

## **REGULATORY IMPACT ASSESSMENT IN TANZANIA: THE CURRENT PRACTICE AND CHALLENGES**

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### **ABSTRACT**

Regulatory Impact Assessment (RIA) systematically assesses the costs and benefits of proposed and existing regulations. Effective RIA implementation leads to the attainment transparency, accountability, proportionality and consistency which are principles of good governance. Previous surveys on the adoption and practice of RIA in developing countries that included Tanzania showed that these countries fall short of proper implementation of RIA. However, these studies were not in-depth as they focused on a number of countries which vary in economic and political development. Nevertheless, these surveys did not validate their findings with information from the regulated and ordinary citizens. Using both questionnaire and interviews this study therefore gives specific attention to the current practice and challenges of RIA. This study is more enriched as it attempted to gather information from both officials from regulatory agencies, the regulated and representatives of citizens. The study also attempted to fill the knowledge gap given the time lapse between the previous and current study. Findings indicated that compared to previous reports, the practice of RIA has improved but has not reached its full potential. With regards to challenges, the study showed that Tanzania is largely facing similar challenges since the first adoption of RIA over two decades ago. Overall, there is general positive improvement on the use of RIA particularly on regulations that affect the business sector. This study is part of my PhD dissertation to be submitted to the University of Dar es Salaam.

**Keywords:** Regulatory Impact Assessment, Ex-ante RIA, Ex-post RIA, Good Governance

### **1. INTRODUCTION**

Regulatory Impact Assessment (RIA) is a term used to describe the process of systematically assessing the benefits and costs of a new regulation or an existing regulation, with the aim of improving the quality of regulatory policy (Kirkpatrick & Parker, 2003). RIA aims to enhance public policy-making by systematically integrating the stock of available knowledge into these processes (Hertin, Jacob, Pesch, & Pacchi, 2009).

RIA has spread throughout the globe (Ladegaard 2005; Jacobs 2006; Kirkpatrick & Parker 2007; Kirkpatrick, Parker & Zhang 2004; Weatherill 2007; Wiener 2006). With effective stakeholder consultation throughout the process and systematic analysis of costs and benefits of proposed and existing regulations, RIA is a fundamental component of the smart regulatory state enhancing transparency, accountability, proportionality, consistency and overall principles of good governance advocated by international organizations such as Organization of Economic cooperation and development (The European Commission 2001 and OECD reports).

The underlying rationale for RIA is that regulations need to be assessed on a case by case basis to see whether they improve social welfare. RIA can contribute to both the outcome and the process dimensions of social welfare. By providing a systematic, evidenced based and consultative framework for policymaking, RIA systems are thought to encourage good governance and contribute to better business enabling environments – and ultimately economic growth (World Bank, 2009). The purpose of a RIA is to explain the objectives of the regulatory proposal, the risks to be addressed and the options for delivering the objectives.

In Tanzania RIA was introduced in 2004 and is a legal requirement in Tanzania (Kirkpatrick, C. and Yin-Fang Zhang 2004; LIAISE report, 2014). RIA was introduced as part of much wider program ‘Business Environment Strengthening for Tanzania’ (BEST) which received funding from International organizations (Welch 2007). RIA is particularly mentioned as a tool to assist the transformation of historically socialist systems to market driven economies. For instance, in 1998 the government of Tanzania showed commitment to regulatory good practices by issuing principles of good regulation while indicating that RIA is a tool for policymaking that helps the government to apply these principles. The document indicates the need for RIA to include among others: ascertain whether the new regulation would have desired impact, identify side effects to affected parties, cost of compliance as well as sharing of stakeholders’ views (The World Bank Group, 2010).

