Deliverable 6A: Preliminary Relevance and Sustainability Assessment

Revised Draft Report

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List of abbreviations

AGOA African Growth and Opportunity Act

CCTTFA Central Corridor Transit Transport Facilitation Agency

CET Common External Tariff
CFTA Continental Free Trade Area

CPCS Canadian Pacific Consulting Services
CRBC China Road and Bridge Corporation

CSO Civil Society Organisation

DAC Donor Assistance Committee

DEQ Detailed Evaluation Question

DRC Democratic Republic of Congo

EA East Africa

EABC East Africa Business Council
EAC East Africa Community

NMC National Monitoring Committees

EALA East African Legislative Assembly

EPA Economic Partnership Agreement

EPZ Export Processing Zone
EQ Evaluation Question
EU European Union

HEQ Higher Evaluation Question

IBM Integrated Border Management

KEPSA Kenya Private Sector Alliance

KICC Kenyatta International Convention Centre

KPA Kenya Port Authority

M&E Monitoring and Evaluation

MEAC Ministry of East African Community (TZ)

MSC Most Significant Change
NOC National Oversight Committee

NTB Non-Tariff Barrier

OECD Organisation for Economic Cooperation and Development

OPM Oxford Policy Management
OSBP One Stop Border Posts
PAR Project Appraisal Report
PEA Political Economy Analysis

PIC Programme Implementation Committee

PS Permanent Secretary

PSO Private Sector organisations
REC Regional Economic Community

SADC Southern African Development Community

SCT Single Customs Territory
SGR Single Gauge Railway
SO Strategic Objective

TFTA Tri-Partite Free Trade Area
TMEA Trade Mark East Africa
TMSA Trade Mark Southern Africa

TOC Theory of Change

TPA Tanzanian Port Authority

WS Workstream

WTO World Trade Organisation

Executive Summary

- 1. This report is the Deliverable 6A Preliminary Relevance and Sustainability Assessment, which provides provisional insights on the evaluation questions relating to relevance, coherence, and sustainability to inform a potential review of TMEA's purpose and strategic direction during the course of the evaluation. In answering these questions, the report focuses on the project-level performance (i.e. TMEA programme outputs), not TMEA programme outcomes, which will be assessed using contribution tracing in the Phase 2 Performance Evaluation report. However, where our findings at the projects level allow, we refer to the possible contribution of TMEA to higher level outcomes, should the TOC assumptions hold. In doing so, we make references to the relevant findings sourced by the three Phase 1 reports (report 2D/2E Strategic Objective 2 and 3: Interim Evaluation; report 2C/3A Strategic Objective 1: Interim Evaluation; and report 2B Institutional and Organisational Assessment).
- 2. The UK Department for International Development (DFID) contracted Oxford Policy Management (OPM) to conduct an evaluation of TMEA for learning and accountability purposes. The evaluation aimed to: i) test the theory of change (TOC); ii) analyse and, to the extent possible, measure impact on regional trade, growth and poverty (including gender-related aspects) and sustainability; iii) assess the effectiveness of the TMEA programme; and iv) identify lessons learnt that are relevant beyond TMEA.
- 3. The evaluation design is structured to answer five high-level evaluation questions (HEQs), which are mapped to the TMEA results chain. Evaluation activities are organised into six workstreams, which together deliver a comprehensive and coherent evaluation of TMEA. The Performance Evaluation report will address all the evaluation questions, drawing on all the preceding deliverables.
- 4. This study involves the following activities:
 - Preliminary situation analysis of East Africa trade policy.
 - Review of preliminary evaluation results produced by other workstreams to date.

(a) Preliminary situation analysis of East Africa trade policy

- 5. The **preliminary situation analysis of East Africa trade policy** provided the contextual understanding as a necessary foundation for making evaluative judgements on many of the WS6 DEQs. This included:
 - Mapping out all relevant country systems and agencies, including a systematic assessment
 of the degree to which TMEA was aligned with them, whether this fostered effective
 government ownership and impact, and how this could have been strengthened;
 - Mapping out all other relevant development programmes in the region, including an
 assessment against the TMEA SOs and TOC to assess the degree to which TMEA's focus
 and activities were designed and implemented in a way that was consistent, complementary
 and coordinated:
 - Mapping out all other relevant programmes, which have worked with regional institutions in Africa, and the approaches employed;
 - Mapping other ongoing national and regional level trade-related initiatives, and the extent to which these are complemented (or not) by TMEA interventions; and,
 - Systematically identifying and tracking EAC regional trade development priorities, as well as general policy and political economy changes.

Key Summary

(i) From the outset, TMEA was demand-led and activities were designed and prioritised based on the priorities identified by partner countries and institutions.

- (ii) TMEA has been able to adjust its national programs according to policy developments in the respective countries.
- (iii) TMEA continually monitors the political economy of the region, and considers this within projects and activities, but cannot control all the external factors which affect the TMEA programme performance.
- (iv) TMEA remains a demand-led organisation; nonetheless, it carefully evaluates the impact of its interventions and directs its support toward the most effective initiatives.
- (v) Several institutional mechanisms were established to ensure TMEA's support remains relevant. The team, which undertook the Organisational Assessment/ Expert Review, believed that the existing TMEA institutional and organisational model was generally effective in successfully delivering the first TMEA strategy (report 2B, Institutional and Organisational Assessment, p. 9). Despite several isolated areas for improvement, the assessors identified no systemic flaws or failures (ibid.).
- (vi) TMEA leverages and complements existing initiatives from other donors' charter. TMEA has leveraged changes in the regional political economy to advance regional integration and economic growth.
- (vii) While there is a need for stronger evidence to understand the contribution of TMEA, preliminary findings indicate there has been a reduction in the time taken for moving goods along the Northern Corridor, whilst cost reduction is context specific. In fact, according to 2D/2E (p.55-56) all five countries reduced the time required for import and export, with Tanzania presenting the least improvement. For Burundi, Kenya, Rwanda, and Uganda the time reduction is hand-in-hand with cost reduction. Meanwhile, in Tanzania, import and export costs increased between 2010 and 2017, despite time reduction. There is also evidence that the Malaba OSBP project should produce the necessary crossing time improvements and increase the level of trade facilitation to a level consistent with international best practice (report 2C/3A, p.22). Phase 2 of the evaluation will assess TMEA's contribution in more depth.
- (viii) TMEA encountered resistance on several initiatives aimed at reduced trade costs and lowering external tariffs. This included import substituting stakeholders lobbying to maintain the status quo on the exceptions to the common external tariff, and a lack of government commitment to prioritise liberalisation for trade in services.
- (ix) TMEA staff considered their work increased awareness surrounding the importance of trade facilitation to economic development. The work of TMEA has been used by governments within East Africa to advance their, already agreed, economic agenda of increasing trade.
- (x) In contrast to other donors, TMEA has concentrated on ensuring that the OSBPs are functioning (report 2C3A, p. 27). This helped TMEA gain prominence throughout East Africa, but most notably in Uganda and Kenya, within its work in key priority areas. This profile facilitates high-level dialogue with Senior Government Officials and other key stakeholders.
- (xi) The private sectors role is increasing when it comes to trade policy and advocacy in East Africa (2D2E report, p. 50).

(b) Analysis from Output Analysis of SO1, SO2 and SO3.

At project level TMEA has done an excellent job at identifying and implementing relevant projects effectively and efficiently. Sustainability is a concern, as public bodies in East Africa continue to depend on TMEA for the implementation of key trade.

By 2012, with more than 200 activities underway across a wide range of stakeholders, TMEA was viewed by many as the 'go to' agency for trade facilitation. This resulted from the close relationship between TMEA and the Ministries of Trade and East African Cooperation in Kenya, where many donors managed their regional programs. Secondly, the sustainability of the TMEA supported port

improvements, will not be achieved without changes in the type of port management arrangements. As suggested by 2C3A report (p. 31), best practice port reform and modernisation initiatives are generally focused on the transition to a landlord port model, port management improvements and assisting with developing and implementing Public Private Partnerships (PPP). It is argued that the sustainability challenge is relevant to the ports (Mombasa and Dar) i.e. that without wider reform, institutional strengthening and embedding new practices into the KPA and TPA (and other stakeholders material to efficient port operations) these lessons and short term improvements are not likely to lead to significant performance improvements and cost reductions to port users (p.3). Thirdly, under SO3 the capacity of many of the CSO/PSOs to secure and manage funds remains weak. Whilst the sustainability of the supported institution may appear to be weak from the outset, and whilst this should not be a barrier for TMEA engagement, there should be a greater ex ante understanding of the consequences of initiatives being sustained on exit of TMEA funding support (report 2D2E, p 42).

Report 2D/2E suggests that as TMEA becomes more of a learning organisation and less of a project facility, greater attention will need to be given to addressing the sustainability of the interventions undertaken, to prevent institutions- especially under S02- becoming dependent on TMEA.

At a programme level, TMEA has aligned itself, and been responsive to regional trade policy priorities, and in most cases, successful at addressing these priorities. TMEA is demand led and activities are designed and prioritised based on the priorities identified by partner countries and institutions. A key strength of TMEA is that by continuous monitoring of political economy developments, it has been able to adjust its national programs, especially in relation to responding to the actual implementation of policy by the EAC states. Report 2D/2E (p.50) notes that the private sector is playing an increasing role in trade advocacy and policy advice under SO3 (as opposed to advocacy and policy advice led by the public sector under SO2). This is a valuable finding in understanding the trade policy context of East Africa and can be developed in the future programs.

TMEA proved to be able to adapt promptly and sensitively to the changing political economy, but the overall context seems to have worsened since TMEA outset. TMEA operates in an extremely complex environment with multiple interconnected political economy factors potentially having an impact on the work that the institution conducts. Most of the time, it can manage these risks, using its politically savvy staff, to understand the underlying motivation of key actors, especially government. Where there is alignment surrounding a policy, then TMEA rapidly and flexibly seizes opportunities available, encouraging encourage greater trade.

1 Introduction

1.1 Evaluation overview

The Trade Mark East Africa (TMEA) programme is a multi-donor project, which seeks to lift barriers to trade to generate positive and sustainable change via a combination of regional and national initiatives, and with an investment of over USD \$500 million. TMEA is a large and complex programme, with national and regional dimensions and many sub-projects implemented across several countries.

Learning and accountability are the two main purposes of the evaluation. In addition, the Terms of Reference also identify four core evaluation objectives:

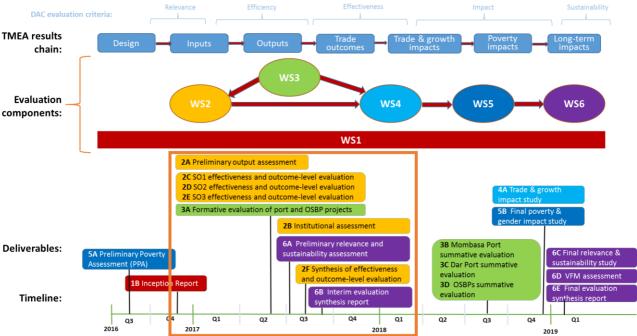
- i) Test the TOC;
- ii) To analyse and, to the extent possible, measure the regional integration programmes' impact on regional trade, growth, and poverty (including gender-related aspects) and sustainability;
- iii) Assess the effectiveness of the TMEA programme, including organisational effectiveness and value for money; and
- iv) Identify the relevant lessons learnt beyond TMEA, which could be applicable to future programmes or contexts.

The evaluation design is structured to answer five high-level evaluation questions (HEQs), which map the TMEA results chain, and are divided into 51 DEQs. To make this complex evaluation manageable, and to provide clear lines of responsibility, **our evaluation activities are organised into six workstreams, which together, will deliver a comprehensive and coherent evaluation of TMEA**. Each HEQ is addressed through a dedicated workstream and related deliverables. The Performance Evaluation report will address all the evaluation questions, drawing on all the preceding deliverables.

Table 1: Mapping evaluation questions to workstreams

HEQ	Workstream
Not applicable	Workstream 1 (WS1): Evaluation management, quality assurance and communications
HEQ1: Has the programme been effective in delivering its outputs and outcomes? How has this been affected by the programme's organisational model and how could this be improved?	WS2: Effectiveness and outcome assessment
HEQ2: Have the port and OSBP projects been effective in delivering their outputs and achieving their trade outcome objectives?	WS3: Evaluation of ports and OSBP projects
HEQ3: What is the likely impact of TMEA on trade outcomes and growth, and what factors are critical in order to ensure the sustainability of positive impacts?	WS4: Trade and growth impact study
HEQ4: What is the likely impact of TMEA on poverty and gender, and what factors are critical in order to ensure the sustainability of positive impacts?	WS5: Poverty and gender impact study
HEQ5: How robust and verified are the causal links and assumptions in the TOC? What does this imply for the relevance, coherence, and sustainability of the programme, and what are the lessons learnt that are relevant beyond TMEA?	WS6: Strategic review and evaluation synthesis

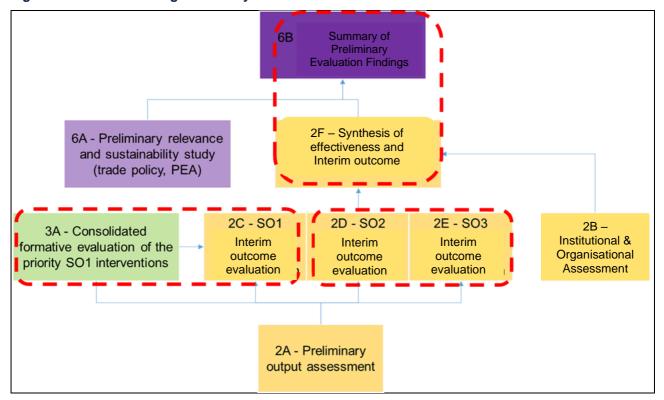
Figure 1: Evaluation design summary



1.2 Preliminary Relevance and Sustainability Assessment rationale and scope of work

This report is **Deliverable 6A – the Preliminary Relevance and Sustainability Assessment** for the independent and external evaluation of TMEA. It has been prepared by the evaluation team consortium, led by OPM.

Figure 2: Evaluation Design Summary - Phase I



The study involves the following activities:

- Preliminary situation analysis of East Africa trade policy.
- Review of preliminary evaluation results produced by other workstreams to date.

The **preliminary situation analysis of East Africa trade policy** provides the contextual understanding that is a necessary basis for making evaluative judgements on many of the WS6 DEQs. This includes:

- Mapping out all relevant country systems and agencies, including a systematic assessment of the degree to which TMEA is aligned with them, whether this has fostered effective government ownership and impact, and how this can be strengthened;
- (ii) Mapping out all other relevant development programmes in the region,¹ including an assessment against the TMEA SOs and TOC to assess the degree to which TMEA's focus and activities were designed and implemented in a way that has been consistent, complementary and coordinated;
- (iii) Mapping out all other relevant programmes that have worked with regional institutions in Africa, and the approaches employed;
- (iv) Mapping other ongoing national and regional level trade-related initiatives, and the extent to which these are complemented (or not) by TMEA interventions; and
- (v) Systematically identifying and tracking EAC regional trade development priorities, as well as general policy and political economy changes.

This **preliminary relevance and sustainability study** is undertaken to describe the situation analysis of East Africa trade policy context from 2010 to the present, so that insights and recommendations on the contextual factors that influence TMEA can be provided to TMEA management and donors prior to the end of the evaluation period.

1.3 Scope of findings

The Preliminary Relevance and Sustainability Assessment provides provisional insights on the DEQs relating to relevance, coherence, and sustainability to inform a potential review of TMEA's purpose and strategic direction during the evaluation. The Performance Evaluation report will explore the contextual issues influencing the broader programme outcomes in relation to the contribution and pathway analysis, which will be completed in phase 2 of the evaluation. This report addresses the following evaluation questions (Table 2) and by doing so, the report references the findings and conclusions of other Phase 1 deliverables, especially 2D/2E (Strategic Objective 2 and 3: Interim Evaluation), 2C/3A (Strategic Objective 1: Interim Evaluation) and 2B (Institutional and Organisational Assessment) as sufficient and appropriate evidence to support the evaluative statements presented.

