

**EVALUATION OF RETIREMENT SYSTEMS OF COUNTRIES  
WITHIN THE SOUTHERN AFRICAN DEVELOPMENT  
COMMUNITY**

Country Profile: Mozambique

OPM



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## **Abbreviations**

AIDS	Acquired Immune Deficiency Syndrome
DFID	Department for International Development
GDP	Gross Domestic Product
HDI	Human Development Index
HDR	Human Development Report
IMF	International Monetary Fund
INAS	National Institute of Social Action
INE	National Statistical Institute
MFI	Monetary Flow Index
MMAS	Mozambican Ministry of Women and Social Action
NBFI	Non Bank Financial Institutions
OPM	Oxford Policy Management
EGFAE	Estatuto Geral dos Funcionaris Funcionários e Agentes do Estado (General Statue on Civil Servants and Agents of the State), 14 of 2009
INSS	Instituto Nacional de Seguranca Social (National Institute of Social Security)
PAYG	Pay As You Go
PARPA	Plano De Accao Para A Reducao Da Probeza Absolute( Action Plan for the Reduction of Absolute Poverty)
PPP	Purchase Power Parity
PSA	Programa Subsidio de Alimentos (Unconditional Cash Transfer Programme)
USAID	United States Agency for International Development
MMAS	Mozambican Ministry of Women and Social Action
INAS	National Institute of Social Action



# 1 Country and Retirement System Overview

## Box 1.1 Country overview

Population 2007 (INE, Population Census):	20,530,714
Proportion of population above 65 – 2007 (UN):	3.3%
Proportion of population above 65 – 2020 (UN):	3.6%
Proportion of population rural (WB, 2005):	73%
GDP per capita (IMF 2009 – US\$):	465
Proportion of population below poverty line (\$2/day) (2003):	54%
Labour force:	Not available
Labour force participation rate:	Not available
Unemployment %:	Not available
Employment in formal sector (% of total employment):	Not available
Employment in subsistence agriculture (% of total employment):	Not available
HIV/Aids prevalence (% of population 15-49) (UNAIDS 2008)	12.5%

## **Box 1.2 Retirement systems overview**

### **Formal systems**

#### **Social assistance**

Mozambique does not have a social assistance scheme specifically targeted at the elderly. However, the Programa Subsidio de Alimentos operates as an unconditional cash transfer, and goes to women from age 55 and men from age 60, as well as to chronically ill and disabled people – all subject to a means test. In mid-2008, the benefit went to 143,455 people, and ranged between MZM 100 and MZM 300, depending on the number of children in the household. Coverage of the country is incomplete, but expansion and funding plans have been developed.

#### **National social insurance**

Mandatory social insurance is prescribed for private sector workers in the Lei de Protecção Social (2007) and managed by the National Social Security Institute. The old age pension is a DB scheme payable to women from age 55 and men from age 60. The scheme covers a range of benefits, and is in the middle of a reform process after allegations of fraud and mismanagement. The scheme is funded from employee contributions of 3% and employer contributions of 4%. The benefits are equal to 50% of average earnings multiplied by the number of months worked out of a total of 240, with the proviso that the total months of contributions cannot be more than 432. The minimum monthly pension is 60% of the national minimum wage.

#### **Civil service occupational schemes**

The public officer's pension scheme caters for civil servants (including local government employees) and is a PAYG DB scheme, the broad rules of which are set out in the General Statute on Functionaries and Agents of the State, Act No. 14 (2009). A tender has been issued for technical support to convert this fund to a DC fund. Member contributions are 7% of earnings. In March 2009, 103,000 pensioners received benefits: of those pensioners, only 31,000 were former civil servants (and the remaining 72,000 pensions were paid to former military personnel); there were 200,000 contributors at that stage. The pension equals the final salary times the years of service divided by 35.

#### **Private occupational schemes and voluntary schemes**

The Financial Sector Stability Assessment (IMF, 2009: 11) states that 'The pension sector remains dominated by the obligatory, state-run PAYG system, although there are a few, small private corporate pension funds'. However, no information could be sourced on private occupational funds and other private/voluntary funds. Most observers conclude that the private pension system is insignificant.

#### **Informal retirement systems**

There is little information available on informal pension mechanisms. Asset accumulation, particularly housing in urban areas, can help to provide security into old age; however, no hard data are available.

