



**GREEN
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Consideration of accreditation proposals and activities – Addendum VIII

Accreditation assessment of APL189

Summary

This document contains the recommendation by the Accreditation Panel for accreditation of applicant 189 (APL189), the National Environment Management Council (NEMC), based in the United Republic of Tanzania, in accordance with the revised accreditation framework adopted in paragraph (a) of decision B.42/13, and includes the screening report confirming the applicant meets the screening requirements contained in part 1 of annex II to document GCF/B.42/04/Add.01.

I. Introduction

1. The National Environment Management Council (NEMC) is a national direct access entity based in the United Republic of Tanzania. The applicant is a body corporate established by the Government of Tanzania body with a mission to coordinate environmental management activities and support the implementation of environmental policy and programmes in the United Republic of Tanzania.
2. The applicant applied and was assessed in accordance with the revised accreditation framework (adopted in decision B.42/13, paragraph (a)). The applicant is eligible for, and applied under, the fast-track accreditation process (adopted in decision B.08/03, paragraphs (c)-(h)), as an Adaptation Fund entity. As per decision B.42/13, paragraph (i), the NEMC application has been assessed by the Accreditation Panel (AP) against the relevant screening requirements as contained in document GCF/B.42/04/Add.01 titled “Accreditation Framework”, annex III, table 1. As part of this assessment, the AP consulted the applicant’s website and third-party websites to complement the information provided in the application. The AP’s assessment was concluded with the issuance of a screening report to the applicant, as contained in Section III below.
3. The applicant has applied to be accredited for the following parameters under the GCF fit-for-purpose approach:¹
 - (a) **Access modality:** direct access, national. The applicant received a national designated authority or focal point nomination for its accreditation application from Tanzania;
 - (b) **Track:** fast track; and
 - (c) **Maximum environmental and social risk category:** category B/Intermediation 2 (I-2)).²

II. Contribution to GCF mandate and strategic goals

4. The applicant is found to have the potential to support GCF in implementing its Strategic Plan for 2024–2027 with respect to:
 - (a) Increasing the portfolio of direct access entities to GCF in Tanzania and the Africa region;
 - (b) Submitting the indicative projects and programmes to GCF; and
 - (c) Potentially contributing to the adaptation and mitigation balance in the GCF portfolio since the applicant focuses on adaptation and cross-cutting activities and supporting diversity in GCF results areas such as infrastructure, water, sanitation and hygiene.
5. The applicant has demonstrated institutional presence and relevant networks. The NEMC is a government body that coordinates environmental management and promotes sustainable development in Tanzania. NEMC has served as an accredited entity of the Adaptation Fund since 2017, implementing four adaptation projects in Tanzania that aim to

¹ Refer to section IV below for the recommendations by the Accreditation Panel.

² As per the revised Environmental and Social Policy adopted in decision B.BM-2021/18, category B is defined as “Activities with potential limited adverse environmental and/or social risks and impacts that, individually or cumulatively, are few, generally site-specific, largely reversible, and readily addressed through mitigation measures” and intermediation 2 is defined as “When an intermediary’s existing or proposed portfolio includes, or is expected to include, substantial financial exposure to activities with potential limited adverse environmental or social risks and impacts that are few, generally site-specific, largely reversible, and readily addressed through mitigation measures; and includes no activities with potential significant adverse E&S risks and impacts that, individually or cumulatively, are diverse, irreversible, or unprecedented”.

strengthen climate-resilient livelihoods, food security, ecosystems restoration and locally led adaptation. In addition, in 2020, NEMC received a grant from the World Bank to manage a project aiming to reduce chemical waste from artisanal mining activities in the United Republic of Tanzania.

6. The applicant intends to propose programmes and projects to GCF that are aligned with the national development priorities and climate change strategies of the United Republic of Tanzania, including its nationally determined contribution and national adaptation plans. The role of NEMC in addressing climate change is embedded in its legal mandate under Tanzanian law, which designates NEMC as the national authority responsible for environmental management in the United Republic of Tanzania. In its 2022–2026 strategic plan, NEMC outlines its goal of promoting the integration of climate consideration into environmental management, ecosystem restoration and sustainable natural resource management. These goals align with the country's nationally determined contribution, which calls for the upscaling of agricultural land with climate-smart approaches, the insulation of smallholder farmers from climate-related shocks, the enhancement of wildlife and forest management and protection, and investment in climate-resilient water supply technologies and infrastructure.

