



The World Bank

Malawi Platform for National Social Support Project (P169198)

Environmental and Social Review Summary

Concept Stage

(ESRS Concept Stage)

Date Prepared/Updated: 03/18/2019 | Report No: ESRSC00325

**BASIC INFORMATION****A. Basic Project Data**

Country	Region	Project ID	Parent Project ID (if any)
Malawi	AFRICA	P169198	
Project Name	Malawi Platform for National Social Support Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Social Protection & Labor	Investment Project Financing	10/5/2018	12/10/2019
Borrower(s)	Implementing Agency(ies)		
Ministry of Finance, Economic Planning and Development	Malawi National Local Government Finance Committee		

Proposed Development Objective(s)

To improve resilience among the poor and vulnerable population and strengthen the national platform for safety nets.

Financing (in USD Million)	Amount
Total Project Cost	150.00

B. Is the project being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?

No

C. Summary Description of Proposed Project [including overview of Country, Sectoral & Institutional Contexts and Relationship to CPF]

The proposed five-year project will support the second Malawi National Social Support Program (MNSSP II) as the overarching and formal platform in social protection, led by Government with coordinated donor engagement. In this context, the project will contribute to the MNSSP II in two ways, as reflected in the PDO. The first part of the PDO highlights the importance of improving resilience, which is understood as the ability of households to improve initial levels of welfare in the face of chronic stress and to maintain welfare in the face of shocks. In this regard the project emphasizes safety net programs which boost economic and social inclusion. The resilience of these programs will be further strengthened by the delivery systems and capacity investments under the project. The second part of the PDO



highlights the need to more strongly support the effectiveness of a national system for social safety nets under the MNSSP II framework. The project places emphasis on this through efforts to support delivery systems (for social registry, e-payments and citizens engagement), as well as efforts to strengthen overall capacity and harmonization in the sector. The project has three major components: (i) Improving Social and Economic Inclusion. This component focuses on the consolidation of an appropriate package of support for beneficiary households with a mix of program interventions, including social cash transfers, livelihoods support, and enhanced public works, as well as an option for scalable financing in time of crisis; (ii) Strengthening Harmonized Delivery Systems which will focus on strengthening social registry and information management, introduction of e-payments and citizens engagement; and (iii) Capacity Building and Institutional Development Support to support the enactment of the MNSSP II, the setting up of the necessary institutional structure for its implementation and the general management and evaluation of the project.

D. Environmental and Social Overview

D.1. Project location(s) and salient characteristics relevant to the ES assessment [geographic, environmental, social] The project will be a national platform for social safety nets in Malawi and will be implemented in the rural areas of the country mainly in 11 districts (for Social Cash Transfer-SCT), 10 districts (for Public Works-PW) and nationwide for livelihoods. The proposed project will finance public works and livelihood activities under the Component 1 “Improving Social and Economic Inclusion”, sub-component 1.1 “Enhanced Core Programs”. It is envisaged that the combination of the proposed livelihood activities and cash transfers will increase household income through building household level assets, enhancing risk management, and facilitating a shift to more productive types of employment. Cash transfers are expected to have significant impacts on consumption and resilience. The public works include micro projects such as afforestation- both tree planting and regeneration; land resources conservation including gully reclamation; rehabilitation of water supply, drainage, and small access roads, and other small-scale rehabilitations. The project will build on the MASAF IV GRM to develop a harmonized GRM platform for core PNNSP interventions. PNNSP will further seek to strengthen social accountability within GRM to empower households to voice their concerns and increase awareness about the features of the program and their entitlements. In addition, capacity building of GRM staff will be undertaken to enhance their ability to handle large caseload, and will sensitize them to be empathetic towards complaints raised by households to establish their confidence in the system. The project will also focus on enhancing citizen engagement throughout the program cycle to provide the program implementers with the necessary feedback loop, to strengthen the functionality of the GRM, and to improve the quality of the delivered micro projects. Community scorecards, citizen report cards and social audits will be an integral part of the program’s monitoring, oversight and accountability systems.

D. 2. Borrower’s Institutional Capacity

The implementing agency of the project is the National Local Government Finance Committee (NLGFC), which will have responsibility for environment and social risk management including monitoring compliance with the agreed mitigation measures and actions that will be outlined in Environmental and Social Commitment Plan (ESCP). Overall, the implementing agency at national level has shown fairly good implementation of environmental and social safeguards in the existing MASAF IV project. NLGFC has prepared a capacity building plan to address both staffing and skills and knowledge capacity challenges to manage environmental and social risk in the project. As part of the capacity building plan, the implementing agency has already recruited a qualified staff to manage both environmental and social safeguards matters of the proposed project including oversight and supervision of safeguards performance of projects at national level, design, develop and monitor the implementation of instruments for safeguards management throughout the project cycle to ensure consistency and conformity to World Bank and GoM Safeguards standards. The district environmental officers will implement and monitor both environmental and social safeguards



matters at the district level while extension workers will be responsible for environmental and social risk management at the community level. The District environmental officers have taken a number of trainings under the MASAF IV and other World Bank projects to manage both environmental and social risks and extension workers at community level have experience with managing environmental and social issues under the MASAF IV. However, it is still recommended that intensive support be provided to the implementing agency on environment and social risk management during project preparation and implementation to manage challenges that may result from the application of the new ESF.

