Historical List of NCBP Cases

The IDA Non-Concessional Borrowing Policy (NCBP) was introduced in 2006 to help countries improve debt sustainability. The policy aimed at addressing situations in post-Multilateral Debt Relief Initiative (MDRI) and grant-eligible IDA-only countries in which debt relief or IDA grants could potentially: i) cross-subsidize creditors that offer no concessional loans to recipient countries, or ii) create incentives for these countries to overborrow, thereby eroding the gains to debt sustainability obtained from debt relief and grants. The NCBP was replaced by the Sustainable Development Finance Policy (SDFP) as of fiscal year 2020. Below is a list of all NCBP cases from 2006 to 2020, classified by country and year.

1. NCBP Cases by Country

Country	Fiscal year(s)	IDA cycle(s)	Loan(s) amount (estimated as % of GDP)	Risk of debt distress	IDA response	Description
Angola	2007	IDA14	35	Moderate	Hardening of terms	Angola contracted substantial amounts of non-concessional borrowing in the years preceding 2007, estimated at US$15.5 billion (about 35 percent of its 2006 GDP). IDA's decision to harden the terms of the country's borrowing was based on country and loan specific factors. The loan specific assessment took into account the costs of the borrowing and the lack of information on the projects to be financed and their estimated returns. The country specific assessment showed that Angola's weak policy and institutional frameworks did not provide a strong platform for such volumes of borrowing on commercial terms.
Benin	2018	IDA18	1	Moderate	Waiver	Waiver provided to maintain consistency with IMF program.
Burundi	2011	IDA15	4.8	Moderate	Waiver	In 2011, Burundi contracted a loan with the Export-Import (Exim) Bank of India in the amount of US$80 million (4.8 percent of GDP) to finance the construction of the Kabu hydropower plant. The grant element of the loan (32 percent) was below the 50 percent threshold allowed under the IMF agreed supported program. The loan was assessed to be in line with the NCBP based on the unchanged risk rating, the economic viability of the project, and limited

						access to sufficient concessional funds for this critical energy generation investment during the energy crisis in the country.
Burundi	2013	IDA16	1	High	Waiver	Burundi contracted two loans (total of US$30 million) with the Saudi Development Fund and the OPEC Fund in 2013. The grant element of each of these two loans was marginally below the 50 percent policy threshold (48 percent). The IMF Board granted the waiver for the breach of the non-concessional borrowing ceiling in September 2013. These loans were also assessed to be in line with the NCBP based on the assessment of country- and loan-specific factors. In particular, the loan did not have a material impact on debt sustainability and the road project was aligned with the Poverty Reduction Strategy of addressing infrastructure bottlenecks. More precisely, the road project was seeking to connect Burundi with Rwanda and Tanzania, thereby enhancing the transportation network through improved access and trade facilitation.
Cameroon	2009	IDA15	0.3	Low	Waiver	Cameroon contracted a €60 million loan from the French Development Agency (AFD), with a 28 percent grant element. The purpose of the loan was to finance the construction of water treatment facilities and the rehabilitation of the water distribution network. An exception to the NCBP was granted due to the following combination of factors: (i) the viability of the project demonstrated by the project's economic rate of return (estimated at 12 to 13 percent); (ii) the consistency of this project with other donors' projects supporting Cameroon's water sector, including IDA's; (iii) the modest impact of the loan on the country's solid debt outlook; and (iv) the proximity of the loan's grant element to the 35 percent NCBP threshold.
Cameroon	2010-12	IDA15-16	5	Low	Waiver	Twenty five loans totaling US$2.2 billion were contracted between 2010 and 2012. One third of these loans (US$747 million) refer to NCB that was not intended as such, but resulted from technical problems (e.g., changes in the CIRR-

						based discount rate) and had grant elements close to the threshold of 35 percent. The remaining loans (US$1.5 billion with grant element of 13 percent) financed priority projects in the country's Poverty Reduction Strategy Paper in transport, energy, and telecommunication sectors. Given these factors, and the fact that the borrowing did not alter the risk of debt distress rating, the borrowing was assessed to be in line with the NCBP and a new ceiling totaling US$1.2 billion for FY13 was agreed. In FY15, Cameroon became creditworthy for IBRD and was reclassified as a blend country. Countries in blend status are not eligible for grants, and hence also no longer subject to the NCBP.
Chad	2010	IDA15	7.7	Moderate	Volume reduction	In 2010, Chad contracted and guaranteed bilateral loans from Libya and China totaling US$650 million, with a combined grant element of 13 percent. The US$300 million from the Libyan Foreign Bank was provided as budget support (about 3.6 percent of GDP), while China's Petroleum Corporation's (CNPC) provided funding with a government guarantee to the local state-owned oil company totaling US$350 million (4.1 percent of GDP). The latter financed the construction of Chad's N'Djamena refining company (40 percent state-owned). Lack of clarity regarding the economic, social or financial returns of the two projects together with the adverse impact of the non-concessional borrowing on the risk of debt distress prompted a 20 percent reduction in IDA allocations, which is broadly consistent with the grant discount. This measure was considered to be more appropriate than the alternative of hardening the financing terms, given the country's risk of debt distress rating.
Chad	2013-14	IDA16	4.5	High	Waiver	In May and August 2013, Chad contracted two non-concessional loans for oil sales' advances with a commercial partner (Glencore Energy), for a total of US$600 million (4.5 percent of GDP). Considering country- and loan-specific

						arguments, these non-concessional loans were assessed to be in line with the NCBP.
Chad	2013-14	IDA16	9	High	Waiver	In June 2014, Chad committed to a US$1.4 billion operation (9 percent of GDP) similar to a "carried equity" scheme, used to acquire equity participation in the largest oil consortium. Considering country- and loan-specific arguments, the operation was assessed to be in line with the NCBP.
Comoros	2013	IDA16	6.5	High	Waiver	Comoros signed a loan for a total amount of US$41.6 million (approximately 6.5 percent of 2012 GDP) with the Export-Import Bank of India to build a new heavy fuel electricity plant. The shortfall in concessionality for this loan (48 percent, marginally below the required 50 percent threshold) had a negligible adverse impact on debt sustainability. The IMF Board granted a waiver for the breach of the non-concessional borrowing ceiling in June 2013, and IDA also assessed the borrowing to be in line with the NCBP.
Comoros	2018	IDA18	8	Moderate	No waiver, ceiling suggested	In July 2018, Comoros singed a two-tranche loan with Eastern and Southern African Trade and Development Bank (TDB) in the amount of €40 million (equivalent to about 8 percent of GDP) to finance the rebuilding of El-Maarouf Hospital. The first tranche of the loan amounting 25 million euros had a grant element of zero percent. The legal agreement was complicated by making the disbursement conditional on the provision of a NCBP waiver. The authorities requested a waiver for the loan. The NCB committee recommended instead that the Government of Comoros considers the option of requesting a non-zero NCB ceiling.
Comoros	2019	IDA18	2.5	Moderate	Ceiling established	In May 2019, the Government of Comoros requested a non-zero NCB ceiling of €25 million. The ceiling was approved along with specific areas of actions, including: (i) improving debt management and transparency, (ii) limiting the size of external arrears and (iii) engaging in policy dialogue with the

						WB on the prioritization of investments within the framework of competing needs and limited resources.
Comoros	2020	IDA18	--	Moderate	Case closed	In FY20, Comoros disbursed $10 million of the €25 million non-zero NCB ceiling IDA approved. Management confirmed that Comoros performance was in line with the approved ceiling. Management's decision was submitted to WB Board and Comoros NCBP case is closed.
Congo, Democratic Republic of	2009	IDA15	1	High	Waiver	The country borrowed €55 million (less than 1 percent of GDP) from the European Investment Bank with a grant element of 28 percent. This loan was part of an integrated financing package for two projects for which IDA was a co-financier. In this case, the DRC was granted an exception from the NCBP requirements on the basis of two factors: (i) the package satisfied the Bank and Fund criteria to be considered "integrated" in terms of purpose, disbursement schedules and other parameters; and (ii) the grant element of the overall financing package exceeded 35 percent.
Congo, Republic	2009	IDA15	0.3	High	Waiver	The Republic of Congo borrowed €29 million from the French Development Agency (Agence française de développement, AFD) with an estimated 12 percent grant element. The loan was taken to finance the rehabilitation of port facilities. An exception was granted based on the following combination of factors: (i) the projected positive economic returns of the project co-financed through the loan; (ii) the generally sound macroeconomic environment and prudent fiscal and borrowing policies followed in recent years; (iii) the very limited impact of the loan on the country's debt outlook; and (iv) the commitment of the authorities to seeking external financing on highly concessional terms.
Côte d'Ivoire	2011	IDA15	2.2	High	Waiver	In April 2011, Ivorian authorities signed an agreement with the Government of France for a loan of €350 million (US$500 million or 2.2 percent of GDP) with a grant element of 5.6 percent. The loan was contracted in the context of urgent financing needs immediately following a five-month political

