

Feedback and recommendations from Civil Society Organisations for the “Greenprint” strategy of the Southern Agricultural Growth Corridor of Tanzania Initiative

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ActionAID Tanzania

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Haki Ardhi

International Union for Conservation of Nature (IUCN)

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Lawyers Environmental Action of Tanzania (LEAT)

Legal and Human Rights Center (LHRC)

Mtandao wa Jamii wa Usimamizi wa Mimitu Tanzania (MJUMITA)

Njombe Agriculture Development Organization (NADO)

Parakuiyo Pastoralists Indigenous Community Development Organization (PAICODEO)

Participatory Ecological Land Use Management (PELUM)

Policy Forum

Research on Poverty Alleviation (REPOA)

Rural Livelihood Development Company (RLDC)

Rural Urban Development Initiative (RUDI)

Tanzania Forest Conservation Group (TFCG)

Tanzania Forest Industries Federation (SHIVIMITA)

Tanzania Network for Indigenous Pastoralists (TANIPE)

World Wide Fund for Nature (WWF)

Summary:

CSOs in Tanzania welcome the Agricultural Green Growth Investment Strategy contained in the SAGCOT Greenprint. In particular, we welcome SAGCOT's intention to produce a set of Investment Guidelines aimed at ensuring that the initiative attracts 'best in class' investors and to ensure that the initiative does not become the subject of accusations of land grabbing. In order to further strengthen the document, we recommend that the following points should be included in later drafts:

- The exact content of the Investment Guidelines should form the subject of a wide ranging consultative process. The guidelines should also adhere to FAO's Voluntary Guidelines/best agricultural investment guidelines.
- SAGCOT should give specific consideration to the needs of small and medium scale investors in the agricultural and livestock sectors, as these will remain the guarantors of food security and the majority of livelihoods in Tanzania for the foreseeable future. Specifically, detail should be provided on SAGCOT modalities for securing access to land, markets, technical advice and capital for small and medium scale producers.
- Village Land Use Planning processes in SAGCOT clusters should be monitored by an independent body with members drawn from civil society, government, academia and the private sector and funded from outside the SAGCOT envelope
- Lands made available for investment under SAGCOT should remain categorised as village lands and should not be re-gazetted as general lands, or should be guaranteed to return to village lands at the end of the investment period or following the failure of the investment
- Villages making land available for agricultural investments should receive expert independent assistance, financed from outside the SAGCOT envelope, to determine the value of the land for various types of agricultural and other enterprises.
- SAGCOT should not approve projects that involve resettlement. However, if small scale resettlement is to take place we recommend that the proposed Resettlement Planning Framework should be subject to review and agreement by all stakeholders.
- All planned SAGCOT developments should be predicated on the production of a hydrological survey and a high quality integrated water resource management plan which ensures that the environment in the development area is conserved and enhanced.
- SAGCOT investment guidelines should include targets for large commercial irrigated enterprises regarding the extension of irrigation schemes to neighbouring smallholders and communities
- Irrigation enterprises adhere to agreed targets for water use and soil salinity should be continuously monitored.
- The proposed EIA regulations/guidelines for the agricultural sector should undergo a public review process in order to ensure the inclusion of thorough assessments of the impact of the enterprise on local and national food security, water use, potential for salinisation through irrigation, fertiliser and pesticide use and the potential for erosion. Social and economic aspects must be included, in line with the NEMC principles and guidelines. This process needs the involvement, oversight and approval of NEMC.
- That SAGCOT should promote the capacity of local Tanzanian research institutions and companies, to collaboratively develop and distribute improved and appropriate seed varieties so as to meet local demand and increase food security. We recommend avoiding investments proposing to use genetically modified seeds likely to create farmer dependency on these and associated inputs.

Introduction

This document outlines the feedback and recommendations of civil society organisations that work on natural resource and governance issues in Tanzania. These CSOs have joined together in an effort to promote equitable and sustainable use of land and natural resources as part of the Greenprint strategy of the Southern Agricultural Growth Corridor of Tanzania (SAGCOT) initiative.

By providing this feedback and attendant recommendations we aim to assist the SAGCOT initiative to achieve the goal of attracting sufficient investment to unlock the agricultural potential of the corridor while also benefitting smallholder farmers and the rural poor. We recognise that the SAGCOT initiative has the potential to provide a template for future multi-stakeholder coordinated approaches to sustainable, broad-based, pro-poor agricultural and rural development.

