

***ITFC PROGRESS REPORT ON
ENHANCING INTRA-OIC TRADE***



itfc

International
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1. INTRODUCTION

1. Brief about ITFC

The International Islamic Trade Finance Corporation (ITFC) is an autonomous entity within the Islamic Development Bank (IDB) Group created with the purpose of advancing trade to improve the economic condition and livelihood of people across the Islamic world. ITFC has consolidated all the trade finance businesses that used to be handled by various windows within the IDB Group. It commenced operations in January 2008.

The consolidation of the IDB Group's trade finance activities under a single umbrella increased the Corporation's efficiency in service delivery by enabling rapid response to customer needs in a market-driven business environment. As a leader in Shari'ah-compliant trade finance, ITFC deploys its expertise and funds to businesses and governments in its member countries. Its primary focus is to encourage intra-trade among OIC (Organization of Islamic Cooperation) Member Countries (MCs).

Operating to world-class standards, the ITFC's mission is clear from its mandate to be a catalyst for trade development among OIC member countries and beyond. Consequently, while extending trade finance and improving Member countries access for funding, on the other side, ITFC, with a view to develop integrated trade development programs, recently established Trade and Business Development Department, which will provide trade related technical assistance to MCs but in an integrated approach, which will comprise of trade finance and trade development solutions together. Focus areas of the department will be trade promotion, trade facilitation, capacity development, trade mainstreaming and development of strategic commodities.

As a member of the IDB Group, ITFC has unique access to governments in its member countries and works as a facilitator to mobilize private and public resources towards achieving its objectives of fostering economic development through trade. The Corporation helps businesses in member countries gain better access to trade finance and provides them with the necessary trade-related capacity building tools in order to help them compete successfully in the global market.

2. The Resolutions of the 32nd Session of COMCEC

The 31st Session of COMCEC approved following resolutions, whereby ITFC was requested to continue its efforts in contributing to trade and trade cooperation among OIC Member countries.

- “Appreciates trade finance and trade promotion and development activities of ITFC and the mobilization of funds from the international market and development partners for funding the trade operations in the Member States, contributing towards the achievement of intra-OIC trade target of 25 percent.”
- “Commends the efforts of ITFC in financing SMEs and Least Developed Member Countries and takes note of its efforts to diversify its portfolio and extend more financing for agriculture sector that has direct and prominent impact on improving productivity, job creation, increasing export revenues and alleviating poverty. “
- “Calls upon the Member States to complete their membership requirements for the institutions of the IDB Group (ITFC and ICIEC) so that the IDB Group implements its mandate successfully.”
- “Takes note of the trade promotion and capacity development initiatives being implemented by ITFC under its various flagship programs including Aid for Trade Initiative for Arab States (AfTIAS), Arab Africa Trade Bridge Program and Trade Knowledge Program.”
- “Also takes note of the efforts of the ITFC to organize a Trade Development Forum to raise awareness of the private sectors of the Member States on the trade financing facilities of the ITFC and encourages the private sector organizations of Member States actively participate in the Forum.”
- “Welcomes the official launch of the Special Program for Central Asia (SPCA), with its trade financing component, during the 41st Annual Meeting of the IDB Group Board of Governors and takes note of the preparatory efforts being undertaken by IDB Group (ITFC) for its effective implementation.”
- “Takes note of the efforts of the ITFC in implementing integrated Trade Programmes for commodity development through blending its trade finance facilities with its trade related technical assistance interventions and requests ITFC to develop similar programs for other strategic commodities.”
- Commends ITFC;s efforts for the diversification of Islamic Financial Instruments, supporting training programs on Islamic finance and promoting Islamic Finance solutions at international foras and welcomes the announcement of organizing a side event on Islamic Trade Finance during the next WTO Public Forum.”

B. ITFC TRADE FINANCE OPERATIONS FOR DEVELOPMENT

ITFC fulfills its mandate through two main lines of business: 1) Trade Finance, and 2) Trade Development. On the trade finance side, ITFC extends financing for funding trade to sovereign governments, private sector companies, and Small & Medium Enterprises (SMEs) through lines of financing extended to local and regional Banks.