7. NEMC contributes to the mandate of GCF by supporting the paradigm shift of the United Republic of Tanzania towards low-emission and climate-resilient development pathways through environmental governance, climate policy implementation, ecosystems-based adaptation and effective management of climate finance programmes. NEMC offers this support on the basis of previously completed climate-related assessments, resilience-building projects, conservation activities and climate-smart water infrastructure development, among other projects. In addition, as an implementing entity of the Adaptation Fund since 2017, NEMC has implemented four adaptation projects in the United Republic of Tanzania, totalling USD 5 million. These projects aimed at strengthening climate-resilient livelihoods, food security, ecosystems restoration and locally led adaptation.

8. The applicant has experience in financing and implementing projects in the range of USD 1 million to USD 7.3 million. In particular, NEMC has experience implementing:

- (a) USD 14.2 million (grants) for two projects to improve disposal practices for chemical waste;
- (b) USD 5.98 million (grants) for two conservation and habitat-restoration projects;
- (c) USD 3.6 million (grants) for three climate resilience projects that seek to protect the livelihoods of communities dependent on farming and fishing; and
- (d) USD 1.28 million (grants) for a water supply resilience project, including the construction of harvesting infrastructure such as reservoirs.

III. Screening report

3.1 Screening requirements assessed by the Secretariat

3.1.1 Legal status

9. The applicant, National Environment Management Council, is a body corporate under the laws of established pursuant to the National Environment Act 1983 (repealed by the Environmental Management Act, Cap. 191 2004 (as amended)).

10. The applicant has provided evidence that it has legal personality, has the legal capacity and authority to enter into contracts, and can bear financial and legal responsibility for

performing those obligations. Based on the evidence submitted, the Secretariat finds that the applicant meets the “legal status” screening requirement.

3.2 Screening requirements assessed by the Accreditation Panel

11. As per paragraph 2 above, the applicant is eligible for, and applied under, the fast-track accreditation process as an Adaptation Fund entity. The screening requirements for corporate governance and internal control, financial management, procurement, project management, and integrity except for the Investigation Function are considered to have been met by way of fast-track accreditation.

3.2.1 Integrity

12. NEMC applies the Code of Ethics and Conduct for the Public Service (2005),³ which extends to personnel, governing body members, consultants, contractors and independent experts. This is further supported by ethical requirements in the NEMC Staff Rules and Staff Regulations (2023) and the Public Service Regulations (2022). Ethical obligations are communicated at onboarding through formal acknowledgement and reinforced through periodic training and awareness campaigns (e.g. through posters); these have all been reviewed by the AP. Oversight is exercised by an executive-level ethics committee operating under approved terms of reference. The committee meets regularly on an annual basis, as evidenced by minutes provided to the AP.

13. NEMC has adopted a publicized zero-tolerance approach to fraud, corruption, financial misconduct and other prohibited practices; this approach is broadly aligned with the GCF Policy on Prohibited Practices and is further articulated in the NEMC anti-fraud and bribery policy and Strategy as well as in the Whistleblower Institutional Policy and Procedures. The policies apply to staff, consultants, contractors, executing entities and other stakeholders engaged in NEMC operations.⁴ The Whistleblower Institutional Policy and Procedures⁵ The Whistleblower Institutional Policy and Procedures provides for confidentiality, protection against retaliation and anonymous reporting, and is supported by channels that accommodate anonymity and are accessible to both internal and external parties.⁶ Channels established for reporting wrongdoing include an electronic reporting system, reporting by email and reporting by phone; the electronic reporting system provides for anonymity and is accessible in both Swahili and English.

14. Investigations are undertaken by ad hoc independent committees appointed by the Director General and governed by established terms of reference and investigation guidelines, documented within the publicly available NEMC whistle-blowing Institutional Policy and Procedures.⁷ Investigation outcomes are reported to the Director General, as demonstrated by reports reviewed by the AP; however, consolidated trends arising from cases are not routinely reported on to the Director General or governing body. The whistle-blowing policy nevertheless establishes a process of monthly reporting of incidents received to management. Serious allegations, including fraud and corruption, are referred to competent national authorities, including the Prevention and Combating of Corruption Bureau (PCCB), which provides an additional layer of independence. PCCB is an independent national authority with a statutory investigative and prosecutorial mandate. Personnel involved in investigations demonstrate relevant experience in fraud investigation, anti-money-laundering (AML) and asset-recovery investigations.

³ Available at www.policyforum-tz.org/sites/default/files/CodeEthics.pdf.

⁴ See www.nemc.or.tz/publications/policies-and-legislation.

⁵ See www.nemc.or.tz/publications/policies-and-legislation.

⁶ See <https://emrejesho.gov.go.tz/home>.