## 2 Country background

Table 2.1 below provides an overview of progress with regard to some standard economic indicators

**Table 2.1 Mozambique Economic and Social Indicators**

Country Indicators	1990/92	2005/06	2008
GDP per capita (US\$)	150	310	370
Average inflation (%)	39	9.7	10.3
External debt (% of GDP)	286	81	36.8
	69	54	54
Poverty incidence (%)	(1997)	(2003)	(2003)
Net primary school enrolment (%)	43	71	89
Under-five child mortality (per 1,000)	235	152	68
Population (millions)	16.5	20.1	21.3

Source: IDA 2009  
(IDA 2009)

### 2.1 Demography

The 2007 Population Census recorded a population of 20,530,714, of whom 10,743,579 (52.3%) were women and 9,787,135 (47.7%) were male.

Data from the National Statistical Institute (INE) indicates that 2.6% of the population is aged 65+, while the working age population (15-64) is 53.7%.

The Human Development Report 2009 indicates that the emigration rate is 4.2% and that 84% of emigrants go to South Africa.

Population projections indicate a population of 27,439,021 by year 2020, with an average annual growth rate of about 2.3%. These projections assume a reduction in the total fertility rate for women (from 5.4 in 2005 to 4.5 in 2020) and in the infant mortality rate (from 107.9 per 1000 live births in 2005 to 60.4 in 2020), resulting in a steady improvement in life expectancy at birth from 47.1 years in 2005 to 54 years in 2020.

### 2.2 Labour market

Based on data from the 2002/03 income and expenditure survey, 82% of the economically active labour force were engaged in the agriculture sector (down from 90% in 1997). This decline appears to be caused by a reduction in the labour force as more children enrolled in education and because (predominantly) men moved away from rural areas in search of more rewarding work opportunities (self-employment in non-agricultural activities and male wage employment in the private sector, which grew by 283,000 between 1997 and 2003). Consequently, women working in agriculture made up half of Mozambique's economically active population in 2003 and nearly two-thirds of the agricultural labour force.

Women tend to dominate the rural subsistence agriculture sector. They have relatively low incomes (especially female-headed households). Income diversity is associated with higher overall income, suggesting that lower income quintiles are more vulnerable to exogenous

shocks and secular trends, such as the relative deterioration of agricultural prices. Those with formal wage income are almost all in the upper income quintile.

## **2.3 Socio-economic**

Sustained economic growth has contributed to the fall in poverty from 69% in 1996/97 to 54% in 2002/03 (approximately 29% live at or below \$1 per day). The Gini coefficient is about 40. Good progress is being made towards the millennium development goals for reducing income poverty and infant mortality, but the increase in primary school enrolment is below target.

Based on 2002/03 income and expenditure data, the Poverty, Gender and Social Assessment (WB, 2008) notes that, "in urban areas, women earn 13% of household income, men earn 65% and the remaining 22 percent of urban income is reported as earned jointly by households in the form of home production, pensions and alimonies, income from capital, and occasional income". It appears that pensions are not significant as a source of household income in rural households.

Mozambique's Human Development Index has increased by 1.34% annually from 0.280 in 1980 to 0.402 in 2007. However, it is still ranked 172 out of 182 countries. The index is based on life expectancy at birth of 47.8 years, an adult literacy rate of 44.4% for those aged 15+, a combined gross enrolment ratio of 54.8% and GDP per capita (in PPP US\$) of \$802. On the Human Poverty Index, Mozambique is ranked 127 out of 135 countries, with poor scores on probability of not surviving to age 40 (40.6%), adult illiteracy (55.6% and not using an improved water source (58) but relatively well on children underweight for age (24%). The Gender Development Index value is close to the HDI, and will improve significantly once the recent improvements in female school enrolment translates into higher female adult literacy.

Net primary school enrolment was 89% in 2008, up from 43% in 1990/92. Under-5 mortality rate was 68 per 1,000 live births in 2008, down from 235 in 1990/92.

## **2.4 Economy and finance**

Mozambique has recorded significant progress since the end of the civil war in 1992. Real economic growth was about 8% per annum from 1994 to 2004.

The HDR 2009 states that remittances totalled \$99 million in 2007, equivalent to \$5 per capita.