Specific studies on RIA that included Tanzania sought to find out the adoption of RIA in developing and transitional countries. Using a sample of 30 developing countries Kirkpatrick, and Parker (2004) survey revealed that a number of these countries have started applying some form of RIA though not comprehensive and still at early stage. In 2007 Zhang conducted a follow up study taking seven out of the original 30 countries in developing countries in Asia and Africa by making use of the data collected through two existing questionnaire surveys conducted in 2003 and 2007 respectively Zhang (2010). This survey revealed that these countries had not made substantial improvement in implementing wide-ranging RIA. In 2014 Adelle, C. and others conducted a study on the extent of RIA adoption and implementation in 14 developing and emerging economies. This survey concluded that although there are efforts in the adoption and implementation of RIA, however, these efforts have not sustainably contributed to regulatory governance. Nevertheless, other studies on the practice of RIA in less developed countries also report that RIA has not made significant progress in these countries because of inadequate institutional capacity, challenge of transferring a best ‘best practice’ models rooted in different economic, social and political contexts of developed countries and the fact that RIA programs were largely donor funded (Zhang and Thomas 2009; World Bank 2009; Parker and Kirkpatrick 2007). The puzzle is, over two decades since its adoption, what is the current state of play in Tanzania? Is there any tangible positive improvement? Do we have same challenges reported years back?

Worth emphasizing is that these studies focused on a number of countries in their sample rendering a lack of in depth focus on a particular country. In fact, although these countries are all characterized as developing/ emerging countries, they also vary in terms of political and economic setting. Similarly, most of the studies conducted were biased towards economic regulations. At the same time, with regards to respondents, these studies either sent questionnaire to government official or interviewed elite government officials. For instance, in Adelle et al. (2014) a semi-structured interview was carried with those at the strategic level. Accordingly, these findings lack information on the views of the regulated and citizens on their knowledge on RIA and whether or not are engaged in regulatory process.

This current study therefore sought to fill the gap by giving detailed evidence on the practice of RIA in Tanzania. This study is more enriched as it attempted to get information from both officials from regulatory institutions, the regulated and representatives of citizens. The study also attempted to fill the knowledge gap given the time lapse between the previous and current study. Particularly, this research focused on social regulations which also have influence on the implementation of economic regulations.

## **2. METHODOLOGY**

This study used both questionnaire and semi-structured interviews. Questionnaires were used to collect data from regulatory authorities namely Occupational Health and Safety Authority (OSHA) and National Environmental management Council (NEMC). OSHA is particularly charged with the responsibility of ensuring safe and healthy working conditions in all workplaces, by setting and enforcing laws and standards that will be observed by employers in every workplace. NEMC on the other hand, is mandated with the legal and institutional framework for the sustainable management of the environment in mainland Tanzania. Questionnaires were also distributed to Better Regulation Section (BRS) a unit under Prime Ministers' office whose main activity is to initiate adoption of modern instruments such as RIA and advice on policy, legal and regulatory constraints to private sector development. Interviews were conducted with the regulated manufacturing/processing industries and Civic society Organizations (CSOs) as representatives of the citizenry. CSOs included in the sample were those representing employees such as Trade Union Congress of Tanzania (TUCTA) and Tanzania Union of Industrial and Commercial Workers (TUICO); the environment - Lawyers Environmental Action Team (LEAT); and industry association- Confederation of Tanzania Industries (CTI). Data from interviews with the regulated and CSOs helped to confirm information from regulatory institutions and Better Regulation Section. The main questions revolved around; current practice of ex-ante and ex-post RIA, RIA guidelines, cost benefit analysis, RIA coordinating unit, stakeholders' consultation and considered challenges.

## **3. FINDINGS AND DISCUSSION**

### **The Practice of Ex-ante and Ex-post RIA**

Results confirm that Tanzania has adapted RIA guidelines from OECD. Conversely, these guidelines are not widely published and are not explicit as to show systematic procedure for implementing RIA from the analysis of costs and benefits to stakeholder consultation. With regards to ex- ante RIA, findings indicate that a systematic ex-ante process is not well in place. From respondents' view it

appears that ex –ante RIA seem to be acknowledged not as both analytical and consultation tool but only as a consultation process. The findings also demonstrate that regulatory institutions do not carry out a rigorous cost benefit analysis that quantifies and qualifies socio-economic and environmental impacts of the proposed regulations. With limited cost benefit analysis there is not as much consideration for non-regulatory approaches. Though regulation is often the most appropriate option it should not be automatically the only choice in all circumstances. An analysis of the key costs and benefits of a proposal is the central analytical component of the ex-ante RIA. Above all, it was also revealed that there is no legal requirement to have a Regulatory Impact Analysis Statement (RIAS) as required by RIA guidelines containing of description, alternatives, benefits and costs, consultation, compliance and enforcement, and contact. The findings imply that there is hardly evidence-based analysis of new regulations. This denotes that largely, regulations falls short of proportionality as a pillar of regulatory governance as they generally fail to strike a balance between the advantages that it provides and the constraints it imposes. What seems to be legally emphasized is the need to comply with consultation process which is also inadequate as will be seen in the upcoming section.

