Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

Appraisal Stage | Date Prepared/Updated: 29-Jan-2020 | Report No: PIDISDSA28274
BASIC INFORMATION

A. Basic Project Data

<table>
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<th>Country</th>
<th>Project ID</th>
<th>Project Name</th>
<th>Parent Project ID (if any)</th>
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<td>Malawi</td>
<td>P171877</td>
<td>Malawi - Resilience and Disaster Risk Management</td>
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<td></td>
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<td>Project Additional Financing</td>
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<th>Financing Instrument</th>
<th>Borrower(s)</th>
<th>Implementing Agency</th>
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Proposed Development Objective(s) Parent

The Project Development Objective is to “support the Government of Malawi to meet the immediate food security and livelihoods restoration needs of the communities affected by drought and promote recovery and resilience in key affected sectors”. In the event of a future eligible crisis or emergency, the Project may also be able to provide immediate recovery support to GoM through a proposed Contingent Emergency Response Component.

Proposed Development Objective(s) Additional Financing

Support the recovery of livelihoods and infrastructure in affected areas and strengthen capacity for flood and drought risk management.

Components

- Improving Food Security and Sustainable Livelihoods
- Enhancing Drought-Resilience and Preparedness
- Contingent Emergency Response Component (CERC)
- Project Management

PROJECT FINANCING DATA (US$, Millions)

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### Details

#### World Bank Group Financing

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<td>IDA Grant</td>
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#### Environmental Assessment Category

**B-Partial Assessment**

#### Decision

The review did authorize the team to appraise and negotiate.
B. Introduction and Context

Country Context

Malawi is vulnerable to a variety of natural hazards, notably floods, droughts, strong winds, cyclones, earthquakes and landslides, which are known to cause both rapid and slow on-set disasters. Among the weather-related shocks, droughts and floods have had the greatest impact on the country’s economy, livelihoods and infrastructure – over the past 5 decades, the country has experienced more than 19 major flood and drought events. Malawi’s high level of vulnerability is attributed to several geo-climatic factors such as (i) the influence of the El Niño and La Niña phenomena on climate variability; (ii) the variability in water levels in the country’s three major lakes; and (iii) its location among a tectonically active boundary between two major African plates within the great East African Rift System.

Climatic projections and models suggest that the severity of frequency of climactic shocks will continue to increase – however, lack of capacity and resources make risk reduction, preparation and response against drought and extreme rainfall events more challenging. Malawi has several Disaster Risk Management (DRM) related policies and legislative instruments, emphasizing the importance of early warning systems, preparedness, and resilience and the Cabinet of Ministers has recently approved the Malawi Disaster Risk Management Bill with the intention to shift the institutional framework from emergency response to a more holistic DRM approach. Challenges in implementation include: (i) limited national budget for meaningful and effective activities for climate resilience and DRM; (ii) development and investment planning at national, regional and local level is not properly informed by disaster risks (iii) institutional frameworks are slowly supporting shifts toward mainstreaming disaster risk reduction and (iv) there is not systematic disaster risk assessment and mapping for hydro-meteorological and geological hazards to guide decision making.

The agriculture sector contributes 28 percent of Malawi’s GDP and 78 percent of export earnings, and employs 64 percent of the workforce, which consists mainly of subsistence farmers. Smallholders account for 80 percent of agricultural production and 70 percent of agricultural GDP in Malawi; they are engaged in low-productivity rain-fed agriculture vulnerable to floods and droughts and constrained to only one crop per year in non-irrigated land due to the length of the rainy season. In recent years, the country has suffered from weather shocks with increasing frequency, which have affected productivity and food security. Efforts have been made to make the rural sector more resilient to unanticipated climactic events including enhancing irrigation potential. Nonetheless, only about four percent of crop land is currently irrigated constraining agricultural intensification and commercialization.