Table 2: DEQs addressed in Deliverable 6A

Programme relevance:

DEQ5.3 To what extent does the programme support EAC regional trade development priorities?

DEQ5.4 How have changes in policy and in the political economy in the region impacted on the programme or on its relevance?

DEQ5.5 Do TMEA interventions complement other ongoing initiatives (both government and private sector)?

Coherence and coordination:

DEQ5.6 What are the strengths and weaknesses of the working model observed to date?

DEQ5.7 Is the complementarity and coordination between national and regional levels optimal throughout all programme components and activities?

¹ Annex B shows the mapping exercise in detail, while relevant programmes are discussed in the text against the TMEA activities with which they are deemed to align.

Programme relevance:

DEQ5.8 To what extent does the TMEA model bring greater results than the sum of its parts? How could this be strengthened?

DEQ5.11 Is the operational model at donor level appropriate and efficient for delivering TMEA? What are the key enablers which need to be preserved, and what are the remaining constraints arising from donors' systems?

DEQ5.12 Did TMEA align with country systems and agencies in an effective manner for ownership, and for impact? How could this be strengthened?

DEQ5.13 Are the focus and activities of TMEA consistent with, and additional to, those of others' development programmes in the region? To what extent has the programme facilitated improved coordination?

DEQ5.14 What sort of approaches have been more successful in working with regional institutions in Africa?

Sustainability:

DEQ5.17 What benefits (both social and financial) of the programme are likely to be sustainable and would continue with or without TMEA (staffing and funding)?

DEQ5.18 What should be the essential components of a future exit strategy in order to sustain impact?

DEQ5.19 What is the likelihood that individual results and overall impact will be sustained after existing donors stopped funding, and that there will be a lasting positive impact on the poor?

DEQ5.20 How are stakeholders engaged through the programme and beyond its life, and how do they take TMEA lessons learnt into account?

2. Preliminary situation analysis of TMEA's East Africa trade policy context

2.1. Introduction and Methodology

The objective of the trade policy context review is to assess the relevance, alignment coherence, cross-cutting impacts, and sustainability of TMEA interventions from the perspective of East African Trade Policy over the period 2010-2017. The assessment is based on a review of TMEA official documents, third party reports by the EAC Secretariat, member states, other donors and researchers, and semi-structured interviews with a range of stakeholders involved with EAC and trade issues in East Africa. Respondents include TMEA Senior Management Team, Private sector TMEA Board Members, and members of the Evaluation Committee, TMEA Country Directors, and officials from DFID, USAID, and the World Bank. In addition, where applicable, the report makes references to the findings and conclusions of Phase 1 deliverables, especially those of 2D/2E, 2C/3A and 2B (Institutional and Organisational Assessment) to support evaluative statements presented in the text.

2.2. Analysis

(i) From the outset TMEA was demand led and activities were designed and prioritised based on the priorities identified by partner countries and institutions.

When TMEA was established in 2010, the key trade priorities for the EAC, and the countries within the EAC, were trade costs and transport time, which represented major constraints. The EAC Secretariat studies identified 'inadequate capacity' and 'resource constraints' as contributory factors to the slow implementation of the Customs Union. Lengthy delays clearing goods at borders, and numerous non-tariff barriers (NTBs), were considered key barriers suppressing increases in intra-regional trade. Earlier work by the EAC Secretariat, the World Bank and private sector groups, such as the Rwanda Private Sector Foundation, all identified NTBs as major constraints to trade². The Canadian Pacific Consulting Services (CPCS) study on transport costs and the Northern Corridor Study, provided evidence of the high transport costs faced by importers in Rwanda, Uganda, and Burundi of moving goods from the two coastal economies of Kenya and Tanzania. This provided the impetus for the initial NTBs along the route. At the outset, the work was not focused on the efficiency of the ports of Dar es Salaam and Mombasa³.

During the design of TMEA, DFID commissioned a series background studies on trade and growth in East Africa, examined existing regional trade programs funded by DFID in Southern Africa and the USAID Trade Hubs, and engaged in an extensive stakeholder consultative process. During the design period the EAC Secretariat and Kenya, Burundi and Uganda requested technical assistance and financial support to assist with implementing their commitments under the EAC Common Market. Burundi requested support for establishing an effective Revenue Agency as an essential building block for reforming customs, building support for OSBP, and promoting macroeconomic stability⁴.

The TMEA strategy for working with the EAC Secretariat, over the period 2012-2016, noted that the support 'to regional integration is provided in the context of the EAC and its key protocols.' In practice, this resulted in TMEA delivering strategic support to the various EAC organs targeted at

.

² These include: Mugisa E, C. Onyango and P. Mugoya (2009), An Evaluation of the Implementation and Impact of the EAC Customs Union, Final Report to the EAC Secretariat; Trade and Investment Consortium (2009), Impact Assessment of the East African Customs Union; World Bank (2008), Non-Tariff Measures on Goods Trade in the East African Community: Synthesis Report, No. 45708-AFR, Washington DC; Rwanda Private Sector Foundation (2008), Assessment of the NTB along the Northern and Central Corridors; and the Report from the Launch of the EAC Regional Forum on NTB, Kampala, December 2008.

³ It was necessary for TMEA to establish a dialogue with both the KPA and TPA before a programme could be developed.

⁴ The OBR project achieved its objectives and is considered successful however, it is not consistent with any of the Four Outputs adopted by TMEA in the period 2010-2014.

strengthening their capacity to develop, coordinate and oversee legislation, policies and programs aimed at realising the Fourth EAC Development Strategy, 2012-2016. TMEA provided the EAC Secretariat with long-term technical assistance as part of an institutional strengthening project aimed at supporting the customs union and implementation of the Common Market Protocol.

TMEA also incorporated work on One Stop Border Posts, which had started with an earlier regional World Bank project (East African Trade and Transport Facilitation Project, EATTFP) started in 2006, and was behind schedule on the construction of the border posts.

(ii) TMEA has adjusted its national programs according to policy developments in the respective countries

The EAC Development Strategy, 2011/12 – 2015/16 subtitled 'deepening and accelerating integration' provided the framework for TMEA's interventions. The document identified the key drivers for advancing regional integration as the creation of a strong legal framework; strategic selection and harmonisation of prioritised programmes at national and regional levels; and, application of common policies and gradual elimination of all barriers to trade. In explaining how the constraints slowed regional integration, the EAC list included the prevalence of NTBs; inadequate infrastructure, inadequate national level capacities to domesticate regional policies; and, mismatch during implementation of trade facilitation instruments. There was a consensus that improving trade competitiveness was crucial for economic development, and there were clear pathways linking trade competitiveness to economic growth. The trade priorities identified by the EAC and its member states, would if addressed effectively, be expected to contribute to economic growth.

The election of President Kenyatta in 2013, resulted in a firm commitment to reduce trade costs through improving infrastructure, promoting trade facilitation, and reducing non-tariff barriers along the Northern Corridor. The Presidents of Rwanda and Uganda welcomed this. Positive results along the Northern Corridor from Mombasa to Kigali would encourage reforms along the Central Corridor from Dar to Bujumbura, Bukavu, Goma, and Kampala.

The East African Business Council (EABC) is a key private sector stakeholder with a primary focus on regional integration. At their Annual Summit in March 2016 the concerns raised provide an insight into the current trade priorities. This included the necessity of continuing to work on: harmonising customs procedures; applications for exceptions ('stays') to the EAC Common External Tariff; the continued imposition of NTBs reflecting domestic lobbying by national companies; and the unfinished implementation of the Customs Union and the Common Market. The EABC recommended focusing on the two regional corridors (northern and central) and supporting additional harmonisation of laws and regulations.

During Phase 1 (2010-2017), TMEA focused on internal borders within the EAC, and the two gateway ports of Dar es Salaam and Mombasa; going forward TMEA will also provide support to inland borders between EAC members and the DRC and other border countries (Somalia). Significant changes to TMEA activities have occurred. Firstly, as more development partners invested in TMEA, a proportion of funds were earmarked to specific projects. In addition there were political developments requiring adjustments to national programs, and/or, responding to directives from funding partners on engagement. For example, there was a requirement for TMEA to cease working with the Government of Burundi, and to suspend operations in South Sudan owing to internal conflict and instability.

A TMEA Board Member noted that several national level activities, addressing trade facilitation (e.g. concern over tariff evasion), encouraged increased regional cooperation. Uganda was the main driver behind the introduction of cargo tracking as they were concerned about losing revenue. Equally, Kenya was concerned that goods, cleared for transit to Uganda and Rwanda, may be sold in Kenya without paying duty and had previously insisted on a transit bond. TMEA assisted with the decision to allow Customs Officials from other EAC countries to be located at Mombasa Port to clear goods for direct transit. This enabled Kenya and Uganda to agree on introducing cargo tracking, which removes the requirement for a transit bond. This saved both time and resources, and was particularly beneficial for SMEs who frequently had their goods delayed whilst they waited

for the transit bond to be redeemed, in order to pay the duty so the goods could continue their journey into Uganda.

In 2017, the East African trade agenda continued to focus on the importance of regional integration as a driving force for broad based economic growth. The EAC agenda also saw a move toward prioritising completion of the Tripartite Free Trade Area (TFTA) and concluding negotiations for the Continental Free Trade Area (CFTA). Whilst reducing and removing tariffs between regional partners remained on the agenda, a priority was to address non-tariff measures, trade facilitation and promoting industrialisation. Experts who undertook the institutional and organisational assessment, were of the opinion that Strategy I was well-aligned with the remit and purpose of TMEA as a regional trade facilitation organisation, and its stated mission and vision. The TMEA Senior Leadership Team (SLT), The TMEA Senior Management Team (SMT) and Council Members also confirmed they considered that Strategy 1 had delivered the expected results, to the satisfaction of the TMEA donors (report 2B Institutional and Organisational Assessment; p.19).

The TMEA draft strategy for Phase II is consistent with the priorities set forth by the EAC and individual member states. With the design of Phase II, TMEA is responding to the EAC regional priorities of deepening integration, extending integration across Africa (through the TFTA and the CFTA), to increase trade diversification, and increase the value added within the region through industrialisation. The former is being delivered through TMEA providing finance for Member States to actively participate in the ongoing trade negotiations. For the latter, CFTA is focussed on supporting interventions to reduce trade costs through the WTO Trade Facilitation Agreement and activities aimed at strengthening the logistics sector. It was the opinion of the organisational assessment team that Strategy II is comprehensive, cohesive and clear, and seeks to achieve greater impact than its predecessor based on i) Lessons learnt from the implementation of Strategy I; and ii) Changes in the regional trade environment (market demand). The assessors also considered that Strategy II was responsive to market demand, relevant to development goals and consistent with both the TMEA Theory of Change (ToC) and its results framework (report 2B Institutional and Organisational Assessment, p. 19). Strategy II will now urgently need adapting to the emerging reduced-budget scenario. TMEA would benefit from an early 'reduced-budget scenario' strategy (a revision of Strategy II) to identify the 'core' and 'non-core' delivery areas for the period of Strategy II and how these will be reflected in the organisational and governance structure.

(iii) TMEA continually monitors the political economy of the region and takes it into account in projects and activities.

TMEA continually monitors the political economy throughout East Africa as mobilising stakeholder support is necessary for successful implementation. However, the assessors who undertook the organisational assessment of TMEA believed changes to country strategies, to reflect rapid change in the national operating environment, does not always happen on a timely basis and suggested that a framework for regular review would add value (report 2B Institutional and Organisational Assessment, p 20). The Senior Leadership team updates 'risk' at the country and project level each month. Several respondents noted that TMEA had commissioned a confidential political economy assessment prior to committing to finance infrastructure investments at the Ports of Mombasa. In 2014, DFID commissioned an update on the political economy analysis of the East African Community (Booth, et al 2014). This report examined the links between political and economic power, the challenges to initiatives promoting competition, and strengthening economic governance. The report concluded that economic growth in 'certain sub-sectors of some economies' had already taken place and could be expected to continue, however, these 'success stories' reflected the confluence of elite political and commercial interests. In the authors' view, such developments, whilst positive, did not translate into broad based transformative growth, which removes millions of people out of poverty.

When civil unrest erupted in South Sudan, TMEA amended their project activities to focus directly on alleviating poverty for cross-border traders, and channelled their support through civil society organisations (CSOs) and private sector organisations (PSOs). TMEA has also reorganised their

program in Burundi, in response to the deteriorating political climate, by terminating all their projects with the Government while continuing to work with private sector and civil society.

(iv) TMEA remains a demand-led organisation; nonetheless, it carefully evaluates the impact of its interventions and directs its support towards the most effective initiatives

Whilst the EAC Secretariat and TMEA have agreed on a 'demand-led and partnership anchored approach', there has been some concern over the dependence of the EAC to build technical capacity through donor funded programmes and the lack of funding from member state contributions. Reliance on donor funding for staffing technical positions at the EAC Secretariat was not sustainable overall, and raised the question of the commitment of member states to effectively implement and enforce the agreed regional integration agenda.

Implementation of the EAC regional integration agenda takes place at the national level. The initial TMEA strategy supporting EAC integration at the member state level identified a shortage of technical capacity as a core constraint to implementation. In response, TMEA provided funding for both long-term and short-term technical assistance to the Ministries of East African Cooperation (MEACs) in various member states. Whilst this achieved several notable positive outcomes (as documented in the TMEA commissioned evaluation), it had, at best, a marginal impact on the speed of implementation at the country level. The key factor determining implementation of the regional agenda was identified as the degree of political commitment from the Executive.

The major constraint to implementing the Common Market related to mobilising political commitment in the key Ministries of Finance and Foreign Affairs, and the President's Office. Once TMEA recognised that a shortage of technical capacity within the MEACs was not the binding constraint, they cut back direct support to the MEACs and increased their activities around the regional priorities supported by the Heads of State from Kenya, Rwanda and Tanzania. The commitment of the Heads of State to substantially reduce trade costs along the Northern Corridors provided the catalyst for TMEA to pivot its priorities from a narrow emphasis on hard infrastructure (e.g. road improvements, weigh bridges, new border buildings) to supporting a wide range of soft infrastructure activities. The inclusion of a wide range of soft infrastructure activities along the length of the corridor from Mombasa Port was critical for increasing cross border efficiency and reducing trade costs. Activities included One-Stop Border Posts (OSBP), support for regulatory harmonisation, improved efficiency of freight forwarders (through a training program), and electronic transit. These projects were all consistent with the original 2012 TMEA program.

Unlike SO1, TMEA's status as a demand-led institution meant that there is, to a certain extent, a lack of coherence in TMEA SO3 projects. According to report 2D2E (p.40), some SO3 projects had questionable relevance for TMEA, because they were market-development projects without any emphasis on trade. Other projects expanded into access to finance, which is not relevant for TMEA.

(v) Several institutional mechanisms have been set up to ensure that TMEA's support remains relevant.

To ensure that TMEA's support remained responsive and relevant to EAC policy priorities, TMEA and the EAC established a technical oversight committee to monitor progress. The priority areas for the oversight committee include: One Stop Border Posts; Customs; Single Customs Territory Study; Harmonisation of Commercial Laws; Strengthening of Fiduciary Systems; Tripartite FTA negotiation; Video Conferencing facilities: and Result based budgeting and monitoring and evaluation system.

Once the TMEA Country Office was established and a Memorandum of Understanding agreed between TMEA and the national Government, a National Oversight Committee (NOC) was established. NOCs were set up in each of the five EAC countries. The NOC sought to ensure all TMEA activities were demand driven and leveraged existing initiatives. Membership of the NOCs included representatives from the host government, other international cooperating partners, the private sector, and civil society. At the outset, the NOCs functioned more as stakeholder forums

(as noted in the Annual Review, 2012) however, over time they functioned as a governance body, engaging in the oversight of programme activities.

