania Occupational Health and Safety Act No. 5 of 2003. The Act has special provisions and procedures to be followed to ensure workers safety, health and welfare of persons in places of work. Measures relating to OHS are for protecting workers from injuries, illness or impacts associated with exposure to hazards encountered in the work place or while working. Such OHS measures include provision of PPE, awareness raising and guidance on how to prevent accidents at work place. The implementation of parent project (PSSNII) has encounter some challenged in the implementation of health and safety in some of PW. It was observed in several missions were community workers were working without proper PPEs, absence of first Aid kits in workplace, and lack of safety signage contrary to the requirements of the LMP and OHS Act No, 5 of 2003. For the AF measures will be strengthened to ensure issues related to health and safety are closely monitored. The LMP also has the details of the grievance redress mechanism for community workers and the roles and responsibilities for monitoring such workers. As the public works will be conducted by the community members, labor influx and associated risks are not anticipated.

However potential changes in power relations among those employed and their supervisors as well as with the rest of the community will be monitored during project implementation and where and when required appropriate measures will be put in place in consultation with the communities and other relevant stakeholders. For the



Additional Financing, the scope and activity remain the same, if the project requires new recruitment, the LMP will be updated prior to any civil works.

ESS3 Resource Efficiency and Pollution Prevention and Management

The project will finance subprojects that would include soil and water conservation activities, water supply projects and small-scale irrigation. The project will promote soil and water conservation and sustainable use of water and energy that are likely to have positive impacts on ecosystem services. The proposed tree nurseries and agroforestry activities may require the use of agrochemicals. In the parent project emphasis has been put on the use of organic manure and compost fertilizers, and integrated pest management while discouraging reliance on chemical pesticides. However, in the event of tree planting or horticultural subproject that may require application of agrochemical for instance, to address a significant pest invasion, the PAA Sector Expert shall advise based on prevailing situation of the incidence, whether being a localized one or an epidemic situation affecting large area. In a situation and when use of pesticides will be inevitable, the project will be advised to apply biodegradable pests control materials. The ESMF includes guidance and measures to promote Integrated Pest Management (IPM) and safe use of chemicals.

ESS4 Community Health and Safety

The project will maintain measures to assess and manage the risks of SEA/SH through existing GRM and developing GBV action plan and it will be part of the ESMP.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The project has prepared a Resettlement Policy Framework that spells out the overall principles and objectives of ESS5 and provide guidance on how to manage land acquisition or potential restriction of access. In addition, the RPF provides guidance on Voluntary Land Donation (VLD) where applicable. Implementation of the current PSSN shows that for requirements of very small land, communities may opt for VLD instead of land acquisition. The procedures for land donation include detailed documentation that showed the voluntary nature and freedom of choice, a practice that will be upheld in this project. Certain public works may require some land, but overall land requirements are expected to be limited. The project is not expected to physically displace people or their assets. As the details of the various interventions are finalized, site-specific Resettlement Action plans or voluntary land donation agreements, whichever is applicable, will be prepared during project implementation. For the Additional Financing, the project will use the existing RPF which is sufficient and does not need to be updated or revised.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The project will finance subprojects that will include activities on promoting multipurpose tree nurseries, agroforestry and fishponds. These activities may have environmental and social impacts. The ESMF provides guidance on applying the mitigation hierarchy and the precautionary principles in the design and implementation of such activities to promote the sustainable management of natural resources and support livelihoods of local communities



ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

The project will be implemented throughout Tanzania, including areas in which disadvantaged communities are present. Therefore, the parent project has prepared a Vulnerable Groups Planning Framework (VGPF) that provides a framework for: avoiding or mitigating adverse impacts; providing sustainable development benefits in a timely way and culturally appropriate manner; ensuring there is meaningful consultation and engagement in a culturally appropriate and gender and inter-generationally inclusive manner. The project will also include a grievance redress mechanism that is culturally appropriate and accessible to disadvantaged communities, taking into account the availability of judicial recourse and customary dispute settlement mechanisms of the communities. The project may include broader social measures, such as sustainable land, forestry and water management, to strengthen the capacity of disadvantaged communities. During project implementation, and according to the guidance in the VGPF, VGPs will be prepared. The VGPF will not be updated because the current VGPF covers vulnerable and marginalized communities assessed and mitigation measures outlined relevant.

ESS8 Cultural Heritage

The project will implement multiple community-based public works that may have impacts on cultural heritage, mainly through chance finds.

ESS9 Financial Intermediaries

Not Currently Relevant

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways	No
OP 7.60 Projects in Disputed Areas	No

B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework? No

Areas where “Use of Borrower Framework” is being considered:

It is not proposed to rely on the Borrower's Environmental and Social Framework at this time.

IV. CONTACT POINTS

World Bank

Public Disclosure



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Borrower/Client/Recipient

Borrower: United Republic of Tanzania

Implementing Agency(ies)

Implementing Agency: Tanzania Social Action Fund

V. FOR MORE INFORMATION CONTACT

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VI. APPROVAL

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Practice Manager (ENR/Social) Helene Monika Carlsson Rex Cleared on 07-Apr-2023 at 03:05:29 EDT
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Public Disclosure