⁷ See www.nemc.or.tz/publications/policies-and-legislation.

15. NEMC operates within the national AML and countering the financing of terrorism (CFT) legislation (Anti-Money Laundering Act 2022) and has recently developed internal AML/CFT guidelines demonstrating the operationalization of the applicable legal requirements and strengthening its due diligence and sanctions screening arrangements. Risk-based due diligence is undertaken; however, currently, screening is conducted against national sanctions lists and firms blacklisted by the Public Procurement Regulatory Authority, as demonstrated by evidence (due diligence and screening) presented to the AP. The recently developed procedures are intended to broaden the scope of these controls. Oversight of AML/CFT is assigned to the Director of Finance and Administration.

16. The AP finds that the applicant meets the screening requirements for integrity.

3.2.2 On-lending/blending

17. The applicant did not apply to be assessed against this screening requirement.

3.2.3 Revised Environmental and Social Policy and ESS standards

A. Revised Environmental and Social Policy

18. NEMC adopted its environmental and social policy in 2022, to address environmental and social (E&S) risks, impacts and safeguards, and revised it to reflect new governance arrangements in September 2026. The policy provides a framework for identifying, assessing, managing and monitoring E&S risks and impacts. It applies to the NEMC environmental management activities, regulatory functions, programmes and projects, and was approved by the Governing board.

19. On sexual exploitation, abuse and harassment (SEAH), the NEMC gender and anti-sexual harassment policy, from December 2020, establishes a zero-tolerance approach, commits NEMC to maintaining a work environment free from discrimination and harassment, requires allegations to be investigated, and provides for disciplinary action. Its scope extends to employees, managers, executing entities, contractors, consultants and other third parties involved in NEMC activities. For SEAH, reports may be received through e-Mrejesho and referred by designated officers to Human Resources for handling under the gender and anti-sexual harassment policy. NEMC maintains a dedicated SEAH register covering the nature of complaints, actions and referrals, investigation status, and resolutions. Procedures maintain confidentiality, protect complainants from retaliation, respect complainants' dignity, restrict access to sensitive information and allow for referral to appropriate support services where required.

B. Environmental and social management system

20. NEMC has a documented environmental and social management system (ESMS), from June 2017, for identifying, assessing, managing and monitoring E&S risks. The ESMS covers screening, risk categorization, mitigation, monitoring, stakeholder consultation, disclosure and grievance redress. It is integrated into project-cycle management and is consistent with International Finance Corporation Performance Standards 1–8. The documented procedure for identifying and assessing risks follows the project cycle. Activities are screened and categorized by risk, an environmental and social impact assessment is carried out where screening so indicates, and environmental and social management plans are prepared to address identified impacts. Monitoring and management procedures are documented and evidenced. The E&S policy requires re-screening during implementation, application of mitigation measures, quarterly environmental and social monitoring reports, and audits and evaluations. The

monitoring report for the World Bank-financed Environmental Health and Pollution Management Program (EHPMP) provides evidence of an established system for identifying, assessing and managing E&S risks, including stakeholder engagement and monitoring. Project performance reports for two Adaptation Fund-supported projects – one involving agropastoral communities in Kongwa District and another relating to water-harvesting technologies in rural communities in semi-arid areas of the United Republic of Tanzania – provide further evidence of monitoring against identified risks during implementation.

21. NEMC has a system to assess and monitor downstream partners and project proponents. The E&S policy requires environmental and social assessment, ESMPs, re-screening during implementation, mitigation, quarterly E&S risk-monitoring reports, and audits and evaluations. Responsibilities are assigned to the Director of Environmental and Social Impact Assessment, environmental inspectors and zonal offices, the Environmental and Social Unit, and project proponents, which are responsible for implementing approved ESMPs. The zonal office network provides a supervision presence outside headquarters. The EHPMP monitoring report further demonstrates application of the NEMC E&S risk management, stakeholder engagement and monitoring arrangements.

22. External communication on environmental and social matters is provided for in the client service charter, the environmental and social grievance redress mechanism (GRM) framework and, operationally, through the e-Mrejesho system of the Government of the United Republic of Tanzania. The charter recognizes stakeholders' rights to access information and submit complaints, and it provides channels including offices, letters, telephone, email, the website and social media.

23. The E&S policy governs information disclosure. It requires the timely and accessible disclosure of draft and final environmental and social assessment reports, including ESMPs, to project-affected people and other stakeholders. Additionally, it mandates that NEMC make project performance reports, including the implementation status of E&S measures, publicly available through its website and other appropriate channels. NEMC demonstrated its track record through an ESIA report for the Mercury-Free Gold Processing Centre in Bumva village, Shinyanga; disclosure pages for ongoing and pipeline climate change projects; a list of EIA certificates issued; and records relating to complaints.