The NOCs remain active and continue to meet quarterly.⁵ TMEA senior leadership estimated that 90 percent of their coordination with donors took place at the national level and was coordinated through the NOCs. TMEA senior leadership further noted an ongoing tension between the NOCs and TMEA Head Office over the delegation of authority, with the NOCs requesting more control over the allocation of funds.

TMEA also conducts an annual stakeholder survey to increase TMEA's understanding of stakeholders' level of satisfaction with TMEA, and their knowledge, attitudes, perceptions, interests, and experiences with the programme. The findings are integrated into future programs and/or services. The 2015 TMEA Stakeholder Satisfaction Survey reported a high level of trust with TMEA having a strong reputation as a dependable, ethically engaged, flexible, solution driven partner. The three top 'likes' included: (i) TMEA's activities to promote trade and regional integration, (ii) their teamwork and professionalism, and (iii) transparency and flexibility.

Strategy II's results-based management system, and results-based PCM guidelines, are in place and should enable an improved understanding of evidence. Adaptive programming improvements are moving away from the design stage and toward the management of interventions, whilst consideration of the political context is becoming increasingly apparent at all stages of the project cycle, particularly in the case of future Fragile and Conflict-Affected States (FCAS) initiatives (report 2B Institutional and Organisational Assessment, p 31).

(vi) TMEA complements existing initiatives from other donors

TMEA has entered into partnerships with UNCTAD, ITC and the World Customs Organisation for activities related to the Trade Facilitation Agreement, Women and Trade, and Customs Modernization, respectively. TMEA also participates in the Global Alliance for Trade Facilitation partnership and is co-financing an intervention with Maersk.

TMEA has signed Memoranda of Understandings with the WTO and UNCTAD. TMEA has provided grants for the IFC to produce the EAC Scorecard. TMEA have also provided funding under a Reimbursable Advisory Service Project (RAS) to the World Bank for them to deliver technical services for TMEA work requests. This has been utilised for a growth pole study. Although this work was conducted by World Bank staff, it was managed by TMEA and was not subjected to the standard WB internal review process. TMEA have also cooperated with the World Bank on the Great Lakes Trade Facilitation Project, where they agreed to focus on different border posts.

The TMEA Council includes representatives from the 7 donor agencies providing finance to TMEA, and TMEA participates in the Donor Coordinating Meetings at the regional and country level. TMEA is required to conduct donor mapping prior to approving a new project. The Donor Coordinating Meetings at the national level represent the major formal forum for exchanging information on trade projects. At the regional and sub-regional level, TMEA activities are endorsed by the EAC Secretariat and participating member states, respectively.

In principle, the National Oversight Committees also include representatives from donors providing trade related support, however, in practice it appears the donors who actively attend are those that have invested in TMEA. A review of the minutes from recent NOC meetings in Kenya and Uganda (November 2015 and November 2016) showed participation from DFID, USAID, Royal Danish Embassy, and Global Affairs Canada. It does not appear that the major multilateral donors (World Bank, UNDP, and EU) and other bilateral donors with large trade projects (JICA) are actively engaged in the NOCs.

⁵ Please see the next subsection on complementing existing initiatives from other donors for further detail about the de facto attendance at the NOC meetings.

Outside of the formal institutional framework (of the donor meetings and the NOCs) TMEA staff are engaged in active dialogue with technical staff from other agencies. For instance, the World Bank Lead for the Dar es Salaam Gateway project confirmed their active engagement with TMEA and provided numerous examples of the strong and positive cooperation. These included an agreement for TMEA to co-finance the feasibility study for inspection stations along the Dar es Salaam corridor. Also, the World Bank Report, *Women and Trade in Africa* (2013) explicitly references TMEA activities aimed at improving the conditions for women engaged in cross-border trade. The report notes TMEA work on awareness raising. This has subsequently been expanded to include the cross-border charter.

(vii) TMEA has used changes in the regional political economy to advance regional integration and economic growth.

This section reports in summary form, specific results, or outcomes, highlighted in interviews with TMEA Board Members, TMEA staff and other stakeholders, on how TMEA activities had used changes in the political economy to support regional integration and economy growth.

Economic reforms, and progress on regional integration in East Africa in the decade before TMEA, resulted in a rapid expansion of the private sector and increased regional trade across a wide range of activities. This growth was particularly notable amongst manufacturers, construction companies, and wholesale/retail distribution chains such as Nakumatt, Tuskys, and Uchumi (Hoffman and Kidenda 2015).⁶ With the increase in transport volumes, trucking companies advocated for more efficient trade facilitation to increase the effectiveness of their fleet. TMEA was instrumental in working with both the private sector apex bodies (for example, Kenya Manufacturers Association, Uganda Manufacturers Association, Rwanda Private Sector Foundation), sector associations (Kenya Transporters Association, Freight Forwarders, customs clearing agents), the public private Corridor Secretariats, and government officials to harness the commitment to increase transport efficiency in the region.

Specific results include:

- The removal of roadblocks, weighbridges, more efficient administrative procedures, and eliminating multiple bonds on the route from Mombasa to Kampala and Kigali (Northern Corridor). The transit time to move a container from Mombasa to Kampala and Kigali has declined (during TMEA Phase 1, 2010-2016) from 18 to 4 days, and 22 to 7 days, respectively. Transport prices have been declining along the Northern Corridor. Reduced prices and quicker turn-around times have increased efficiency in the road haulage sector through Kenya, Rwanda, and Uganda.
- Axle load limits have been standardised (agreed in May 2013), at 56 tonnes gross vehicle weight inclusive of cargo, throughout the EAC, although implementation remains challenging.
- The Single Customs Territory is operational. Customs officials from Uganda and Rwanda are now placed inside Mombasa Port to facilitate direct transit.
- Private sector advocacy organisations in East Africa have gained a more prominent role in influencing policy design and implementation in 2017, than was the case in 2010 (see also report 2D2E pp 46-47). The Annual East African Business Summit is held ahead of the EAC Summit, and the recommendations from the private sector are automatically submitted for consideration to the Heads of State. However, whilst the stronger sector associations lobby for improving efficiency along the main highways, some do not always lobby for increased liberalisation, but for the self-interest of the association's members, notably the haulage bodies. The various national and private sector advocacy organisations campaign for protection for their sector from increasing regional competition.
- (viii) There have been reductions in time for moving goods along the Northern Corridor.

 There is also evidence of improvements in trade facilitation with the implementation of

⁶ These three chains operate over 150 stores throughout East Africa.

the OSBP at selected borders. However, there have been no further reductions in tariffs and impact on transport costs needs further assessment.

The Transport Observatory Report of November 2016, and the Poree impact study cited in report 2C3A (p. 18) emphasised the substantial time saving in using the border crossing, which has had a considerable impact on trade facilitation, and should provide economic benefit for users of the border post. Large fluctuations in commodity prices, which account for the bulk of trade, limit the usefulness of trends in aggregate exports and imports for drawing conclusions. Further work is required to trace the benefits from reducing trade costs on production costs and consumer prices.

TMEA is committed to addressing soft infrastructure reforms, however, they assert that financing the hard infrastructure provided the opening for beginning the dialogue on procedural and regulatory reform at the border posts.

There have been limited changes in tariffs during the period 2010-2017, with the EAC countries choosing to retain protection for their sensitive sectors. It is not possible to indicate any significant improvements in tariff policy during the period 2010-2017, however, there have been improvements in trade facilitation, in increasing the profile of NTBs and their reduction (report 2D2E, p. 3), and in streamlining procedures to reduce trade costs. As suggested in report 2C3A, the key measure of effectiveness of the TMEA activities, which contributed towards improved port infrastructure on the pathway to a reduction in trade costs, has been achieved. However, there is the exception of Malaba, where time and costs have temporarily increased due to ongoing construction works. Once construction work is completed, time and trade costs are expected to decrease as a result of the reduced transit time. TMEA was actively engaged in supporting these improvements, through delivering a range of inputs including technical assistance, raising awareness, facilitating stakeholder dialogue, and participating at regional technical meetings. The aggregate value of exports from East Africa continues to be determined by changes in international commodity prices. There is preliminary evidence of reduced transport times resulting in increased trade flows in the region. According to report 2C3A (p. 27) of the three OSBPs evaluated, Busia is the most effective in achieving time reduction in cross-border traffic, by utilising the new infrastructure and IBM. Cross-border time comparisons also show that efficiency has considerably improved from 2011 to 2016, notably with a reduction in the average crossing time from Kenya to Uganda, from 14 to 3 hours. However, it is not possible to attribute changes in trade flows with the rest of the world to specific TMEA activities. The reduction of trade costs is expected to encourage increases in trade volumes. However, other factors did not remain constant, and there were significant fluctuations in commodity prices, which complicates the analysis of trade flows. The impact on transport costs needs to be further investigated. Performance evaluation in Phase 2, will explore the specific contribution of TMEA to the observed outcomes for selected projects and overall programme.

(ix) TMEA encountered resistance on initiatives aimed at reduced trade costs and lowering external tariffs. This included import substituting stakeholders lobbying to maintain the status quo on the exceptions to the common external tariff, and a lack of government commitment to prioritise liberalisation for trade in services.

TMEA has encountered challenges in building support for advancing the trade in services agenda. After financing the Service Platform for two years, this was discontinued owing to EAC and member states' lack of commitment to continue funding.

The EAC Secretariat requested TMEA to support a study examining EAC external trade policy and recommend changes to the Common External Tariff (CET), which would promote export competitiveness. This work was completed but has not been utilised in the subsequent bi-annual meetings. The CET review, for Rwanda and Uganda, which recommended gradual elimination of exceptions to the maximum tariff, has not resulted in any changes. The discussions within the EAC over reforming the CET continue to be driven by national vested interests and are not supported by technical analysis. The implicit recognition of these political economy barriers in the programme theory of change, offers a point of entry to improve the ways TMEA understands and acts on

incentives on a country-by-country basis, using evidence from their extensive catalogue of research to bolster their work.

The ASSET program, which provided for an electronic transit bond through the EAC, was discontinued owing to strong opposition from a major importer in Rwanda. Further, when ASSET was designed and piloted by TMEA, it did not have the support of COMESA. COMESA was supporting a Regional Transit Bond, but TMEA had not secured the buy-in from key political players within COMESA. Without endorsement from COMESA there was limited national commitment, and no commitment from the REC for implementation. In the absence of this institutional support, the ASSET scheme was unlikely to have the regional/national 'champions' necessary for overcoming the resistance to change from stakeholders benefiting from the existing arrangements. Developing a transit bond remains a priority, and the ASSET approach has been modified to address private sector stakeholder concerns, and to ensure support from the RECs. A revised transit scheme is now in operation between Kenya and Uganda.

Despite TMEA's substantial support for the removal of NTBs, the process has proven to be slow, and to date, many of the most restrictive NTBs remain in place. TMEA support has prioritised strengthening the MEACs and facilitating meetings of the National Monitoring Committees (NMCs), which report on NTBs to the EAC Regional Forum on NTBs.⁷ TMEA has also funded the private sector advocacy organisation, East African Business Council, to undertake applied research on NTBs along the transport corridors, and financed the State of East Africa report⁸. In 2015, the East African Legislative Assembly (EALA) passed the EAC Elimination of Non-Tariff Barriers Act. The member states have yet to ratify the Act.

(x) TMEA staff consider their work has increased awareness of the importance of trade facilitation to economic development. EA governments have used TMEA's work to advance their already agreed economic agenda of increasing trade.

TMEA provided briefings on the importance of the trade agenda for economic development of Kenya, to all political parties prior to the Presidential Election in 2013. In Uganda, President Museveni presented an award to TMEA for their work, and the Government of Uganda has allocated funds to construct an improved access road to the OSBP.

The Deputy President of Kenya, William Ruto, stated "TMEA continues to achieve tremendous success in its programmes, which are aimed at improving the competitiveness of the region. The Kenyan Government continues to partner with TMEA on several transformational projects, which will have a significant impact on Kenyan businesses and generally the prosperity of Kenyans."

The work of TMEA has contributed to raising awareness on the role of trade logistics in promoting competitiveness. TMEA worked closely with the revenue authorities in Uganda, Rwanda, and Burundi. TMEA invited President Kenyatta to visit one of their relatively small projects¹⁰ at Mombasa Port. Following President Kenyatta's visit, the Port Authority was galvanised into improving efficiency – in the knowledge that the President had taken a personal interest. President Kenyatta also met with Presidents Kagame and Museveni, to discuss improving performance, and they agreed to establish an informal Coalition of the Willing (CoW), to improve transport infrastructure along the Northern Corridor. Kenya would take the lead on the port of Mombasa, Uganda on railways, and Rwanda on trade systems (customs, border controls, etc.). This high-profile commitment to reducing trade costs provided a convenient vehicle for TMEA to deliver specific projects along the route. TMEA senior officials stated their work has resulted in EAC economies adopting a positive attitude toward investing in regional rail service upgrades for the movement of bulk commodities

⁷ The NMC for the EACM members were instituted in 2007, with the exception of Burundi.

⁸ TMSA provided financial support for maintaining the Tripartite online registration and database for NTB (www.tradebarriers.org) Since TMSA closed has not been updated.

⁹ January 27, 2014, The People's Daily.

¹⁰ The Port Charter. At that time TMEA was funding access roads to the port.

Senior officials from the Kenya Ministry of Trade, consider TMEA a partner in their commitment to implementing the Trade Facilitation Agreement (TFA). In 2014, TMEA financed the Kenya Trade Facilitation Needs Assessment for the Government of Kenya, and TMEA are now providing support for implementation. Kenya achieved all its obligations under the TFA, and ratified the WTO TFA in December 2015. The officials also highlighted TMEA funding for the preparation of the National Trade Policy. The Ministry of Trade officials stated that "TMEA has assisted us to achieve our goal," and they look forward to continuing to work with TMEA as a partner in implementing the trade agenda.

One Stop Border Posts (OSBPs). This primarily began as an infrastructure project, involving the design and construction of modernised border posts. In interviews, TMEA staff stated that their commitment to finance new infrastructure, supported the development of a dialogue on improving border coordination between multiple agencies, and reforming systems and procedures for more efficient goods clearance. Now, all OSBP projects are integrated with 'soft' infrastructure activities to improve integrated border management.

NTB mechanism. TMEA supported five country level projects and one regional level project aimed at reducing NTBs. As noted by the Formative Evaluation of TMEA projects on NTBs to Trade (LDP, November 2015), all these projects were well "aligned with EAC priorities and policy (Treaty, Protocols, EAC Time Bound Programme on Eliminations of Identified NTBs, and the EAC NTB Act)." The projects were aligned with national strategies in Burundi, Rwanda, Tanzania, and Uganda. However, Kenya did not have a national strategy in place when the project began. The projects provided support to the National Monitoring Committees and the EAC Secretariat. The Formative Evaluation reports that 87 NTBs were resolved of the 112 identified. However, more analysis is required on the strategic importance of the identified and resolved NTBs (as noted by the Formative Evaluation).

TMEA provided support to the various EAC National Bureau of Standards. This included the provision of testing equipment, and staff training and resulted in a significant reduction in the cost of testing (conformity assessment) by the public regulators. The strengthening of the efficiency of the National Quality Infrastructure remains a priority for the EAC.

(xi) TMEA has established a regional profile for its work on priority areas, which facilitates high-level dialogue with senior government officials and other key stakeholders.