Reforms are required to improve financial sector intermediation and access to financial services. The commercial banks dominate the financial sector but their activities are restricted to the upper income quintile. There has been rapid growth in microfinance institutions in both the number of clients and the size of the loan portfolio and an improvement in performance (by 2005 over 30% of MFIs had loan recovery rates in excess of 90% against only 16% in 1997). However, operations are largely restricted to the Maputo-Matola urban corridor (this accounts for about 62 percent of MFIs and 50 percent of micro-borrowers) and only 12% of borrowers (5% of the total active portfolio) are in rural areas. This reflects the pattern of non-agricultural informal activities.

## **2.5 The elderly**

Research by HelpAge International in eight communities in Tete, Mozambique, found that older people were caring for half of all orphaned children and for a quarter of the total number of people living with HIV/AIDS. (HelpAge International 2005)

The absence of social assistance programmes has been identified as a factor in the prevalence of poverty. PARPA II (page 117) identifies “guaranteed social assistance to the elderly in poverty as a priority” and list as specific objectives: to provide services to the poor elderly by opening community centres; financial and physical assistance to the vulnerable poor and sensitisation about the rights of the elderly, and; giving support to the elderly at Social Units. The PSA is currently being expanded with other documents also referring to a planned extension of social assistance to the elderly.

However, the elderly are only one of several target groups for fiscal support and there appears to be no evidence that actions to achieve this objective have been implemented to date. There seems to be a debate about whether the social safety net should in the first place be extended to cover more children or to the elderly.

## **3 Formal retirement systems – Social Assistance**

### **3.1 Legal and institutional**

The Law on Social Protection 4 of 2007 sets out the broad framework for social protection. It distinguishes between “basic social protection”, “mandatory social protection” (Seguranca Social Obrigatoria) and “supplemental social protection” and sets out the broad framework for each of these elements.

At the moment there is no social assistance scheme focused specifically on the elderly. The biggest general social assistance programme (the PSA or conditional cash grants) does, however, include a large proportion of elderly people. Other smaller social assistance schemes are the Social benefits for Work Programme (5,275 beneficiaries in 2008), income generation programmes (7,358) and Direct Social Support (24,224).

The PSA is administered by INAS, a unit in the Ministry of Women and Social Affairs.

### **3.2 Eligibility, access and coverage**

Regulations on Basic Social Protection in terms of the Law on Social Protection were published in November 2009 and come into operation on 31 March 2010. In terms of these Basic Social Security is targeted at the nationals who are unable to work, do not have the means to satisfy their basic needs and are in vulnerable situations. Vulnerable individuals include people living in absolute poverty, children in difficult situations and older people in absolute poverty, persons with disabilities in absolute poverty and people with chronic and degenerative diseases.

Absolute poverty is defined as the inability due to disability and/or lack of opportunities to access the basic minimum conditions “under the rules and dynamics of the society”. For the purpose of cash and in kind benefits, the elderly are defined as women above age 55 and men older than 60 and “female heads of household and orphaned and vulnerable children” are added specifically.

The PSA goes to women 55 and older and men 60 and older as well as to chronically ill and disabled people – all subject to a means test, which also includes assets or certain types of housing (we are awaiting the decree setting out the rules in detail). In mid-2008 the benefit went to 143,455 people. Coverage of the country is incomplete but expansion and funding plans have been developed.

### **3.3 Financing**

The Law states “budget appropriations” as the source of funding for Basic Social Protection, and also “contributions, gifts, donations or subsidies” and “revenue by any means legally admitted”. Currently the PSA is funded through appropriations on the national budget and flows directly to INAS, the unit within the Ministry of Women and Social Action responsible for the PSA.

For 2004, the IMF (Selected Issues 2005) recorded transfers to households totalling M 2.276 billion out of total expenditure of M 32.607 (equal to 7.0% of public expenditure and 1.7% of GDP). The disaggregated allocations were: M 1.7bn for pensions, M 0.287bn for welfare payments and M 0.290bn for other. Unfortunately, subsequent editions of this table do not

provide a comparable disaggregation of public expenditure, but Total Transfers were recorded (IMF Article IV Report 2009) in 2008 as M 7.4bn, equal to 11.1% of total expenditure and 3.1% of GDP, indicating that household transfers are still substantial. Further analysis of the government budget is required but this information has not been received yet and is not electronically available.