We thank SAGCOT for not only giving us an opportunity to provide feedback on the Greenprint, but also for being flexible with its timetable and providing an extension on the deadline to ensure that CSO feedback is included. Our feedback and recommendations are organised into a number of thematic areas, including investment guidelines and sources of investment for green growth, land and water planning and allocation, environmental issues and the role of smallholder farmers, foresters, pastoralists and other land users. It should be noted that, although this is a response to the Greenprint document, we have referred also to the draft Environmental and Social Management Framework for further information.

General Comments

- Our coalition commends the SAGCOT Green Growth team for the production of the Greenprint strategy. In environmental and social terms the Greenprint adds welcome detail on the intention of SAGCOT to ensure that development in the targeted corridor takes place in a manner that is “environmentally sustainable, socially equitable and economically feasible.” However, much more detail is required.
- We welcome that the Green Growth Investment Strategy, contained in the Greenprint, forms an integral part of SAGCOT’s Partnership Principles, which in turn, will form the basis for participation of all stakeholders in the initiative. In particular, we welcome the intention to produce a set of SAGCOT Investment Guidelines aimed at ensuring that the initiative attracts “best in class” investors prepared to integrate sustainability into their investment plans.
- We also welcome the acknowledgment contained in the Greenprint that the achievement of Agricultural Green Growth (AGG) will necessitate significant investment in the areas of institutional strengthening and policy implementation. We recognise that these investments and improvements will only take place as a result of a concerted programme of coordinated activity involving government agencies, central and local government authorities working in cooperation with the private sector, smallholder farmers and many other stakeholders in the growth corridor regions. We, as civil society organisations, are committed to assisting this effort.
- We strongly recommend that the Greenprint document be harmonised with the existing Investment Blueprint document as there are divergences between the two. For example the Blueprint advocates streamlining national laws covering compulsory acquisition, while the Greenprint advocates participatory land use planning. We also strongly recommend that the Greenprint is harmonised with national laws, priorities and institutions, in order to achieve a more sustainable and demand driven enterprise.

1. Investment in Agricultural Green Growth (AGG)

We welcome the Greenprint's identification of five priority areas for investment in AGG over the next five years: 1) agricultural extension, 2) support for local organisations, 3) systematic land and water planning, 4) guidelines for investment in land and agriculture and 5) a pro-AGG investment generation programme.

Investment Guidelines

We welcome the statement in the Greenprint (p.49) that "(To) ensure that investment in SAGCOT is broadly beneficial and equitable, a set of SAGCOT Investment Guidelines should be formulated and applied." The Greenprint states that these Guidelines will "make clear that SAGCOT will not seek to compete with corrupt regimes that facilitate land grabs, in what may be described as Africa's 'race to the bottom' for investor dollars." Also, we welcome that the Guidelines will "provide a set of Green Growth principles and outcome targets for companies that invest in land and agriculture."

The Greenprint (p.50) also outlines a number of other desirable conditions to be met by investors in agriculture, forestry and other land-based activities.

- **We recommend that the exact content of the Investment Guidelines should form the subject of a wide ranging consultative process. It will be necessary to produce a well-defined set of Guidelines that will not be open to a wide latitude of interpretation. The guidelines should also adhere to FAO's Voluntary Guidelines/best agricultural investment guidelines.**
- **In addition to guidelines for individual investors, it is also necessary to produce guidelines for each cluster area to enhance development and governance at this level.**
- **We recommend that the guidelines are structured in such a way that smaller scale investors with fewer resources can participate and develop their businesses.**
- **We recommend that the Investment Guidelines are also published in simple Kiswahili.**
- **In addition, we recommend the establishment of a system of independent adjudication for each individual project's plans and subsequent performance according to well defined, quantifiable indicators and criteria.**
- **We also recommend that preservation of local and national food security form a prime factor in the consideration of proposals for land-based investment, regardless of size. All investments should be able to demonstrate that they will not threaten food security at these two levels.**
- **Also, we feel that SAGCOT should give specific consideration to the needs of small and medium scale investors in the agricultural and livestock sectors, as these will remain the guarantors of food security and the majority of livelihoods in Tanzania for the foreseeable future. Specifically, detail should be provided on SAGCOT modalities for securing access to land, markets, technical advice and capital for small and medium scale producers.**