The rapid expansion of TMEA, supported by multiple donors, raised their profile within East Africa. In Kenya, TMEA had high-profile support of the Permanent Secretary (PS) for Ministry of East African Cooperation, David Obonyo Nalo, who had previously served as PS in the Ministry of Trade. From the outset, David Nalo requested TMEA to provide technical support for regional integration to MEAC (in early 2010 MEAC remained understaffed). In Burundi, TMEA provided support for the establishment of the Revenue Office, which was a high priority of the Government. In Rwanda and Uganda, TMEA's support for the newly established Ministry of East African Affairs, was well regarded by both governments. In addition, in Rwanda TMEA supported the Customs department and the Private Sector Foundation. The strong buy-in for TMEA country level activities in Burundi, Kenya, Rwanda, and Uganda raised the profile of TMEA within the region. Building support and buy-in for TMEA engagement in Tanzania took 18 months.

The election of President Uhuru Kenyatta in Kenya in 2013, a former Minister of Trade with a private sector background, has also been instrumental in raising TMEA's profile. The Head of State has officially supported TMEA and its agenda of reducing trade costs and increasing trade. Several TMEA Board Members, who are based in the region, considered TMEA had raised the profile of trade amongst policy makers. They also noted that several TMEA activities, including the OSBP, were 'high-profile', and presented excellent public relations opportunities for senior politicians to 'show that they are delivering results' and can 'get things done'.

The considerable number of trade related activities financed by TMEA raised their profile throughout the region. By 2012, with more than 200 activities underway across a wide range of stakeholders, TMEA was viewed by many as the 'go to' agency for trade facilitation. This resulted from the close relationship between TMEA and the Ministries of Trade and East African

Cooperation in Kenya, where many of the donors managed their regional programs. The election of President Kenyatta in 2013, on a platform of delivering sustainable and diversified economic growth through the private sector, renewed donor interest in supporting East African Integration.

TMEA activities through 2013-2014 and beyond, focused on OSBP, port improvement, electronic certification, reduction in NTBs (reducing the number of weigh stations along the route); these succeeded in reducing transport prices along the corridor. Whilst other donors, including the World Bank and JICA, were also involved in supporting trade facilitation, TMEA certainly contributed towards raising the profile of trade facilitation. In November 2015, President Kenyatta announced a major reshuffle aimed at increasing government efficiency. He appointed Betty Maina, as PS East African Community Integration (she was well known to TMEA in her previous role as Executive Secretary Kenya Association of Manufacturers), and Dr. Chris Kiptoo, as PS International Trade, who was formerly the Kenya Country Programs Director for TMEA. These changes in government personnel, and the appointment of new high profile regional business persons as TMEA Board Members, served to cement TMEA's profile as a vehicle for promoting increased trade through lowering trade costs.

3. Preliminary insights/conclusions from Output Analysis of SO1, SO2 and SO3

The objective of this section is to provide preliminary insights to the evaluation questions on relevance, alignment coherence, cross-cutting impacts, and sustainability of TMEA interventions. The conclusions are drawn, similar to the previous section, from the review of TMEA official documents, third party reports by the EAC Secretariat, member states, other donors and researchers, and semi-structured interviews with a range of stakeholders involved with EAC and trade issues in East Africa. Respondents include TMEA Senior Management Team, Private sector TMEA Board Members, and members of the Evaluation Committee, TMEA Country Directors, and officials from DFID, USAID, and the World Bank. In addition, where applicable, the section makes references to the findings and conclusions of the reports 2D/2E, 2C/3A and 2B (Institutional and Organisational Assessment), to support evaluative statements presented in the text with sufficient and evidential basis. Table 3 presents an overview of output analysis by strategic objectives with the references from other sources where possible.

3.1. At project level: summary of workstream findings

TMEA has done an excellent job at identifying relevant projects and implementing them effectively and efficiently, yet sustainability is a concern at several levels.

Firstly, there is a concern surrounding sustainability by the growing dependence on TMEA for the implementation of key trade, enabling support to public bodies in East Africa. By 2012, with more than 200 activities underway across a wide range of stakeholders, TMEA was viewed by many as the 'go to' agency for trade facilitation. To some extent this resulted from the very close relationship between TMEA and the Ministries of Trade and East African Cooperation in Kenya, where many of the donors managed their regional programs Secondly, the sustainability of TMEA supported port improvements will not be achieved without changes in the type of port management arrangement. As suggested by report 2C3A (p. 31), best practice port reform and modernisation initiatives are generally focused on the transition to a landlord port model, port management improvements and assisting with developing and implementing Public Private Partnerships (PPP). It is argued that the sustainability challenge is relevant to the ports (Mombasa and Dar) i.e. that without wider reform, institutional strengthening, and embedding new practices into the KPA, and TPA (and other stakeholders material to efficient port operations) these lessons and short-term improvements are not likely to lead to significant performance improvements and cost reductions to port users (p.3). Thirdly, as argued by report 2D2E (p. 42) under SO3 the capacity of many of the CSO/PSOs to secure and manage funds remains weak. Civil Society Organisations (CSOs) supported under SO3, appeared to struggle due to a lack of appropriate internal processes related to risk mitigation and cash flow management. In some cases, this led to delays in implementation and delivery of outputs. This necessitated TMEA staff to work with the CSOs to strengthen areas of weakness highlighted in the due diligence phase, and not identified in the initial project design and appraisal process (report 2D2E, p. 3). Whilst the sustainability of the supported institution may be recognised as being weak from the outset, and whilst this should not be a barrier for TMEA engagement, there should be a greater ex ante understanding of the consequences of initiatives being sustained on exit of TMEA funding support.

3.2. At programme level

i) TMEA is aligned and responsive to regional trade policy priorities and, in most cases, successful at addressing these priorities.

TMEA activities are designed and prioritised based on the concerns identified by partner countries and institutions. TMEA has adjusted its national programs according to policy developments due to a continuous monitoring of political economy developments, other stakeholder initiatives, and assessment of the results of its initiatives. The approach of TMEA in having a presence and local governance structure in each of the EAC countries, is critical in this respect, as all TMEA projects

need to develop ownership of activities and influence stakeholders to support and engage in implementation (report 2D/2E, p.26). TMEA has established a high profile throughout East Africa for its work on the key priority areas, and has been instrumental in achieving reductions in time for moving goods along the Northern Corridor, as well as improvements in trade facilitation with the implementation of the OSBP at selected borders. Report 2C/3A, (p.22) suggests that Malaba OSBP project should produce the necessary crossing time improvements, and increase the level of trade facilitation to that consistent with international best practice. This is supported by report 2D/2E, which suggests a reduction in time within the project 0223 on the Single Customs Territory (SCT). According to the report (p.25), there were a range of outputs completed, which resulted in the outcome of a reduction in clearance and transit time for the Northern Corridor (Mombasa-Kigali) from 21 days to 5 days, and on the Central Corridor (Dar- Kigali) from 25 to 6 days. According to report 2D/2E, (pp. 55-56) all five countries reduced the time required for import and export, with Tanzania showing the smallest improvement.

In terms of reduction in costs, it is context specific. For Burundi, Kenya, Rwanda, and Uganda time reduction goes hand-in-hand with a cost reduction (report 2D/2E, pp.55-56). Meanwhile in Tanzania, import and export costs increased between 2010 and 2017, despite the time reduction. According to report 2C/3A (p.3) Busia OSBP provides increasingly reduced clearance times both for entrance and exit of cargo and passengers. With Malaba OSBP, the report claims that the project should produce the necessary crossing time improvements and increase the level of trade facilitation to a level consistent with international best practice (p.26). Report 2C/3A (p.28) raises major questions on the potential effectiveness of the Mirama Hills OSBP and argues that the estimation and distribution of the time and cost saving will need further validation and assessment from the performance assessment. The evidence is also mixed for Mombasa and Dar ports, where according to report 2C/3A (p.49) the Mombasa projects have achieved some time and cost reductions, but the projects in Dar, have in general, not had the same results.

Although time reduction and partial cost reduction outcomes are claimed to have been achieved, there is a need for stronger evidence surrounding causation and attribution given that TMEA interventions are part of wider transport and logistic systems, which depend on complementary investments and improvements. The impact on transport costs needs to be further investigated as part of the performance evaluation in Phase 2.

TMEA encountered resistance on several initiatives aimed at reducing trade costs and lowering external tariffs. However, TMEA staff considered their work had increased awareness of the importance of trade facilitation to economic development. Report 2D/2E (p.61) also claimed that there is a higher resistance of national government to accept change in gender related issues than in trade related issues.

ii) TMEA adapted promptly and sensitively to the changing political economy, but the overall context seems to have worsened since TMEA outset.

TMEA operates in an extremely complex environment with multiple interconnected political economy factors potentially having an impact on the work that the institution conducts. Most of the time, it can manage these risks using its politically savvy staff to understand the underlying motivation of key actors, especially government. This is echoed by the report 2D/2E (p.26), which suggests that projects, have on many occasions, been effective at overcoming constraints, even when these are of a political and institutional nature, though this has taken time. Where there is alignment surrounding a policy, then TMEA rapidly and flexibly seizes opportunities to encourage greater trade. In this environment is not surprising that TMEA has been exposed to risks, which have the potential to cause great reputational harm. TMEA has implemented a number of measures to ensure the chance of reputational damage happening again is minimised. However, certain external constraints are beyond the control of TMEA and affect programme performance. For example, as suggested by report 2D/2E (pp. 25-26) in relation to SO2 projects, in South Sudan and Burundi, the fragility and weakness of other state institutions was a major reason for delay in project implementation. In the latter country, a change in political circumstances led to projects effectively being put on hold due to restrictions on channelling development aid to public body institutions. In the rest of the region, political constraints were also cited as a major problem. The

upcoming election in Kenya in August 2017, had effectively meant that projects requiring approval from other government actors were delayed from the end of 2017 onwards. Another large SO2 project in Kenya experienced considerable delays after unexpected legal challenges from other stakeholders. There were major political constraints encountered in the implementation of SO3 project activities related to the fragile state status of two of the countries (Burundi and South Sudan) (report 2D/2E, p.42). Other key issues delaying project implementation was the change in government in Tanzania, which several SO2 activities on hold and affected SO3.

The year and a half up to the first draft of this study was a turbulent time in East Africa, with the new administration in Tanzania playing a significant role in shifting regional dynamics and suppressing its own private sector. Kenya is also a significant player, and is seen as the regional powerhouse, although viewed with suspicion by other countries, and as a result, feels isolated. Politicians and senior business leaders at the highest level determine the success, or lack of success in trade reform in their respective countries, and relationships between these leaders, are constantly shifting. However, global events such as Trump's presidency and Brexit are fuelling anti-free trade sentiments amongst these leaders and there is evidence of greater protectionism than reported in 2015, which threatens efforts to ensure greater regional integration. New security risks have created space for more NTBs, and TMEA needs to consider to what extent it wants to be involved in humanitarian and security efforts. Decentralisation in Kenya should mean that efforts concentrate equally at the national and county levels.

Many respondents found it challenging to predict the future of the trade sector in East Africa, as it is constantly evolving and unpredictable. Youth is an expanding demographic in East Africa and will drive the trade agenda, particularly around employment. Technology and social media are allowing for an increasingly open democratic space, and there is evidence of citizens using these online platforms to hold corrupt actors to account; it is likely that social media will play an increasingly vital role in the future. When people are informed through online media then they can drive the agenda.

Table 3 : Overview of output achievement assessment by Strategic Objective

Criteria SO1 SO2 SO3

The TMEA Focus on Ports is Appropriate. Deep-sea

cargo ports are a critical and necessary part of international trade facilitating infrastructure: most of the freight is transported by sea through designated import / export ports. Ensuring "gateway" ports have enough capacity to manage trade is essential to economic growth; capacity is determined through adequate physical assets (quay length, yard area, equipment) and importantly operational efficiency. The TMEA support to the Kenya Port Authority (KPA) and Tanzania Port Authority (TPA) reflects this best practice. The TMEA contribution to the OSBPs is based on the principles of improving the physical infrastructure and refining integrated border management to create models operating to international best practice. Support to the OSBPs is highly relevant in fitting with the mandate of TMEA's SO1 as well as addressing the needs of stakeholders. Busia - Given the likely time horizon and the expected benefits that the OSBP will bring over the next 10 years, the intervention can be considered highly relevant to the needs of the EAC and consistent with the Theory of Change (report 2C/3A, p.17). Malaba - This project is highly relevant given the almost doubling of bordercrossing times due to the current infrastructurerelated problems. The need and appropriateness of the OSBP is without question. However, TMEA's contribution can only be assessed once work on the infrastructure has restarted, and the remedial work to the OSBP on the Kenyan side has

The main beneficiaries or recipients of assistance were national ministries. standards agencies, and parastatals. Given that TMEA was demand led and responding to requests from tangential to the core TMEA partner organisations, not every partner organisation was the most appropriate recipient institution. Projects score well on relevance with 16 out of 20 projects performing well (Green) and just, four classified as amber. Based on stakeholders' responses, the bottom of the pyramid the assessment of the evaluators was that there was a strong performance of relevance to country needs, but a slightly weaker fit with the overall mandate of TMEA. (report 2D/2E, p.23).

SO3 projects had a mixed score with respect to relevance, with 10 out of 20 projects performing well (Green) on relevance, and 10 with an amber rating There were no projects that scored low on relevance or where there were any major concerns. A question is raised in some

interventions as to whether TMEA is always the most suitable funder of the activity as the canvas of business competitiveness for SO3 projects is broad. It can be argued that the focus of some SO3 projects is mandate (report 2D/2E, p. 39). This has included projects that intervene within specific sectoral value chains at the level of production quality (e.g., primary processing by coffee farmer cooperatives). Some projects working at have also expanded into developing access to finance, which is outside of TMEA's ToC. These projects are 0453, 1229, 0934 & 0921, 1356, 1138, 1131, 1066 & 1071, 1344 (report 2D/2E, p. 48. Table 23). It is not surprising that Strategy II will see the existing three outcome areas reduced to two (SO1 for 'reduced barriers to trade' and SO2 for 'improved business competitiveness') with the current SO3 merged into Outcome 2 (report 2B Institutional and Organisational Assessment, p. 26)

Criteria	S01	SO2	SO3
	been completed (report 2C/3A, p.2). Mirama hills - As with the other OSBPs Mirama Hills is a relevant intervention, which fits with the TMEA mandate and has met with the needs of the stakeholders (report 2C/3A, p.25). Both ports (Dar and Mombasa) that are two regional gateway (import / export) ports are strongly aligned to SO1, according to report 2C/3A (p. 47)		

The critical shortfall in SO1 relates to reform and modernisation, which is a key assumption in the TMEA impact pathway. The sustainability of TMEA supported port improvements will not be achieved without changes in the type of port management arrangement. As suggested by report 2C3A (p. 31) best practice port reform and modernisation initiatives are generally focused on the transition to a landlord port model, port management improvements and assisting with developing and implementing Public Private Partnerships (PPP). It is argued that the sustainability challenge is relevant to the ports (Mombasa and Dar) i.e. that without wider reform, institutional strengthening and embedding new practices into the KPA and TPA (and other stakeholders material to efficient port operations) these lessons and short term improvements are not likely to lead to significant performance improvements and cost reductions to port users (p.3)Busia - Further investment is necessary to make certain that the road into Busia at the Kenyan side is 'streamed' with three lanes to the exit/entrance gate. Moreover, ensuring an uninterrupted power supply and adequate water supply must be tackled with urgency (report 2C/3A, p.19)Malaba – There is an excellent relationship emerging between KRA and their Ugandan counterparts at the URA as well as between the other agencies operating at the border. Such relationships would suggest good sustainability of the OSBP and the amber rating on