						crisis and civil war and aimed at re-launching the economy and consolidating peace. Côte d'Ivoire's non-concessional borrowing was assessed to be in line with IDA's NCBP based on multiple factors, including (i) the contribution of the loan to macroeconomic stability and peace; (ii) the absence of alternative financing with better financing terms; (iii) the modest impact of this non-concessional loan on the country's debt sustainability; (iv) the support by the IMF Board for the government's emergency program that included this loan, while recognizing that the IMF debt policy did not apply at the time of loan signature; and (v) the commitment of the new government to avoid any further non-concessional borrowing until the HIPC Completion Point was reached.
Ethiopia	2011	IDA15	2	Low	Waiver	Three non-concessional loans contracted during FY11 amounting to US$833 million, with a grant element of 18 percent, were assessed to be in line with IDA's NCBP. These loans financed infrastructure projects in transport and agriculture, in line with the government's Growth and Transformation Plan.
Ethiopia	2013-14	IDA16	17	Moderate	Volume reduction + hardening of terms	In April 2013, at the request of the Government of Ethiopia, IDA established non-concessional borrowing ceilings of US$1 billion for FY13 and, in principle, US$1 billion in each of FY14 and FY15. In FY13 and FY14, Ethiopia contracted significant volumes of non-concessional debt amounting to US$5.8 billion and US$2.9 billion, respectively. These volumes exceeded the annual limits agreed with IDA. For FY15, Ethiopia's debt assessment shifted from low to moderate risk of debt distress and, as per IDA's Performance Based Allocation (PBA) system, Ethiopia became eligible to receive 50 percent of its IDA allocation in the form of grants (the April 2014 DSA was the latest available at the time of Senior Management deliberation and decision). In response to the contracted amounts exceeding the agreed limits under the NCBP, IDA took the following remedial measures: (i)

						converted the grant portion of the PBA allocated volume for FY15 into regular IDA credits in order to mitigate the moral hazard issues and (ii) applied a 5 percent volume cut to Ethiopia's FY15 allocation. The Government of Ethiopia did not agree with the assessment that it was in breach of the NCBP. The argument was that the US$1 billion ceiling should be measured in terms of disbursement rather than commitment (FY13 and FY14 non-concessional disbursements did not exceed the annual ceiling).
Ethiopia	2015	IDA17	2	Moderate	Hardening of terms	IDA concluded that the Government of Ethiopia complied with the non-concessional borrowing ceiling set for FY15, having issued a US$1.0 billion 10-year Eurobond priced at 7.125 percent consistent with the NCBP ceiling. However, the conversion of the grant portion of the PBA into regular IDA credits was maintained for FY16. In addition, due to debt sustainability considerations, the NCB ceiling was reduced to $0.75 billion for FY16 (1.1 percent of GDP).
Ethiopia	2016	IDA17	1	Moderate	Hardening of terms	The conversion of the grant portion of the PBA into regular IDA credits was maintained for FY17. In addition, due to debt sustainability considerations, the NCB ceiling was further reduced to US$400 million for FY17 and FY18 (0.5 percent and 0.3 percent of GDP, respectively).
Ethiopia	2017	IDA17	1	Moderate	No remedy	The reported NCB contracted was estimated to be within NCBP limits.
Ethiopia	2018	IDA18	2	High	Hardening of terms	The Government of Ethiopia breached the NCBP ceiling by a wide margin. There were also delays in the reporting of NCB contracted in FY17 amounting to US$1.14 billion. Meanwhile, the 2017 DSA downgraded the Ethiopia risk of external debt distress from "moderate" to "high" and Ethiopia NCB ceiling was revised to zero. In response to the breach of the NCBP ceiling and reporting delays, IDA hardened Ethiopia's terms by converting 50 percent of the grant portion of IDA allocation (which was supposed to be 100 percent considering the shift to high risk of debt distress) into credit for FY19.

Ethiopia	2019	IDA18	--	High	Hardening of terms	For FY20, while commending the authorities for not contracting any NCB in FY19, management maintained the responses in place in FY19 given the country's short record of adherence to the NCBP ceiling and history of multiple breaches.
Ethiopia	2020	IDA18	--	High	Case closed	A review under the new SDFP approved three PPAs for Ethiopia and concluded that this was sufficient to incentivize the country to pursue reforms to address its public debt vulnerabilities. The Ethiopia NCBP case is closed.
Ghana	2007	IDA14	8	Moderate	Hardening of terms	Non-concessional borrowing in Ghana was assessed by IDA following the September 2007 issuance of a US$750 million Eurobond on international capital markets, and a US$292 million non-concessional loan agreement with China Exim Bank. A key consideration in IDA's response was the strength of Ghana's policies and institutions and the impact of the borrowing on the economy. In particular, the impetus to borrow was driven by the energy crisis which deepened in the second half of 2006 and early 2007. However, some uncertainty remained as to the potential returns of planned investments. Specifically, the large size of the non-concessional borrowing contracted raised concerns regarding its impact on the country's debt distress risk. IDA Management took these factors into account in deciding that the terms of IDA's financial assistance should be on blend terms in line with Ghana's increased market access.
Ghana	2009	IDA15	2	Moderate	Hardening of terms	IDA's financing to Ghana was on blend terms during FY09-FY11 in response to continued significant levels of non-concessional borrowing.
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Ghana	2011	IDA15	10	Moderate	No remedy	In 2011, Ghana's non-concessional borrowing (NCB) amounted to US$3.4 billion (or 9 percent of GDP) of which US$3 billion was contracted with the China Development Bank (CDB). The remainder of US$0.4 billion was borrowed

						from foreign commercial banks to procure police and defense equipment, build a power plant, and undertake water and sanitation works. The average non-concessional loan carried a grant element of 9 percent. At the request of the borrower, IDA reviewed the Master Facility Agreement (MFA) signed with the CDB in December 2011 for US$3 billion to finance projects including the development of railways, gas infrastructure, and industrial zones in the Western region, commercial agriculture in Accra plains, multi-modal transportation in the Eastern region, fisheries infrastructure in coastal areas, urban transport in Accra, and nation-wide SME incubation. All projects were aligned with the Ghana Shared Growth and Development Agenda (GSGDA) approved by Parliament in December 2010. The review concluded that the projects to be financed under the Agreement were in line with GSGDA's objectives and justified by expected high returns, particularly from the gas project. Based on the conclusions of the review as well as the Joint DSA of November 2011, the IMF increased the limit on NCB to US$3.4 billion for calendar year 2011. Since Ghana borrowing in 2011 was within this limit, the country had not breached IDA's NCBP requirements, and IDA regular volumes and terms were again applied in FY12 and FY13 (IDA's financing to Ghana was on blend terms during FY09-FY11 in response to continued significant levels of non-concessional borrowing). Once Ghana's GNI per capita was above the IDA operational cutoff for more than two consecutive years, the country shifted to IDA lending on blend terms starting from FY14 and, therefore, is no longer subject to the NCBP.
Guinea	2012-13	IDA16	5.8	Moderate	Waiver	Three loans signed with the India Eximbank and the OPEC Fund for International Development for a total amount of US$28 million (0.45 percent of GDP) with grant elements of 24 and – for two loans – 30 percent, were relatively small and had a negligible impact on debt sustainability. The

						contracting of non-concessional loans without prior consultations with either the World Bank or IMF was due in part to weak technical capacity. The fourth loan, for the Kaleta hydroelectricity project, was signed with Export-Import Bank of China and amounted to US$335 million (5.3 percent of GDP). Although initially expected to meet the 35 percent threshold at the time the final terms were negotiated in early-December 2012, a change in the discount rate later in the year, resulted in a drop in the grant element to 33 percent when the loan was signed on January 4, 2013. Hence, the concessionality breach was marginal and caused by external factors to the project financing arrangements. The assessment of country- and loan-specific factors for these four non-concessional loans contracted by Guinea during 2012-2013 led IDA to assess the borrowing to be in line with the NCBP.
Kyrgyz Republic	2013	IDA16	0.5	Moderate	Waiver	A US$30 million loan (0.5 percent of GDP) was contracted by the state-owned Elektricheskiye Stantsii (Electrical Power Plants - EPP) with the Eurasian Development Bank to finance the fuel purchases of its Bishkek combined heat and power plant for the 2013-2014 heating season. The grant element of the loan amounted to zero. The loan amount was relatively small and had a negligible impact on debt sustainability. The contracting of the loan without consultations with either the World Bank or IMF was due to weak technical capacity. The IMF Board granted the waiver for the breach of the non-concessional borrowing ceiling on June 10, 2013. Based on country- and loan-specific criteria, IDA assessed the loan to be in line with the NCBP.
Lao PDR	2010-14	IDA15-16	9	Moderate	Hardening of terms	Lao's authorities contracted loans totaling US$3.1 billion (or 9 percent of GDP per annum) from 2010 to 2014, with a weighted grant element of 23 percent. No sector-specific information on the projects financed by non-concessional borrowing (NCB) was available. In addition, debt sustainability had deteriorated in recent years, in part as a