During the nine years since its inception in 1429H, ITFC's achievements have been remarkable in both trade financing and trade development arenas. Total cumulative approvals and disbursements reached US\$35.4 billion and US\$26.8 billion, respectively. On the other hand, total cumulative funds mobilized from partner banks and financial institutions reached US\$26.9 billion, reflecting ITFC's critical role as a catalyst to attract funding for large-ticket trade transactions for the benefit of Member Countries. Furthermore, ITFC continued to extend financing to a number of Member Countries under the multi-year framework agreements in place for many of the large-ticket sovereign clients. Regional initiatives such as the Africa Initiative continued to make noticeable progress.

In the area of trade development, the Trade Cooperation and Promotion Program (TCPP) continued to complement ITFC's trade finance activities through its six lines of business, namely Trade Promotion, Trade Facilitation, Capacity Building, Development of Strategic Products, Trade Mainstreaming and Support to Trade Finance. In line with the new strategic direction, ITFC started shifting its interventions to an integrated program based approach, combining trade finance with trade development & capacity building in order to multiply the impact. Examples include (i) the Indonesian Coffee Export Development Program, and (ii) an initiative to support cotton producers in West Africa to expand their export markets.

1. Contributing to Energy Security in Member Countries

Sustainable access to energy is a key driver of economic and social development. Energy services have multiple impacts on productivity, people's health, education, and food security. According to estimates, 3 billion people around the world are lacking access to electricity the majority being in Sub-Saharan Africa (SSA) and developing Asia. Lack of infrastructure and access to energy are the main reasons for the sector's underperformance in those countries.

Therefore, improving access to energy is crucial to unlocking the potential for faster economic and social development. It is in this context that ITFC considers supporting the energy sector as one of the main pillars of its strategy in its interventions in Member Countries. As such, ITFC remains a historical partner for providing financing to secure fuel oil in order to maintain stability for electricity generation reaching large number of the disadvantaged population.

In many Member Countries where there are limited financiers who can fund energy transactions which often require sizable funding, ITFC's support plays a catalyst role in which it mobilizes resources from international markets to fund these large-ticket syndicated energy deals. Over the years, ITFC has gained substantial experience in this sector with global presence spanning 57 countries.

ITFC's financing provided for the energy sector is characterized by the following:

- In 2016 (1437H), energy products financing represented about 60% of total approval, balanced between crude oil and petroleum products financing;
- The bulk of the energy-related financing are for countries in Asia and MENA followed by countries in Sub-Saharan Africa;

2. Supporting Agricultural Exports of Key Commodities

ITFC's interventions in agriculture continue to cover commodities that help create jobs, improve productivity, alleviate poverty, and bolster food security. It is worth mentioning that ITFC provides significant support to food security in Sub-Saharan Africa where a large portion of the trade finance portfolio is allocated to the agricultural sector, which has strong impact on enhancing food security for farmers. In fact, agriculture accounts for the largest share (54%) of ITFC's trade financing portfolio for Sub-Saharan Africa. It is worth mentioning that although agriculture financing is primarily for cash crops (namely cotton and groundnuts), it, nonetheless, helps boost food security as farmers use part of the agricultural inputs funded by the financing to grow their food crops. In addition, the funding allows farmers to receive timely payments for their crops, thereby enhancing their household income. Furthermore, there are financing operations, albeit small, specifically designated for food security. This amounted to USD17 million in 1437H-1438H (2016) and was for the Government of Mali (cumulatively USD42 million).

In addition to the interventions in SSA, ITFC also extended funding to Coffee (Indonesia) and wheat (Kazakhstan), both of which contribute to enhancing the incomes and livelihood of farmers. The following are some of the measures taken to enhance food security and further the support to the agriculture sector:

- Synergy & partnership with IDB Agriculture Department to collaborate on boosting financing to the agriculture sector in Member Countries;
- Partnership with the new OIC Islamic Food Security Organization;
- Linking of producers directly with buyers in Member Countries; and
- Working in a targeted manner to pursue financing that enhances food security in Member Countries.

In 1437H-1438H (2016), overall approvals for the agriculture sector reached 13% of the portfolio, which received the third largest allocation after energy. During the year, ITFC approved 16 operations for the agriculture sector in eight Member Countries. The following are the key features of ITFC's financing in this segment:

- The bulk of the financing is towards support of key export commodities, such as cotton and groundnuts in the agricultural sector;
- Africa and MENA accounted for the largest share in this portfolio with Cameroon, Burkina Faso, Cote d'Ivoire, The Gambia and Djibouti being the main beneficiaries.