The projects are scored less well on sustainability and learning. Many of the public sector partners struggled with effective project management including financial and output reporting to TMEA. Inevitably this required more active input by the TMEA staff than originally planned. 4 projects rated green, 11 as amber, 3 as amber-red, and 1 as red (report 2D/2Ep. 29) scoring. The sustainability of SO2 projects are recognised as weak, and there should have been a greater ex ante understanding of the consequences of TMEA exit. The focus was on supporting the trade enabling activity with insufficient attention on how the institution could continue without TMEA support (ibid. p.32) Similarly, report 2B (Institutional and Organisational Assessment) also suggests weaknesses in the monitoring of data intake at project level (mostly under SO1 and SO2) and the lack of a clear paper trail of all project activities and relevant budgets (including changes to any of these agreed on after the PAR). There is also a need for a more thorough definition of milestones against which (outcome) progress can be comprehensively assessed during the implementation process (p. 42). Formal learning seemed limited, following on from the weak monitoring system. However, informal learning opportunities were stronger - TMEA country teams were in regular contact and sharing ideas, although not in a systematic forum, and projects often appeared to know of other relevant TMEA projects and had shared knowledge with them. A better monitoring system which produced

reports of value would

On sustainability, a common feature of the SO3 projects was the lack of absorption capacity of the recipient organisation and therefore many of the activities, such as support to cross border traders will not go to scale without further support. This issue also applied to the advocacy activities, as many of the civil society organisations appeared to struggle with having appropriate internal processes related to risk mitigation and cash flow management, which led to delays in implementation and delivery of outputs. Projects funded under SO3 performed less well with respect to sustainability and learning, with 7 green ratings, 12 amber, and one amber-red (report 2D/2E, p. 46). TMEA had appeared to help build relationships between

performing similar activities in different countries, and organised conferences bringing together beneficiaries. However, monitoring systems and reporting was weak. This is partly a result of working with smaller institutions in SO3 with limited experience in monitoring. TMEA has developed monitoring guidelines to help partners, but they appear to have been insufficient to address this issue.

small organisations

Criteria	SO1	SO2	SO3
	the Kenyan side of operations reflects the relatively stronger commitment observed on the Ugandan side for the implementation of the IBM systems training and capacity building (report 2C/3A, p. 23). Mirama Hill - Questions have been raised on the suitability of this OSBP, which needs to be validated during the performance stage of this evaluation in 2018 to provide an accurate assessment and determine whether the facility will be sustainable or run at excess capacity (report 2C/3A, p. 26).	strengthen learning opportunities (ibid. p.32)	
Overall assessment	It is reasonable to conclude that both KPA and TPA have benefitted from TMEA support to date. The principal benefits were at an operational level through joint working and sharing of good practices and new ways managing key port planning functions. In both the KPA and TPA changing strategic direction towards reform and modernisation has not yet been successful. OSBPs are considered highly relevant to the needs of the EAC, but in terms of their sustainability, there are certain concerns over sustainability of Busia and Mirama Hill, which need to be addressed and be further explored by Phase 2.	The conclusion from the output assessment of the SO2 projects is that the portfolio of projects has performed very well. TMEA must take a considerable amount of credit for making significant gains to economic integration in East Africa through support to the EAC and national institutions. TMEA has achieved some major breakthroughs in SO2 especially in areas such as the SCT and reducing NTBs. The EAC is the best performing of the Regional Economic Communities in Africa and TMEA has played a significant role here. However, SO2 projects suitability raises a concern given that some of them are dependent on TMEA funding and therefore need to consider the future without it. Learning from these projects also needs strengthening i.e. formal learning especially by improving project monitoring system.	The conclusion from the output assessment of the SO3 is like SO2: the portfolio of projects has performed well, and many projects are contributing to the outcomes of greater market access and trade, with some weaknesses on efficiency and sustainability. SO3 projects have delivered a range of different outputs to support business competitiveness including technical assistance to support traders and organisational strengthening of civil society and professional service organisations. These institutions are beginning to use their voice effectively to influence changes in NTB notification and economic integration issues. The weak performance of SO3 projects in relation to sustainability and learning seems to be characterised by the nature of the projects involved. Therefore, sustainability and learning should also meet this condition to ensure they are relevant and fit for purpose.

3.3. Evaluation Questions

This sub-section provides insights to inform answers to the evaluation questions based on the previous two sections.

Programme relevance:

DEQ5.3 To what extent does the programme support EAC regional trade development priorities? TMEA was originally set up to support the Protocol for the Establishment of the EAC Common Market (2009) and has been a demand level facility using the EAC Development Strategy (2011/2 and 2015/6) for providing the framework for TMEA interventions.

TMEA played a significant role in both responding to regional trade priorities of the EAC but also in raising the profile of the importance of improving the trade infrastructure in the EAC including OSBPs, port efficiency, NTBs and Standards (see p 38). Many issues as NTBs and Standards did not have national level policies before TMEA's engagement.

DEQ5.4 How have changes in policy and in the political economy in the region impacted on the programme or on its relevance?

There have been major changes in the political economy environment including instability in Burundi and South Sudan and the major change of political direction in Tanzania in November 2015. The relevance of TMEA is undiminished by the difficult political economy environment (see p 30-31) and understanding of the political economy has been a major success of TMEA in being politically networked but also being strong enough to resist political pressure (p 27-28). Risk assessment is a key part of TMEA operations. As per the report 2B Institutional and Organisational Assessment (p. 30) TMEA risk management tends to look at project- and investment-level risks. Corporate and enterprise-level risk management is less well developed, although some work on this has recently been undertaken.

DEQ5.5 Do TMEA interventions complement other ongoing initiatives (both government and private sector)?

Yes, there are good elements of complementarity with on-going Government initiatives under both SO2 and SO1. This includes government infrastructure initiatives on both the Northern and Central Corridors including the standard gauge railway and the CCTTFA (pp 19-20 and 27). This also applies to government initiatives on several National Bureaus of Standards and National Monitors of NTBs. Under SO3 there have been a number of initiatives to support business associations (see pp 26-27 and 31) and success has been more notable where the governments have been supportive of the private sector, notably in Kenya, Uganda, Rwanda, and Burundi.

Coherence and coordination

DEQ5.6 What are the strengths and weaknesses of the working model observed to date?

Expert reviewers consider that the existing TMEA institutional and organisational model has been broadly effective in successfully delivering the first TMEA strategy (report 2B Institutional and Organisational Assessment, p. 9). Despite several isolated areas for improvement, assessors identified no systemic flaws or failures (ibid.). The assessment team identified the mix of organisational elements and characteristics, which they consider supporting the functionality and effectiveness of the model. They reviewed the various organisational options, including those set out in Section 8.3.3 (p. 99) of Strategy II, and suggest that any future organisational model should be closely based on the existing model, suggesting retention of a Special-Purpose Vehicle (SPV) and a legally registered not-for-profit organisation. The assessors are of the opinion that the current model is appropriate for TMEA's mission, and that change 'for the sake of it' would be unnecessarily complex and expensive.

DEQ5.7 Is the complementarity and coordination between national and regional levels optimal throughout all programme components and activities?

A key strength of the TMEA model is the presence of country offices with national governance and steering through the NOCs.

TMEA has been able to adjust its national programmes according to policy developments in the respective countries (p19) and a key strength of TMEA has been its flexibility to operate according to the national priorities in each of the EAC countries as well as provide support to the implementation of the project activities including an influencing role with the recipient organisations.

Programme relevance:				
	It was noted in report 2D/2E that TMEA has been slow in updating national level strategies, noting the absence of an updated strategy for Tanzania since the significant change of policy direction of the new Government in 2015.			
DEQ5.8 To what extent does the TMEA model bring greater results than the sum of its parts? How could this be strengthened?	This analysis will be completed with updated poverty and trade analyses in 2018/19.			
DEQ5.11 Is the operational model at donor level appropriate and efficient for delivering TMEA? What are the key enablers which need to be preserved, and what are the remaining constraints arising from donors' systems?	The assessment team who undertook the institutional and organisational assessment (2B Institutional and Organisational Assessment) suggest that any future organisational model should be closely based on the existing model suggesting retention of a Special-Purpose Vehicle (SPV) and a legally registered not-for-profit organisation. They are of the opinion that the current model is broadly appropriate for TMEA's mission, and that change 'for the sake of it' would be unnecessarily complex and expensive. They suggested that investor (donor) relationship management would benefit from more regular engagement between donors, the Board and, the TMEA senior leadership team. An early meeting between TMEA management and donors was recommended, with the aim of finding a way to streamline donor reporting to reduce, where possible, the TMEA management and staff burden without compromising the quality or timeliness of the information provided to donors (report 2B Institutional and Organisational Assessment, pp. 54). But it is worth noting that the institutional and organisational assessors did not specifically review the relationships between donors and country teams. Interaction here tends to be at the level of the NOC and a review of NOC minutes suggests that relationships are functional but could be strengthened by improved communication and reporting. However, this finding is anecdotal and not based on a detailed assessment (report 2B Institutional and Organisational Assessment, p. 33).			
DEQ5.12 Did TMEA align with country systems and agencies in an effective manner for ownership, and for impact? How could this be strengthened?	As a demand led facility, TMEA aligned with country agencies and ministries of East African Cooperation where appropriate and engaged with civil society organisations under SO3. In pursuing an influencing agenda, TMEA supported many national agencies in support of trade enabling activities including trade logistics, OSBPs, NTBs and various National bureau of standards. It was recommended in report 2D/2E that more focus be given to SO3 project activities to be more closely aligned with the core TMEA mandate of trade enabling. SO1 and 2 projects are recognised as highly relevant to the local contexts according to reports 2D/2E and 2C/3A.			
DEQ5.13 Are the focus and activities of TMEA consistent with, and additional to, those of other's development programmes in the region? To what extent has the programme facilitated improved coordination?	TMEA operates as a multi-donor facility with the participation of the Governments of the UK, Finland, Denmark, USA, Canada, Belgium, and the Netherlands. TMEA is the main trade enabling facility for these development partners and there is particularly good cooperation and coordination with other major donors who are not part funders including the European Union. Evidence from Annual Reviews indicates good cooperation between donors, which includes agreement, for example by the Programme Investment Committee (PIC) to coordinate the annual review process to be jointly coordinated to reduce the risk of overburdening the programme with multiple reviews. There is evidence of good coordination with non-TMEA donors at the ports (BKD Consulting 2014). According to report 2C/3A (p.2), the TMEA strategic direction and focus on reform is consistent with the World Bank policy direction, as is clearly outlined in the Dar es Salaam Maritime Gateway Programme (DSMGP) Project Appraisal Document (PAD). It was also the intent of the Japan Internationl Cooperation Agency (JICA) support to continue terminal expansion at Mombasa.			

Programme relevance:

DEQ5.14 What sort of approaches have been more successful in working with regional institutions in Africa?

TMEA encountered resistance on several initiatives aimed at reduced trade costs and lowering external tariffs. This included import substituting stakeholders lobbying to maintain the status quo on the exceptions to the common external tariff, and a lack of government commitment to prioritise liberalisation for trade in services. (See p 38).

Report 2D/2E highlights the success of working with the EAC on SCT. TMEA must take a considerable amount of credit for making significant gains to economic integration in East Africa through support to the EAC and national institutions. This has been a slow process of building trust and the TMEA office in Arusha has been crucial in building relations. TMEA has achieved some major breakthroughs in SO,2 especially in areas such as the SCT and reducing NTBs. The EAC is the best performing of the Regional Economic Communities in Africa and TMEA has played a key role here.

Sustainability

DEQ5.17 What benefits (both social and financial) of the programme are likely to be sustainable and would continue with or without TMEA (staffing and funding)?

TMEA has raised (see p 40-41) the profile of trade among policy makers. Several TMEA activities, including the OSBP, were 'high-profile' and presented excellent public relations opportunities for senior politicians to 'show that they are delivering results' and can 'get things done'. By 2012, with more than 200 activities underway across a wide range of stakeholders, TMEA was viewed by many as the 'go to' agency for trade facilitation. This resulted from the close relationship between TMEA and the Ministries of Trade and East African Cooperation in Kenya where many of the donors managed their regional programs. In terms of impacts that will be sustainable in the long term without TMEA financing, the economic benefits of the support to ports and OSBP will only be sustainable if there is institutional reform and a move towards a landlordport model with competitive concessions. Without these in place, lessons and short term improvements are not likely to lead to significant performance improvements and cost reductions to port users (report 2C/3A, p. 3). In addition, report 2B Institutional and Organisational Assessment (p. 35) suggests there is a need to rapidly adapt structures, systems, and staff to align with the probable reduced-budget scenario for Strategy II that is critical to immediate financial sustainability.

DEQ5.18 What should be the essential components of a future exit strategy in order to sustain impact?

There are sustainability issues across all the strategic objectives of TMEA. It was noted that many of the recipient organisations had weak absorption capacity. While the sustainability of the institution supported may be recognised as weak from the outset, and whilst this should not be a barrier for TMEA engagement, there should be a greater ex ante understanding of the consequences of TMEA exit on the organisation and project with a clear articulation and design of an exit strategy for each project identified in the project document.

DEQ5.19 What is the likelihood that individual results and overall impact will be sustained after existing donors stopped funding, and that there will be a lasting positive impact on the poor?

To be addressed in the Performance Evaluation and the trade and poverty studies in 2018-2019.

DEQ5.20 How are stakeholders engaged through the programme and beyond its life, and how do they take TMEA lessons learnt into account?

Key government and EAC stakeholders have become engaged with TMEA on the understanding that it is not a time bound programme but long-term trade enabling project. TMEA has also had to play a major influencing role with the port authorities to ensure Government buy-in to SO1 activities (report 2C/3A, p.2). There is good engagement by several civil society organisations with TMEA. As highlighted in the Institutional and Organisational Assessment (report 2B), the 2016 TMEA Annual Review suggests (para. 75) concludes that **TMEA fails to contribute significantly to knowledge addition of what works and what doesn't work in the wider community**'. Over time, TMEA has developed a wealth of knowledge, which could add value to the wider development community

Programme relevance:

in East Africa and beyond. It is understood that TMEA is proposing to focus more resources on external communications when Strategy II is implemented. This will need to go beyond marketing messages to also involve the packaging of relevant learning information targeted at trade players and development organisations. The annual review suggests that non-confidential summaries of all evaluations could be prepared and made publicly available. The assessors (report 2B Institutional and Organisational Assessment, p. 44) support this suggestion but would also recommend the packaging and dissemination of learning captured through the new TMEA knowledge management system. Accordingly, the lessons learnt will inform the need for better internal practices, systems, and skills but also for wider understanding.

Annex A List of meetings and questionnaire for Trade Policy Analysis

Semi-Structured Interview Questions

- **Q.1** When TMEA was set up in 2010, please describe the key trade priorities for the EAC and the countries within the EAC?
- **Q.2** How did TMEA decide to prioritise their work activities at the outset? How has this evolved over time? (For example, literature review, consultations with key stakeholders (please identify), the development of the TOC and the implications of this for designing interventions).
- **Q.3** What would you see as the major changes in East Africa (and country level) trade policy priorities over the past 5-6 years? How do you see this evolving?
- **Q.4** Once TMEA began activities in 2010 (and onwards), how did TMEA ensure it remained responsive to developments at the country/regional level? Institutional mechanisms -country offices, establishment of country committees. Please provide examples of activities that were stopped/revised/increased in response to either difficulties/successes during implementation or changing government priorities.
- **Q.5** How does TMEA ensure their activities are complementary with other donor development programs across each of the three Strategic Objectives? How has this process evolved during Phase 1 and how do you see it working during Phase II?
- **Q.6** Given the size of the TMEA portfolio of projects do you think it has the potential to 'influence' or 'nudge' the trade agenda (prioritise actions) in East Africa? If you believe TMEA has 'influenced the agenda, please provide specific examples.
- **Q.7** Are there trade policy issues on which TMEA has not been able to mobilise support for reform?
- **Q.8** (With the caveat that we are not seeking to quantify attribution) to what extent has TMEA contributed to increased awareness and support for trade facilitation within East Africa? Are their specific programs (SPS, standards, NTB etc.) where TMEA activities (either at the country level or regionally) have been able to leverage the work of the EAC Secretariat and specific member states?
- **Q.9** Do you believe trade policy in East Africa has improved (become more open) during the period 2010-2017? If, yes, has this resulted in increased trade (within the region and between the region and the rest of the world)?
- **Q.10** How does TMEA respond/react to the changing political economy in East Africa? For example, civil unrest in South Sudan, the decline in the quality of governance in Burundi, and economic policy changes in selected countries. It would be useful to understand the magnitude of these changes and the dynamics (speed of change) as this has implications for programme management as well as effectiveness and impact.
- **Q.11** Are there any changes in trade policy, at the national or regional level to which TMEA contributed, or has been able to leverage towards realising reductions in trade costs? Has TMEA been able to take advantage of changes in the regional political economy to support regional integration and promote growth?