						result of the significant levels of NCB. In the November 2014 DSA, Lao's rating worsened from "moderate" risk of debt distress, to a borderline moderate risk verging on high risk. IDA responded to the borrowing by converting 62 percent of the allocated grants for Lao PDR into credits, reflecting the timing of the decision midway through the fiscal year, and the advanced stage of the project dialogue with the authorities.
Madagascar	2014	IDA16	0.5	Low	Waiver	A non-concessional loan equivalent to US$30 million (0.3 percent of GDP) was signed with the Abu Dhabi Fund to help rehabilitate the National Route 5 between Soanierana Ivongo and North Mananara Airport. The grant element was estimated to be 27 percent. The loan had a negligible adverse impact on debt sustainability. Madagascar was under IMF's Rapid Credit Facility (RCF) program, and in the process of shifting to the Extended Credit Facility (ECF) arrangement. The IMF granted a waiver for the non-concessional financing, and IDA assessed the borrowing to be in line with the NCBP. In addition to the aforementioned borrowing, two further non-concessional loans totaling US$23.5 million (or 0.2 percent of GDP) with a grant element of 34 percent were signed with the OPEC Fund for International Development (OFID) to support two projects. The first project aimed at creating an irrigated area in the Melaky region in order to reduce poverty by increasing rice production. The second project focused on the energy sector and would provide parallel financing to the growth poles project financed by IDA from 2006 to 2014. Considering the small size of these loans, their expected benefits in terms of development impact, their limited impact on the DSA as well as the types of projects financed (irrigation and energy sector), IDA assessed the borrowing to be in line with the NCBP.
Maldives	2017	IDA17	29	High	Hardening of terms	Between June 2015 and September 2016, the government of the Maldives contracted eight loans and issued a bond with

						a total amount of US$ 1.031 billion (about 29 percent of 2016 GDP) on non-concessional terms. The loans had a combined grant element of close to zero percent. Central to these debt-financed investments were plans to relocate population from islands and atolls vulnerable to natural disaster and climate change to larger islands in Greater Malé. Following the review of the case, IDA decided to harden the country's terms from 100 percent grant given the country's high risk of debt distress, to a 50 percent grant and 50 percent credit basis in FY18.
Maldives	2018	IDA18	25	High	Hardening of terms	In FY18, the Maldives signed and guaranteed non-concessional loans in the amount of US$1.010 billion (25 percent of 2016 GDP) to support its large effort to consolidate its population around the capital city, a strategy that could reduce the cost of service delivery while supporting job creation and the climate change agenda. Following the review of the case, IDA decided to keep the country's terms to a 50 percent grant and 50 percent credit basis in FY19.
Maldives	2019	IDA18	6.4	High	Hardening of terms	Based on country and loan specific factors, management decided to maintain the hardening of the terms for FY20.
Maldives	2020	IDA18	9.7	High	Partial waiver, Case closed	The Government of Maldives (GoM) has requested ex-ante waivers for five loans/guarantees to contract US$ 514 million in non-concessional borrowing. The ex-ante waiver requests, and related IDA Management decisions, can be grouped in three categories: (i) The proposed US$ 40 million Asian Infrastructure Investment Bank (AIIB) loan is appropriately integrated with other financing sources and the proposed financing package would be concessional. A waiver was deemed warranted. (ii) A component of the proposed Samurai Bond (up to US$ 100 million – out of a total of US$300 million) will finance early retirement of the Eurobond issued in 2017. A partial waiver for this component is also warranted. (iii) The remaining ex-ante waiver requests – including the Samurai Bond components

						not related to the early retirement of the Eurobond issued in 2017 – were not granted, as these would increase further the stock of debt and increase fiscal vulnerabilities. The review of the case was pending by end FY20 and the case transitioned to SDFP. Given the country's track record in FY20, Management decided to require that the Maldives, despite being a small state, prepares three PPAs including a zero NVB debt ceiling. The Maldives FY21 PPAs were approved and the NCBP case is closed.
Mali	2007	IDA14	1	Low	Waiver	Mali entered into a non-concessional external financing agreement with the Islamic Development Bank (IsDB) in July 2007 for US$70.7 million, equivalent to about 1 percent of its 2007 GNI. The financing was to meet a critical need for additional electricity generation capacity to ease a short term crisis in the energy sector. IDA agreed that a waiver was justified due to: (i) Mali's urgent need for additional electricity generation capacity; (ii) the high expected economic and financial rates of return of the project; (iii) the strength of Mali's policies and institutions; and (iv) the modest size of the financing and the minimal impact on Mali's macroeconomic framework and debt sustainability.
Mauritania	2007	IDA14	4	Moderate	Waiver	Two non-concessional loans were signed by Mauritania in 2007. The first loan from the Arab Fund for Economic and Social Development (AFESD) for US$129 million to finance drinking water in Nouakchott was provided with a grant element of 34.6 percent, just short of the 35 percent level. An agreement in principle on more favorable terms led to an IMF waiver. The second publicly-guaranteed loan from the IsDB for US$18 million aimed to boost the electricity production capacity of SOMELEC, the national electricity company. Because the loan and lease package did not meet the minimum concessionality requirement under the IMF and World Bank policies, a supplemental grant from Japan that would be part of an overall integrated package of financing was agreed to in principle by the IsDB and Japan.

						On the basis of this, a waiver of the performance criteria on non-concessional borrowing was also provided by the IMF Board.
Mauritania	2010	IDA15	1.4	Moderate	Waiver	In November 2009, the government of Mauritania contracted an external loan from the Arab Monetary Fund in the amount of 9 million Arab Accounting Dinars (1.4 percent of GDP). The loan had a 4.7 percent grant element. IDA assessed the borrowing to be in line with the NCBP on the basis of the following factors: (i) the key role of this loan in helping the country implement critical crisis response measures to mitigate the impact of the global food and financial crises; (ii) the importance of the loan in assisting the country in maintaining macro-economic stability threatened by severe domestic and external shocks, while Mauritania sought to fully normalize its relationships with the international donor community; (iii) the lack of available concessional financing as also argued by the IMF team; and (iv) the limited impact on debt sustainability.
Mozambique	2016	IDA17	11	Moderate	Volume reduction + hardening of terms	Between 2009 and 2014, Mozambique contracted a previously undisclosed non-concessional borrowing of US$1.3 billion by issuing guarantees to state controlled companies and through direct borrowing from lenders. The debt comprised two guarantees for loans contracted by commercial companies with state equity participation amounting to US$1.16 billion. In addition to these guarantees there were also direct loans of US$133 million from bilateral creditors. This debt was about 10 percent of GDP and was not previously disclosed to the World Bank and IMF. After disclosure, non-concessional borrowing by Mozambique breached the US$1.5 billion ceiling set for non-concessional borrowing under the IMF program in place since 2013. This ceiling breach shifted Mozambique risk of debt distress rating from moderate to high. IDA remedy to the breach of NCBP was to convert grant volume that Mozambique would have received for FY17 as a red-light

						country into regular IDA credits and apply a 20 percent reduction in the volume of IDA allocation.
Mozambique	2017	IDA17	1	High	Volume reduction	In March 2017, Mozambique contracted a US$138 million loan in non-concessional terms to finance the migration from analog to digital broadcasting. Considering this borrowing and given the earlier undisclosed non-concessional borrowing, IDA applied a 10 percent volume cut to Mozambique's allocation under the PBA framework in FY18. IDA provided FY18 financing to Mozambique on 100 percent grant terms consistent with the country's debt distress risk rating.
Mozambique	2018	IDA18	--	High	Volume reduction	In September 2018, IDA reviewed its FY18 decision, noting that Mozambique did not contract any new known debt in the review period. However, the review also noted that limited progress had been made with respect to resolving debt defaults and restoring debt sustainability. The review also noted that the external audit of the previously undisclosed debt fell short of expectations due to significant information gaps. In view of these developments, IDA decided to retain the same remedy approved for FY18 (10 percent volume reduction to FY19 PBA allocation, with IDA financing on 100 percent grant terms) in FY19.
Mozambique	2019	IDA18	--	High	No remedy	Considering the progress achieved in pursuing accountability regarding non-disclosed debts, enhanced reporting, and steps to close debt-related legal and regulatory loopholes, as well as no new cases of NCB, Management decided to lift Mozambique's volume discount with effect in FY20.
Mozambique	2019	IDA18	36.4	High	Waiver	In May 2019, Mozambique requested an ex-ante waiver for US$4.6 billion (36.4 percent of GDP) of planned borrowing and issuance of a sovereign guarantee to the state-owned hydrocarbons company, Empresa Nacional de Hidrocarbonetos de Moçambique (ENH), to participate in Liquified Natural Gas (LNG) projects investment. LNG production is expected to be transformational for