Unplanned urbanization and poor building and infrastructure construction standards are underlying factors of vulnerability. Although only 15.3 percent of Malawi’s population live in urban areas, and its rate of urbanization is modest when compared with other African countries, Malawi’s urban population is expected to almost triple, from 2.2 million in 2015 to 6.3 million by 2040. Urbanization is concentrated in four major cities—Blantyre, Lilongwe, Mzuzu and Zomba—where growth is mostly informal and unregulated, largely because of lack of adequate and affordable housing for the urban poor, lack of enforcement capacity, and weaknesses in land use planning and building codes. Although all cities are vulnerable to floods, Blantyre City was the most heavily affected by Tropical Cyclone Idai. Blantyre City is the commercial and industrial center of Malawi, in part due to its connectivity with neighboring countries Mozambique, Zimbabwe, South Africa, Zambia and Tanzania.

Sectoral and Institutional Context

Building resilience: The Malawi National Resilience Strategy (NRS 2018), aims to make Malawi more resilient to
disasters and break the cycle of food insecurity. As demonstrated by the consecutive disasters in 2014/15 (flood), 2015/16 (drought) and 2019 (heavy rains and strong winds from cyclone Idai); a multi-phase, multi-sector programmatic approach is required to ensure that not only immediate recovery needs are met, but that underlying vulnerabilities are addressed to break the cycle of recurrent disasters that are becoming more frequent and severe. To achieve its objective, the NRS is based on four key pillars, namely Pillar 1 (Resilient Agricultural Growth), Pillar 2 (Risk Reduction, Flood Control and Early Warning Systems), Pillar 3 (Human Capacity, Livelihoods and Social Protection) and Pillar 4 (Catchment Protection and Management). Knowing that weather-related shocks are inevitable, the Project goes beyond recovery and reconstruction to supporting the tools and capacity for ex-ante preparation, institutional capacity building and strategic planning. These efforts, consistent with the NRS, are guided by the recently approved Disaster Risk Management Bill (2019), National Disaster Risk Management Policy (2015), the Malawi Growth and Development Strategy (MGDS III 2017-2022) and the Government of Malawi’s Post-Disaster Needs Assessment (PDNA 2019).

Institutional Context of Sectors Relevant to the MRDRMP

**Agriculture:** The MoAIWD is responsible for policy development and strategic management of the agriculture sector and has recently developed the National Agricultural Policy (NAP) to harmonize sector policies. The NAP is fully aligned with the existing core policies, including the Vision 2020 Framework, the second Malawi Growth and Development Strategy (MGDS II), and the Agriculture Sector Wide Approach (ASWAp). The long-term agricultural development strategies are to support a high level of agricultural productivity, diversification and commercialization to ensure equity, household food security, income growth, employment, and sustainable utilization of natural resources.

**Irrigation:** Increased investment in irrigation is consistent with Malawi’s higher-level development plans and aspirations articulated in the Vision 2020, MGDS III, and ASWAp. The irrigation sector core strategies are now guided by the three priority areas from the Irrigation Master Plan and Investment Framework as well as the (Draft) National Irrigation Policy. The priorities are to increase irrigation coverage through sustainable approaches of harnessing water for development of new schemes as well as rehabilitation and modernization of old schemes, and to build capacity for technicians/staff and farmers. The MoAIWD is responsible for oversight at ministry level, and the Department of Irrigation are the technical lead and oversee implementation and management of activities.

**Water Resources and Water Supply:** The government developed a National Water Resources Investment Strategy (NWRIS, 2011) and an Irrigation Master Plan (2015) to guide investments in water resources to meet a range of water needs for productive purposes. Under the vision “Water and Sanitation for All”, the sector goal is to ensure sustainable provision of adequate quantity and quality of water and adequate sanitation services. MoAIWD takes roles in facilitating management of water resources as well as formulating related policies. Water supply in urban and small towns is managed by five statutory water boards and rural water supply is managed by Water User Associations (WUAs) with technical backstopping by District Water Officers and the Department of Water and Sanitation.

**Disaster Risk Management:** DoDMA in the Office of the Vice President, has the legal mandate to coordinate and direct Disaster Risk Management (DRM) programmes in the country. The National Disaster Risk Management (NDRM) Policy was approved in 2015 with the overall goal to sustainably reduce disaster losses in lives and in the social, economic and environmental assets of communities and of the nation. The policy covers Disaster Risk Reduction (DRR), preparedness, mitigation, response and recovery. In light of the recurring disasters affecting country, the GoM is currently developing a National Resilience Strategy, which articulates three main objectives that will guide the DRM activities in Malawi: (i) promote irrigation for food security and nutrition and drive export; (ii) reduce the effects of floods and occurrence of drought; and (iii) enhance effective Early Warning Systems (EWSs). The NRS envisions a Malawi that will transition from
recurrent humanitarian appeals to encourage productive investments in complimentary interventions through institutional coordination and multi-sectoral planning and implementation.