3. Promoting Islamic Banking while serving SMEs in Member countries

In order to reach a larger number of Small and Medium Enterprises (SMEs) in Member Countries, ITFC provides Murabaha Financing to local financial institutions and commercial banks, which, in turn, extend the financing to SMEs and private sector clients. This not only contributes to creating badly needed access to finance, but it also helps promote Islamic Banking as partner banks are introduced to Islamic financing instruments. The following are highlights of ITFC's support to the SME sector.

4. Mobilizing resources for funding Trade

The year 1437H-1438H (2016) was not a normal year for ITFC in terms of funding of trade finance operations. The low commodity prices, fragility of some Member Countries, deterioration of creditworthiness of some clients, and increasing cost of capital and interest rates, all presented a number of challenges that restricted the ability of ITFC to raise the targeted funding volume from its partners. This translated into less number of syndicated transactions, and drop in volume of mobilized funds from ITFC's partners.

Despite the challenges, the partnership network proved to be resilient and as strong as it has been in previous years. ITFC had been successful this year to continue on its grand goal of expanding its network of partners by adding new ones from financial institutions and banks. Working with the existing and new partners, ITFC was able in 1437H-1438H (2016) to mobilize USD2,432 million in 22 syndicated operations in favor of 15 Member Countries. This level of mobilized funds represents about 56% of the total trade financing provided by ITFC to its clients this year. The year 1437H-1438H (2016) was also a significant year for collaborating with IDB's funds and entities, as the total funding from IDB has reached a record USD897 million.

Building on this network of partners, ITFC will continue to sustain and maintain the growth of its network by maintaining and strengthening its relationship with its current partners, and building new ones focusing on international and regional multilateral development banks.

5. Enhancing Support & Collaboration through Field Presence

ITFC, in partnership with the IDB Group and its members, embarked on a decentralization and enhancement of regional presence initiative with the goal of delegating authorities and responsibilities to the field. Increased regional presence brought ITFC closer to clients, which enabled it to serve its member countries' needs. Moreover, by being in the field, the risks arising from increasing challenges of the operating environment and uncertainty in global markets can be better assessed.

The IDB Group 'one group' approach in field presence intends to ensure: (i) harmonized 'branding' of IDB Group services; (ii) Group synergy in business development and intervention; and (iii) economies of scale and cost sharing.

As a strategic priority, ITFC decided to relocate a number of client-facing staff to the Regional Offices and Country Gateway Offices. To date, ITFC has collaborated with IDB Group members in the Dakar Regional Office (Senegal, covering 11 countries in the West Africa region) and in Country Gateway Offices located in Dhaka (Bangladesh), Istanbul (Turkey), and Jakarta (Indonesia). ITFC is expected to join other IDB Group members in the Regional Office in Rabat in the near future. The decentralization and enhancement of regional presence strategy is already yielding significant benefits in improved client relationship, greater regional visibility, and increased business volume and approvals.

There are significant positive outcomes to be gained from ITFC's presence in the regions, in establishing a Regional Office in Dakar, ITFC gained easy access to West Africa. Establishing a local presence in Dakar has increased efficiency with significantly increased disbursement throughout West Africa.

Indonesia is the largest economy in Southeast Asia and is one of the largest emerging market economies of the world, and coffee plays an important socioeconomic role. Through the Jakarta Country Gateway Office, ITFC was able to work on establishing the Indonesian Coffee Export Development Program, which has increased deferred selling, and overcome the lack of financing in the market.

Bangladesh is among the world's top 12 developing countries and one of the largest markets in Southeast Asia. Having a local presence in Dhaka has improved relations with the Bangladeshi government and helped ITFC gain greater access to the private sector, which in turn has increased disbursements.

One of the most active ITFC portfolios, Turkey's market is showing strong growth despite recent political upheaval. The regional presence in Istanbul has resulted in significantly increased approvals of USD 860 million in 1437H-1438H (2016), which represent 19.21% of total approvals in ITFC. This trend is expected to continue over the next three years. ITFC's decentralization of authority and responsibility to the field strategy is key to enhancing ITFC's visibility and activities in the field. ITFC will continue to decentralize and enhance regional presence over the next three years.