Ex-post evaluation is particularly necessary for developing countries like Tanzania taking into account that some regulations have been developed under pressure to respond to certain political regime or world economic demands. An important aspect is for regulators to have mandatory periodic evaluations in policies and their regulations and standing mechanisms by which the public can make recommendations to modify existing regulation. When asked whether there is a mandatory periodic collection of information on the perception of existing regulations a good number of respondents said no while others rather unexpectedly, do not even know about periodic evaluations. Only a few respondents agreed that there is periodic ex-post analysis.

Furthermore, a majority of respondents confirmed that there is barely own initiative to collect information on the perception of the existing regulations. For some, particularly the regulated manufacturing/processing industries have never had the opportunity to air their views/suggestions regarding existing regulations. In fact, only a few of the regulated communicated their complaints and suggestions regarding the existing regulations. Most of these complaints revolved around conflicting and overlapping regulations. A handful of stakeholders lamented that effective communication is constrained by lack of feedback mechanism and a single point avenue where stakeholders can access information and give their suggestions and complaints.

Nevertheless, officials from better regulation section, a unit at the Prime Minister’s office mandated with ensuring quality regulations revealed that currently there has been a survey on a number of regulations that seemed to impede the smooth running of the business sector. The overarching motivation for carrying out ex-post analysis as set out in the Blueprint document (2018) was to improve the business environment. Worth underlining is that currently Tanzania in her efforts to improve the business environment has embarked on reforming a number of regulations that have duplication of mandates; conflicting mandates; operational inefficiencies (e.g. time taken to issue a particular permit/license) and ad hoc procedures (multiple and duplicating inspections); unreasonable levels of various fees and charges. As a response, about 120 regulations were reviewed, similar regulations were consolidated and some overlapping regulations were also removed (Blue Print document, 2018). In one instance, it was seen that there was duplication of permits where local government issues building permits, OSHA and fire departments also issue building inspection and safety certificate. It was therefore approved that local government authorities should be the only

custodian for building permits issuance and all crosscutting regulators like OSHA and NEMC should submit their requirements to Local Government Authorities LGAs and recognize the permit issued by the latter. This orderly, systematic, transparent, rapid and low-cost means of counting and then rapidly reviewing a large number of regulations against clear scientific criteria for good regulation, and eliminating those that are no longer needed is what Jacobs and Associates, (2006) termed as guillotine. The recent review of numerous regulations that were perceived to impede the easiness to do business suggests a positive improvement in practicing ex-post RIA in Tanzania.

### Stakeholder Consultation

In regulatory process there are groups that gain from government action and groups that lose, some stakeholders may have influence to demand regulation, others to remove regulation. Regulators who act without first seeking input from groups affected by a regulation are unlikely to succeed in determining whether or how compliance with the regulation will be attained. Effective consultation helps government circumvent problems of producing regulations that are excessive, unnecessary or poorly designed. As outlined in the guidelines for policy/regulation preparations in Tanzania (*Mwongozo wa Sera, 2016*), the importance of engaging stakeholders in regulatory process is stressed. Similarly Part XIV of the Environmental Management Act, 2004 indicates the requirement of public participation in environmental decision making. Particularly, section 178 (2) aptly states the following;

“The public shall have the right to participate in decisions concerning the design of environmental policies, strategies, plans and programs and to participate in the preparation of laws and regulations relating to the environment”.