						Mozambique's economic growth and fiscal revenues. In addition, the participation of ENH is expected to attract international investors and constitutes an opportunity for catalyzing the development of the gas sector in the country. After careful deliberation, Management approved the requested waiver conditional to fulfilling ex-ante and ex-post conditionalities: (i) publishing the amount and terms of the guarantee, (ii) publishing ENH's financial statement, (iii) continuing the disclosure of ENH's annual audited financial statements and debt contracted for all LNG projects, (iv) regular reporting of sovereign guarantee, and (v) inclusion of this information in the annual State's General Account to be shared with Parliament.
Mozambique	2020	IDA18	--	High	Case closed	While the country was in compliance with the NCBP, the FY20 discussion was not concluded at the time the new debt policy became effective and the case transitioned to SDFP. A review under the SDFP approved three PPAs for Mozambique and concluded that this was sufficient to incentivize the country to pursue reforms to address its public debt vulnerabilities. The Mozambique NCBP case is closed.
Rwanda	2008	IDA14	2	Moderate	Waiver	Rwanda was given an exception to the NCBP for US$100 million in planned borrowing to finance an energy project from the Exim Bank of India on terms with a grant element of 40 percent (short of the minimum grant element of 50 percent as per the IMF program). At the country's request, the IMF modified the performance criteria for Rwanda to include a non-zero ceiling for non-concessional borrowing. The proposed financing of the Nyabarongo hydropower project was projected to result in the production of urgently needed electricity allowing Rwanda to gradually eliminate recurrent subsidies and reduce the electricity tariffs towards levels competitive on a regional basis. The World Bank had been involved upstream in this decision, and had made a positive assessment of the financial viability of the project

						and the fit within the least cost electricity generation expansion plan.
Rwanda	2009	IDA15	1	Moderate	Waiver	Rwanda contracted a US$33 million loan from the Exim Bank of China, with a 34 percent grant element, to finance a road improvement project. The exception to the policy was granted based on the following combination of factors: (i) the economic viability of the project as assessed by the World Bank country team; (ii) the non-availability of more concessional financing, including from IDA; (iii) the negligible impact of the loan on Rwanda's debt outlook; and (iv) the development partners' assessment that contracting the loan did not limit Rwanda's access to concessional financing.
Sao Tome & Principe	2014	IDA16	10	High	Waiver	The authorities signed a US$40 million (about 10 percent of GDP) credit line with Angola. The original conditions specified in the agreement implied a grant element of 20 percent. The authorities renegotiated the terms and obtained a grant element of 45 percent (slightly below the IMF program target of 50 percent). The credit line was intended to primarily finance a public investment program. Specifically, US$15 million were expected to be disbursed to the Treasury in 2014, while the remaining amount was expected to be disbursed over the period 2015-2016 to support the public investment program via complementary agreements that established the scope and the amount of the project to be financed. IDA assessed the borrowing to be in line with the NCBP.
Sao Tome & Principe	2020	IDA18	0.4	High	Waiver, Case closed	In FY20, São Tomé and Príncipe's requested an ex-post waiver for US$1.7 million loan (0.4 percent of GDP) contracted in July 2019. IDA decided to grant an ex-post NCBP waiver for the loan considering the government's overall effort to reduce arrears and enhance debt sustainability. The management's decision was submitted to WB Board and São Tomé and Príncipe's NCBP case is closed.

Senegal	2009	IDA15	1.4	Low	Waiver	Senegal borrowed US$160 million (1.4 percent of GDP) on commercial terms from the Government of France to finance the clearing of outstanding arrears with domestic suppliers. Senegal was granted an exception on the basis of a simultaneous occurrence of the following: (i) the significant macroeconomic benefits associated with restoring the credibility of the State and strengthening private sector balance sheets; (ii) the Fund Executive Board's, and other donors' endorsement of the government arrears clearance program and its financing; (iii) the limited scope for alternative financing in the deteriorating global context; (iv) the modest impact of the non concessional loan on the country's debt outlook; and (v) the strength of policies and institutions in Senegal and Senegal's commitment to sound debt management.
Tajikistan	2018	IDA18	7.2	High	Waiver	In September 2017, Tajikistan issued a Eurobond worth US$500 million (7.2 percent of 2016 GDP) maturing in 10 years and priced at 7.125 percent with zero grant element. The loan was contracted in non-concessional terms to finance the construction of the Rogun hydropower plant. The issuance of the Eurobond led Tajikistan's risk of debt distress to shift from moderate to high in November 2017. After considering several project and country specific factors (including an external shock that depressed commodity prices and remittance inflows, weak policy and institutional performance, banking sector issues, and the project's prospect for export earnings) and lack of alternative concessional financing, IDA Management granted a waiver in response to the breach.
Tajikistan	2019	IDA18	--	High	No remedy	The FY19 annual NCBP review confirmed that Tajikistan was in compliance with the NCBP Committee recommendation as no new NCB was contracted.
Tajikistan	2020	IDA18	--	High	Case closed	There was no remedy in FY20 as Tajikistan complied with the requirements to meet policy actions set by the NCBP Committee during the previous year's review. IDA

						recommended the country team to continue the dialogue with the government in selected policy actions. While the country was in compliance with the NCBP, the FY20 discussion was not concluded at the time the new policy became effective and the case transitioned to SDFP. A review under the SDFP approved three PPAs for Tajikistan and concluded that this was sufficient to incentivize the country to pursue reforms to address its public debt vulnerabilities. The Tajikistan NCBP case is closed.
Tanzania	2020	IDA18	4	Low	Waiver	The NCBP Committee recommended Tanzania's request for an ex-post NCBP waiver for three loans (totaling US$ 2,660 million or about 4 percent GDP) contracted between January 2019 and June 2020. Tanzania is at a low risk of debt distress and is not required to prepare PPAs for FY21. Policy dialogue on debt will continue in the context of the country's DSA and broader macroeconomic monitoring.
Togo	2014	IDA16	0.6	Moderate	Waiver	The authorities contracted three non-concessional loans totaling US$26.4 million (0.6 percent of GDP). The average grant element of the loans amounted to 25 percent. The three loans financed the following projects: (i) the rehabilitation of the Lome-Cinkanse-Ouagadougou road (financed by the West African Development bank (BOAD) and the ECOWAS Bank for Investment and Development (EBID)); (ii) the enhancement of the capacity of electric energy distribution by creating a larger network of medium and low voltage in the hinterland of the country (financed by BOAD and EBID); and (iii) an agricultural project with the objective to improve food security and increase the income of agricultural producers (financed by EBID, BOAD, the International Fund for Agricultural Development (IFAD) and the Global Agriculture and Food Security Program (GAFSP)). The borrowing was assessed to be in line with the NCBP based on the development viability of the projects, unavailable concessional financing, and minimal impact of the borrowing on the debt outlook.

Uganda	2020	IDA18	0.9	Low	Waiver, Ceiling established, Case closed	Uganda has requested a waiver on a Euro 249.9 million (0.9 percent of GDP) non-concessional loan package to support the construction of the Kampala Industrial and Business Park (KIBP). The financing package consists of two loans with a volume-weighted grant element of 18 percent. IDA decided to grant a waiver for the non-concessional loan package for the following reasons: (i) amounts are relatively small, and simulations based on the latest debt sustainability analysis suggest that the impact on the trajectories of the country's debt burden indicators similarly are small; (ii) The loans have important economic benefits and positive spillover effect to the economy and the investment is in line with the Government's industrial development strategies. In line with its borrowing plans, Uganda later requested to establish a US$2.0 billion non-concessional borrowing ceiling for FY20. Management approved the debt ceiling. The board was notified and Uganda's NCBP case is closed. In low risk of debt distress on May 31, 2020, Uganda was not required to prepare FY21 PPAs. Policy dialogue on debt will continue in the context of the country's DSA and broader macroeconomic monitoring.
Vanuatu	2020	IDA18	5.5	Moderate	Waiver, Case closed	Vanuatu requested a waiver on a USD 51 million non-concessional borrowing contracted for the construction of roads. The purpose of the loan was to finance Phase II of the Tanna and Malekula Road Project. The grant element of the loan was approximately 28 percent. An exception to the NCBP was granted due to the following combination of factors: (i) The project has a clear rationale and will result in substantial economic benefits to the tourism and agriculture sectors; (ii) The 2019 IMF-WB Debt Sustainability Analysis indicates that the 2018 loan did not trigger a downgrade in the assessed risk of debt distress; (iii) there were no alternative sources of more concessional financing available to finance this project. The Board note was published, and

						Vanuatu's NCBP case is closed. Vanuatu, rated at moderate risk of debt distress, prepared FY21 PPAs, which were approved by Management.
Zambia	2011-12	IDA15-16	5.3	Low	Waiver	The authorities contracted loans amounting to US$1.25 billion (roughly 5.3 percent of GDP), including a bond issued in September 2011 in the amount of US$750 million or 3.2 percent of GDP (following the discontinuation of an IMF program in June 2011). The combined grant element of the loans was about 13 percent. The loans were earmarked for infrastructure projects. The borrowing was assessed to be in line with the NCBP based on the following considerations: (i) the development viability of the projects as assessed by the World Bank country team; and (ii) no shift in the risk rating.
Zambia	2013-14	IDA16	6	Moderate	No remedy	Zambian authorities signed a number of new non-concessional loans in 2013 in the amount of US$545, of which US$360 million (65 percent of the NCB) was from the China Development Bank and the Exim Bank of China, and the remainder provided by the Saudi Fund for Development and the European Investment Bank (EIB). In addition, the Government issued a Eurobond in the amount of US$1 billion in April 2014. Zambian authorities requested (i) a consideration under the NCBP for loans contracted in 2013 for a total amount of US$545 million; and (ii) the establishment of a NCB ceiling of US$3 billion over a three year period (2014-2016). While no shifts in the risk rating occurred at this stage, an agreement on a non-zero ceiling was complicated by the then ongoing IMF negotiations and the need to avoid situations of setting parallel ceilings. In FY16, Zambia was no longer subject to the NCBP and shifted to Gap status.

