



Additional Financing Appraisal Environmental and
Social Review Summary
Appraisal Stage
(AF ESRS Appraisal Stage)

Date Prepared/Updated: 11/18/2022 | Report No: ESRSAFA493



BASIC INFORMATION

A. Basic Project Data

Country	Region	Borrower(s)	Implementing Agency(ies)
Malawi	EASTERN AND SOUTHERN AFRICA	The Republic of Malawi	Malawi National Local Government Finance Committee
Project ID	Project Name		
P180152	Malawi Social Support for Resilient Livelihoods Project Second Additional Financing		
Parent Project ID (if any)	Parent Project Name		
P169198	Social Support for Resilient Livelihoods Project		
Practice Area (Lead)	Financing Instrument	Estimated Appraisal Date	Estimated Board Date
Social Protection & Jobs	Investment Project Financing	11/10/2022	12/20/2022

Proposed Development Objective

The objectives of the Project are to improve resilience among the poor and vulnerable population and to strengthen the national platform for safety nets in the Republic of Malawi.

Financing (in USD Million)	Amount
Current Financing	329.50
Proposed Additional Financing	160.50
Total Proposed Financing	490.00

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

Yes

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

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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. Detailed project location(s) and salient physical characteristics relevant to the E&S assessment [geographic, environmental, social]

The proposed AF2, and AF1, will strengthen resilience building and the national platform for social safety nets in Malawi by targeting all 28 districts and the 4 cities. Thus, the coverage will expand geographically but also in terms of targeting both rural and urban populations. This scale up is leveraging on the initial implementation of SCTP in the 11 districts, and EPWP and livelihoods support interventions nationwide. It is envisaged that the combination of scaled up SCTP, more climate smart focused EPWP (CS-EPWP) and livelihood support activities will increase household income through building household level assets, enhancing risk management, and facilitating a shift to more productive and climate smart types of employment. Selection of beneficiaries, inclusivity, stakeholder engagement, power dynamics and gender are some of the critical aspects in this situation, and need to be reflected in E&S assessment at this level and the instruments that are going to guide project implementation. Furthermore, the CS-EPWP is based on integrated catchment management using a landscape restoration approach which includes sub-projects such as afforestation- both tree planting and regeneration; land resources conservation including gully reclamation; infiltration pits, swale construction and contour ridging as well as small access road maintenance, run-off management and rehabilitations, and in urban areas includes improving runoff-management such as by clearing drainage areas, erosion rehabilitation and mitigation such as check dams, swales and mitre drains. As the specific sites for the CS-EPWP sub projects are not yet known and the site interventions not yet identified, screening for biodiversity, cultural heritage, natural disasters risks etc., will be carried out in the updated ESMF for AF2, which shall then provide guidance in the development of the site specific ESMPs. Eligibility/exclusion list of activities and areas shall be included to ensure that protected and high conservation value areas, and high social risk areas are avoided, or if not avoided then appropriately mitigated, and require relevant National legislation permits are obtained prior to works. Identification of areas and compilation of the Village Level Action Plans (VLAPs) that map out the location, type and number of interventions in the identified areas, that CS-EPWP will be implementing, is being led by the Department of Land Resources Conservation.



Landscape Restoration is a key approach to building Malawi's climate resilience. Several Donor Partners and World Bank projects include activities to support Malawi's National Forest Landscape Restoration Strategy and Bonn Challenge commitment. The CS-EPWP activities directly contribute towards these National objectives. In order to strengthen coordination, planning, and monitoring of the various activities in various projects by various donors, NGOs and CSOs, and Government of Malawi, the project will support the Department of Land Resources Conservation to establish an in-country Landscape Restoration Community of Practice forum.