C. Proposed Development Objective(s)

Original PDO
The Project Development Objective is to “support the Government of Malawi to meet the immediate food security and livelihoods restoration needs of the communities affected by drought and promote recovery and resilience in key affected sectors”. In the event of a future eligible crisis or emergency, the Project may also be able to provide immediate recovery support to GoM through a proposed Contingent Emergency Response Component.

Current PDO
The Project Development Objective is to “support the recovery of livelihoods and infrastructure in affected areas and strengthen capacity for flood and drought risk management”.

Key Results

PDO Level Indicators

- Number of households benefitting from restored and enhanced irrigation schemes
- Number of people with access to improved water supply as a result of the Project
- Number of people in areas with reduced flood risk due to project interventions
- Number of government bodies utilizing project generated data and knowledge products for decision making
- Number of functional local DRM authorities in Project affected areas established or strengthened

D. Project Description

Component 1: Improving Food Security and Sustainable Livelihoods (increase by US$14 million)

Sub-Component 1.4: Climate Smart Irrigation (USD $14 Million)

The objective of this component is to strengthen the resilience of rural agricultural communities through rehabilitation and construction of irrigation schemes, enhancement of agricultural production and catchment rehabilitation. Additional funding will be used to strategically complete rehabilitation and construction of selected irrigation schemes based on feasibility studies, engineering designs and construction supervision following irrigation development guidelines, code of conducts and standards. The sub-component will develop large scale and small-scale irrigation schemes with special focus on high value crop production and marketing. The irrigation infrastructure will be used as an enabler to scale up commercial agricultural production of high value crops, horticulture production and value chain such that at least one pilot scheme will be selected to explore a value-chain and market access approach. The component will also support Water Users’ Associations in sustainable utilization, management and supervision of the reconstructed irrigation schemes and implement comprehensive micro catchment management.

Component 2: Enhancing Drought and Flood Risk Management (increase by US$63 million)
Sub-component 2.1.: Rehabilitating and Augmenting Critical Water Supply Infrastructure (USD $10 Million)

This sub-component aims to strengthen the resilience of communities vulnerable to drought through the provision of reliable water supply systems. The activities under the subcomponent include (a) rehabilitation and upgrading of 8 water supply schemes, which would include drilling of high-yield boreholes equipped with pumping systems connected to water supply intakes as well as transmission and network rehabilitation; (b) drilling of 150 rural boreholes in selected districts to serve the affected communities and public institutions; (c) technical assistance for the establishment of water supply management structures for managing the rural water supply systems; and (d) management of the catchments areas for gravity-fed water supply systems, equivalent to those activities described under Sub-component 1.4 for irrigation schemes. The component may also finance a study to assess the impact of the water supply systems (including gravity-fed schemes and boreholes) under the MDRRP to inform sustainable implementation, operation and maintenance, and M&E strategies for water supply interventions.

Sub-component 2.2. Strengthening Flood and Drought Risk Management in Shire Basin (US$11 million)

The objective of this sub-component is to enhance decision making for management of flood and drought risk in the Shire River Basin and Blantyre City, utilizing a territorial and basin approach to drive Disaster Risk Management. The component will invest in the following key areas: (a) Updating the 2012 Flood Risk Management Plan for the Shire River Basin with recently available high-resolution surface elevation data and flood modelling. Critical priority investments emanating from the plan will be funded by Subcomponent 2.4; (b) Enhancing the ODSS system and its interaction with KABOM, including real-time data, to improve forecast accuracy of water levels used for the operation of the Kamuzu Barrage, which regulates water flow from Lake Malawi into the Shire River; maximizing flood control downstream; and ensuring appropriate water storage in Lake Malawi for dry periods; (c) Developing, for the first time, a risk atlas and a runoff and flood management and investment plan for Blantyre City, which will guide land use planning, urban development regulation and all future investment in the city. Some prioritized investments will be funded through Subcomponent 2.4; (d) Modernizing the early warning and forecasting capacity of the Department of Water Resources (DWR) and the Department of Climate Change and Meteorological Services (DCCMS).