2. NCBP Cases by Year

Fiscal year(s)	Country	IDA cycle(s)	Loan(s) amount (estimated as % of GDP)	Risk of debt distress	IDA response	Description
2007	Angola	IDA14	35	Moderate	Hardening of terms	Angola contracted substantial amounts of non-concessional borrowing in the years preceding 2007, estimated at US$15.5 billion (about 35 percent of its 2006 GDP). IDA's decision to harden the terms of the country's borrowing was based on country and loan specific factors. The loan specific assessment took into account the costs of the borrowing and the lack of information on the projects to be financed and their estimated returns. The country specific assessment showed that Angola's weak policy and institutional frameworks did not provide a strong platform for such volumes of borrowing on commercial terms.
2007	Ghana	IDA14	8	Moderate	Hardening of terms	Non-concessional borrowing in Ghana was assessed by IDA following the September 2007 issuance of a US$750 million Eurobond on international capital markets, and a US$292 million non-concessional loan agreement with China Exim Bank. A key consideration in IDA's response was the strength of Ghana's policies and institutions and the impact of the borrowing on the economy. In particular, the impetus to borrow was driven by the energy crisis which deepened in the second half of 2006 and early 2007. However, some uncertainty remained as to the potential returns of planned investments. Specifically, the large size of the non-concessional borrowing contracted raised concerns regarding its impact on the country's debt distress risk. IDA Management took these factors into account in deciding that the terms of IDA's financial assistance should be on blend terms in line with Ghana's increased market access.
2007	Mali	IDA14	1	Low	Waiver	Mali entered into a non-concessional external financing agreement with the Islamic Development Bank (IsDB) in July

						2007 for US$70.7 million, equivalent to about 1 percent of its 2007 GNI. The financing was to meet a critical need for additional electricity generation capacity to ease a short term crisis in the energy sector. IDA agreed that a waiver was justified due to: (i) Mali's urgent need for additional electricity generation capacity; (ii) the high expected economic and financial rates of return of the project; (iii) the strength of Mali's policies and institutions; and (iv) the modest size of the financing and the minimal impact on Mali's macroeconomic framework and debt sustainability.
2007	Mauritania	IDA14	4	Moderate	Waiver	Two non-concessional loans were signed by Mauritania in 2007. The first loan from the Arab Fund for Economic and Social Development (AFESD) for US$129 million to finance drinking water in Nouakchott was provided with a grant element of 34.6 percent, just short of the 35 percent level. An agreement in principle on more favorable terms led to an IMF waiver. The second publicly-guaranteed loan from the IsDB for US$18 million aimed to boost the electricity production capacity of SOMELEC, the national electricity company. Because the loan and lease package did not meet the minimum concessionality requirement under the IMF and World Bank policies, a supplemental grant from Japan that would be part of an overall integrated package of financing was agreed to in principle by the IsDB and Japan. On the basis of this, a waiver of the performance criteria on non-concessional borrowing was also provided by the IMF Board.
2008	Rwanda	IDA14	2	Moderate	Waiver	Rwanda was given an exception to the NCBP for US$100 million in planned borrowing to finance an energy project from the Exim Bank of India on terms with a grant element of 40 percent (short of the minimum grant element of 50 percent as per the IMF program). At the country's request, the IMF modified the performance criteria for Rwanda to include a non-zero ceiling for non-concessional borrowing. The proposed financing of the Nyabarongo hydropower

						project was projected to result in the production of urgently needed electricity allowing Rwanda to gradually eliminate recurrent subsidies and reduce the electricity tariffs towards levels competitive on a regional basis. The World Bank had been involved upstream in this decision, and had made a positive assessment of the financial viability of the project and the fit within the least cost electricity generation expansion plan.
2009	Cameroon	IDA15	0.3	Low	Waiver	Cameroon contracted a €60 million loan from the French Development Agency (AFD), with a 28 percent grant element. The purpose of the loan was to finance the construction of water treatment facilities and the rehabilitation of the water distribution network. An exception to the NCBP was granted due to the following combination of factors: (i) the viability of the project demonstrated by the project's economic rate of return (estimated at 12 to 13 percent); (ii) the consistency of this project with other donors' projects supporting Cameroon's water sector, including IDA's; (iii) the modest impact of the loan on the country's solid debt outlook; and (iv) the proximity of the loan's grant element to the 35 percent NCBP threshold.
2009	Congo, Republic	IDA15	0.3	High	Waiver	The Republic of Congo borrowed €29 million from the French Development Agency (Agence française de développement, AFD) with an estimated 12 percent grant element. The loan was taken to finance the rehabilitation of port facilities. An exception was granted based on the following combination of factors: (i) the projected positive economic returns of the project co-financed through the loan; (ii) the generally sound macroeconomic environment and prudent fiscal and borrowing policies followed in recent years; (iii) the very limited impact of the loan on the country's debt outlook; and (iv) the commitment of the authorities to seeking external financing on highly concessional terms.

2009	Congo, Democratic Republic of	IDA15	1	High	Waiver	The country borrowed €55 million (less than 1 percent of GDP) from the European Investment Bank with a grant element of 28 percent. This loan was part of an integrated financing package for two projects for which IDA was a co-financier. In this case, the DRC was granted an exception from the NCBP requirements on the basis of two factors: (i) the package satisfied the Bank and Fund criteria to be considered “integrated” in terms of purpose, disbursement schedules and other parameters; and (ii) the grant element of the overall financing package exceeded 35 percent.
2009	Ghana	IDA15	2	Moderate	Hardening of terms	IDA’s financing to Ghana was on blend terms during FY09-FY11 in response to continued significant levels of non-concessional borrowing.
2009	Rwanda	IDA15	1	Moderate	Waiver	Rwanda contracted a US$33 million loan from the Exim Bank of China, with a 34 percent grant element, to finance a road improvement project. The exception to the policy was granted based on the following combination of factors: (i) the economic viability of the project as assessed by the World Bank country team; (ii) the non-availability of more concessional financing, including from IDA; (iii) the negligible impact of the loan on Rwanda’s debt outlook; and (iv) the development partners’ assessment that contracting the loan did not limit Rwanda’s access to concessional financing.
2009	Senegal	IDA15	1.4	Low	Waiver	Senegal borrowed US$160 million (1.4 percent of GDP) on commercial terms from the Government of France to finance the clearing of outstanding arrears with domestic suppliers. Senegal was granted an exception on the basis of a simultaneous occurrence of the following: (i) the significant macroeconomic benefits associated with restoring the credibility of the State and strengthening private sector balance sheets; (ii) the Fund Executive Board’s, and other donors’ endorsement of the government arrears clearance program and its financing; (iii) the limited scope for alternative financing in the deteriorating global context; (iv) the modest impact of the non concessional loan on the

						country's debt outlook; and (v) the strength of policies and institutions in Senegal and Senegal's commitment to sound debt management.
2010	Chad	IDA15	7.7	Moderate	Volume reduction	In 2010, Chad contracted and guaranteed bilateral loans from Libya and China totaling US$650 million, with a combined grant element of 13 percent. The US$300 million from the Libyan Foreign Bank was provided as budget support (about 3.6 percent of GDP), while China's Petroleum Corporation's (CNPC) provided funding with a government guarantee to the local state-owned oil company totaling US$350 million (4.1 percent of GDP). The latter financed the construction of Chad's N'Djamena refining company (40 percent state-owned). Lack of clarity regarding the economic, social or financial returns of the two projects together with the adverse impact of the non-concessional borrowing on the risk of debt distress prompted a 20 percent reduction in IDA allocations, which is broadly consistent with the grant discount. This measure was considered to be more appropriate than the alternative of hardening the financing terms, given the country's risk of debt distress rating.
2010	Ghana	IDA15	--	Moderate	Hardening of terms	IDA's financing to Ghana was on blend terms during FY09-FY11 in response to continued significant levels of non-concessional borrowing.
2010	Mauritania	IDA15	1.4	Moderate	Waiver	In November 2009, the government of Mauritania contracted an external loan from the Arab Monetary Fund in the amount of 9 million Arab Accounting Dinars (1.4 percent of GDP). The loan had a 4.7 percent grant element. IDA assessed the borrowing to be in line with the NCBP on the basis of the following factors: (i) the key role of this loan in helping the country implement critical crisis response measures to mitigate the impact of the global food and financial crises; (ii) the importance of the loan in assisting the country in maintaining macro-economic stability threatened by severe domestic and external shocks, while Mauritania

						sought to fully normalize its relationships with the international donor community; (iii) the lack of available concessional financing as also argued by the IMF team; and (iv) the limited impact on debt sustainability.
2010-12	Cameroon	IDA15-16	5	Low	Waiver	Twenty five loans totaling US$2.2 billion were contracted between 2010 and 2012. One third of these loans (US$747 million) refer to NCB that was not intended as such, but resulted from technical problems (e.g., changes in the CIRR-based discount rate) and had grant elements close to the threshold of 35 percent. The remaining loans (US$1.5 billion with grant element of 13 percent) financed priority projects in the country's Poverty Reduction Strategy Paper in transport, energy, and telecommunication sectors. Given these factors, and the fact that the borrowing did not alter the risk of debt distress rating, the borrowing was assessed to be in line with the NCBP and a new ceiling totaling US$1.2 billion for FY13 was agreed. In FY15, Cameroon became creditworthy for IBRD and was reclassified as a blend country. Countries in blend status are not eligible for grants, and hence also no longer subject to the NCBP.
2010-14	Lao PDR	IDA15-16	9	Moderate	Hardening of terms	Lao's authorities contracted loans totaling US$3.1 billion (or 9 percent of GDP per annum) from 2010 to 2014, with a weighted grant element of 23 percent. No sector-specific information on the projects financed by non-concessional borrowing (NCB) was available. In addition, debt sustainability had deteriorated in recent years, in part as a result of the significant levels of NCB. In the November 2014 DSA, Lao's rating worsened from "moderate" risk of debt distress, to a borderline moderate risk verging on high risk. IDA responded to the borrowing by converting 62 percent of the allocated grants for Lao PDR into credits, reflecting the timing of the decision midway through the fiscal year, and the advanced stage of the project dialogue with the authorities.