We appreciate that the potential for reputational risk for SAGCOT partners in the event of bad publicity will likely ensure the establishment of a thorough oversight process. However,

- **We recommend that an independent oversight body, funded from outside the SAGCOT envelope, be established.**

- **We recommend the production of a clear set of measures that can be imposed on investors who do not adhere to the Investment Guidelines and to agreements with host communities. These measures should be legally enforceable under contract, environmental and other relevant legislation.**

Sources of investment for green growth

The Greenprint introduces the idea of four new types of investor/investment which could complement the investment sources previously outlined in the Blueprint, i.e. private sector, public sector and the multi-donor catalytic fund. These are 1) small scale farmers and farmer associations 2) civic sector 3) social investors and 4) climate finance.

We welcome this broadening of the sources of funding seen by SAGCOT and particularly for the acknowledgement in the Greenprint that attracting investors with a stated commitment to environmental and social sustainability will “enhance the reputation of the region as a whole and attract other such companies.”(p.66)

However, the Greenprint acknowledges (p.21) that smallholder farmers will remain as the prime investors in 85% of the agricultural land in the corridor by 2030. While the Greenprint sees “strong potential for expansion” in small scale agricultural debt financing via financing and other newer sources of debt finance, it makes no reference as to how SAGCOT could play a part in this expansion.

- **We recommend that SAGCOT plays a more pro-active role in increasing the supply of reasonably priced small scale agricultural debt financing that is specialised and tightly related to markets.**
- **In particular, we recommend that SAGCOT plays a pro-active role in linking smallholders and farmers associations with sources of equity capital with an interest in providing marketing and technical expertise.**

2. Land and Water Planning and Allocation

Land Use Planning

We strongly welcome SAGCOT’s recognition that there is a need for “new land use planning efforts across multiple scales” (p.46). We specifically welcome the acknowledgements that:

- less than 10% of villages in Tanzania have developed land use plans,
- few villages have achieved official title to their lands,
- existing land use plans can be overridden by central government authority,
- there is no single coherent process for identifying lands suitable for agriculture or forestry investments
- sectoral land use plans produced by various government agencies are not harmonised

We recognise that access to land and security of tenure are critical issues for both potential and actual investors and communities in the SAGCOT corridor. Clarity is required for all stakeholders if potential conflicts are to be avoided and the process of resource allocation is to avoid controversy. We appreciate that SAGCOT recognises that much work needs to be done, largely by government agencies, to overcome the constraints outlined above.

We welcome the proposal to undertake a “systematic assessment of economic, agricultural and environmental constraints and opportunities at district/cluster level” alongside a multi-level consultative process to identify and define governmental, private sector and community concerns. Also the proposal that participatory village land use planning be conducted throughout the clusters and that VLUP will allow neighbouring villages to cooperate on planning and the identification of opportunities.

We welcome the proposal to raise the capacity for VLUP in cluster sectors through use of SAGCOT Catalytic Funds. Part of this process should involve sensitising communities about the importance of VLUP by emphasising its potential long term benefits.

- **We recommend that the VLUP process in SAGCOT clusters be monitored by an independent body with members drawn from civil society, government, academia and the private sector and funded from outside the SAGCOT envelope. The authority of the independent body to oversee planning processes should be recognised by all SAGCOT partners.**

We welcome the idea that a scale up in VLUP will be supported by a revolving fund to be replenished by investors who take up opportunities in communities who have identified lands for development as a result of the planning process.