II. SCREENING OF POTENTIAL ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

A. Environmental and Social Risk Classification (ESRC)

Moderate

Environmental Risk Rating

Moderate

The project is not expected to generate adverse environmental impacts or substantial risks on the environment. Likely impacts are expected to be temporary, reversible, low in magnitude and site-specific. Where public works are envisioned these are expected to include rehabilitation of rural roads, small scale irrigation, drainage and water systems. These rehabilitation activities would be small community-selected microprojects and would not involve the construction and building of new infrastructure, but would focus on the maintenance of natural resources, and the rehabilitation of small assets linked to the management of the respective catchments. Possible projects could include, among other things reforestation and regeneration; land resources conservation including gully reclamation; rehabilitation of water supply, drainage, small access roads, and will improve management of natural resources. The potential environmental impacts caused by rehabilitation works and associated handling and storage of construction materials may include waste production, excessive noise and dust levels, and disposal of asbestos-containing material, if present. Potential environmental impacts to be avoided in community livelihood activities include deforestation and land degradation through overgrazing, poor watershed management, and improper agriculture practices and land use. The project is classified as Moderate risk from an environmental perspective and as defined under the Bank's ESF due to the nature of the proposed works and associated environmental risks, and the capacity of the client in the understanding and application of Bank's ESF, and relevant Standards.

Social Risk Rating

Moderate

Overall this operation is expected to generate positive results for poor and vulnerable populations in Malawi through the provision of a social safety net. There are public work, small in scope, and ranging from 500 to 10,000 US dollars of which 80% are wages and 20% are inputs or materials for the relevant public works as well as and livelihood activities designed to provide temporary employment to poor households with labor capabilities. The public works include rehabilitations of rural access roads, small scale irrigation schemes, drainage and water supply systems linked to catchment management and community asset management. These type of small infrastructures will involve physical civil works and associated activities which have the potential to cause construction related health and safety concerns for both community laborers/workers and surrounding local communities, may entail temporary loss of land and access restrictions during construction that can easily be managed and mitigated. Other potential impacts and risks may involve the use of child labour and weaknesses in the targeting mechanisms for both the vulnerable individuals and households. Therefore, in general social risk is moderate because the footprint of such small community infrastructures is considered localized with impacts that are site specific, reversible and/or manageable.



The Cash Transfer Program (CTP) is designed to take account of gender considerations, provide positive gender outcomes and is expected overall to empower females by improving joint decision making at household level. The injection of cash into poor rural households and communities does impact household and community relations and the evidence to date under the program suggests that such multiplier effects are in fact strong and positive, and generate important economic investments for beneficiaries and non-beneficiaries alike. Potentially the transfer of cash could have negative effects including exacerbating intra household tensions and increasing the risk of GBV and abandonment. However, the operational evidence under the existing program on this is weak.

The capacity of client to manage social risks and impacts varies from satisfactory to moderately satisfactory. The application of the new WB ESF is considered as a challenge, however, during project preparation the Bank will discuss with the client on the next steps towards the application of the new framework so that concrete measures are suggested.

B. Environment and Social Standards (ESSs) that Apply to the Activities Being Considered

B.1. General Assessment

ESS1 Assessment and Management of Environmental and Social Risks and Impacts

Overview of the relevance of the Standard for the Project:

The project will not support construction of any new infrastructure and will operate in micro-catchments under 250 hectares in size. It will finance only small micro projects, mainly for nature conservation and for rehabilitation of small infrastructure. These type of activities may entail physical civil works that are likely to generate environmental and social impacts such as construction related health and safety concerns for both laborers/workers and surrounding local communities as well as potential child labour impacts. The project doesn't support any activities that would include land acquisition and as a result no permanent physical displacement is expected. Depending on the scale of the rehabilitation works, there could be clearing, site preparation and construction that could lead to loss of vegetation and associated fauna, soil disturbance and erosion. The injection of cash, through the SCT program, into poor rural households and communities could also potentially impact household and community relations and may have negative effects including GBV and an exacerbation of exclusion. However, in general, these potential environmental and social risks and impacts are predictable, expected to be temporary and reversible, low in magnitude, and site-specific. The scope and sites of public works and livelihood activities are not yet defined nor identified, therefore, a framework approach (ESMF and RPF) will be adopted to provide guidance on the appropriate instruments such as Environmental and Social Impact Assessments/Environmental and Social Management Plans (ESIAs/ESMPs), and where necessary Resettlement Plans (RPs) to be prepared. The Environmental and Social Commitment Plan, drawn and agreed upon with the borrower, will set out the substantive measures and actions that will be required for the project to meet environmental and social requirements over a specified period of time. These measures shall be implemented within the specified timeframes and the status of implementation will be reviewed as part of project monitoring and reporting. The ESMF will make use of the general and sector-specific EHSGs for the identified subprojects in relation to occupational and community health and safety.