Annex B Trade Policy Mapping

B1. Trade Policy Mapping by country

Country	Burundi	
Trade policy players	 Ministry of East African Affairs Ministry of Commerce, Industry, Posts, and Tourism Burundi Revenue Authority 	
Trade policy documents	 National Plan for Investments in Agriculture (20122017) National Strategy for Development in Sustainable Tourism funded by UNDP Country Strategy Paper (20122016) AfDB 	
Relevant trade develo	ppment programmes	
USAID	Economic Growth and Trade Fostering economic opportunity is a strategy across many of our programs in Burundi. Partners provide economic incentives, such as vocational training and cash for work, as well as support for savings and loan groups and creating microenterprises. Through a partnership with the private sector in the coffee sector, we equip farmers with the knowledge, skills, and techniques to improve both quality and productivity.	
EU	The Country's economic and social development has been affected by the consequences of civil disorders erupting between 1993 and 2005 making Burundi a fragile state from the Great Lakes region. The country faces, in particular, a strong demographic growth (2.9%), a very high population density (~360 inhab/ km²) and a very low growth domestic product (GDP) per capita. More than 90% of Burundi's population depends on agriculture, which contributes for 35% to the GDP and is mainly based on subsistence farming. Furthermore, since the beginning of 2015, the country is gripped by a political crisis with security implications directly impacting the progress made since 2005. Since direct support to the Burundi Government and institutions were temporarily suspended in March 2016, the European Union chose to redirect a part of its aid to activities directly benefitting local population and civil society. In addition, the EU still finances ongoing activities but also initiates new development operations with the communities concerned, and supports humanitarian and emergency actions for the fight against poverty and for access to basic services. The National Indicative Programme (NIP) 2014 – 2020 under the 11th European Development Fund has set aside EUR €432 million for Burundi and outlined among the main focal sectors of the EU cooperation with the country: Support for Sustainable Rural Development Fundrition; Health; Energy.	
World Bank	The Burundi current portfolio is composed of 14 projects for USD \$371.8 million, which is one of the best performing programs in the Africa Region. The Bank continued to support the government's development program, including a programmatic series of development policy operations, investment lending, policy dialogue, economic and sector work and technical assistance. The World Bank also contributed to economic growth through agriculture rehabilitation, basic service delivery through public financial management and procurement reforms, peace consolidation, and job creation through programs of public works and reintegration of ex-combatants. Burundi Great Lakes Regional Integrated Agriculture Development Project (Source: World Bank website)	

Country	Burundi	
	The development objectives of the Great Lakes Regional Integrated Agriculture Development Project for Burundi are: (i) to increase agricultural productivity and commercialisation in targeted areas in the territory of the recipient and improve agricultural regional integration; and (ii) to provide immediate and effective response in the event of an eligible crisis or emergency. The project comprises of four components. The first component, smallholder productivity and production enhancement lays the foundation for sustainable intensification and diversification of rice, maize, and dairy production. This component will build capacity in maize, rice, and dairy producer Organisations (POs) by training their members, and it will ensure that POs are legally registered to facilitate access to rural finance and linkages with suppliers or traders. The second component, support to investments in agro-processing and market linkages seeks to enhance productivity and profitability for smallholder farmers and for small- and medium-scale agro-processors by strengthening their capacity to reduce post-harvest losses, promoting increased value addition, and facilitating access to markets. The third component, institutional integration, knowledge acquisition, and dissemination of information at the regional level will support regional exchanges of information, knowledge, and technologies through (among other channels) the establishment of a web based exchange platform; specialized training and exchanges on priority themes for some 300 scientists, technicians, or extension workers, creating communities of practice; and degree training on priority research themes for the targeted value chains (with the completion of at least 3 PhD and 9 MSc degrees). The fourth	
JICA		
Other donors		

Country	Kenya		
Trade policy players	 Ministry of East African Affairs Ministry of Trade Kenya Bureau of Standards Export Promotion Council Kenya Revenue Authority Kenya Ports Authority 	 Kenya National Chamber of Commerce and Industry Kenya Private Sector Alliance Kenya Manufactures Association Federation of East African Freight Forwarders Kenya Plant Health Inspectorate Service (KPHIS) Cross-Border Traders Associations 	
Trade policy documents	Vision 2030Medium Term Implementation PlansNational Trade Policy	International trade policy (draft)National Export Development StrategyTourism Development Strategy	
Relevant trade development programmes			
USAID	USAID works closely with the Government of Kenya to implement activities that promote increased trade. USAID's Trade and Investment Hubs are designed to reinforce regional and bilateral efforts to strengthen Africa's economic competitiveness and assist countries to take greater advantage of the trade opportunities provided by the African Growth and Opportunity Act (AGOA) and other global trade initiatives. The Trade and Investment Hub programs include trade capacity building, improvements to the private sector enabling environment, better market access and opportunities, trade facilitation, food security programs, and export promotion support for African products. COMPETE in Kenya Key achievements and ongoing activities in Kenya include:		

Country	Kenya		
	- Installed and operationalised Revenue Authorities Digital Data Exchange (RADDEx), an IT program that increases communication between customs agencies at two border posts: Malaba (Kenya/Uganda), Busia (Kenya/Uganda). RADDEx was cited in the 2010 World Bank "2010 EAC Doing Business Report" as a success in strengthening customs coordination.		
	- Supported accession of Kenya, Burundi, and Tanzania to the Kyoto Convention on Customs.		
	- Worked with Kenya Bureau of Standards, the EAC, COMESA, and the private sector to harmonise regional standards for 22 staple foods including maize, wheat, rice, beans, millet, and similar grains.		
	 Catalogued and published the geocoded locations of existing staple food warehouses in Kenya and Uganda on www.eastafricancorrdiors.org, providing commodity quality and quantity information needed for national and regional staple foods balance sheets. 		
	 Assisted the National Cereals and Produce Board of Kenya to develop Warehouse Receipt Systems legislation and warehouse certification guidelines needed for structured regional trade. 		
	- Launched a new agricultural finance certificate program with the Kenya School of Monetary Studies that will train and certify East African bankers in agricultural lending and warehouse receipts Established a Certificate in Agricultural Insurance with the Kenya College of Insurance and the EAC to train regional insurance industry and financial institutions on agricultural risk mitigation options like weather index insurance.		
	 Currently implementing innovative Purchase Order Finance Pilot Program with United Bank for Africa and Equity Bank to allow small and medium enterprises working in target value chains to use orders as collateral for working capital loans. Women in Business including Cross Border Traders 		
	Small businesses in Kenya are challenged by the lack of essential business support services, especially financial services. Two thirds of Kenyans do not have access to basic financial services such as bank accounts. Due to the prominent role of agriculture in Kenya's economy, USAID's activities to strengthen the agricultural sector play an important role in reducing poverty and encouraging broad-based growth. In addition, USAID supports the growth of microenterprises, especially in rural and agricultural areas.		
	The European Union spends about 100 million euros per year on Development Cooperation that directly benefits Kenya, mainly funded from the European Development Fund.		
	Together, the European Union and its Member States are the biggest suppliers of development assistance to Kenya. Based on Kenya's development strategy Vision 2030, the following sectors of concentration have been identified as priorities for European Commission funding:		
	Food security and resilience to climatic shocks		
EU	Sustainable infrastructure		
	Accountability of public institutions It should be noted that Karus to gother with Divardo signed the EDA, which no gotieted between EAC and EUM in June 2015 and		
	It should be noted that Kenya together with Rwanda signed the EPA, which negotiated between EAC and EUM in June, 2016 and subsequently ratified by Parliament before the deadline set by the EU, while the other 3 Partner States of Tanzania, Burundi and Uganda are yet to sign. Kenya stood to lose a lot from her duty free access to EU market for her flowers and fresh vegetables. In addition the EU provides some funding to Kenya for other crosscutting activities, such as support to strengthen the National Treasury's role as the national authorising officer of development funding for the country. And Kenya also receives funding from various other EU programmes that address particular topics at a regional (multiple country) or global level.		
	programmos that address particular topios at a regional (mattiple sountry) or global level.		

Country	Kenya
World Bank	The current International Development Association (IDA) portfolio amounts to nearly USD \$5.5 billion in 27 national projects (\$4.2 billion) and six regional projects (\$1.3 billion). The projects are mainly focused in the areas of transport, devolution, energy, water, urban, health, public sector management and social protection.
JICA	Trade and Industry Promotion The program is to focus on the SMEs promotion by their training, and the promotion of "One village One Product" for local industrialisation in terms of more competitive product development for export promotion. JICA Projects Trade Training Program for SME exporters (Phase 2) Project for Improving OVOP Services Project on Productivity Improvement Private Sector Development Industrialisation through trade and investment promotion, employment creation and income generation are crucial for poverty alleviation through economic growth. The Government of Kenya aims at industrialisation in Vision 2030 and promotes local industrialisation Japan's Assistance Policy Japan will support SMEs development for achieving poverty alleviation and economic growth through industrialisation and export promotion Program on Improvement of Regional Transport Infrastructure (Kenyan Component) The program is to improve facilities and functions of Mombasa Port and regional trunk roads starting from the Port, and support streamlining the customs procedure in order to enhance the trade in the entire East African region.
Other donors	

Country	Rwanda		
Trade policy players	Ministry of East African Affairs and TradeRwanda Revenue Authority	Private Sector FederationSector associations such as manufacturers, exporters etc.	
Trade policy documents	 National Trade Policy Rwanda National Export Strategy (NES) Cross Border Trade Strategy EDPRS II 	PSD StrategyMarket Entry StrategiesRwanda Standards Board Strategic planCapacity Building Needs assessment	
Relevant trade development programmes			
USAID	USAID is also helping Rwanda benefit from regional trade within the East African Community, by improving trade facilitation policies, increasing the competitiveness of Rwandan products and upgrading infrastructure at border posts. As a landlocked country, efficient and effective trade with neighbors like Uganda, Tanzania, and the Democratic Republic of Congo will be essential if Rwanda is to meet its goal of becoming a middle-income country by 2020. USAID support resulted in a 46% reduction in time for goods to clear customs; 64% reduction in export release time; and a USD \$225 reduction of import cost per truck. USAID works closely with the Government of Rwanda to implement activities that promote increased trade. USAID's Trade and Investment Hubs are designed to reinforce regional and bilateral efforts to strengthen Africa's economic competitiveness and assist countries to take		

Country	Rwanda
	greater advantage of the trade opportunities provided by the African Growth and Opportunity Act (AGOA) and other global trade initiatives. Through the East Africa Trade Investment Hub (EATIH), USAID facilitated the development of the Rwanda AGOA Action plan in 2016. The EATIH programs include trade capacity building, improvements to the private sector enabling environment, better market access and opportunities, trade facilitation, food security programs, and export promotion support for African products.
EU	
	The World Bank portfolio is currently comprised of 10 national projects with net commitment of USD \$ 844.35 million, and six regional projects with a national commitment of USD \$204 million.
	The Lake Victoria Transport Project (LVTP) will help improve the efficient and safe movement of goods and people along the regional corridor from the border crossing at Rusumo to the border crossing at Nemba and Rusizi together with upgrades to road asset management and road safety in Rwanda.
World Bank	"LVTP is expected to provide better access to rural communities living alongside the road corridor that rely almost exclusively on agriculture and livestock for their subsistence,"
WOIIU Balik	This project is the first project in a series of three, in Rwanda, Tanzania and Uganda, they are part of the Lake Victoria Transport Program. It will be prepared under the Integrated Corridor Development Initiative in the East Africa Community countries.
	The Ngoma Nyanza road is an important extension to facilitate more efficient freight movements of cargo and passengers within the country and across countries, especially from Tanzania to Southern Province of Rwanda as well as Burundi and the Democratic Republic of Congo. The project will stimulate new jobs and income earning opportunities to the people in Ngoma, Bugesera and Nyanza districts through upgrading and maintenance works as well as downstream development activities generated along the corridor as a result of the improved access
JICA	
Other donors	

South Sudan		
Ministry of Foreign Affairs also covering East African Affairs with a Minister to be appointed		
 National Development Dev Plan (20112013) Interim Country Strategy Paper (20122014) AfDB S S National DevPlan(20112013) Interim Country Strategy (2012203) AfDB UNDP Country Programme Paper (July 2016-Dec2017) 		
Relevant trade development programmes		
USAID has rehabilitated hundreds of kilometers of roads and built bridges across South Sudan, including the major transport route from Juba to Nimule, the Ugandan border crossing. In 2012, USAID completed construction of the Juba Nimule road the largest infrastructure project ever built in South Sudan and the young nation's first paved highway. Juba Nimule Road On February 10, 2011, USAID launched the final stage of building the 192-kilometer Juba Nimule Road, the start of tarmacking what will be southern Sudan's first highway—the only paved road outside major towns. The project is funded by USAID in close cooperation with the		
1		

Country	South Sudan	
	Government of Southern Sudan (GOSS) Ministry of Transport and Roads and aims to strengthen development and bolster economic growth in southern Sudan. USAID has rehabilitated hundreds of kilometers of roads and has built bridges across South Sudan, including the major transport route from Juba to Nimule, the Ugandan border crossing.	
EU		
World Bank	World Bank Group Projects mostly support humanitarian assistance	
JICA	JICA's interventions. (see JICA's interventions in Tanzania)	
Other donors	 HARISS (20142020) GBP 433,881,855 SS Health Pooled Funds GBP 112 mill Building Resistance to Climate Change GBP 109,895,365 Girls Education 	

Country	Tanzania		
Trade policy players	 Ministry of East African Cooperation Ministry of Trade and Industry Tanzania Revenue Authority Tanzania National Bureau of Standards 	Tanzania Ports AuthorityBoard of External TradeTanzania Private Sector Alliance	
Trade policy documents	 National Five Year Development Plan, 2016/17to 2020/21 NTP 2009 and currently under review Second Five Year Dev Plan 2016/172020/21 Trade Policy and Transport costs Tz Overview of progress and policy challenges The National Investments Policy 2009 currently under review Tz Industrial Policy Execution and big challenges Trade 2013, SIDA 	 National Investments and Promotion Policy WB Tz DTIS 2016 URTz Agricultural Marketing Policy Long Term Perspective Plan 2011/122025/26 Tz Country Strategy Paper (AfDB) Regional Trade Policy Options for Tz UNDP Tz Country Report (Annual series) 	
Relevant trade develo	Relevant trade development programmes		
USAID	Economic Growth and Trade USAID/Tanzania takes a multifaceted approach to building inclusive, broad based economic growth that includes improving agricultural productivity, spurring investment in the energy sector, preserving natural resources and biodiversity, and filling the unmet need for family planning services. Furthermore, by ensuring women and youth can take advantage of opportunities in these sectors, these efforts work toward reducing extreme poverty and sustaining economic growth well into the future.		
EU	The relations with Tanzania have evolved around historical links and decades long traditions of development cooperation but are dynamically expanding into areas of trade and investment, as well as in the regional political and security agenda. Peace and stability along the shores of the Indian Ocean and in the African Great Lakes region are shared foreign policy priorities. The EU's main objectives concerning Tanzania are:		