Sub-component 2.3. Strengthening Comprehensive Disaster Risk Management Capacity at National, District and City Level (USD $ 16 Million)

The objective of this sub-component is to enhance the capacity for disaster risk management, in line with the DRM institutional framework, and improve delivery of services at the national, district and city level. Priority investments will be selected and financed to ensure a coordinated and consistent approach to building the capacity of the DRM system in line with the legal framework in place. This subcomponent will build on the existing assessments for the Department of Disaster Management Affairs (DoDMA) to formulate a strategic multiyear investment plan for improvement of the overall DRM system, which is currently lacking. Though the project has earmarked funding under this subcomponent to finance critical areas of the plan, as in other programs and interventions in Malawi, plans are not often followed by appropriate financing for their execution. Guided by the plan, the following investments will be financed at minimum: (a) construction of a National Emergency Operational Center and other priority capital expenditures arising from the strategic plan; (b) development of a National Comprehensive Risk Assessment and maps, today unavailable, and in the appropriate resolution to guide the development of district-level DRM plans and contingency plans; (c) capacity building of district DRM officers.
and DRM committees for the development of district DRM and contingency plans; and (d) support to the operationalization of the DRM Bill and capacity of local DRM authorities.

Sub-component 2.4.: Flood and drought risk reduction infrastructure (US$26 million)

The objective of this sub-component is to reduce the risk of communities exposed to flooding and enhance the resilience of community to drought through strategic infrastructure investments. The subcomponent will support both the rehabilitation and construction of scaled-up no-regret infrastructure investments prioritized by the parent project as well as priority investments informed by the flood and drought risk management plans for the Shire River Basin and Blantyre City produced as part of Subcomponent 2.2. The subcomponent may finance, among others, (a) flood defense and control structures such as dykes, check dams, and drainage structures; (b) nature-based solutions that will enhance natural habitat and increase biodiversity in addition to controlling siltation and runoff; (c) water harvesting structures such as excavated tanks and small dams constructed for multipurpose use including irrigation and/or water supply; (d) restoration and conservation plans in micro-catchments, including strengthening community management, in hotspots upstream of critical infrastructure.

Component 4: Project Management (increase by US$3 million)

This component will be scaled up with US$ 3,000,000 to cover the additional cost of implementation and the extension of the closing date by 3 years.

E. Implementation

Institutional and Implementation Arrangements

The institutional structure of the MRDRMP will be changed, with the project reporting to the Ministry of Agriculture, Irrigation, and Water Development (MoAIWD) rather than the Ministry of Finance, Economic Planning, and Development (MoFEPD). The project will be implemented by a newly formed Program Management Unit (PMU). The PMU will comprise a multisectoral technical team consisting of staff from the ministries and departments attached to the project and a team of fiduciary staff who will be recruited competitively to provide support on project management, procurement, FM, M&E, and environmental and social safeguards. Given the nature of the AF activities, the MoAIWD will provide stronger oversight and technical leadership and promote stronger coordination among participating agencies in the project, many of whom fall under the MoAIWD’s umbrella. The DoDMA will play a key role in programmatic coordination, planning, and implementation of the intervention in an integrated and cohesive manner that facilitates resilience building. The DoDMA will support the prioritization of interventions, resources, geographical, and beneficiary targets.

F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)

The AF will geographically focus within the districts affected by both the recent flood and drought events. The 15 affected districts include Balaka, Blantyre, Chikwawa, Chiradzulu, Machinga, Mangochi, Mulanje, Mwanza, Neno, Nsanje, Phalombe, Thyolo and Zomba in the Southern Region and Dedza and Ntcheu in the Central Region. These districts have experienced alternating periods of flooding and drought over the recent
years, and these events have clearly overwhelmed national disaster response capacities in Malawi. The country’s existing developmental deficits are being further widened, and poverty reduction and growth interventions are facing serious disruptions. The proposed project therefore aims to provide reconstruction and recovery support to affected areas. It is expected that it will yield benefits and livelihood opportunities through provision of high priority reconstruction and rehabilitation of public infrastructure in the worst affected areas of the region in addition to enhancing government’s and the local community’s capacity in dealing with future disasters.