### **3.4 Contingencies covered**

In addition to targeting absolute poverty of some vulnerable groups, the regulations also provide for free health care, free schooling, school meals and other school requirements for vulnerable groups

### **3.5 Benefit type and levels**

The Law specifies that benefits can be in the form of “risk benefits” (“cash or in kind”) and “social support” which is services which could include “community development projects, housing, hospitality, food and “means of payment”. The regulations, as indicated above, include:

- Regular social cash transfers under risk benefits;
- Free health care;
- Exemptions from, or support with, certain costs of schooling;
- Identification of priority groups for school social work;
- “Social Support” which includes support for “fixed periods in response to temporary situations”
- Programmes of social integration through work.

Monthly payments in the PSA range between 100 and 300 meticaïs per household, depending on the number of children in the household. Mtn 300 is the maximum amount and goes to a five-person household (one recipient and 4 dependents). The increment per dependent is Mtn 50.

### **3.6 Financial and social sustainability**

We do not have information on total cost of the PSA and what is intended under the law on Social Protection. There is activism for expansion of benefits, also from donors who have made 10-year commitments in terms of funding (DFID) but expansion is limited by overall budgetary constraints (around 50% of the budget of the government is from donor funding). Certain stakeholders have also raised concerns about the “productivity” of grants and the relative priority of other target groups such as children. Evidence about impact has been used effectively to expand coverage. One potential strategy is to expand part of the PSA into a social pension with wider coverage.

## **4 Formal retirement systems – National Social Insurance**

### **4.1 Legal and institutional**

The Law on Social Protection 4 of 2007 also sets out the broad framework for mandatory social protection which has been further elaborated in regulations (Decree 53 of 2007).

Mandatory social protection is administered by the National Institute of Social Security (INSS), an autonomous agency reporting to the Ministry of Labour.

### **4.2 Eligibility, access and coverage**

The social insurance fund covers all private sector workers (those not included in the General Law on Civil Servants and State Agents) and specifically mentions the self-employed and seasonal workers. It is indicated that domestic workers, artists and agricultural workers will be included after decision the Minister of Labour, taking into account the capacity and administrative structure of the INSS.

The old age pension is payable to women older than 55 and men older than 60, who have been part of the system for at least 20 years and have a minimum of 10 contributing years before requiring a pension. Also, for claimants who have been part of system for at least 30 years and have a minimum of 25 contributing years, age is not a factor. Finally, there is also the possibility of early retirement at a minimum age of 50 years old in cases of proven mental or physical disability.

### **4.3 Financing**

National social insurance is funded from employee (3% of remuneration) and employer (4% of remuneration) contributions.

### **4.4 Contingencies covered**

The scheme covers death, old age, invalidity, illness and maternity.

### **4.5 Benefit type and levels**

The benefits specified are sick pay and hospital allowance, maternity allowance, invalidity pension, old-age pension, a death and funeral grant and a survivor's pension.

The old age pension is equal to 50% of average earnings multiplied by the number of months worked out of a total of 240 with the proviso that the total months of contributions cannot be more than 432. The minimum monthly pension is 60% of the maximum national minimum wage (minimum wages differ by sector)

For death before retirement the death benefit is 6 times the average earnings in the six months before death and 6 times the pension payable in the month of death in the case of a pensioner. Adjustments are made where here are minor children involved. Three years of enrolment and 6 months of input contributions are required before a death benefit is payable.

For a death benefit there must have been 3 months of enrolment and three months with inputs and the amount is set by the relevant Minister.

The survivor's pension is equal to the old-age pension with 50% payable to the surviving spouse and 50% distributed equally among the children.

#### **4.6 Preservation, withdrawal and protection of rights**

People who cease to work may elect to stay on the system voluntarily.

#### **4.7 Administrative cost**

The Act specifies that reserves will be managed in line with conditions set by the relevant Ministers but according to the principles of "security, efficiency and liquidity". Rules for investment or an investment policy has apparently not been finalised, one of a number of reform proposals that are ongoing.

#### **4.8 Financial and social sustainability**

The financial situation of the INSS is unclear as annual reports have not been released for a number of years and required actuarial reports have been outstanding for some time.

The need for reforms relating to the retirement system was identified some time ago (See, for example, the World Bank's 2003 Financial Sector Assessment Programme). Note was made of the need for an actuarial study, strengthening of systems, development of an investment strategy, drafting of regulations and development of an implementation strategy and most of these included in PARPA II in 2006

Reforms seem still to be lagging with most matters pointed to in 2003 and again raised in 2006 still outstanding (see the Memorandum on Economic and Financial Policies - May 2009; 5th Review of the PSI and in the Government's Memorandum (November 2009, para. 15)). No documents showing progress could be accessed in February 2010, although there was access to beneficiary and contributor numbers.