The AF2 will build on and continue to realign and improve the harmonized SSRLP Grievance Redress Mechanism. By strengthening a harmonized GRM platform for all Project Affected Persons (PAPs) across the core programs, the AF2 will make further investments in GRM to allow beneficiaries to have improved access to platforms for lodging their grievances. Pre-existing GRM structures will be utilized or revived, and where necessary, new ones established across the 28 districts and 4 cities nationwide. Grievance Redress Committees (GRCs) will receive continuous training and close monitoring and performance review to enhance their roles and responsibilities and be equipped with knowledge on how to handle sensitive grievances such as political interference, corruption, GBV/SEA/SH and defilement. The Project Implementing agency-National Local Government Finance Committee (NLGFC)- will coordinate with the Ministry of Gender, Children, Disability and Social Welfare and their Partners on social protection GRM capacity building, and GIZ, to enhance the capacity of the GRCs in handling these sensitive grievances. Furthermore, in conjunction with other social protection partners including UNICEF and GIZ, the AF2 will seek to strengthen social accountability within social protection sector to empower households to voice their concerns and increase awareness about the features of the program and their entitlements. The collaboration will continue with the current 351 toll free line housed in the Ministry of Gender Children, Disability and Social Welfare. In addition, capacity building of GRM staff will be undertaken to enhance their ability to handle large caseload as a result of scaled activities under the AF2, 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 risks management including monitoring compliance with the agreed on mitigation measures and actions as outlined in both the recently updated Environmental and Social Commitment Plan (ESCP), and the ESMF that will be updated, for the AF2 in accordance to ESS1. Learning from MASAF experience limiting the range of site interventions with an approved list will assist to avoid higher risk activities. In addition the scaling up of the climate smart enhanced public works component will incorporate environmental and social safeguard lessons from the concluded pilot EPWP implementation under MASAF IV. Overall, the implementing agency at national level has shown good implementation of environmental and social safeguards in the existing previous MASAF IV project and the existing SSRLP. 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, especially following scaling up of some of the interventions. As part of the capacity building plan, the implementing agency has qualified staff to manage both environmental and social safeguards matters of the proposed project, including oversight and supervision of safeguards performance of the project's activities 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 Government of Malawi Safeguards policies and standards. A project support unit to complement NLGFC’s capacity which was proposed as part of the AF1 will be continued to ensure adequate support to AF2. It has been proposed that the SSRLP needs to have dedicated E&S safeguards personnel, and staffing restructured to reflect national, cluster of districts, and district portfolio roles and responsibilities. At PIU level, there will be 4 safeguards personnel [two senior personnel (environmental and social) and two Environmental Safeguards Officer and Social Safeguards Officer], who will have overall responsibility of E&S management and compliance of the project national wide. Under them, there will be 4 District Cluster Coordinators (DCCs) who will be responsible for planning, implementation and monitoring of E&S for their cluster of districts. They will work with project recruited Project Facilitators for the 28 districts and 4 cities, whose overall responsibility will be technical in nature (i.e. project implementation) but will have E&S implementation, monitorign and reporting as part of their job description. Since the project is leveraging on decentralized structures of Government, the DCCs will closely work with the Environmental District Offices (EDOs), District Social Welfare Offices (DSWOs), District Environmental Sub-Committees (DESC) and Extension Workers on E&S risk screening, preparation of tools, implementation of E&S activities and mitigation measures, and monitoring of achievement and compliance. At community level, E&S activities will be implemented in collaboration with Catchment Management Committees (CMCs), Village Development Committees (VDCs), Village Natural Resource Management Committees (VNRMCs), Grievance Redress Committees (GRCs), and project implementation committees, where available. It must be noted that in the 4 cities, urban based structures will mirror the above rural community level structures. All these structures will be key in, among other things, ESMP implementation, monitoring E&S compliance, recording and handling grievances and reporting at community and district/ city levels.

With regard to E&S capacity and experience, the Environmental District Officers (EDOs) have taken a number of trainings under the SSRLP as well as other World Bank decentralized projects to manage both environmental and social risks. Extension or field workers at community level also have experience with managing environmental and social issues under the SSRLP. Learning from MASAF IV, the need for ongoing and refresher training on screening and ESMP development will be important to maintain ESF standards. This will be provided by NLGFC and EAD staff to DEOs, DSWOs, DESCs, district project officers/ facilitators and extension workers, as well as similar officers and structures at city council level. Additionally, improvements in the follow up of ESMP requirements and conditions by the Area Executive Committees will be a focus of NLGFC and District Environmental Sub-Committee support. However, it is still recommended that intensive support be provided to the implementing agency on environment and social risks management during project preparation and implementation to manage challenges that may result from the application of the new ESF.

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II. SUMMARY OF 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 significant adverse environmental impacts or substantial risks on the environment. Likely impacts are expected to be reversible, low in magnitude, and localized, provided ESMPs are appropriately developed and implemented. Public works subprojects are expected to target reforestation activities



and also include soil and water conservation activities to improve runoff management and reduce erosion, and maintenance of erosion of rural roads, pathways including drainage channels. Public works activities are also going to take place in urban areas of the 4 cities. However, all these rehabilitation activities would be small community-selected subprojects and would not involve the construction and building of new infrastructure, but would focus on the maintenance of existing structures and protection of natural resources, improved runoff management and erosion mitigation, and the rehabilitation of small assets linked to the management of the respective catchments. 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, water pollution, sanitation, and unprotected open pits. In addition, there could also be risk of finding environmental liabilities, for instance soil contamination, particularly in urban areas, which could pose health risks to residents, animals and plants; as well as potential risk of introducing invasive species in reforestation activities, especially in rural settings. Furthermore, potential environmental impacts to be avoided in community livelihood activities include deforestation and land degradation through poor watershed management, and improper agriculture practices and land use resulting in significant sediment accumulation and pollution downstream. 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. Additional capacity to oversee safeguard instruments development and implementation is required, and effective monitoring could positively contribute to other National environmental targets.