Areas where reliance on the Borrower's E&S Framework may be considered:

The operation will not use the Borrower's E&S Framework in the assessment, development and implementation of sub projects. The project will comply with relevant national legal requirements



ESS10 Stakeholder Engagement and Information Disclosure

Stakeholder Engagement (SE) is at the center of this project considering the fact that many stakeholder groups are involved in both its preparation and implementation. SE includes the following: (i) stakeholder identification and analysis; (ii) planning for stakeholder engagement; (iii) consultations and disclosures; (iv) grievance redressal systems; and (v) continuous interface with and reporting to the stakeholders. The project recognizes the importance of engagement with relevant stakeholders, beneficiary communities and project affected parties throughout the project cycle. In that regard, the borrower has commenced extensive consultations throughout the preparation process including consulting with key stakeholders on the design of the operation to enhance buy in into the project at the national level. To ensure that all consultations are inclusive and accessible (both in format and location) and through channels that are suitable in the local context, the borrower will develop and implement a Stakeholder Engagement Plan (SEP). The SEP will be prepared and disclosed as early as possible and before project appraisal. The SEP will include mechanisms for setting out a Grievance Redressal Mechanism (GRM). Under the current MASAF IV program, a GRM has been set up and is in its initial stages of implementation across all districts. The borrower will, therefore, build on the MASAF IV GRM and develop a harmonized GRM platform for interventions under this project. The borrower will strengthen social accountability within the GRM to empower households to voice their complaints, concerns, queries, clarifications and increase awareness about the features of the program and their entitlements. The GRM platform will seek to establish a continuous feedback and responsive platform between beneficiary communities and implementing structures. The grievance mechanism will also be used for compliance to the requirements of Resettlement Plans.

B.2. Specific Risks and Impacts

A brief description of the potential environmental and social risks and impacts relevant to the Project.

ESS2 Labor and Working Conditions

The project will not entail a significant amount of community labor as the project aims at rehabilitating micro-infrastructure. However, rehabilitation works will entail temporary employment to poor households with labor capabilities and proper management of community workers will be required. Hence, the borrower will apply the relevant provisions of this ESS and EHSG in a manner proportionate to the nature and scope of the operation, the specific activities in which the community is engaged and the nature and potential risk and impacts to community workers. In that regard the Borrower will prepare Labor Management Procedures (LMP) which will have detailed information on the work terms and conditions including explicit prohibition of child labor. Health and safety of workers, especially women will be assessed in the Environmental and Social Management Plans in relation to community labor and will be set out in the labour management procedures. The labor management procedures will clearly identify the terms and conditions on which community labor will be engaged, including the amount and method of payment and times of work. The labor management procedure will also specify the manner in which community workers can use the existing GRM to raise grievances in relation to the project. The labor management procedures will also take consideration that proper training is provided to community workers, tailored to needs and potential risks and impacts of the project. The borrower will assess whether there is risk of child labor within the community labor and identify and manage those risks by taking appropriate steps to remedy the situation in consistence with this ESS.

**ESS3 Resource Efficiency and Pollution Prevention and Management**

The nature of the proposed project will not cause significant water and energy use, however, the rehabilitation works (albeit micro-infrastructures) and associated handling and storage of construction material could cause waste production, excessive noise and dust levels, and disposal of asbestos containing material, if present. The Bank will require adoption of adequate work-related health and safety practices (OHS aspects) throughout the construction period. The project may include community-selected livelihood microprojects with agricultural activities. These could include small scale livestock rearing or crops such as ground nut. The ESMF will include the potential for pesticide use ensure minimized use and safe handling, to be elaborated in the Environmental and Social Impact Assessment and Management Plans where there is the potential for pesticide use to cover use, application and storage.

ESS4 Community Health and Safety

As can be expected, physical civil works can pose risk to local communities' health and safety. In that regard, the Environmental and Social impact assessments will include requirements for Community Health and Safety including HIV Social Mitigation Measures; Traffic/Road Safety Management with measures to ensure safety of nearby communities and road users during rehabilitation and Emergency Response with procedures to respond to accidents and incidents. The ESMF will make use of the general and sector-specific EHSGs for the identified subprojects in relation to community health and safety.

ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The nature of subprojects in the public works program is not expected to require any permanent land acquisition as the infrastructures will be under rehabilitation. As a result, no permanent physical displacement or loss of assets is expected. However, some form of land loss, most likely of a temporary nature and some restrictions on access to make way for physical works can be expected during rehabilitation. As the project scope and locations are not yet defined and identified, the borrower will prepare a Resettlement Policy Framework (RPF) to guide the preparation of subprojects site specific Resettlement Plans, if these will be required at implementation. The requirement to prepare subproject specific resettlement documentation will be outlined in the Environmental and Social Commitment Plan, that will be drawn and agreed upon with the borrower and disclosed prior to appraisal.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The proposed project is not expected to involve primary production and/or harvesting of living natural resources. Hence, potential environmental risks and impacts associated with this ESS is not relevant at this stage. However, relevance of this ESS will be further assessed during project preparation as part of the environmental and social assessment process.

ESS7 Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities

This standard is not applicable to Malawi because there are no groups of people who fit the description of people in ESS 7.

**ESS8 Cultural Heritage**

By the nature of physical works that will be undertaken in the public works program, some of excavation, movement of earth and impounding can be expected. These types of activities pose the possibility of encountering both known and unknown physical and cultural resources. Though the possibility is not considered significant, the borrower will avoid impacts on cultural heritage and where such avoidance is not possible, will identify and implement measures to address these impacts in accordance with the mitigation hierarchy. The treatment of Physical Cultural Resources (PCR) including archaeological relics, fossils, human graves, shrines, sacred trees or groves that may be encountered will follow a Chance Finds Procedure that will be elaborated in the Environmental and Social Impact Assessment and Management Plans for the subprojects.

ESS9 Financial Intermediaries

This standard is not applicable to this operation.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways No

OP 7.60 Projects in Disputed Areas No

III. WORLD BANK ENVIRONMENTAL AND SOCIAL DUE DILIGENCE**A. Is a common approach being considered?** No**Financing Partners**

KfW, EU, Irish Aid and UNICEF

B. Proposed Measures, Actions and Timing (Borrower's commitments)**Actions to be completed prior to Bank Board Approval:**

The actions to be completed prior to approval include:

- i. Prepare, in consultation with the Bank, a Stakeholder Engagement Plan (SEP) as early as possible and disclose it before appraisal.
- ii. Prior to project appraisal, prepare framework documents (ESMF and RPF) to guide the preparation of project specific plans at implementation.
- iii. Prepare draft Labor Management Procedures (LMP).
- iv. Prepare the ESCP outlining material measures and actions to be undertaken over a specified timeframe.

Possible issues to be addressed in the Borrower Environmental and Social Commitment Plan (ESCP):



The measures and actions to be outlined in the ESCP will include the preparation and implementation of:-

- i. Environmental and Social Impact Assessment (that applies a mitigation hierarchy) for all relevant subproject investments and the preparation of an Environment and Social Management Plan;
- ii. Resettlement Plans for all relevant subprojects that entail land acquisition and the involuntary taking of land, loss of assets, livelihoods or restrictions to access;
- iii. A Stakeholder Engagement Plan including the operationalization of a project level grievance redress mechanism in the project life cycle;
- iv. Labor management procedures for the Public Works Program;
- v. ESF capacity-building plan for districts/local governments and communities;

C. Timing

Tentative target date for preparing the Appraisal Stage ESRS

15-Jun-2019

IV. CONTACT POINTS

World Bank

Contact:	Mary C.K. Bitekerezo	Title:	Senior Social Development Specialist
Telephone No:	5355+3235 /	Email:	mbitekerezo@worldbank.org
Contact:	Violette Mwikali Wambua	Title:	Senior Social Development Specialist
Telephone No:	5394+3204 /	Email:	vwambua@worldbank.org
Contact:	Ian Munro Gray	Title:	Senior Environmental Specialist
Telephone No:	5-394-3219	Email:	igray@worldbank.org
Contact:	Fisseha Tessema Abissa	Title:	Senior Environmental Specialist
Telephone No:	473-5789	Email:	fabissa@worldbank.org

Borrower/Client/Recipient**Borrower:** Ministry of Finance, Economic Planning and Development**Implementing Agency(ies)****Implementing Agency:** Malawi National Local Government Finance Committee

**V. FOR MORE INFORMATION CONTACT**

The World Bank
1818 H Street, NW
Washington, D.C. 20433
Telephone: (202) 473-1000
Web: <http://www.worldbank.org/projects>

VI. APPROVAL

Task Team Leader(s):	Colin Andrews, Ivan Drabek
Safeguards Advisor ESSA	Nathalie S. Munzberg (SAESSA) Cleared on 20-Mar-2019 at 11:39:14
Practice Manager	Robert S. Chase (PMGR) Concurred on 20-Mar-2019 at 22:44:16