Practically, findings indicate that majority of respondents stated that stakeholder participation is still low while a few respondents indicated moderate participation. Besides, it is not mandatory for regulatory institutions to communicate RIA results with their concrete implications and options identified publicly. Meanwhile, most of the stakeholders indicated that they are invited to participate in regulatory process in the last stage when detailed proposals have been prepared. They lamented that at times they are bombarded in stakeholders meetings with large volumes of documents making it difficult to make constructive comments. An official from Confederation for Tanzania Industries complained that they are commonly given one week to read voluminous documents which are inadequate for them to consult over 300 of its members for comments. Only a handful confirmed that they are invited at the early stage of the process. For instance TUCTA, a civic society organization representing employees confirmed that they are invited at early stake as experts, particularly in regulations regarding work place safety.

Respondents contended that the lack legal requirement for regulatory agencies to release RIA documents for consultation compounds the problem. This implies that there is no guarantee that stakeholders' views are taken into account. Similarly, the government guideline for formulating policy/regulations aptly states that, *if necessary*, stakeholders' committee could be formed at the early stage to articulate stakeholder's views. This denotes that agencies are not bound to engage stakeholders in the initial stage of a regulatory process. At the same time, officials from better regulation section indicated that there is no standardized format for involving stakeholders. Analysis of the stakeholders helps to identify the people, groups and organizations that have an important part in the projected or existing regulations and may be either positively or negatively affected by the

reforms or are in a position to influence the outcome of the reform by supporting or opposing it. For instance, it is important to analyze how familiar the group/individual is with the regulation being proposed, how large the group is and how the group/individual is influential. Additionally, establish whether there are any deterrents that could lessen participation and how they can be supported. With lack of standardized format there is no guarantee that stakeholders will be rigorously consulted. Likewise, some civic organizations revealed that currently, the opportunity to be invited in regulatory process seem to be subject to one's political inclination.

These findings submit that stakeholders are at most consulted on an *ad hoc* basis being provided with complete draft to read and give their views limiting an initial round of exchange and communication about the possible effects that the legislation may have once it is approved. There is also no standardized allowable duration for people to give their inputs.

### **RIA Implementation, Coordination and Quality Control**

The creation of a central oversight and coordinating body with responsibility for promoting the use of RIA is the single most substantial quality assurance mechanism underscored by OECD guidelines. The advocacy role of coordinating bodies cover an array of essential aspects containing reviewing individual RIA, delivering training and providing methodological guidance. For effective implementation of both ex-ante and post-ante regulatory assessment a legal or high-level mandate is needed to support RIA implementation, to counter resistance from vested interests and foster political accountability. Findings from regulating institutions and BRS in this study show that parent ministries are responsible for implementing RIA in Tanzania.

However, a few of the respondents reveal that regulatory institutions, consultants, desk officers and government units are also responsible for implementing RIA. This implies that, in some instances, consultants and desk officers are tasked with the responsibility of assessing proposed and reviewing existing regulations. In the context of this finding, the review of documentaries such as *The Mwongozo wa Sera* (2016) shows that respective ministers are required to ensure stakeholder consultation is carried out before assenting the new regulation. Additionally, ministers have legal powers to address regulatory challenges in their respective agencies/regulatory institutions. For instance, Section 2 of Occupational Health and Safety Act, 2003 gives mandate to the minister to exempt certain work places and factories from the requirement to comply with the Act. As such, stakeholders who feel that the application of the OSHA Act to their business is unwarranted have the option of making a strong case and apply for exemption from the Minister under this provision. Undeniably, RIA is best conducted by ministries or regulatory agencies, which draft new or amend existing regulations (World Bank 2010). Such agencies are responsible for specific areas of regulation and therefore are best versed to understand regulatory problems and offer possible solutions. Doubtlessly, ministries or regulatory agencies typically have direct contacts with affected stakeholders and thus have a good understanding of the possible impact of proposed regulations on all the third parties.

Meanwhile, to safeguard quality regulations, the currently approved Blueprint (2018) for regulatory reforms underline the need for respective ministers to ensure all future regulations particularly those that are likely to impact upon a substantial part of the business community are subjected to detailed RIA. While promoting a business-enabling environment, the Blueprint also seeks to protect the

health, general well-being and social, environmental, cultural and economic statuses of consumers from harm that may be occasioned by some devious business operators (Blueprint, 2018).