2011	Burundi	IDA15	4.8	Moderate	Waiver	In 2011, Burundi contracted a loan with the Export-Import (Exim) Bank of India in the amount of US$80 million (4.8 percent of GDP) to finance the construction of the Kabu hydropower plant. The grant element of the loan (32 percent) was below the 50 percent threshold allowed under the IMF agreed supported program. The loan was assessed to be in line with the NCBP based on the unchanged risk rating, the economic viability of the project, and limited access to sufficient concessional funds for this critical energy generation investment during the energy crisis in the country.
2011	Côte d'Ivoire	IDA15	2.2	High	Waiver	In April 2011, Ivorian authorities signed an agreement with the Government of France for a loan of €350 million (US$500 million or 2.2 percent of GDP) with a grant element of 5.6 percent. The loan was contracted in the context of urgent financing needs immediately following a five-month political crisis and civil war and aimed at re-launching the economy and consolidating peace. Côte d'Ivoire's non-concessional borrowing was assessed to be in line with IDA's NCBP based on multiple factors, including (i) the contribution of the loan to macroeconomic stability and peace; (ii) the absence of alternative financing with better financing terms; (iii) the modest impact of this non-concessional loan on the country's debt sustainability; (iv) the support by the IMF Board for the government's emergency program that included this loan, while recognizing that the IMF debt policy did not apply at the time of loan signature; and (v) the commitment of the new government to avoid any further non-concessional borrowing until the HIPC Completion Point was reached.
2011	Ethiopia	IDA15	2	Low	Waiver	Three non-concessional loans contracted during FY11 amounting to US$833 million, with a grant element of 18 percent, were assessed to be in line with IDA's NCBP. These loans financed infrastructure projects in transport and

						agriculture, in line with the government's Growth and Transformation Plan.
2011	Ghana	IDA15	10	Moderate	No remedy	In 2011, Ghana's non-concessional borrowing (NCB) amounted to US$3.4 billion (or 9 percent of GDP) of which US$3 billion was contracted with the China Development Bank (CDB). The remainder of US$0.4 billion was borrowed from foreign commercial banks to procure police and defense equipment, build a power plant, and undertake water and sanitation works. The average non-concessional loan carried a grant element of 9 percent. At the request of the borrower, IDA reviewed the Master Facility Agreement (MFA) signed with the CDB in December 2011 for US$3 billion to finance projects including the development of railways, gas infrastructure, and industrial zones in the Western region, commercial agriculture in Accra plains, multi-modal transportation in the Eastern region, fisheries infrastructure in coastal areas, urban transport in Accra, and nation-wide SME incubation. All projects were aligned with the Ghana Shared Growth and Development Agenda (GSGDA) approved by Parliament in December 2010. The review concluded that the projects to be financed under the Agreement were in line with GSGDA's objectives and justified by expected high returns, particularly from the gas project. Based on the conclusions of the review as well as the Joint DSA of November 2011, the IMF increased the limit on NCB to US$3.4 billion for calendar year 2011. Since Ghana borrowing in 2011 was within this limit, the country had not breached IDA's NCBP requirements, and IDA regular volumes and terms were again applied in FY12 and FY13 (IDA's financing to Ghana was on blend terms during FY09-FY11 in response to continued significant levels of non-concessional borrowing). Once Ghana's GNI per capita was above the IDA operational cutoff for more than two consecutive years, the country shifted to IDA lending on

						blend terms starting from FY14 and, therefore, is no longer subject to the NCBP.
2011-12	Zambia	IDA15-16	5.3	Low	Waiver	The authorities contracted loans amounting to US$1.25 billion (roughly 5.3 percent of GDP), including a bond issued in September 2011 in the amount of US$750 million or 3.2 percent of GDP (following the discontinuation of an IMF program in June 2011). The combined grant element of the loans was about 13 percent. The loans were earmarked for infrastructure projects. The borrowing was assessed to be in line with the NCBP based on the following considerations: (i) the development viability of the projects as assessed by the World Bank country team; and (ii) no shift in the risk rating.
2012-13	Guinea	IDA16	5.8	Moderate	Waiver	Three loans signed with the India Eximbank and the OPEC Fund for International Development for a total amount of US$28 million (0.45 percent of GDP) with grant elements of 24 and – for two loans – 30 percent, were relatively small and had a negligible impact on debt sustainability. The contracting of non-concessional loans without prior consultations with either the World Bank or IMF was due in part to weak technical capacity. The fourth loan, for the Kaleta hydroelectricity project, was signed with Export-Import Bank of China and amounted to US$335 million (5.3 percent of GDP). Although initially expected to meet the 35 percent threshold at the time the final terms were negotiated in early-December 2012, a change in the discount rate later in the year, resulted in a drop in the grant element to 33 percent when the loan was signed on January 4, 2013. Hence, the concessionality breach was marginal and caused by external factors to the project financing arrangements. The assessment of country- and loan-specific factors for these four non-concessional loans contracted by Guinea during 2012-2013 led IDA to assess the borrowing to be in line with the NCBP.
2013	Burundi	IDA16	1	High	Waiver	Burundi contracted two loans (total of US$30 million) with the Saudi Development Fund and the OPEC Fund in 2013.

						The grant element of each of these two loans was marginally below the 50 percent policy threshold (48 percent). The IMF Board granted the waiver for the breach of the non-concessional borrowing ceiling in September 2013. These loans were also assessed to be in line with the NCBP based on the assessment of country- and loan-specific factors. In particular, the loan did not have a material impact on debt sustainability and the road project was aligned with the Poverty Reduction Strategy of addressing infrastructure bottlenecks. More precisely, the road project was seeking to connect Burundi with Rwanda and Tanzania, thereby enhancing the transportation network through improved access and trade facilitation.
2013	Comoros	IDA16	6.5	High	Waiver	Comoros signed a loan for a total amount of US$41.6 million (approximately 6.5 percent of 2012 GDP) with the Export-Import Bank of India to build a new heavy fuel electricity plant. The shortfall in concessionality for this loan (48 percent, marginally below the required 50 percent threshold) had a negligible adverse impact on debt sustainability. The IMF Board granted a waiver for the breach of the non-concessional borrowing ceiling in June 2013, and IDA also assessed the borrowing to be in line with the NCBP.
2013	Kyrgyz Republic	IDA16	0.5	Moderate	Waiver	A US$30 million loan (0.5 percent of GDP) was contracted by the state-owned Elektricheskiye Stantsii (Electrical Power Plants - EPP) with the Eurasian Development Bank to finance the fuel purchases of its Bishkek combined heat and power plant for the 2013-2014 heating season. The grant element of the loan amounted to zero. The loan amount was relatively small and had a negligible impact on debt sustainability. The contracting of the loan without consultations with either the World Bank or IMF was due to weak technical capacity. The IMF Board granted the waiver for the breach of the non-concessional borrowing ceiling on