Country	Tanzania	
	To support Tanzania's further political and social democratisation; and	
	 To advocate a pro-poor growth agenda and better economic governance and business climate; and to encourage Tanzania's continued involvement in regional economic integration processes as well as political and security initiatives that contribute to the consolidation of regional integration, peace and democracy in the region. 	
	The National Indicative Programme agreed between the EU and Tanzania for the 2014-2020 period, foresees funding worth EUR € 626m for good governance and development, energy and sustainable agriculture. The Economic Partnership Agreement agreed in October 2014 between the EU and the members of the East African Community, including Tanzania, is open to signature and ratification.	
World Bank	The World Bank Group's current portfolio in Tanzania includes 25 operations with a commitment of nearly USD \$3.95 billion, most of which is allocated to transport. In addition, the country benefits from six regional projects. The WBG also supports analytical and technical assistance activities to complement projects and program	
JICA	In the Trade, Infrastructure and Private Sectors interventions to the sector are fivefold: first, providing policy advice to the Ministry of Industry, Trade and Investment (MITI); second, improving business environment and job creation through general budget support; third, developing local potential industries through development of industrial clusters; fourth, strengthening the support for quality and productivity improvement of manufacturing enterprises through KAIZEN approaches; finally to open up opportunities for young future leaders in Tanzania by providing Master's degree and internship programs in Japan through the ABE (African Business Education) Initiative, which was launched at the Fifth Tokyo International Conference on African Development (TICAD V) in June 2013. More than 60 young Tanzanians had studied a Master's degree program in Japan as of May 2016 under the ABE Initiative. Transport: Further enhancing the countrywide transport network and decongestion of Dar es Salaam as a gateway to the regional economy.	
	JICA interventions are: (i) enhancing the national transport network which covers all the transport modes including road, railway and port in terms of infrastructure development and rehabilitation (e.g. central railway rehabilitation, trunk road upgrading and construction and operationalisation of the One Stop Border Post), thereby strengthening the key strategic international corridors; (ii) improving urban transport in Dar es Salaam to alleviate congestion since the 1980s (e.g. namely Selandar bridge, Kilwa Road, New Bagamoyo Road, Tazara Flyover) while supporting urban transport master plan formulation and inter-ministerial coordination mechanism development; (iii) assisting capacity development relating to rural road maintenance and development through technical cooperation including promotion of Labor Based Technology (LBT) which is able to provide road improvement and job creation at the same time.	
Other donors		

Country	Uganda		
Trade policy players	 Ministry of East African Affairs Ministry of Industry and Trade Uganda Revenue Authority Uganda Export Promotion Board Uganda National Bureau of Standards 	 Uganda Manufactures Association Uganda National Chamber of Commerce Private Sector Alliance Association of Fresh Produce Exporters 	
Trade policy documents	Uganda National Trade Policy, 2007National Standards and Quality Policy	 Buy Uganda build Uganda Policy, May 2014, and National Export Development Strategy, 2015/16 to 2019/20 	
Relevant trade develo	pment programmes		
USAID	Economic Growth and Trade Building Uganda's capability to mitigate the environmental impacts of oil exploration and production is a priority. Our ecotourism programs provide local communities opportunities to develop tourism businesses and services that will enhance communities' connection to Uganda's natural resources, which will reduce threats to biodiversity and protect the country's diverse landscapes.		
EU			
World Bank	Regional Trade Facilitation Project Uganda From April 2001 to June 2013. Total cost, USD \$ 60 mill, Committed USD \$ 20 mill. While performance of the regional trade facilitation project for Africa is satisfactory, the project has fallen short of its potential due to the restrictive capital structure of the Africa Trade Insurance Agency (ATI) and a misalignment of products offered by ATI with market requirements. Three changes are proposed: (i) capital restructuring of ATI; (ii) expansion of product lines offered; and (iii) consolidation of the existing individual IDA projects under a single project number. These modifications (i and ii) will help solidify ATI's capacity to deliver on its mandate to facilitate productive trade and investment for member states while the third proposed change (iii) will realign World Bank processes to ensure a regional approach to development		
JICA			
Other donors			

B2. Regional Projects

World Bank Group

EAC Financial Sector Development and Regionalization Project I

This Project Paper seeks the approval of Executive Directors to provide Additional Financing (AF) for the East African Community (EAC) Financial Sector Development and Regionalisation Project I (P121611-FSDRP I). The original project was an IDA grant in the amount of USD \$16 million equivalent approved by the Board on January 31 2011. The proposed AF seeks USD \$10.5 million over a three-year implementation period, so the project will have had a cumulative life of 8 years and 8 months when it closes on September 30, 2019. In addition, this Project Paper includes a restructuring to (i) revise the results framework; (ii) revise disbursement estimates; and (iii) carry out changes to components and costs.

In 2014, The World Bank provided USD \$1.2 billion to support infrastructure development and improve the competitiveness of the East African Community (EAC) states. In addition, through IFC and MIGA, the World Bank Group will provide additional resources for regional infrastructure through market-driven private sector financing and guarantees. The financing will contribute to the EAC states' planned investments in the next three to seven years. This support is additional to large ongoing individual country programs.

"We are partnering with the EAC governments, other development partners and the private sector to invest in regional infrastructure and to help deepen policy integration and reduce barriers to trade in the EAC," said the World Bank Country Director for Burundi, Tanzania and Uganda, during the EAC Heads of State retreat in Nairobi. "We are preparing investments to revive the region's inland waterways on Lakes Victoria and Tanganyika, and to enhance the capacity and efficiency of the two main EAC ports on the Indian ocean: Dar-es-Salaam in Tanzania, and Mombasa in Kenya. We will also invest in specific transport links to better connect landlocked countries (Burundi, Rwanda, Uganda and South Sudan) to the Northern and Central corridors, this way improving these countries' access to the ports of Mombasa and Dar-es-Salaam."

World Bank Group portfolio in the EAC

The World Bank is already supporting the EAC's regional integration agenda with investments of USD \$2.3 million in 17 regional projects in priority sectors. These include roads, railways, energy, information and communications technologies, finance, trade, health, agriculture, livestock development and health.

IFC presently has a portfolio of over USD \$1 billion in EAC countries. Project support sectors include agribusiness, finance, infrastructure, manufacturing, services, and telecommunications. IFC's infrastructure portfolio in East Africa includes investments in Kenya Power and Lighting, Thika Power and Gulf Power in Kenya; and the Bujagali Hydropower Project and Umeme in Uganda.

MIGA's portfolio in the EAC includes 11 projects, amounting to a gross exposure of USD \$550 million. MIGA's support for the energy sector is particularly noteworthy and includes guarantees for the Gulf, Thika, Triumph, and OrPower 4 independent power producers in Kenya; KivuWatt Ltd. in Rwanda; and Bujagali and Umeme in Uganda.

The Bank Group is also using its knowledge resources and experience to assist the EAC member countries in analytical work and policy reforms that are critical to unleashing the region's growth potential and increasing its global competitiveness in trade and investment.

1(ii) WASHINGTON, September 25, 2015—About 80,000 traders and their families in Africa's Great Lakes Region whose livelihoods depend on cross-border trade will benefit from greater food security, more jobs, and an overall increase in welfare as a result of the USD \$79 million International Development (IDA)* grant and credit approved today by the World Bank Group's Board of Executive Directors.

Today's financing will support the Great Lakes Trade Facilitation Project, which is designed to reduce the costs faced by traders, the majority of whom are small-scale and women traders, in the surrounding borders of the Democratic Republic of the Congo (DRC), Rwanda and Uganda. It will help to develop regional markets near border crossings and facilities to handle an increased flow of goods, services, and people, as well as provide resources to strengthen government agencies at the border to deliver high quality and efficient services.

This project is the first project in a series of three, in Rwanda, Tanzania and Uganda, they are part of the Lake Victoria Transport Program. It will be prepared under the Integrated Corridor Development Initiative in the East Africa Community countries.

"Regional approaches to trade facilitation are critical to leverage national efforts," said Makhtar Diop, World Bank Group Vice President for the Africa Region. "The three Great Lakes countries included in this project share similar challenges that must be tackled through collective action, and borders are the solution provided they are safe and enable traders to do business in a conducive environment."

For many communities in the DRC, Rwanda and Uganda, key markets are situated across the border and informal cross-border trade plays a major role in linking small producers to markets. Border crossing points, such as Petite Barrière in Goma, DRC which averages 20,000 to 30,000 crossings a day, can become major bottlenecks for traders trying to reach potential buyers.

"We are pleased that our two countries have been trading with one another for a long time, which can help forge peace, stability, and security in the Great Lakes Region," said Madame Nefertiti NGUDIANZA BAYOKISA KISULA, the Minister of Trade for the DRC and Monsieur Francois KANIMBA, the Minister of Trade for Rwanda in a joint communique. "We welcome the prospect of our countries becoming a part of the Tripartite Free Trade Area (TFTA) COMESA-EAC-SADC and the development of the Great Lakes Trade Facilitation Project."

The funds approved today will go toward improving core trade infrastructure and facilities to provide efficient and secure traffic flows of pedestrians, passengers, and commercial vehicles at border crossing points. It will also improve security of small-scale traders, through separate lanes for pedestrians, lighting and cameras, as well as provide warehouses so traders can safely store their goods. These improvements will help reduce the time it takes to move across borders and conduct business activities allowing traders to take multiple trips a day and increase their incomes.

"Today's project will help support regional stability by improving livelihoods in border areas, facilitating cross-border trade and strengthening economic interdependence through connective infrastructure, policies and procedures," said Anabel Gonzalez, Senior Director for Trade & Competitiveness at the World Bank Group.

Infrastructure improvements at the border will be accompanied by better border management and governance and better trained officials. This is particularly important to small-scale traders, and especially women, who are often victims of harassment and physical violence and are forced to pay bribes.

Women are key to boosting trade and prosperity, and their ability to do so safely is paramount. Therefore, the project will promote functioning mechanisms for

addressing complaints and resolving disputes, increase safety and reduce the scope for harassment at the border.

The Great Lakes Trade Facilitation Project follows a promise made in 2013 by World Bank Group President Jim Yong Kim during a visit to DRC, Rwanda and Uganda with UN Secretary-General Ban Ki-moon to support peace, security and economic development in the Great Lakes. During the visit, Kim pledged USD \$1 billion in additional funds to improve health, education, nutrition, job training and other essential services in DRC and the wider Great Lakes region.

1(iii) May 25, 2017— The World Bank today approved an USD \$81 million International Development Association (IDA)* credit to support Rwanda's transport sector.

The Lake Victoria Transport Project (LVTP) will help improve the efficient and safe movement of goods and people along the regional corridor from the border crossing at Rusumo to the border crossing at Nemba and Rusizi together with upgrades to road asset management and road safety in Rwanda.

The EIF programme supports the Government's vision for national development building institutional capacity to develop and implement key policies, strategies, regulatory frameworks and trade reforms. Through the analytical diagnostic trade studies funded through the EIF and other donors, trade priorities promoting job opportunities, increases in incomes and rural development feature strongly in the Economic Development and Poverty Reduction Strategy (EDPRS II 2013 2018). Key sector strategies for the implementation of the EDPRS II have also incorporated trade priorities, including the Strategic Plan for the Transformation of Agriculture in Rwanda Phase III; Infrastructure (Energy, Transport UrbaniSation and Rural Settlement); Financial Sector Development; Private Sector (Small- and Medium-sized Enterprises, Tourism and Manufacturing); Education; and, importantly, the National Cross-Border Trade Strategy (2013-2018). These have been instrumental in drawing in development partners' financial support and the Government's commitment to ensure that the strategic documents are effectively implemented to enable policy reforms and development impact. The incorporation of the EIF programme in the Ministry of Trade and Industry (MINICOM) has been at the heart of quickening the pace of progress.

The Single Project Implementation Unit (SPIU) set up at MINICOM with EIF support focuses on ensuring synergies and sustainability for externally funded projects and coordinates other donor funded projects relating to Aid for Trade (AfT) and investment. In addition to the EIF, the SPIU is funded by the World Bank, the

International Fund for Agricultural Development, the African Development Bank (AfDB) and UNIDO. In terms of joint donor initiatives, the EIF has joined hands with the European Union (EU) to improve market access, and with TradeMark East Africa (TMEA), the World Bank and AfDB on transport, market infrastructure and trade logistics. Additionally, the Rwanda Trade Logistics and Distribution Services Strategy has been supported through the SPIU, together with the United Kingdom's Department for International Development as the EIF Donor Facilitator and TMEA.

Cross border trade (CBT) directly benefits the poor and can be a driver for regional peace and key to regional trade integration. Informal CBT accounts for a considerable proportion of Rwanda's regional trade, with exports estimated at USD \$108.3 million in 2015 and imports of USD \$22 million. This is a very different trade balance compared to the formal sector, where Rwanda runs a trade deficit.

Rwanda has 53 border crossing points, and 36 of these are informal ones. Through the National Cross Border Trade Strategy, the Government plans to build markets around border areas to help facilitate CBT. In this framework, the EIF funded feasibility studies for CBT market infrastructure, which were completed with detailed designs for six districts bordering three other EIF Countries (Burundi, the Democratic Republic of Congo (DRC) and Uganda).

Building on this groundwork, an EIF funded project was launched to improve the cross-border business environment as envisioned in the Strategy, by addressing the institutional mechanisms, trade-related capacities and the strategic trade support infrastructure. The project has the overall objective of improving the livelihoods and the earning potential of those engaged in CBT in Rwanda, of which 74% are women, and 90% of these women traders rely on CBT as their sole source of income.

Through the EIF project and with TMEA support, MINICOM has established the CBT Coordination Unit to coordinate and implement the National CBT Strategy and ensure mainstreaming of CBT into national programmes. The Unit has been institutionalised and integrated into the Trade and Investment Development Division of MINICOM to ensure the CBT projects' continuity beyond the projects' end phase. Plans are also underway to consolidate all various CBT projects under development under the combined CBT programme in Rwanda, to be coordinated by the Unit. As such, the Unit is developing a management model for the market centres, while the Government is encouraging cross border traders' cooperatives to organize themselves into strong institutions to be able to carry forward this agenda to future generations.

This programmatic approach is also intensively leveraging development partners' support for CBT initiatives. The EIF project, which is being implemented together with TMEA support, has set the stage and triggered additional investments that have paved the way for significant resources to develop CBT in Rwanda. Support already mobilised includes USD \$26 million from the World Bank and USD \$6.7 million from TMEA, UN Women and the New Partnership for Africa's Development. Other partners including the Common Market for Eastern and Southern Africa (COMESA); the AfDB and the EU are exploring options for supporting this key area. Even with the EIF project itself, the Government of Rwanda through the Local Administrative Entities Development Agency and district authorities are contributing more than a third of the project costs with initial commitments of USD \$1,600,154 (US\$978,877 from the Central Government and USD \$621,227 from District Administrations) alongside the EIF's contribution of USD \$3,485,870.

These market centres are being built with the ownership of local leaders, thereby strengthening the public private partnership amongst the trading countries along the common borders, facilitating revenue collection and contributing to the elevation of informal activities into formal business. With EIF support, the construction of market centres on the borders of Uganda (at the Cyanika border post) and of DRC (in Karongi on the shore of Lake Kivu) are now underway. The World Bank through the Great Lakes Trade Facilitation Project is establishing further CBT markets on the borders of DRC and Rwanda to reduce the costs faced by traders, the majority of whom are small-scale and women traders. TMEA is currently funding the construction of two further cross-border posts, one in cooperation with COMESA, while the Government has already financed the construction of a CBT market in Nyarunguru.