An interview with officials from Private Sector Development and Empowerment (PSDE) and BRS reveal that the former Better Regulation Unit (BRU) wound up its activities in 2009 and was mainstreamed to PSDE under which a unit for ensuring quality regulations, regulatory reforms and coordination of initiatives to improve the business environment and investment climate was created named as Better Regulation Section (BRS). Along this line, documentary review also shows that the former BRU was a custodian of regulatory institutions. The major role of BRU was to manage, coordinate, facilitate, support, fast-track, and report the BEST reforms that cut across a number of sectors. BRU managed the implementation of the BEST program under which RIA was identified as a key tool for quality assurance regulatory reforms.

Even though the BRU was charged with the mandate of fast tracking the reforms, it did not have powers to push the implementers in respective ministries to undertake the reforms at the required pace. As opposed to BRU which was a program funded by the international community, BRS is part of government and funded by the government to predominantly serve the private sector. The main role of BRS is to initiate the adoption of modern instruments and approaches particularly the - Regulatory Impact Assessment, Regulatory Simplification and Regulatory Guillotine in policy and legal regulation framework. BRS is in the Prime Ministers' Office who essentially coordinates the private sector. BRS addresses issues of regulatory assessments where every department and ministry is required to have thematic technical working groups dealing with issues that affect the business sector.

Findings denote that BRS does not have a coordinating role for regulatory institutions. The lack of coordinating unit jeopardizes the proper implementation of ex-ante assessment and overall RIA. These findings parallel what Deighton- Smith, E. and Kauffmann, (2016) observed about a lack of effective and transparent RIA processes overseen by a specialized government body that can provide regulators with high quality, trusted and impartial advice about regulatory issues, as well as the quality of analysis contained in RIAs. These specialized units are responsible for determining which regulatory reforms require impact assessment, provide guidance to experts conducting the assessments and frequently review and monitor regulatory impacts conducted in individual ministries and inform the cabinet about compliance with regulatory impact assessment requirements.

Essentially, as required by OECD the body charged with coordinating the ex-ante process should have mandate to prevent regulatory proposals going to cabinet where there has been no substantive ex-ante RIA conducted. Indeed, with ineffective coordinating role, there is probability of the regulatory process being largely dominated by the political realm. Nevertheless, with the current approved blue print focusing on better ways to improve business climate in Tanzania which underscores strict observance of the RIA requirement for all regulations proposed by Ministries, Departments and Agencies (MDAs) and Local Government Authorities (LGAs) by-laws, it is probable that effective RIA will be well-thought-out in upcoming proposed regulations. However, the need for putting in place a coordination unit for all regulatory authorities is indispensable for improved RIA implementation.

### **Current challenges for implementing RIA**

Previous surveys conducted in developing countries indicated that effective implementation of RIA is not comprehensive due to a number of challenges. Some of the challenges specified pertained to capacity, a lack of data, knowledge, lack of political support among others (Lagard, P. 2005; Kick Patrick et al, 2004, Zhang, 2010; OECD 2009, 2010.). The question is whether or not Tanzania experiences the same challenges after over two decades of RIA adoption.

Findings in this study designate that although there has been positive improvement in the application of RIA to proposed and existing regulations, Tanzania is still constrained with challenges some of which are similar to those reported in previous surveys. For instance, the study established that effective participation is inhibited by inadequate skilled personnel and budgets for collecting and analyzing data from stakeholders. Similarly, trade unions, civil service organizations as well as corporations who are essential stakeholders poorly understand their critical role within constructive partnership of problem solving based on RIA. Largely, business representatives have inadequate capacity to assess proposals from government and collect timely and relevant information that provides solution to the problem. Moreover, regulatory institutions are compelled to reduce the number of participants and duration due to budgetary limitations. A lack of participatory culture in citizens prevents effective participation in regulatory process.

Likewise, findings indicate that citizens are not intrinsically motivated to participate in regulatory process. Officials from Civic Society Organizations confirmed that particularly ordinary citizens are in most cases are not interested in intangible issues such as those dealing with environment or safety of work places, they are mostly concerned about their basic needs such as food and the rest does not matter. Overall, citizens are of the view that there is somebody or a body that is endowed with decision making on their behalf. Similarly, budgetary constraint and the mindset that RIA is complex and costly make official to restrain from rigorous cost benefit analysis.