24. The environmental impact assessment and audit regulations allow the NEMC council to call for a public hearing and for a public review of environmental impact statements during the review process. The NEMC scheme of service assigns the Director of Environmental and Social Impact Assessment responsibility for coordinating district authorities, sector ministries and public participation in the ESIA review process and organizing public hearings. The Kongwa project evidenced this practice, where a community-based participatory exercise covering villages in Mtanana and Ugogoni wards conducted consultations between 14 May and 30 August 2019. Participants included women, farmers, livestock keepers, beekeepers, orphans, traders, herders, teachers, people with disabilities, youth, elders, and schoolgirls and schoolboys; recorded participation was 55 per cent men/boys and 45 per cent women/girls.

25. In terms of organizational structure, NEMC functions with a dual structure, comprising both regulation and project management. The ultimate oversight and legal responsibility rest directly with the office of the Director General. The Director of Environmental and Social Impact Assessment is responsible for risk screening, management, mitigation and monitoring. For climate change projects, the Climate Change and Special Areas Unit, under the Directorate of Environmental and Research Management, undertakes coordination. At the operational level, assigned climate and project management specialists internally manage the day-to-day oversight of the portfolio. Curricula vitae for further E&S managers and the Gender Focal Point provide additional evidence of institutional capacity. Because NEMC is a semi-autonomous

agency under the executive Government, it submits technical reports to the Vice-President's Office.

C. Grievance redress mechanism

26. The NEMC environmental and social GRM framework, updated in August 2026, comprises procedures for receipt, registration, screening, investigation, resolution and closure of grievances, and communication of outcomes to complainants.

27. NEMC has demonstrated that e-Mrejesho provides an operational electronic channel through which members of the public can direct complaints and feedback to NEMC. Users may make submissions with their personal details, anonymously, through an e-Mrejesho account or as a public or retired public servant, provide a description and supporting documentation, and select relevant environmental complaint categories. Access is available through the web platform, mobile application and Government USSD service, including for users without smartphones. NEMC provided evidence of the submission process and a system-generated complaints report, demonstrating that its system functions adequately.

28. The mechanism is available for complaints concerning harm or impacts associated with projects implemented or supervised by NEMC, rather than being limited to complaints concerning the regulatory services of NEMC. Environmental categories include pollution, noise, environmental permits and procedures, and other environmental concerns. The system is accessible through the NEMC web interface and mobile application, and through the Government USSD service.

29. NEMC also confirmed that e-Mrejesho may receive SEAH complaints. Human Resources refers such complaints for handling under the gender and anti-sexual harassment policy and records them in a dedicated SEAH register. Arrangements provide for confidential handling, restricted access to sensitive information, protection from retaliation and referral to support services where required.

30. The e-Mrejesho is integrated operationally with its GRM rather than functioning as a separate redress mechanism. Designated NEMC officers receive complaints submitted through the platform, register them and route them to the relevant technical unit or zonal office. The GRM then governs acknowledgement, screening, investigation and resolution, communication of the outcome, and closure. The e-Mrejesho dashboard provides tracking and an institutional record. Evidence submitted to the AP showed 56 feedback items, including 41 complaints, with cases recorded as new, under processing or closed. The system-generated extract included environmental pollution, noise and vibration, and ESIA-related complaints.

31. An appeal and escalation mechanism addresses the independence of review. A complainant dissatisfied with the response of NEMC may appeal in writing within 10 working days. The appeal is reviewed by a multidisciplinary committee chaired by the Director of Environmental Compliance and Enforcement. If dissatisfaction remains, the matter may be escalated to a higher authority, including the Permanent Secretary responsible for Environment in the Vice-President's Office, or referred to an independent mediator where appropriate. e-Mrejesho additionally escalates overdue matters through the management hierarchy of NEMC and enables responsible Government authorities to monitor unresolved complaints through the Government feedback system.

32. NEMC provided system-generated evidence of complaints received through e-Mrejesho. The evidence demonstrated actual use of the mechanism, although NEMC informed the AP that the system is still being operationalized and the available extract does not provide a separate and reliable year-by-year summary for the preceding three years.

33. The AP finds that the applicant meets the screening requirement on grievance redress.

34. The AP finds that the applicant meets the screening requirements for the revised Environmental and Social Policy and the screening requirements for environmental and social standards for activities of up to medium E&S risk (category B/I-2), as applied for.