C. TRADE COOPERATION AND PROMOTION PROGRAM (TCPP)

1. Platforms of Cooperation for Enhanced Regional Economic Integration

1.1. Aid for Trade Initiative for Arab States (AFTIAS)

With a view to enhance the trade cooperation & integration among Arab States and with the rest of the World, ITFC has taken the initiative to design and implement a Regional Trade Development Program with a particular focus on “enhancing regional integration” to fuel the economic growth and development. The Aid for Trade Initiative (AFTIAS) Programme was prepared and launched in December 2013. More specifically, AfTIAS Program objectives are:

- Enhance regional competitiveness through trade policy reforms and strengthening Trade Support Institutions (TSIs) institutional capacities;
- Strengthen trade supply side and value chain integration;
- Strengthen regional and sub-regional trade cooperation organizations’ capacity to better administer trade integration policies & programs.

Five UN Agencies (ILO, ITC, UNCTAD, UNDP and UNIDO), The League of Arab States (LAS), the Permanent Missions of Arab Countries in Geneva, the Arab Regional Organizations, Islamic Corporation for Private Sector Development (ICD), Foreign Trade Training Center of Egypt are project implementing agencies of the Program. The list of the projects implemented and being under implementation are provided in the Annex-1. Five new projects were approved and appraised for funding by Technical Selection Committee are included in the Annex-1. The program implementation is expected to be completed by the mid-2018, which will be followed by an external program evaluation and assessment exercise.

1.2. Special Program for Central Asia (SPCA)

IDBG has prepared a Special Program for Central Asia (SPCA) in 2016 to address some of the development challenges faced by Central Asian Member States. As part of its complementary roles in supporting IDB Group efforts to enhance regional integration among the Member countries, ITFC has closely worked with Country Programming Department of IDB during the preparation of the Program Document. Trade development and promotion of regional trade integration is one of the main focus areas of the program.

The trade component of the initiative has two sub-focus areas. The first area aims at improving regional economic integration among Central Asian Member countries of OIC by implementing various trade facilitation measures at national and regional level. The second area aims at improving trade competitiveness of agri-food industries in SPECA Countries and their possible integration to the Global Value Chain. As part of its effort in the implementation of the program, ITFC and UNDP will organize two regional training workshops for government authorities and TSIs on the following subject, which will lay the ground for further activities as envisaged by the program.

Training on Market Analysis & Trade Flows

Training on Paperless Trade to facilitate cross border trade

These training programs will be followed by national workshops and seminars related to trade/export financing to enhance human and institutional capacities in the Member countries. ITFC also consider promoting the idea of development of commodity markets in the region by introducing bonded warehouse licensing, warehouse receipt system as a collateral and liquid asset in the banking sector.

1.3. Arab Africa Trade Bridge Program (AATB)

The intra-regional trade between Arab States and African Member countries of OIC does not reflect the trade potentials between both regions. As a result, ITFC, Saudi Export Program (SEP), Arab Bank for Economic Development in Africa (BADEA), Islamic Corporation for the insurance of the Investment and Export Credit (ICIEC), agreed to form a partnership platform to address this issue by developing a regional trade promotion program to boost intra-trade between the two regions.

The launching Forum of the Arab-Africa Trade Bridge Program was organized in cooperation with Ministry of Commerce, Industry, Investment and Digital Economy in Rabat, the Kingdom of Morocco during 22-23 February 2017. This program, developed by ITFC in coordination with national, regional and international institutions and authorities, aims promoting and increasing trade flows between the Arab and SSA countries and provide and support trade finance and export credit insurance, as well as bridging the economies through the development of logistical platforms and enhancing existing capacity building tools related to trade in order to increase and diversify trade and partnership opportunities among the two regions. Program focus areas includes :

- Supporting development of institutional capacities of trade support institutions and exporting SMEs through providing training programs related to exports and international trade,
- Supporting organization of specialized business forum, B2B Meetings, international exhibitions, establishing on-line business-information platform for companies,
- Supporting preparation of studies, reports related to cross-border trade, logistics, trade potentials, etc.
- Providing trade finance and export insurance facilities for companies from both regions.