- **We recommend that investors who will benefit from reduced pre-acquisition costs in this way should contribute a fee to the revolving fund that is set at a level that allows replication of VLUP processes in a number of other communities.**
- **We recommend that it be forbidden for investors seeking land to directly finance village land use planning and Environmental Impact Assessments (EIAs) in SAGCOT cluster areas. These activities should be financed from the revolving fund.**
- **We recommend that SAGCOT partners look at ways of assisting the Government to build the capacity of the Land Use Planning Commission in order to streamline the VLUP process and the process of issuing official Village Land Certificates.**
- **We recommend that all stakeholder interests should be recognised as an integral part of VLUP in SAGCOT clusters as a method of reducing resource conflicts in the region. We also recommend that PLUMP (Participatory Land Use Management Plans be made at the higher or cluster level, so as to recognise landscape values (water, forest, wildlife, minerals etc) and plan for inter-village resource use. This is particularly important for mitigating downstream impacts of water use and for encouraging sustainable forest and wildlife management.**
- **We recommend that the rights of women and children are ensured in VLUP processes and land allocation processes in the SAGCOT area.**
- **We also recommend that legal arrangements be made to ensure that, either 1) lands made available for investment under SAGCOT should remain categorised as village lands and should not be re-gazetted as general lands, or 2) that lands are automatically reinstated to the village in the event of the failure/maladministration of the investment or the expiry of the lease. In this way villages retain ultimate control and will be free to either seek another investor on their own terms or to return the land to village use. We also recommend that leases on land for investment be shorter e.g 15-20 years renewable.**
- **We recommend that investors be required to demonstrate the capacity to develop allocated land within 3 years of being granted a lease. The continuance of the lease should be dependent on an agreed level of development taking place within this time.**

The suggestion that land remain categorised as village land, although not in the Greenprint, is put forward in the SAGCOT draft Environmental and Social Management Framework (ESMF). We welcome its inclusion there and recommend that SAGCOT's principles include a commitment to reinforcing village land tenure in this way.

- **In addition, we recommend that villages making land available for agricultural investments should also receive expert independent assistance, financed from outside the SAGCOT envelope, to determine the value of the land for various types of agricultural and other enterprises. Villages should also be assisted to recognise the income value of the land should it be put to alternative uses by the village itself.**

Indicative figures agreed by communities regarding these valuations along with details of other benefits sought by communities should be available to investors at a centrally administered database (land bank administration), and also accessible to community members and other stakeholders. These measures would help maintain transparency in the land procurement process and reduce the potential for corrupt negotiation processes and future conflicts.

- **We recommend the establishment of a publicly accessible database of lands available for investment with their valuations. Potential investors using catalytic funding must select lands from the database.**

Securing unconflicted funding for this expert independent assistance on valuation, the establishment of a system of VLUP monitoring and the establishment of a database will require further consideration by Government and SAGCOT partners.

- **Finally, we recommend that all contracts between investors and communities be produced in plain language Kiswahili and be made publicly available and accessible at the District and village levels for scrutiny in order to avoid conflict.**

Resettlement

The Greenprint only contains one instance of the word resettlement. The word does not appear in the Investment Blueprint. However, the SAGCOT SRESA (p.60) details a process of research and consultation that will lead to the production of a Resettlement Policy Framework (RPF) that meets the requirements of the World Bank. Part of this research will estimate the extent of 'displacement' required by extrapolating from a case study focussing on the Kilombero cluster.

The RPF will establish best practice criteria for resettlement, valuation and compensation.

- **We recommend that the RPF be a subject to review and agreement by all stakeholders. We also recommend that SAGCOT should avoid approving projects that involve resettlement.**

(The ESMF mentions that sub-projects requiring resettlement will not be eligible for Catalytic Funding (p.53 ESMF). This is confusing and requires clarification)

Water management

The Greenprint promotes precision agriculture as a potential investment for social investors in the Catalytic fund, who may wish to build the capacity of smallholder farmers to implement water and nutrient efficient farming methods.

- **We recommend that all large planned SAGCOT developments should be predicated on the production of a hydrological survey and a high quality integrated water resource management plan which takes the water balance (input-output) into account and ensures that the environment in the development area is conserved and enhanced.**

These plans should also take account of the needs of: 1) downstream water users, 2) the requirements of wildlife sustaining environments and 3) important fisheries such as the Kilombero Valley and Rufiji delta during all seasons of the year. The predicted effects of longer term climate change should be built into planning processes to ensure sustainability. As with land use planning, water management planning processes should be participatory, transparent and accountable.

- **We recommend that SAGCOT guidelines include targets for large commercial irrigated enterprises regarding the extension of irrigation schemes to neighbouring smallholders and communities.**
- **We recommend that all current uses of water (domestic, agricultural and livestock (including pastoralist use) are documented and that these uses will not be threatened or limited by new developments.**
- **We recommend that target water offtake is agreed and carefully monitored for each enterprise.**
- **We recommend that integrated water management plans should: 1) include an initial assessment of the potential for salinisation due to irrigation, 2) stipulate a requirement for regular assessment of changes in soil salinity in irrigation schemes and 3) specify measures to mitigate this effect.**
- **We recommend that SAGCOT assess the possible effects of the proposed Stiegler's Gorge dam on the relevant cluster areas.**
- **We recommend that all water user associations in the SAGCOT area be properly registered and regulated.**

It is accepted that the production of SAGCOT cluster and regional level water resource management plans to the required standard will be an expense that will be borne on the front end by Government and donor partners.