G. Environmental and Social Safeguards Specialists on the Team

Ian Munro Gray, Environmental Specialist
Violette Mwikali Wambua, Social Specialist

SAFEGUARD POLICIES THAT MIGHT APPLY

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KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

A. Summary of Key Safeguard Issues

1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:

Activities supported under MRDRMP aim to provide reconstruction and recovery support to affected areas in which livelihoods, public infrastructure and service delivery were impacted severely by the recent drought and flood events. The planned interventions are expected to yield benefits and livelihood opportunities through provision of high priority reconstruction and rehabilitation of public infrastructure in the worst affected areas of the region in addition to enhancing government’s and the local community's capacity in dealing with future disasters. The AF efforts learn from the earlier MDRRP safeguards implementation experience to help manage potential impacts. Most importantly, activities that are likely to generate large scale, significant and/or irreversible impacts are excluded from the project. Where impacts are expected, within the construction of irrigation, water supply and flood risk infrastructure the potential impacts are anticipated to be site-specific, minimal and manageable through commonly used mitigation approaches. The anticipated impacts include possible loss of vegetation, disturbance of water courses, temporary or permanent loss of land and livelihoods, construction related impacts such as community and occupational health and safety, possible influx of workers and populations leading to spread of disease, illicit behaviour and potential for GBV/SEA. An environmental category “B” has been assigned, and Operational Policies 4.01, 4.04, 4.09, 4.37, 4.10, 4.11 and 4.12 have been triggered.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:

MRDRMP is not anticipated to generate significant or long-lasting adverse impacts. MRDRMP will fund a large number of small to medium size rural infrastructural rehabilitation and reconstruction works in localized sites across the flood and drought affected parts of the country. The key challenge for safeguards lies not in the individual sub-project interventions but managing the overall number, geographical spread, range of implementing actors and diversity of intervention activities. While the sub-project interventions may have associated adverse impacts, these are not expected to be complex or irreversible. Potential impacts are expected to be minor, localized and temporary making these impacts manageable within the confines of project design and planned mitigation approaches to be developed during project preparation. The interventions with the most significant anticipated environmental and social impacts focus where the project will fund the construction works to rehabilitate irrigation, water and flood risk reduction infrastructure. These will include rehabilitation of small scale water harvesting and irrigation systems; gravity fed water supply systems; boreholes (also new sites); small dams. These interventions are well known and have a good track record of implementation across a diverse range of locations and situations. The potential risks, likely impacts and envisaged mitigation approaches are therefore already well understood by practitioners. Mitigation measures are expected to be available to address all anticipated adverse impacts.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.

The MRDRMP, in view of the fact that it is responding to an emergency situation, will not fund large-scale new infrastructure development projects that could potentially have long-term and irreversible impacts. Instead, the proposed project focuses on rather smaller scale rural rehabilitation and re-construction sub-projects.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

No new safeguards policies have been triggered as a result of this Additional Financing, but the Parent Project ESMF
and RPF have been updated. As the project locations and interventions are not yet defined and identified, a framework approach with an Environmental and Social Management Framework (ESMF) and Resettlement Policy Framework (RPF) has been adopted to provide guidance on the appropriate instruments to be used for specific subprojects during project implementation. (The ESMF and RPF were disclosed in-country on January 27, 2020 and on the World Bank Info Shop on January 28, 2020.)