Through their concerted focus on CBT, Rwanda is striving to achieve the target of 28% of export growth as underlined in the EDPRS II through promoting regional trade. In line with the Vision 2020 development goals, the Government of Rwanda also continues to aggressively pursue a reform agenda focusing on enhancing the attractiveness of the country as an ideal investment location, promoting trade and entrepreneurship as well as laying a firm foundation for industrial growth and development. The EIF programme will continue to support resource mobilisation efforts to facilitate export promotion and access to regional and global markets. Rwanda's CBT story is reflective of how the LDCs have assumed the responsibility of "trade, not aid", connecting peoples' aspirations into reality. There is an energetic pull to the prosperity agenda in Rwanda that has counted on EIF backing to build high-levels of engagement, resource mobilisation and commitment from the government, the private sector, civil society, development partners and communities countrywide. Making trade easier for cross-border traders through

organised border markets, storage infrastructure, improved border logistics, access to finance, improved border security is leading to long-term change for border communities.

EU/COMESA

In May 30, 2017, The European Union signed two Financing Agreements for a total amount of 68 million Euros to finance implementation of two programmes in the COMESA region. These are; Trade Facilitation programme (53 million Euros) and Small-Scale Cross-Border Trade programme (15 million Euros).

The Ambassador of the European Union to Zambia and Representative to COMESA, and COMESA Secretary General, signed the two agreements.

The funds are part of the COMESA specific envelope of 85 million euros provided by the European Union under the 11th European Development Fund (EDF) Regional Indicative Programme for the East African, Southern African and Indian Ocean (EA-SA-IO) region signed in June 2015 for the period 2014 – 2020.

The trade facilitation programme is meant to reduce the cost of doing business and moving goods in the COMESA region. The programme has identified five key priority areas for support, namely; monitoring and resolution of Non-Tariff Barriers (NTBs); implementation of the World Trade Organisation – Trade Facilitation Agreement; coordinated border management and trade and transport facilitation along selected corridors and border posts.

Others are the implementation of harmonised, science based Sanitary and Phytosanitary (SPS) and Technical Standards and support to trade negotiations/promotion covering trade in services, free movement of persons and trade negotiations.

The beneficiaries of the programme will primarily be the Member States of COMESA and the private sector/traders in the COMESA/Tripartite region, with the COMESA Secretariat playing a coordination and facilitation role.

The programme on small-scale cross-border trade aims at increasing the formalisation of informal cross-border trade and enhancing trade flows leading to higher incomes for small-scale cross border traders.

This is being done through simplifying the Certificates of Origin, Customs document and addressing harassment of small-scale cross border traders at the borders. The programme has identified five key areas of support. These include the implementation of specific trade facilitation rules and instruments at selected border areas, so as to reduce the cost and time for crossing borders by small-scale traders.

The others are the reduction of corruption, bribery and harassment (including gender-based violence) at selected border areas; support to Cross-Border Traders Associations (and similar business associations), so as to effectively defend the interests of traders and deliver good quality support services; data collection/management/dissemination and research on ICBT, to increase evidence based knowledge and inform trade policy-making processes at national and regional level; and the building/upgrading of border infrastructures at selected border areas.

The beneficiaries of the programme will be primarily small-scale traders (in particular women traders) regularly crossing borders in the COMESA/tripartite region to sell and buy goods, as well as the associations who represent them and defend their interest.

P019: Targeted Support to COMESA Secretariat to Enhance its Regional Trade Integration Agenda

Under this project funded by EU and Implemented by COMESA, the component below will support Cross Border Women traders and Women and Youth in Business as detailed below.

The COMESA Treaty in Articles 154 and 155 address gender issues with the view to ensure meaningful participation of women in the regional economic and trade integration process which are crucial factors to achieve the desired sustainable and inclusive development in the region. Women and men in the economy are workers, producers, traders, consumers, tax payers and users of public services at all levels with a varying degree depending on their needs and socio-economic status. Trade, on the other hand, has different aspects including trade liberalisation, which is the core business of COMESA and has various impacts on women and youth.

Under this component, the following outputs should be realized at the end of the project:

- Trade professionals develop stronger programming skills in the areas of mainstreaming women and youth traders in COMESA's regional trade integration agenda.
- COMESA On-line Trade and Gender training module and planning guidelines developed and installed

- Comprehensive support framework for women and youth small scale cross border traders developed.

Mainstreaming gender / women and youth in COMESA's regional trade integration

In the COMESA region, a significant number of studies pointed that gender disparity is prominent, informed by the socio economic as well as cultural environment of women and men in the region. In the economic sector, women as producers and/or traders do not usually yield the required outputs to expand their businesses. This happens due to their limited access to resources including finance, different opportunities and inadequate knowledge and information of specific sectors. For instance, in the services sector, in most of the COMESA countries, women's participation in the sector is at the lower level of meeting basic needs.

Studies also pointed out that in most of the cases, trade policies do not primarily take into account the gender dimension as it ought to be. This contributes to unfavorable policy and legal environment, limited gender disaggregated data in trade sector, inadequate gender analytical skill among technocrats and mindset challenges to integrate women's concerns in the mainstream, inadequate institutional or systematic support for empowerment of women and youth in the business communities. The conventional approach of developing trade policies and programs is often overlooking the differential effects of trade policy and regional trade agreements on women and men.

To ensure addressing the varying needs and interests of women and men including youth in the trade sector, it is necessary to strengthen the analytical skills of trade specialists. Trade experts in COMESA region should be able to interrogate a given situation using gender analytical frameworks such, inter alia, as measuring access to assets by women and men, existing practices and level of participation of women, men and youth, institutional response to their needs and concerns, and law and policy environment.

The Thirty Fourth Meeting of the Council of Ministers (Addis Ababa, March 2015) endorsed the decision of the Eighth Meeting of the COMESA Ministers Responsible for Gender and Women Affairs on the need to mainstream gender in all programmes including trade. The Council decided that:

- i. All Divisions, Units and Programmes should ensure that gender is mainstreamed at all levels of programming, from design to evaluation; and
- ii. "The Secretariat's statistical office should disaggregate statistical data wherever possible "

In addition, the Ninth Meeting of Ministers responsible for Gender and Women's Affairs held in Livingstone, August 2016 passed a decision on the same matter emphasising a sustainable training mechanism. Their decision was presented for endorsement to the Thirty Sixth Meeting of the Council of Ministers, which took place mid-October 2016 in Antananarivo, Madagascar. The Ministers' Decision on "Professionals at Secretariat and member States to undertake the course once available, and apply the knowledge in programming" reads: "The Human Resources Unit at Secretariat should make the trade and gender online training mandatory for every professional staff in the Secretariat"; and also "Secretariat should communicate to Member States once the Trade and Gender module is finalised and the on-line course is ready". To realise the above Council decisions, the Secretariat, through the support of this project, will develop the on-line COMESA Trade and Gender module that can be accessed by trade professionals in the Secretariat and at member State levels. Additionally, the Secretariat should also include the development of gender planning tools with checklists and indicators as well as providing training on the tools once they are finalised to the COMESA staff involved in the regional economic and trade integration process to ensure the mainstreaming of women and youth in the regional trade.

To that end, the project will support the gender and youth mainstreaming process through the following:

- a. To develop and install a COMESA on-line trade and gender training module and planning tools in the Secretariat;
- b. To strengthen institutional and policy support for women and youth small scale cross border traders; and
- c. To formulate a framework for women and youth mainstreaming in intra-regional trade and make it available to trade practitioners in the Secretariat and in the Member States.

Japan International Cooperation Agency (JICA)

In recognition of the need for facilitating integrated, efficient and cost effective transport systems along the EAC Corridors, the Government of Japan, through JICA, accepted the request made by the East African Community in May, 2014, to support the rehabilitation of the Tengeru-Holili road section, affirmed Dr. Bukuku, adding that "the current constructions cover only 14.1km out of the envisaged 22.3km to Usa. This means that there is a gap of around 8.2km to be upgraded to dual carriageway."

JICA has a Project on Capacity Building for the Customs of the East African Region, Phase II. It was conceived under the framework of TICAD II, when Japan announced the Projects of OSBPs to promote smooth and efficient cross-border procedures as an essential component of trade facilitation. Assistance has already been provided for 14 locations in Africa.

Project Purpose:

- Smooth and efficient Customs
- Clearance at common borders are strengthened
- Under OSBP concept with constructive relationship between Customs Administrations and Customs Clearing and Forwarding Agents Project Targets are strengthened, and these are, KRA, Burundi Revenue Authority, RRA, TRA and URA.

Partners are:

- Japan Customs,
- EAC Customs and Trade Directorate
- World Customs Organisation

Key Pillars are:

- Designing OSBP facilities
- Designing and implementation of OSBP ITC Systems (RTMS/CCS)
- Support for Joint Border Surveillance and Joint Water Surveillance
- Master's Degree Trainers Programme
- Training of Customs and Clearance Agents
- Support for Accreditation Systems for Customs Clearing Agents

The above processes have been in operation since :

- Namanga 2008 (Ken/Tz)
- Malaba 2008 (Ken/Ug)
- Busia 2008 (Ken/Ug)
- Lake Victoria 2008 (Ken/Ug/Tz)

Master's Trainer Programme, whose objectives are:

- To develop the Master's Trainers in the respective Customs Administrations of EAC PS with respect with each subject of Customs Valuation (CV), Harmonised Classification (HS) and Intelligence Analysis (IA)
- To develop a standard set of training materials with respect to each subject, i.e. Handbook, Presentation, Curriculum Syllabuses, and Learning Guide

Training for Customs C.A.

- To establish a country wise J.T.F team by Customs Officers and C.F.A Associations and Managements
- To help them have dialogue sessions and planning needs driven plans
- To help in conducting trainings in accordance the training plan under JICA sponsorship

Training Forwarders Benchmark Study in Japan

- Study the Trade Facilitation Measures implemented in Japan Customs and discuss the possibility and challenges of implementing similar systems in EAC Countries

USAID

USAID/ East Africa Competitiveness and Trade Expansion (COMPETE) Project

COMPETE is a 4-year, regional, private sector-oriented program implemented by Chemonics International. It is designed to enhance economic growth and food security in East and Central Africa (ECA). COMPETE activities support USAID's Regional Feed the Future strategy, the Africa-led Comprehensive Africa Agricultural Development Programme (CAADP) and USG priorities including the African Competitiveness and Trade Expansion (ACTE) Initiative, the East African Community Regional Integration Initiative, and the African Growth and Opportunity Act (AGOA). COMPETE works in partnership with regional economic communities (RECs) like the East African Community (EAC) the Common Market for East and Southern Africa (COMESA) and private sector trade and transit associations.

Technical assistance delivered by COMPETE supports these African partners to achieve:

- increased integration and reduced barriers to regional and international trade;
- increased competitiveness and trade in targeted regional value chains [Staple Foods, Cotton/Textiles/Apparel, Specialty Coffee]; and
- increased US/ECA trade and ECA capacity to engage in trade negotiations.

By program end in March 2013, COMPETE is expected to have fostered a 30% increase in both the value and volume of international trade, a 20% increase in market share in intra-regional (COMESA) trade in target value chains, and a 15% reduction in the time and cost of transporting goods through targeted points along selected transport corridors. The COMPETE contract is designed to achieve regional program targets within a total budget ceiling of USD \$84 million.

COMPETE's National Activities Support Regional Outcomes

COMPETE activities span 15 countries in East and Central Africa: Burundi, Comoros, Democratic Republic of Congo, Djibouti, Ethiopia, Kenya, Madagascar, Malawi, Mauritius, Rwanda, Seychelles, Sudan, Tanzania Uganda, and Zambia. COMPETE works in coordination with USAID bilateral Mission programs and national-level donor programs to integrate smallholder farmers into regional markets through structured trade and stimulate increased trade and competitiveness in regional and global markets. COMPETE manages a USD \$24 million Partnership Fund that builds institutional capacity and supports innovation and regional learning through sub-grants to local and regional organisations.

COMPETE also manages the Eastern and Central Africa (ECA) Trade Hub and helps African partners to meet USG "Aid-for Trade" commitments at the World Trade Organisation. The ECA Hub supports development of firm and national level strategies to broaden and deepen the commercial relationship between East African and US companies and build awareness of Africa as a sourcing destination. This includes customised buyer missions that bring motivated US companies to ECA where they can interact with a range of capable African businesses in four core sectors: apparel, cut flowers, commercial crafts/home décor, and specialty foods.

COMPETE in Infrastructure Development

COMPETE supports infrastructure development to increase efficiency at borders and ports that are critical to trade of goods including staple foods along major transport routes in the region (e.g., RADDEx). COMPETE-supported ICT and physical infrastructure improvements link smallholders to regional markets and enable them to meet regional standards and market demand. Examples include development of the Regional Agricultural Trade Intelligence Network (www.ratin.net), national and regional food balance sheets, and an EAC trade database. COMPETE has also facilitated cross border financial payments via support to formation of an ICT task force to fast-track adoption of the legal and regulatory procedures needed for implementation of an East African Payment System across the EAC.

COMPETE in Enterprise Development and Branding

To increase ECA exports to the United States under the African Growth and Opportunity Act (AGOA), COMPETE's ECA Trade Hub provides firm-level technical assistance and creates market linkages through participation in trade shows, organising buyer missions and matchmaking sessions. Results include over USD \$50 million in new business deals under AGOA directly tied to assistance from COMPETE.

COMPETE has also launched Origin Africa, an ongoing campaign and initiative composed of producers, designers, small businesses, exporters, buyers and retailers dedicated to improving African trade. Origin Africa seeks to showcase Africa's potential as a preferred sourcing continent and improve perceptions about doing business in Africa. The initiative involves:

- A Friends of Africa Apparel Board of Advisors, a cross section of 33 leaders in the U.S. apparel industry, who are contributing their knowledge and expertise to guide Africa through its growth as a global sourcing destination;
- A series of customised/targeted buyer missions composed of motivated U.S. companies seeking to source from Africa;
- An emerging network of designers, small businesses, manufacturers, and buyers who are building the value chain and leading the way in African trade; and
- Outreach to millions in the US via Africa-focused advocacy and cause marketing groups such as ONE.org, Invisible Children, Wrap Up Africa, and Indego Africa.

USAID supports the EAC through the Assistance Agreement for Comprehensive Regional Development through September 2017. To date USAID has provided \$17m in assistance. In FY 2015, USAID provided direct assistance in the following areas:

- Trade and Investment
- Environment
- Agriculture
- Health

USAID also provides support to the EAC through the East Africa Trade and Investment Hub.

SELECT ACHIEVEMENTS

USAID has supported the EAC to implement the Customs Union to enable East Africans to move goods regionally with fewer delays and less expense, including:

- The Customs Management Act to harmonise customs regulations and procedures in compliance with World Trade Organisation (WTO) and World Customs Organisation (WCO) standards.
- Harmonised Customs Procedures including publication of a manual to guide member states in adhering to international best practices.
- Harmonised Customs Valuation Methods, a major step toward ensuring compatibility with the WTO Customs Valuation Agreement and WCO recommended best practices.
- Implementation of a Common External Tariff to rationalize duties on cotton, textiles, apparel, and staple foods entering the EAC.
- Customs Interconnectivity through adoption of the web-based RADDEx 2.0 system allowing centralized sharing of customs clearance information, saving time and money, and increasing transparency.

USAID supported the EAC to establish the Common Market to liberalise trade in goods, services, cross border finance and the movement of people. Support includes:

- Joint Border Committees established to improve coordination between government agencies and the private sector at 16 key border posts.
- Development of a Trade Help Desk, a web-based system with trade statistics and market access requirements to improve transparency in trade information.
- Harmonization of standards for 22 staple foods to liberalize and increase regional trade in these commodities.
- Simplified Certificate of Origin introduced to allow duty free cross border shipment of EAC-origin goods worth less than \$2,000, allowing small farmers and traders to increase trade.
- Regional Financial Deepening and Integration increasing access to finance for underserved populations.

USAID supported EAC's Environmental programs include:

 A Trans-boundary Biodiversity program in the Mara River Basin to improve sustainable management of basin resources, including a Biodiversity Action Plan to manage the Mara Basin ecosystem, and a Water Flows Assessment System to help manage Mara river water usage by stakeholders

Annex C List of documents cited

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