- **However, as with land use planning, we recommend that the costs of water surveys and planning undertaken in the identification of potential development sites, as well as continuous future monitoring of water resources and their application, should ultimately be reflected in the cost of the site to the investor, with a portion being remitted to the revolving fund for ongoing land use and water management planning.**

3. Environment

Environmental Impact Assessments (EIAs)

The subject of Environmental Impact Assessments is discussed in the ESMF. All projects that are assessed as falling into Category A will be assessed and approved by the World Bank in addition to undertaking a full EIA under Tanzanian regulations. According to the SRESA sector specific EIA regulations/guidelines are currently being formulated by the Ministry for Agriculture, Food Security and Cooperatives.

- **We recommend that the proposed EIA regulations/guidelines for the agricultural sector undergo a public review process in order to ensure the inclusion of thorough assessments of the impact of the enterprise on local and national food security, water use, potential for salinisation through irrigation, fertiliser and pesticide use and the potential for erosion. Social and economic aspects must be included, in line with the NEMC principles and guidelines. This process needs the involvement, oversight and approval of NEMC.**
- **We recommend that any new EIA guidelines should also take account of the possible long term impacts, on soil quality, water resources and plant and animal species, of large scale mono-crop enterprises.**
- **We recommend that the entire SAGCOT corridor undergo a Strategic Environmental Assessment (SEA) process, conducted by independent and recognised experts who will facilitate the process, under collaboration with NEMC. This process should be guided by OECD/DAC principles and be used to build the capacity of Tanzania to conduct such assessments in line with local priorities.**
- **We recommend that SAGCOT promote the capacity of local Tanzanian research institutions and companies, to collaboratively develop and distribute improved and appropriate seed varieties so as to meet local demand and increase food security. We recommend avoiding investments proposing to use genetically modified seeds likely to create farmer dependency on these and associated inputs.**
- **We also recommend that investments should be made to ensure that post approval Environmental Statements are thorough, independent and publicly available as per environmental management legislation.**
- **In addition we recommend the involvement of NEMC in overseeing a system of continual assessment and monitoring of the environmental impact of investments. All investments should observe the principles of Environmental Management and Protection (polluter pays principle) backed up by a legally enforceable system of compensation for the victims of environmental degradation.**

Payment for ecosystem services

We welcome that the Greenprint discusses the idea of payment for communities managing and preserving important natural resources such as water sources and forests. Three rationale are defined for scaling up systems of payment for ecosystem services: 1) protecting public goods such as water sources, 2) participation in carbon markets and 3) to help companies ensure reliable supplies of key production inputs.

However, the Greenprint suggests that such payments may occur spontaneously in areas of the corridor where they are 'feasible and economically efficient'. Alternatively, it is suggested that SAGCOT stakeholders "(particularly conservation organisations)" should identify potential sites where payment for ecosystem services (PES) may be worthwhile and connect "the parties to organisations that can set up the PES schemes." (p.31)

- **Rather than expecting uptake of PES schemes to occur organically at the initiation of investors with little knowledge of environmental issues, we recommend that SAGCOT donors and the Government should establish a PES Trust Fund with an independent board. This Fund could identify ways in which investors can build PES into their plans for the long term sustainability of their businesses and their relationships with the communities and environment they operate within.**
- **We recommend that the potential for new PES schemes, as well as the enhancement of existing schemes, should form part of comprehensive land use planning surveys that will be required to identify potential sites for investments in larger scale agriculture projects.**

Well defined PES schemes have the potential to form an important part of mutually beneficial relationships between communities and investors in the SAGCOT area. SAGCOT should work with other responsible agencies to ensure that communities are provided with alternative means of benefiting from the management of biologically sensitive areas.