## **5 Formal retirement systems – Occupational Schemes for the civil service**

### **5.1 Legal and institutional**

In 2006 an objective of PARPA II was to “Review the pensions system for government employees”. Pension arrangements for civil servants were subsequently formalised under the General Law on Functionaries and Agents of the State (Act 14 of 2009) and regulations subsequently issued (Decree 62 of 2009). The General Law for Civil Servants and State Agents provides the legislative framework for civil service pensions in the country. It is not clear who oversees the scheme, but the Ministry of Finance runs it. (Mozambique 2009a; Mozambique 2009b)

### **5.2 Eligibility, access and coverage**

In order to qualify for normal retirement an individual must have served at least 35 years of civil service or have attained the age of 60 in the event that the individual is male or 55 in the event that the individual is female, with a minimum of 15 years of service. In the event that one is proven to be incapacitated they would have had to have a minimum of 15 years of civil service to qualify for a pension.

The compulsory retirement age is 65 (male) and 60 years (female). It is possible to postpone such retirement under special circumstances. Early retirement seems only to be available in the case of a work accident or illness and with a vesting period of 35 years.

The minimum number years to vesting are 15 years. In the event that an individual has contributed for fewer years, they will have to pay the equivalent contribution of the missing time to complete 15 years.

In interviews in February 2009 it was indicated that in March 2009 103,000 pensioners received benefits. Only 31,000 of those pensioners were former civil servants and 72,000 military pensions. There were 200,000 contributors at that stage.

### **5.3 Financing**

Employee contributions of 7% of remuneration are made for pensions but pensions are paid from general government revenue.

Income from pensions is exempt from Income Tax.

### **5.4 Contingencies covered**

These are the normal benefits in the case of death, retirement, invalidity and for survivors.

### **5.5 Benefit type and levels**

The pension equals the remuneration at retirement times the years of service divided by 35. After 35 years pensioners will therefore receive 100% of final salary.

## **5.6 Financial and social sustainability**

Given the high level of pension benefits (and special dispensations for certain categories of workers) the civil service pension dispensation holds a high fiscal risk. Its management in-house in the Department of Finance, albeit by a dedicated section, could also be seen as a risk.

## **5.7 Reform initiatives**

The IMF recorded Government's intention to harmonise its salary policy with its pension arrangements. This would have been partly addressed by the new law and regulations but it is unclear exactly how far this reform has been taken.

Given the significant fiscal risk posed by the civil service pension fund, the Ministry of Finance has put out a tender for technical support to establish a defined contribution fund for civil servants. It is understood that the appointment for such support is pending.

## **6 Formal retirement systems – Private occupational and voluntary/private schemes**

The Financial Sector Stability Assessment (IMF, 2009, page 11) states that “The pension sector remains dominated by the obligatory, state-run PAYG system, although there are a few, small private corporate pension funds.” Assets held by pension funds are only M 7,248 million out of total financial sector assets of M 94,409,775 million, of which 96% are held by commercial banks. The report notes that “The stock market is still in its infancy. Just thirteen securities are listed in the stock exchange: five treasury bonds (total amount MTN 3 billion) and seven corporate bonds from five companies. Only one company has listed shares. There are no active mutual funds or brokerage houses—brokers in the stock exchange are the biggest banks. Despite efforts to develop the private pension fund industry, its presence in the market is still very limited. Capital controls prevent foreigners from entering the market.” (IMF, 2009, page 28). A USAID report also concluded that “The rest of the financial sector, however, is not very dynamic. This includes the insurance sector, leasing companies, the stock and bond exchange, and private pension funds.” and the 2009 IMF Financial Sector Stability Assessment “... does not discuss in detail the insurance and pensions sectors. Their size and limited linkages with the core banking sector mean that they are not systemically important at this stage” (Nathan Associates Inc. 2007).

With regard to pension funds and their regulation the IMF (Selected Issues 2007) indicated that: “Nonbank financial institutions (NBFI) were small, non-transparent and subject to limited institutional and regulatory oversight. As such, they could mask sizeable contingent fiscal liabilities. The situation was particularly critical in the insurance and pension sectors, where supervisory capacity was weak and diluted between the Ministry of Finance (insurance) and the state pension scheme, INSS (pensions), which, in turn, had both an administrative and a prudential mandate (page 32).”