						June 10, 2013. Based on country- and loan-specific criteria, IDA assessed the loan to be in line with the NCBP.
2013-14	Chad	IDA16	4.5	High	Waiver	In May and August 2013, Chad contracted two non-concessional loans for oil sales' advances with a commercial partner (Glencore Energy), for a total of US$600 million (4.5 percent of GDP). Considering country- and loan-specific arguments, these non-concessional loans were assessed to be in line with the NCBP.
2013-14	Chad	IDA16	9	High	Waiver	In June 2014, Chad committed to a US$1.4 billion operation (9 percent of GDP) similar to a "carried equity" scheme, used to acquire equity participation in the largest oil consortium. Considering country- and loan-specific arguments, the operation was assessed to be in line with the NCBP.
2013-14	Ethiopia	IDA16	17	Moderate	Volume reduction + hardening of terms	In April 2013, at the request of the Government of Ethiopia, IDA established non-concessional borrowing ceilings of US$1 billion for FY13 and, in principle, US$1 billion in each of FY14 and FY15. In FY13 and FY14, Ethiopia contracted significant volumes of non-concessional debt amounting to US$5.8 billion and US$2.9 billion, respectively. These volumes exceeded the annual limits agreed with IDA. For FY15, Ethiopia's debt assessment shifted from low to moderate risk of debt distress and, as per IDA's Performance Based Allocation (PBA) system, Ethiopia became eligible to receive 50 percent of its IDA allocation in the form of grants (the April 2014 DSA was the latest available at the time of Senior Management deliberation and decision). In response to the contracted amounts exceeding the agreed limits under the NCBP, IDA took the following remedial measures: (i) converted the grant portion of the PBA allocated volume for FY15 into regular IDA credits in order to mitigate the moral hazard issues and (ii) applied a 5 percent volume cut to Ethiopia's FY15 allocation. The Government of Ethiopia did not agree with the assessment that it was in breach of the NCBP. The argument was that the US$1 billion ceiling should be measured in terms of disbursement rather than

						commitment (FY13 and FY14 non-concessional disbursements did not exceed the annual ceiling).
2013-14	Zambia	IDA16	6	Moderate	No remedy	Zambian authorities signed a number of new non-concessional loans in 2013 in the amount of US$545, of which US$360 million (65 percent of the NCB) was from the China Development Bank and the Exim Bank of China, and the remainder provided by the Saudi Fund for Development and the European Investment Bank (EIB). In addition, the Government issued a Eurobond in the amount of US$1 billion in April 2014. Zambian authorities requested (i) a consideration under the NCBP for loans contracted in 2013 for a total amount of US$545 million; and (ii) the establishment of a NCB ceiling of US$3 billion over a three year period (2014-2016). While no shifts in the risk rating occurred at this stage, an agreement on a non-zero ceiling was complicated by the then ongoing IMF negotiations and the need to avoid situations of setting parallel ceilings. In FY16, Zambia was no longer subject to the NCBP and shifted to Gap status.
2014	Madagascar	IDA16	0.5	Low	Waiver	A non-concessional loan equivalent to US$30 million (0.3 percent of GDP) was signed with the Abu Dhabi Fund to help rehabilitate the National Route 5 between Soanierana Ivongo and North Mananara Airport. The grant element was estimated to be 27 percent. The loan had a negligible adverse impact on debt sustainability. Madagascar was under IMF's Rapid Credit Facility (RCF) program, and in the process of shifting to the Extended Credit Facility (ECF) arrangement. The IMF granted a waiver for the non-concessional financing, and IDA assessed the borrowing to be in line with the NCBP. In addition to the aforementioned borrowing, two further non-concessional loans totaling US$23.5 million (or 0.2 percent of GDP) with a grant element of 34 percent were signed with the OPEC Fund for International Development (OFID) to support two projects. The first project aimed at creating an irrigated area in the

						Melaky region in order to reduce poverty by increasing rice production. The second project focused on the energy sector and would provide parallel financing to the growth poles project financed by IDA from 2006 to 2014. Considering the small size of these loans, their expected benefits in terms of development impact, their limited impact on the DSA as well as the types of projects financed (irrigation and energy sector), IDA assessed the borrowing to be in line with the NCBP.
2014	Sao Tome & Principe	IDA16	10	High	Waiver	The authorities signed a US$40 million (about 10 percent of GDP) credit line with Angola. The original conditions specified in the agreement implied a grant element of 20 percent. The authorities renegotiated the terms and obtained a grant element of 45 percent (slightly below the IMF program target of 50 percent). The credit line was intended to primarily finance a public investment program. Specifically, US$15 million were expected to be disbursed to the Treasury in 2014, while the remaining amount was expected to be disbursed over the period 2015-2016 to support the public investment program via complementary agreements that established the scope and the amount of the project to be financed. IDA assessed the borrowing to be in line with the NCBP.
2014	Togo	IDA16	0.6	Moderate	Waiver	The authorities contracted three non-concessional loans totaling US$26.4 million (0.6 percent of GDP). The average grant element of the loans amounted to 25 percent. The three loans financed the following projects: (i) the rehabilitation of the Lome-Cinkanse-Ouagadougou road (financed by the West African Development bank (BOAD) and the ECOWAS Bank for Investment and Development (EBID)); (ii) the enhancement of the capacity of electric energy distribution by creating a larger network of medium and low voltage in the hinterland of the country (financed by BOAD and EBID); and (iii) an agricultural project with the objective to improve food security and increase the income

						of agricultural producers (financed by EBID, BOAD, the International Fund for Agricultural Development (IFAD) and the Global Agriculture and Food Security Program (GAFSP)). The borrowing was assessed to be in line with the NCBP based on the development viability of the projects, unavailable concessional financing, and minimal impact of the borrowing on the debt outlook.
2015	Ethiopia	IDA17	2	Moderate	Hardening of terms	IDA concluded that the Government of Ethiopia complied with the non-concessional borrowing ceiling set for FY15, having issued a US$1.0 billion 10-year Eurobond priced at 7.125 percent consistent with the NCBP ceiling. However, the conversion of the grant portion of the PBA into regular IDA credits was maintained for FY16. In addition, due to debt sustainability considerations, the NCB ceiling was reduced to $0.75 billion for FY16 (1.1 percent of GDP).
2016	Ethiopia	IDA17	1	Moderate	Hardening of terms	The conversion of the grant portion of the PBA into regular IDA credits was maintained for FY17. In addition, due to debt sustainability considerations, the NCB ceiling was further reduced to US$400 million for FY17 and FY18 (0.5 percent and 0.3 percent of GDP, respectively).
2016	Mozambique	IDA17	11	Moderate	Volume reduction + hardening of terms	Between 2009 and 2014, Mozambique contracted a previously undisclosed non-concessional borrowing of US$1.3 billion by issuing guarantees to state controlled companies and through direct borrowing from lenders. The debt comprised two guarantees for loans contracted by commercial companies with state equity participation amounting to US$1.16 billion. In addition to these guarantees there were also direct loans of US$133 million from bilateral creditors. This debt was about 10 percent of GDP and was not previously disclosed to the World Bank and IMF. After disclosure, non-concessional borrowing by Mozambique breached the US$1.5 billion ceiling set for non-concessional borrowing under the IMF program in place since 2013. This ceiling breach shifted Mozambique risk of debt distress rating from moderate to high. IDA remedy to

						the breach of NCBP was to convert grant volume that Mozambique would have received for FY17 as a red-light country into regular IDA credits and apply a 20 percent reduction in the volume of IDA allocation.
2017	Ethiopia	IDA17	1	Moderate	No remedy	The reported NCB contracted was estimated to be within NCBP limits.
2017	Maldives	IDA17	29	High	Hardening of terms	Between June 2015 and September 2016, the government of the Maldives contracted eight loans and issued a bond with a total amount of US$ 1.031 billion (about 29 percent of 2016 GDP) on non-concessional terms. The loans had a combined grant element of close to zero percent. Central to these debt-financed investments were plans to relocate population from islands and atolls vulnerable to natural disaster and climate change to larger islands in Greater Malé. Following the review of the case, IDA decided to harden the country's terms from 100 percent grant given the country's high risk of debt distress, to a 50 percent grant and 50 percent credit basis in FY18.
2017	Mozambique	IDA17	1	High	Volume reduction	In March 2017, Mozambique contracted a US$138 million loan in non-concessional terms to finance the migration from analog to digital broadcasting. Considering this borrowing and given the earlier undisclosed non-concessional borrowing, IDA applied a 10 percent volume cut to Mozambique's allocation under the PBA framework in FY18. IDA provided FY18 financing to Mozambique on 100 percent grant terms consistent with the country's debt distress risk rating.
2018	Benin	IDA18	1	Moderate	Waiver	Waiver provided to maintain consistency with IMF program.
2018	Comoros	IDA18	8	Moderate	No waiver, ceiling suggested	In July 2018, Comoros singed a two-tranche loan with Eastern and Southern African Trade and Development Bank (TDB) in the amount of 40 million euros (equivalent to about 8 percent of GDP) to finance the rebuilding of El-Maarouf Hospital. The first tranche of the loan amounting 25 million euros had a grant element of zero percent. The legal agreement was complicated by making the disbursement

						conditional on the provision of a NCBP waiver. The authorities requested a waiver for the loan. The NCB committee recommended instead that the Government of Comoros considers the option of requesting a non-zero NCB ceiling.
2018	Ethiopia	IDA18	2	High	Hardening of terms	The Government of Ethiopia breached the NCBP ceiling by a wide margin. There were also delays in the reporting of NCB contracted in FY17 amounting to US$1.14 billion. Meanwhile, the 2017 DSA downgraded the Ethiopia risk of external debt distress from “moderate” to “high” and Ethiopia NCB ceiling was revised to zero. In response to the breach of the NCBP ceiling and reporting delays, IDA hardened Ethiopia’s terms by converting 50 percent of the grant portion of IDA allocation (which was supposed to be 100 percent considering the shift to high risk of debt distress) into credit for FY19.
2018	Maldives	IDA18	25	High	Hardening of terms	In FY18, the Maldives signed and guaranteed non-concessional loans in the amount of US$1.010 billion (25 percent of 2016 GDP) to support its large effort to consolidate its population around the capital city, a strategy that could reduce the cost of service delivery while supporting job creation and the climate change agenda. Following the review of the case, IDA decided to keep the country's terms to a 50 percent grant and 50 percent credit basis in FY19.
2018	Mozambique	IDA18	--	High	Volume reduction	In September 2018, IDA reviewed its FY18 decision, noting that Mozambique did not contract any new known debt in the review period. However, the review also noted that limited progress had been made with respect to resolving debt defaults and restoring debt sustainability. The review also noted that the external audit of the previously undisclosed debt fell short of expectations due to significant information gaps. In view of these developments, IDA decided to retain the same remedy approved for FY18 (10