- **We also recommend that preservation of biodiversity and reduction of human impact on vulnerable areas of importance be mainstreamed into SAGCOT planning. SAGCOT contains many protected areas and also sensitive areas with a high biodiversity value, including two RAMSAR sites where wise use should be promoted according to RAMSAR principles. SAGCOT should work with the Ministry of Natural Resources and Tourism and other institutions to identify such areas and strengthen their management and wise use. Particular attention should be given to the establishment of WMAs and PFM in areas where wildlife corridors are identified, so that communities can benefit from sound participatory management of their resources.**

4. Agriculture, Pastoralist and Smallholder Involvement

Extension services

We welcome the SAGCOT focus on sustainable crop intensification. We look forward to the production of investment guidelines containing quantifiable planning and monitoring parameters that ensure that large scale investments operate according to the principles contained in the Greenprint. (p.26)

We agree that there is an urgent need for a large scale up of extension services and Farmer Field Schools to promote conservation agriculture practices and other methods of intensification among smallholders in order to increase production and mitigate the effects of climate change.

The Greenprint sets targets for the growth of AGG extension services to the majority of smallholder households in the corridor. The budget for AGG Extension Units proposes that the civic sector will bear 62% of the \$121m costs of the expansion to 2030, the Government would be responsible for 25% and the private sector 13%.

- **We recommend that the budget for improving extension services should be less donor dependent in the interests of sustainability.**

We welcome the Greenprint's plans for AGG extension services for the SAGCOT area. However, there is a need to:

- Ensure the provision of locally appropriate and acceptable farming systems support strategies which link extension services to market opportunities, in order that smallholders and small-scale producers can link to and benefit from markets opened up by SAGCOT
- Ensure that other areas are not denied extension resources as resources are committed to SAGCOT clusters
- Produce a strategy for how this type of extension scale up can be ring fenced and allowed to develop over a period in order to provide a template for similar efforts in other parts of the country.

Sustainable livestock intensification

The Greenprint proposes sustainable intensification of livestock production through ranching and feedlots. It is proposed that small scale producers will benefit from the presence of modern slaughtering and processing facilities.

- **We recommend that SAGCOT explore ways of ensuring that intensive and extensive livestock production methods can co-exist without coming into conflict over resources. In other words, SAGCOT should recognise that extensive livestock production will remain a far larger source of income for communities in Tanzania than intensive production for the foreseeable future and will continue to produce cheaper and more accessible meat and milk products for the nation.**
- **We recommend that SAGCOT explore the option of group ranching/livestock association schemes on land identified for livestock production.**
- **We recommend that SAGCOT investment guidelines for livestock investors include a requirement for the processing and marketing of a quota of livestock products produced off-ranch.**
- **We recommend that improved veterinary services are accessible to and meet the requirements of livestock keepers, whether small scale stall fed, extensive pastoralist or other potential users such as ranchers.**
- **We recommend that in supporting ranching, priority is given to ranchers who will engage with small scale or extensive pastoralist producers to provide a market for appropriate breeding stock, as well as to provide a market for offtake from pastoralist production. This will increase the potential of pastoralist land use to be sustainable and productive.**

Enterprise approach to community forestry

We look forward to seeing SAGCOT's strategy for community forestry in the final report. We regret that it has not been possible to review this in the draft and hope that we will have the opportunity to have input into this issue prior to the finalisation of the report.

However, the annex section on enterprise and community forestry highlights the work of TAGRODE in promoting participatory forest management in the SAGCOT area. This is welcome. However, we recognise that much work needs to be done, by all stakeholders including the government, media,

academia and civil society, to sensitise communities having forest resources on methods of sustainable management.

- We recommend the production of clear guidelines on how LUP for potential agricultural investors will protect natural forests not currently demarcated under village forest reserves.
- We recommend that the final Greenprint strategy promotes contract and outgrower agreements between communities and commercial firms which emphasise win-win, sustainability, independent monitoring and evaluation as well as equitable distribution of benefits.
- We recommend that all forest resources in the SAGCOT area should be demarcated and mapped by the Ministry of Natural Resources and Tourism, using forthcoming results from the survey of the national forest inventory. This is required to enable SAGCOT to input into a growth in Participatory Forest Management (PFM). In addition, we recommend that SAGCOT elaborate on how it will enhance and facilitate community forest enterprises through PFM.

Thank you for providing us with this opportunity to provide feedback to the SAGCOT Greenprint Strategy.

Tanzania Natural Resource Forum (TNRF) facilitated the development of these recommendations made by Tanzanian Civil Society Organizations.