The regulatory situation remains unclear. There is no comprehensive pension fund legislation and the Law on Social Protection only provides for “Supplementary Social Security” in the broadest terms. The Law provides for the licensing of “institutions for complementary social security” by the Minister of Finance after consultation with the Minister of Labour. It is explicitly stated that taking out supplementary pensions cannot replace mandatory social insurance. While the Minister of Finance has responsibility for licensing there is no regulatory capacity.

The Bank of Mozambique has established a separate pension fund for its employees, and explicit responsibility for managing this fund is given to the Bank in the Law on Social Security. In the Bank’s financial statements its auditors declared that “in accordance with the last actuarial study carried out with reference to 31 December 2006, the responsibility of the Bank with regard to employee retirement pensions was estimated at 4,095,753 thousands of Meticaís, for which a separate fund was constituted, valued at approximately 3.720.053 thousands of Meticaís as at 31 December 2007. The lack of an updated actuarial study carried out with reference to 31 December 2007, does not allow us to evaluate the impact on the uncovered funding responsibility arising from possible changes to the employee retirement pension plan.” (Mozambique 2007)

The private occupational and voluntary pension environment therefore requires significant policy development and work on establishing regulatory capacity. Concerns have been raised about the performance of the financial sector. Among other actions, the financial sector reform programme was intended to develop pension funds legislation (together with

regulations) and strengthen the performance of the INSS with the outcome that the number of registered participants would reach 90% and the number of active contributors would reach 60% by 2010 (page 49). However, implementation of the agreed reform package has been slow, as indicated by the outstanding Key Recommendations (IMF, Financial Sector Stability Assessment, 2009, page 8):

<b>Pensions and Insurance</b>	
Improve INSS governance through introduction of an IT system, publication of financial statements, and assessment of the value of investment portfolio	Short term
Publish outstanding regulations for all pension providers	
Test adequacy of financial resources, shareholders, and business plans of insurance companies	
Conduct actuarial study of INSS to determine whether parametric changes are necessary	Medium term
Adopt an explicit investment policy for INSS	
Subject INSS and other pension providers to independent supervision	
Improve frequency and coverage of data collected by IGS	

While this is a challenging area the USAID report on Financial Sector Constraints on Private Sector Development, USAID (2007) rightly concluded that: "... investment financing cannot be separated from the mobilization of long-term sources of saving. The most promising vehicle for this purpose is a thorough reform of the pension system."

## **7 Informal retirement systems – Asset accumulation**

A major form of asset accumulation is through housing. Formal housing in Maputo generates a substantial monthly rental income and is therefore an attractive asset for the elderly, especially if they are willing to live in a rural area.

A recent report pointed out that in Mozambique, “The overwhelming majority of households organise the building of their own houses, sometimes hiring craftsmen to assist them. Typically, households build incrementally, as and when they have resources available and taking several years to build a small basic house. In rural areas, families build on land held under customary rights, generally using materials obtained nearby at practically no cost. In urban areas, however, households must pay to acquire land and building materials. Thus housing finance is a largely urban issue at present, but in future the rural population will also expect and demand better housing conditions.” (Allen and Johnsen 2008)

The report further points out that: “The size of the housing finance market in Mozambique is negligible. As at March 2008, housing loans accounted for only 3.8 percent of overall bank credit and represented less than 1 percent of gross domestic product (GDP) (Banco de Moçambique, 2008). Overall, the number of mortgage and construction loans granted is small, at about 50 per month, mostly mortgages for existing houses. This essentially reflects the lack of demand, because few people can meet the stringent conditions and few properties are on market.” (Allen and Johnsen 2008)

In order for housing to become a more important asset for the elderly attention will therefore have to be on land rights and development of the housing finance market. With regard to the first – which refer to use rights because land is “owned exclusively by the state” - a recent USAID report has concluded that “The land law itself does not require changes, but rules for authorization of property transfers should be clarified and simplified, and use rights should be more freely usable as collateral. (Nathan Associates Inc. 2007). They also refer to the “lack of an effective property registry system”.

With regard to housing finance the recent report for the World Bank pointed to the need for more research to analyze housing supply and demand before recommendations on land and housing policies, the titling and registration system, the quality of the rental market and improving access to finance could be finalised (Allen and Johnsen 2008).

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