1.4. Trade Development Forum

Another flagship program of TCPP is the Trade Development Forum, which is an attempt to establish a private-public platform of partnership. The Forum aims to bring together trade policy makers and businesspersons. The purpose is to elaborate on trade related issues and policies with a view to agree on common solutions to address common challenges of OIC Member countries, share experiences and best practices in trade development, while providing businessmen opportunities to establish trade partnerships through match-making events. Another purpose is to provide an educational opportunity through selected capacity building event. ITFC is in final stage of concluding a partnership agreement with the host country, where the first edition of the Forum will take place.

2. Partnership for Trade Capacity & Knowledge Development

2.1. Trade Knowledge Bridge Program (TKBP)

Trade related capacity-building activities such as organizing trainings, workshops, seminars, and conferences are among ITFC's regular activities carried out in cooperation with its capacity-building partners. TKBP is an umbrella program of ITFC, which consolidates its capacity building activities and materializing experiences and know-how of its development partners to create sustainable trade capacities both in public and private sectors in OIC Member countries. Various training programs, seminars, workshops are organized by ITFC under its various flagship programs to address these initiatives.

2.2. Youth Training and Employment for International Trade

“Training Program for Export and Employment-TREE”, which is being implemented under the AFTIAS Program is one of the example of How ITFC design long-term sustainable capacity development program with its partner. This program is being implemented by Foreign Trade Training Center (FTTC) and co-financed by the Industrial Training Council (ITC) of Egypt. ITFC envisages the replication of this training program in other Member countries if the recipient countries contribute to the budget of the project.

The training program aims at improving knowledge and skill sets of youth and certify them as Export Specialist that will enable them to find competitive jobs in international trade and establish its own business. A series of training courses will be given to 1000 university fresh graduates. The project implementation was launched in March 2016 by signing the partnership agreement between ITFC, and ITC of Egypt as financiers and the Foreign Trade Training Center (FTTC) as the project implementing agency and training provider.

Following the completion of the training programs, young graduates will be employed by the private companies, which are currently operating in international trade or in the process of extending their operations in other countries. The training program will enhance export culture among the companies and improve their knowledge in matters related to international quality, standardizations, multilateral trading rules, export marketing, branding, and product & quality development.

2.3. The International Trade Capacity Building and Market Access Support Program in Senegal

Similar training program is now being prepared in cooperation with Trade Facilitation Office (TFO) of Canada to support development of human capacity in the domain of international trade. Partnership Agreement with TFO Canada was signed on 23rd January 2017 in Dakar, Senegal. Implementation of the project started in March 2017.

The first component, a training the trainers component, aims to establish an exporter training platform implemented through ASEPEX and other Trade support institutions (TSIs) in Senegal. With this component, ASEPEX and associated TSIs will develop their technical skills in the field

of international trade and will be equipped with the capacity to deliver trade training and support services to Senegalese exporters and potential exporters from various sectors in a manner that will help these firms grow their export activities and contribute to the sustainable economic development and poverty alleviation in Senegal. The second component of the proposed initiative will be focused on preparing and strengthening the capabilities of Senegalese SMEs and their products in order to count with all the necessary tools and knowledge that could contribute to introduce in an efficient and effective way their products into the Canadian market, in order to achieve a significantly positioning against other competitors and be also prepared to take advantage of new export opportunities that could be generated.

2.4. ITFC's Indonesian Coffee Export Development Program

The livelihoods of millions of poorest people in developing countries, and in particular in the least developed countries, are dependent on agricultural commodities. Commodities are backbone of their economies and accounting for the bulk of export earnings, GDP and employment. Similarly, agriculture sector accounts for an average of 11.5% of GDP in IDB MCs; reaching as high as 50 to 60% of GDP in many of these MCs, particularly in LDMCs. Agriculture sector represents more than 40% of the total work force, in some countries, it reaches up to 85%. Therefore, ITFC, since its inception, has been very keen in supporting MCs' strategic commodities by extending its whole value chain financing facilities. Now, in order to assist MCs in addressing challenges they face all along the commodity value chains, ITFC blends its trade financing facilities with its technical assistance support for trade development.

One of its integrated commodity development program was designed to support Indonesian Coffee Sector. ITFC's Indonesian Coffee Export Development Program (ICEDP) addresses the twin challenges faced by the Indonesian Coffee Industry. Access to financing is one of these challenges that will be tackled by ITFC's trade finance facilities. Within the scope of the program, ITFC will extend US\$100 million financing to exporting SMEs in 3 years period that will enhance their competitiveness in global markets and make cash ready for small farm holders as return for their crop.