Depending on the subproject type and environmental/social context, these instruments would be subproject-specific Environmental and Social Impact Assessments (ESIAs) (although considered unlikely), Environmental and Social Management Plans (ESMPs), and/or Resettlement Plans (RPs) to be prepared when the subproject locations become known. Project investments will be designed to ensure compliance with the World Bank Group’s Environment, Health, and Safety Guidelines. The ESMF outlines the substantive measures and actions that will be required for the project to meet environmental and social requirements and the status of implementation will be reviewed as part of project monitoring and reporting. The existing MDRRP project has in place one full time environment and social specialist, supported by 3 interns. This team is working well and has coped admirably with the increased screening requirements due to the CERC. However this team will need to be strengthened to maintain its coverage as works start on the ground and planning for new sub-projects from AF is initiated. In that regard, it has been recommended that the PIU enhances capacity by ensuring an environment specialist as well as a social safeguard specialist are in place, supported by the interns. The MDRRP has an existing safeguards database however as the number of subprojects is already large and will increase with AF this would need to be strengthened to allow more robust management of subproject safeguard instruments, issues as well as planning and audit of safeguards supervision. The key ministries in MDRRP, were partners in the MDRRP and have been involved in other World Bank funded projects. Environmental and social management capacity of these institutions is however mixed. Given the overall number, geographical spread, range of implementing actors and diversity of intervention activities both environmental and social risk management will require more attention from the sector ministries, particularly during construction works. It has been advised that each sector designate an environmental and social focal point.

The client will also carry out an assessment of environmental and social capacity and prepare a training program to strengthen capacity in coordinating, planning, implementing and monitoring environmental and social issues.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.

Key stakeholders in the project include the Ministry of Agriculture, Irrigation and Water Development (MoAIWD); the Ministry of Natural Resources, Energy and Mining (MoNREM); Ministry of Lands, Housing and Urban Development (MoLHUD); Department of Disaster Management Affairs (DODMA); Environmental Affairs Department (EAD), District Councils; Project beneficiaries; and Project Affected Persons. The project recognizes the importance of engagement with relevant stakeholders, beneficiary communities and project affected parties throughout the project cycle and this will be at the centre of project preparation and implementation. In that regard, the borrower has commenced such engagement in the development of the project including consulting with stakeholders on the design of the operation. The approach will be to identify local stakeholders and plan for an engagement process that will be followed/implemented once project locations are known and during implementation. The MDRRP has an existing project level grievance redress mechanism to respond to complaints, concerns, queries, clarifications and feedback from and give voice to stakeholders, beneficiary communities and project affected parties. The project recognizes the importance of engagement with relevant stakeholders, beneficiary communities and project affected parties throughout the project cycle and this will be at the centre of project preparation and implementation. In that regard, the borrower has commenced such engagement in the development of the project including consulting with stakeholders on the design of the operation. The approach will be to identify local stakeholders and plan for an engagement process that will be followed/implemented once project locations are known and during implementation. The MDRRP has an existing project level grievance redress mechanism to respond to complaints, concerns, queries, clarifications and feedback from and give voice to stakeholders, beneficiary communities and project affected parties. The GRM has recently been revamped to improve its effectiveness and accessibility by local communities. The existing MDRRP GRM will therefore be expanded to cover the AF elements. This, together with other existing formal or informal grievance mechanisms in Malawi is expected to form a functional mechanism that is proportionate to the risks and impacts of the project. The proposed project level grievance redress mechanism will have multiple uptake locations and channels. The GRM will also be used for compliance to the requirements of resettlement although given the rehabilitative nature of the sub-
projects, resettlement is expected to be limited. Safeguard instruments will be disclosed locally and through the World Bank.

B. Disclosure Requirements (N.B. The sections below appear only if corresponding safeguard policy is triggered)

Environmental Assessment/Audit/Management Plan/Other

Resettlement Action Plan/Framework/Policy Process

Pest Management Plan

C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting) (N.B. The sections below appear only if corresponding safeguard policy is triggered)
CONTACT POINT

World Bank

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Senior Disaster Risk Management Specialist

Nicholas James Callender
Disaster Risk Management Specialist

Borrower/Client/Recipient

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Implementing Agencies

Ministry of Agriculture, Irrigation and Water Development

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APPROVAL

Task Team Leader(s):
Francis Samson Nkoka
Nicholas James Callender

Approved By

Safeguards Advisor: Nathalie S. Munzberg 28-Jan-2020
<table>
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<th>Practice Manager/Manager:</th>
<th>Meskerem Brhane</th>
<th>28-Jan-2020</th>
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<tr>
<td>Country Director:</td>
<td>Greg Toulmin</td>
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