Another challenge facing implementation of RIA and somewhat different from those previously reported is the perception that RIA is only suitable for regulations that govern the business environment. For instance, the section under the Prime minister's Office is mandated to oversee the quality of regulations that affect the business sector. This is commonly in response to world economic reports that Tanzania still lags behind in easiness of doing business (World Economic Forum, 2017/18). As a result, some of currently proposed regulations in Tanzania like those related to media and other social aspects are largely not regarded with due assessment particularly, effective stakeholder consultation.

On the same footing, the lack of effective coordinating unit for RIA makes ministers and agencies unaccountable for effective implementation of RIA. As stated elsewhere in this document, ministers are responsible for ensuring RIA is carried out, particularly the consultation process. The existence of better regulation section as for now does not seem to have significant impact in coordinating the implementation of RIA. Findings largely imply that some regulations are still politically influenced. Nevertheless, worth noting is that these challenges are not only in developing and transitional economies but also in the comparatively developed nations though with varying degrees.



#### **4. Conclusion and Recommendations**

RIA is the main tool used to achieve regulatory quality which is a cornerstone of regulatory governance observing to the principles of proportionality, accountability, consistency, transparency, and targeting that is, regulation focused on problems, with minimum side effects.

As noted from the findings, albeit, moderate application of RIA in regulations, there are still considerable fissures. Particularly, RIA is mostly implemented as consultation tool rather than as both a consultation and analytical tool. This has to some extent limited the attainment of regulatory governance.

Nevertheless, of particular significance is that currently, there is considerable positive progress in the implementation of RIA. This is evidenced in the Blue Print document (2018) that repeatedly underscores the need to implement RIA in upcoming proposed regulation particularly those impacting the business sector. Related to the above is that the current more to review about 120 existing regulations which were perceived to be obsolete, conflicting and overlapping cannot be downplayed. Similarly, as noted in the discussion, the creation and funding of a RIA coordination unit which is part of the government though it has not made substantial impact is yet another positive improvement.

With regards to challenges, Tanzania is still experiencing challenges largely identified over two decades ago. Worth noting is that even developed countries have also not reached full potential in implementing RIA as per OECD guidelines. However, Tanzania and other developing countries seem to have put less importance in implementing RIA particularly effective consultation as the overall democracy of these countries is generally low.

In view of the findings the study recommends the following; First and foremost is political commitment. Effective and sustainable RIA need to be endorsed and supported with a long term perspective by a high level political and legal mandate. The need for whole-of-government responsibility is necessary to ensure that the implementation of RIA has political support.

The government should focus on institutional capacity building in terms of budgets and adequate skilled personnel that can implement business focus groups, surveys and test panels to discuss draft decisions and regulation. More attention should be given to data collection and quality issues, investment on training, strengthened quality control units and publication RIA manuals. Similarly, given the fact that the business sector and other stakeholders poorly understand their role within a constructive partnership of problem identification and solving based on RIA, there is need to build their capacity to assess proposal from the government and collect timely and constructive information that supports regulatory process.

Respective ministries and their agencies should adopt a ministerial consultation policy that establishes a standardized format for consultation. Given the challenges emanating from reliable data, they should use simplified RIA to ensure proportionality between the merits and demerits of a regulation. Of particular importance is effective consultation to attain quality qualitative data. Meanwhile, they should make consultation accessible to all business and stakeholders by use of various means of communication. Additionally, they should publish open public consultations announced at a single point where stakeholders can access information and give their suggestions and complaints.

RIA should be timely integrated in the decision-making process. Since RIA provides an assessment of risks, benefits and regulatory alternatives, it is important to integrate it at an early stage of the process to reach pre-defined policy objectives. Likewise, sufficient time should be provided and results of open public consultation displayed on website. Additionally, feedback to stakeholder's comments should be summarized in the final regulatory decision.