ITFC is currently working with its local partners in the establishment of Coffee Farmers Training Center, which will provide trainings for farmers on enhanced training practices, offer soil analysis test for fertilizers, and provide tree seedlings at reasonable prices to replace coffee trees with the higher yield ones. Furthermore, ITFC will organize business-matching events to provide direct access to some new export destinations, mainly from OIC Member countries. In the mid-terms, ITFC plans to design a Farmers Cooperatives (FCs) Capacity Development Program to enable FCs to play an active role in the input purchase, direct coffee marketing/exporting, undertaking post harvesting processes and managing training centers. Validation workshop for the Business Plan of the Training Center will be organized in the second half of 2017 in cooperation with local partners.

2.5. Partnership Development Program between West African Cotton Ginners and Southeast Asian Cotton Spinners

West Africa, as a region, is the world's 2nd largest cotton exporter, after USA. Since its inception, ITFC provided value chain financing for African Cotton amounting US\$ 938 million. On the other hand, some OIC MCs, namely, Bangladesh, Turkey and Indonesia are among the top 5 cotton-importing countries. However, direct trade linkage between MCs are weak but has high potential to establish. In this direction, with its local partners from West Africa, African Cotton Association and Textile Mill and Cotton Association from Bangladesh and Indonesia, ITFC will organize cotton B2B meetings in Dhaka, Bangladesh and Jakarta, Indonesia in first half of April 2017. These meetings will facilitate establishment of new and direct business partnership between West African Cotton Ginning Companies and Bangladeshi and Indonesian Textile and Cotton Industry. Similar specialized B2B Meetings will be organized for other sectors, commodities and countries under ITFC's several flagship program, including Arab Africa Trade Bridge Program.

In pursuance to the relevant COMCEC resolutions, ITFC will continue to facilitate organization of seminars, workshop, capacity building activities of OIC Institutions by providing partial financial support that will be reported to upcoming COMCEC Meetings.

Annex-1: List of AFTIAS Projects:

- **Support to the League of Arab States** in promoting regional trade integration, through the strengthening of the capacity of the Department of Economic integration, Economic Affairs at the Secretariat of the Arab League (implemented by UNDP);
- **Performance improvement of the trade and transport corridors** between Sudan and Egypt, Egypt and Saudi Arabia, Saudi Arabia and Jordan, through the enhancement of customs procedures and the equipment of the border centres (implemented by the UNDP);
- **Improvement of regional competition by addressing non-tariff measures** in Egypt, Jordan, Morocco, Palestine, Saudi Arabia, Sudan, and Tunisia and identifying concrete actions at national and regional levels to eliminate non-tariff restrictions (implemented by ITC);
- **Support to the accession of Sudan and the Comoros to the World Trade Organization (WTO)** by providing technical support and capacity building in the field of trade policy, institutional and legal frameworks related to trade reform (UNCTAD);
- **Enhancing the skills of workers in selected export sectors in Egypt** through the application of training tools that aim to help matching the needs of the industry and the skills of job seekers in the sectors of food industry, wood and furniture (implemented by ILO);
- **Strengthening of trade support institutions** in Algeria, Egypt, Kuwait, Lebanon, Oman and Saudi Arabia (implemented by the ITC);
- **Support to small and medium-sized companies** in the Gulf Cooperation Council (GCC) for access to foreign markets project (implemented by ITC);
- **Training of Youth for Employment in international trade**, (implemented by Foreign Trade Training Center (FTTC), Egypt);
- **Capacity Building and Institutional Support Program for Nouadhibou Free Zone** of Mauritania to adopt international practices in organization design, human resources management, financial planning and management (implemented by Islamic Corporation for Development of Private Sector, ICD, IDBG.
- **Feasibility Study to set up a Handicrafts Export Village – Djibouti** (ITC implementing agency)
- **National Trade Strategy to support Algeria’s Economic Diversification** (ITC implementing Agency)
- **Capacity Building for Palestinian SMEs Companies** (UNIDO Implementing Agency)
- **Expanding SME upgrading approach in Tunisia to innovation and export** (UNIDO Implementing Agency)
- **Study for Development of Logistical Platforms for Trade & Investment Facilitation between Morocco and Sub-Saharan Africa** (SNTL Implementing Agency)