						percent volume reduction to FY19 PBA allocation, with IDA financing on 100 percent grant terms) in FY19.
2018	Tajikistan	IDA18	7.2	High	Waiver	In September 2017, Tajikistan issued a Eurobond worth US$500 million (7.2 percent of 2016 GDP) maturing in 10 years and priced at 7.125 percent with zero grant element. The loan was contracted in non-concessional terms to finance the construction of the Rogun hydropower plant. The issuance of the Eurobond led Tajikistan's risk of debt distress to shift from moderate to high in November 2017. After considering several project and country specific factors (including an external shock that depressed commodity prices and remittance inflows, weak policy and institutional performance, banking sector issues, and the project's prospect for export earnings) and lack of alternative concessional financing, IDA Management granted a waiver in response to the breach.
2019	Comoros	IDA18	2.5	Moderate	Ceiling established	In May 2019, the Government of Comoros requested a non-zero NCB ceiling of €25 million. The ceiling was approved along with specific areas of actions, including: (i) improving debt management and transparency, (ii) limiting the size of external arrears and (iii) engaging in policy dialogue with the WB on the prioritization of investments within the framework of competing needs and limited resources.
2019	Ethiopia	IDA18	--	High	Hardening of terms	For FY20, while commending the authorities for not contracting any NCB in FY19, management maintained the responses in place in FY19 given the country's short record of adherence to the NCBP ceiling and history of multiple breaches.
2019	Maldives	IDA18	6.4	High	Hardening of terms	Based on country and loan specific factors, management decided to maintain the hardening of the terms for FY20.
2019	Mozambique	IDA18	--	High	No remedy	Considering the progress achieved in pursuing accountability regarding non-disclosed debts, enhanced reporting, and steps to close debt-related legal and regulatory loopholes, as well as no new cases of NCB,

						Management decided to lift Mozambique's volume discount with effect in FY20.
2019	Mozambique	IDA18	36.4	High	Waiver	In May 2019, Mozambique requested an ex-ante waiver for US$4.6 billion (36.4 percent of GDP) of planned borrowing and issuance of a sovereign guarantee to the state-owned hydrocarbons company, Empresa Nacional de Hidrocarbonetos de Moçambique (ENH), to participate in Liquified Natural Gas (LNG) projects investment. LNG production is expected to be transformational for Mozambique's economic growth and fiscal revenues. In addition, the participation of ENH is expected to attract international investors and constitutes an opportunity for catalyzing the development of the gas sector in the country. After careful deliberation, Management approved the requested waiver conditional to fulfilling ex-ante and ex-post conditionalities: (i) publishing the amount and terms of the guarantee, (ii) publishing ENH's financial statement, (iii) continuing the disclosure of ENH's annual audited financial statements and debt contracted for all LNG projects, (iv) regular reporting of sovereign guarantee, and (v) inclusion of this information in the annual State's General Account to be shared with Parliament.
2019	Tajikistan	IDA18	--	High	No remedy	The FY19 annual NCBP review confirmed that Tajikistan was in compliance with the NCBP Committee recommendation as no new NCB was contracted.
2020	Comoros	IDA18	--	Moderate	Case closed	In FY20, Comoros disbursed $10 million of the €25 million non-zero NCB ceiling IDA approved. Management confirmed that Comoros performance was in line with the approved ceiling. Management's decision was submitted to WB Board and Comoros NCBP case is closed.
2020	Ethiopia	IDA18	--	High	Case closed	A review under the new SDFP approved three PPAs for Ethiopia and concluded that this was sufficient to incentivize the country to pursue reforms to address its public debt vulnerabilities. The Ethiopia NCBP case is closed.

2020	Maldives	IDA18	9.7	High	Partial waiver, Case closed	The Government of Maldives (GoM) has requested ex-ante waivers for five loans/guarantees to contract US$ 514 million in non-concessional borrowing. The ex-ante waiver requests, and related IDA Management decisions, can be grouped in three categories: (i) The proposed US$ 40 million Asian Infrastructure Investment Bank (AIIB) loan is appropriately integrated with other financing sources and the proposed financing package would be concessional. A waiver was deemed warranted. (ii) A component of the proposed Samurai Bond (up to US$ 100 million – out of a total of US$300 million) will finance early retirement of the Eurobond issued in 2017. A partial waiver for this component is also warranted. (iii) The remaining ex-ante waiver requests – including the Samurai Bond components not related to the early retirement of the Eurobond issued in 2017 – were not granted, as these would increase further the stock of debt and increase fiscal vulnerabilities. The review of the case was pending by end FY20 and the case transitioned to SDFP. Given the country's track record in FY20, Management decided to require that the Maldives, despite being a small state, prepares three PPAs including a zero NVB debt ceiling. The Maldives FY21 PPAs were approved and the NCBP case is closed.
2020	Mozambique	IDA18	--	High	Case closed	While the country was in compliance with the NCBP, the FY20 discussion was not concluded at the time the new debt policy became effective and the case transitioned to SDFP. A review under the SDFP approved three PPAs for Mozambique and concluded that this was sufficient to incentivize the country to pursue reforms to address its public debt vulnerabilities. The Mozambique NCBP case is closed.
2020	Sao Tome & Principe	IDA18	0.4	High	Waiver, Case closed	In FY20, São Tomé and Príncipe's requested an ex-post waiver for US$1.7 million loan (0.4 percent of GDP) contracted in July 2019. IDA decided to grant an ex-post NCBP waiver for the loan considering the government's

						overall effort to reduce arrears and enhance debt sustainability. The management's decision was submitted to WB Board and São Tomé and Príncipe's NCBP case is closed.
2020	Tajikistan	IDA18	--	High	Case closed	There was no remedy in FY20 as Tajikistan complied with the requirements to meet policy actions set by the NCBP Committee during the previous year's review. IDA recommended the country team to continue the dialogue with the government in selected policy actions. While the country was in compliance with the NCBP, the FY20 discussion was not concluded at the time the new policy became effective and the case transitioned to SDFP. A review under the SDFP approved three PPAs for Tajikistan and concluded that this was sufficient to incentivize the country to pursue reforms to address its public debt vulnerabilities. The Tajikistan NCBP case is closed.
2020	Tanzania	IDA18	4	Low	Waiver	The NCBP Committee recommended Tanzania's request for an ex-post NCBP waiver for three loans (totaling US$ 2,660 million or about 4 percent GDP) contracted between January 2019 and June 2020. Tanzania is at a low risk of debt distress and is not required to prepare PPAs for FY21. Policy dialogue on debt will continue in the context of the country's DSA and broader macroeconomic monitoring.
2020	Uganda	IDA18	0.9	Low	Waiver, Ceiling established, Case closed	Uganda has requested a waiver on a Euro 249.9 million (0.9 percent of GDP) non-concessional loan package to support the construction of the Kampala Industrial and Business Park (KIBP). The financing package consists of two loans with a volume-weighted grant element of 18 percent. IDA decided to grant a waiver for the non-concessional loan package for the following reasons: (i) amounts are relatively small, and simulations based on the latest debt sustainability analysis suggest that the impact on the trajectories of the country's debt burden indicators similarly are small; (ii) The loans have important economic benefits and positive spillover effect to the economy and the investment is in line with the

						Government's industrial development strategies. In line with its borrowing plans, Uganda later requested to establish a US$2.0 billion non-concessional borrowing ceiling for FY20. Management approved the debt ceiling. The board was notified and Uganda's NCBP case is closed. In low risk of debt distress on May 31, 2020, Uganda was not required to prepare FY21 PPAs. Policy dialogue on debt will continue in the context of the country's DSA and broader macroeconomic monitoring.
2020	Vanuatu	IDA18	5.5	Moderate	Waiver, Case closed	Vanuatu requested a waiver on a USD 51 million non-concessional borrowing contracted for the construction of roads. The purpose of the loan was to finance Phase II of the Tanna and Malekula Road Project. The grant element of the loan was approximately 28 percent. An exception to the NCBP was granted due to the following combination of factors: (i) The project has a clear rationale and will result in substantial economic benefits to the tourism and agriculture sectors; (ii) The 2019 IMF-WB Debt Sustainability Analysis indicates that the 2018 loan did not trigger a downgrade in the assessed risk of debt distress; (iii) there were no alternative sources of more concessional financing available to finance this project. The Board note was published, and Vanuatu's NCBP case is closed. Vanuatu, rated at moderate risk of debt distress, prepared FY21 PPAs, which were approved by Management.