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## Appendix

**Table 1: The practice of Ex-ante RIA in Tanzania**

		Responses	
		N	Percent
Practice of ex-ante process	Identifying and listing the groups likely to be affected by regulation	19	57.6%
	Quantify cost, benefits and risks on proposed regulations	3	9.1%
	Qualify the impact of proposed regulations such as fairness, equity	6	18.2%
	Identify alternatives to regulations such as non-regulatory approaches	5	15.2%
<b>Total</b>		<b>33</b>	<b>100.0%</b>

Field data (2018)

**Table 2: Periodic regulatory evaluation**

Periodic regulatory evaluation		
	Frequency	Percent
Yes	4	18.2
No	10	45.5
Don't know	8	36.4
Total	22	100.0

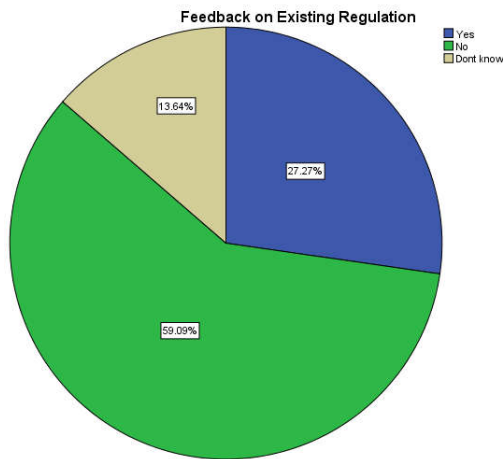
Source: Field data (2018)

**Table 3: Ex-post implementation**

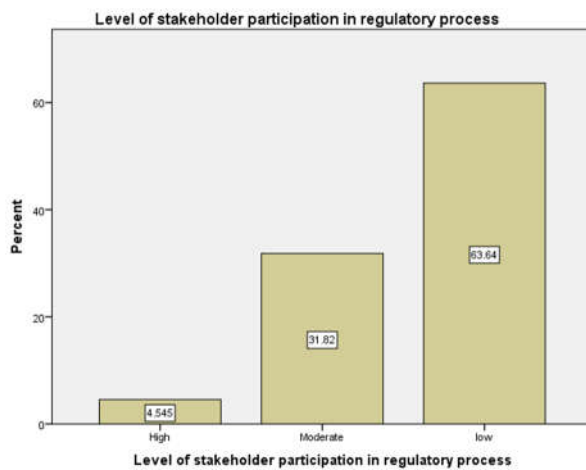
		Ex-post implementation	
		Responses	
		N	Percent
What prompts ex-post implementation	When there is overly none-compliance	22	46.8%
	When stakeholders complain	17	36.2%
	Own initiative to have regular assessment	8	17.0%
Total		47	100.0%

Field data (2018)

**Figure 1: Feedback mechanism**



**Figure 2: Level of Stakeholder participation**



**Table 4: Stage of involving stakeholders in regulatory process**

Stage of involving stakeholders in regulatory process		
	Frequency	Percent
Early stage (outline stage)	2	9.1
Intermediate stage (prior to detailed proposal)	6	27.3
Late stage (after detailed proposal)	14	63.6
<b>Total</b>	<b>22</b>	<b>100.0</b>

**Table 5: Perceived Barriers to stakeholders participation**

	Perceived Barriers to stakeholders participation							22
	Strongly Agree	Agree	Somewhat agree	Somewhat Disagree	Disagree	Strongly Disagree	Row N %	
Insufficient institutional capacity	40%	38.1%	31.8%	0.0%	0.0%	0.0%	0.0%	
Limited knowledge	0.0%	54.5%	36.4%	4.5%	0.0%	0.0%	4.5%	
Inadequate acceptance within public institutions	4.5%	36.4%	40.9%	18.2%	0.0%	0.0%	0.0%	
Inadequate reliable information	40%	39.6%	20.4%	0.0%	0.0%	0.0%	0.0%	
Insufficient political support	4.5%	13.6%	77.3%	4.5%	0.0%	0.0%	0.0%	
No well-established unit for coordinating RIA	22.7%	68.2%	4.5%	4.5%	0.0%	0.0%	0.0%	
Lack of participatory culture from stakeholders	30.5%	40.5%	20.4%	4.5%	0.0%	0.0%	0.0%	
No standardized format for engaging stakeholders	81.8%	4.5%	13.6%	0.0%	0.0%	0.0%	0.0%	