3.2.4 Indigenous Peoples Policy

35. The applicant commits within its ESMS to comply with the GCF Indigenous Peoples Policy for all GCF-financed activities where the policy applies and recognizes the protection of rights, livelihoods, cultural heritage, and traditional knowledge of vulnerable and marginalized groups. The commitment extends to screening, meaningful stakeholder consultation, mitigation of social risks, culturally appropriate consultation, and free, prior and informed consent where required, and an accessible GRM where GCF-supported activities may affect communities that match the characteristics described in the policy. The NEMC instruments address vulnerable and marginalized groups rather than Indigenous Peoples as a separately defined category, consistent with national practice.

36. The 2026 environmental and social policy expressly includes Indigenous Peoples and tribal groups among marginalized and vulnerable groups. The applicant commits to comply with the GCF Indigenous Peoples Policy for all GCF-financed activities where the policy applies and recognizes the protection of rights, livelihoods, cultural heritage, and traditional knowledge of vulnerable and marginalized groups. The commitment extends to screening, meaningful stakeholder consultation, mitigation of social risks, culturally appropriate consultation, and free, prior and informed consent where required, and an accessible GRM where GCF-supported activities may affect communities meeting the characteristics described in the policy.

37. NEMC has implemented PS7 requirements in projects involving Indigenous Peoples aimed at climate adaptation and resilience. For instance, the SWAHAT environmental and social impact assessment report and project risk-management and adaptive measures report demonstrate that screening, risk assessment, stakeholder consultation, preparation of mitigation measures and plans, grievance redress, and environmental and social monitoring were applied to identified social risks, including risks affecting marginalized communities. The additional evidence concerning the NEMC grievance arrangements confirms that project-affected members of the public may raise complaints concerning harm or impacts associated with projects implemented or supervised by NEMC through e-Mrejesho, with the complaint then handled under the NEMC established GRM procedures.

38. The AP finds that the applicant meets the screening requirements for the Indigenous Peoples Policy.

3.2.5 Updated Gender Policy

39. The applicant has a gender and anti-sexual harassment policy and documented arrangements for integrating gender considerations into project management and monitoring. These address non-discrimination and equal participation, prevention and handling of gender-based violence and sexual harassment, and gender-responsive project design, stakeholder engagement and monitoring. The applicant adopted a Gender Action Plan 2026-2030 in September 2026, consisting of specific targets and responsibilities.

40. NEMC applies gender considerations throughout the project cycle. Evidence submitted by NEMC demonstrates gender analysis at the assessment stage, incorporation of gender considerations into project design and stakeholder engagement, and the use of gender-responsive indicators in results frameworks and performance reporting. The Gender Focal Point participates in project missions and consultations, as evidenced in gender assessment work for the World Bank-financed EHPMP.

41. NEMC has a designated Gender Focal Point, in post since 2023, with more than 12 years of environment-sector experience covering stakeholder engagement, gender equality, impact assessment and mitigation for affected communities. Documented responsibilities include coordinating implementation of the gender and anti-sexual harassment policy; integrating gender and inclusion into project design, implementation, monitoring and evaluation; delivering training; conducting risk-monitoring; and supporting the collection of sex-disaggregated data.
42. Evidence of implementation was provided through the Kongwa and SWAHAT projects. The Kongwa project performance report records an initial gender assessment, gender-responsive indicators in the results framework, and activities including women's gardens, women's participation in farmer field schools and training, and bee-keeping and tree-planting activities involving women and older people. The SWAHAT project performance report identifies gender-related risks, including unequal participation of women and men, unequal access to income-generating activities, and women's marginalization in household and community decision-making.
43. The NEMC gender and anti-sexual harassment policy explicitly defines gender balance as the goal of achieving equal representation of women and men in decision-making bodies and across different levels of the organizational structure. The Environmental Management Act of the United Republic of Tanzania establishes a minimum requirement at governance level: of the seven members of the NEMC board appointed by Minister in the Vice President's Office for Environment and Union Matters, at least two must be women. The current statistics of NEMC show that women represent 30 per cent of board members, 20 per cent of directors, and 52 per cent of managerial and principal officer posts.
44. The AP finds that the applicant meets the screening requirements for the updated gender policy.

3.3 Observations for the applicant

45. The applicant is encouraged to implement regular reporting of case trends as required in its whistle-blowing policy.

IV. Recommendations

46. Based on the assessment, the applicant is found to have met all applicable screening requirements.
47. Therefore, the AP recommends APL189 for accreditation and that it be accredited for **maximum environmental and social risk category: medium risk (category B/I-2)**.
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