Social Risk Rating

Moderate

Overall, this operation is expected to generate positive results for poor and vulnerable populations in Malawi through the SCTP, CS-EPWP and livelihoods support that will improve their household income and wellbeing . The primary focus will be on climate smart enhanced public works, with subprojects that are small in scope, ranging from 500 to 10,000 US\$, of which 80% are wages and 20% are inputs or materials for the relevant public works, designed to provide temporary employment to poor households with labor capabilities. The public works include subprojects focusing on rehabilitation and maintenance of rural access roads linking micro-catchments with villages, afforestation, reforestation, soil and water conservation, including construction of infiltration pits, storm drains, soak pits and planting basins, which will take place in beneficiary communities across the 28 districts nationwide. Similarly, rehabilitation and maintenance of access roads and related public infrastructure will be carried out in urban areas of the 4 cities of Malawi. These activities, however, are small and will involve minor 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 or the public. This may also entail temporary loss of land, access restrictions and other related disruptions during construction or works that can easily be managed and mitigated. Other potential impacts and risks include the use of child labour, forced labour, occurrence of disputes, weak grievance redress mechanism, poor stakeholder engagement and outreach interventions, elite capture and weaknesses in the targeting mechanisms for vulnerable and poor households. However, investments under the original project and current operations are guided by the social registry-Unified Beneficiary Registry (UBR) and management information systems that provide a strong mitigation platform towards better and objective targeting of beneficiaries across the core programs, together with institutionalized structures, are assisting in dealing with issues of elite capture and favoritism in the selection of beneficiaries and running of the program. Therefore, in general the social risk is moderate because the nature of the interventions and the footprint of such small community infrastructures is considered localized with impacts that are site specific, reversible and/or manageable. Both the CS-EPWP and SCTP are designed to take into account of gender considerations including during targeting, providing an opportunity for positive gender outcomes and is expected overall to empower females by improving joint decision

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making at household level. The injection of cash into poor rural and urban 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, nonetheless, the GBV risk assessment tool has been applied to the project in accordance with the World Bank's Good Practice Note.

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 subprojects, mainly for improved runoff management including erosion and sediment control, strategic reforestation, and for rehabilitation of small infrastructure. Site interventions will be selected by communities from a list of eligible activities which exclude those with substantial or high environmental and social risks such as critical habitats, areas prone to high risk of natural disaster, cultural heritage and generally. The updated ESMF shall clearly outline the eligibility/ exclusion list to guide selection and implementation of project activities. Although screened to avoid environmental and social issues the eligible activities may still entail physical civil works that are likely to generate environmental and social impacts such as construction related to health and safety concerns for both laborers/workers and surrounding local communities as well as potential child labour impacts. The project does not support any activities that would include land acquisition and as a result no permanent physical displacement is expected. The injection of cash, through the SCT program, into poor rural households and communities could also potentially impact intra household and community relations and may have negative effects including an exacerbation of GBV/SEA, child labour and social 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 of the enhanced public works and climate smart public works activities have been defined, however the sites for the works have not yet been 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). The ESMF for the AF2 is to be updated and will involve consultation of all key stakeholders reflecting the new scope of the operation – urban and rural, and national wide. The updated Environmental and Social Commitment Plan, drawn and agreed upon with the borrower, sets out the substantive measures and actions that will be required for the project to meet environmental and social requirements, especially regarding capacity within the Districts, Cities and the PIU. 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 WBG EHS general and sector-specific guidelines (EHSGs) for the identified subprojects in relation to occupational and community health and safety. The project will support the Department of Land Resources Conservation to strengthen their role in coordination, planning, and monitoring of landscape restoration activities including establishing an in-country Landscape Restoration Community of Practice.



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 mechanisms; 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 entire 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. The same will be replicated for district and community levels across all 28 districts and the 4 cities. To ensure that all consultations and community outreach are inclusive and accessible (both in format and location) and through channels that are suitable in the local context, the borrower has updated the existing Stakeholder Engagement Plan (SEP), including a budget for its implementation. The SEP has included mechanisms for setting out a Grievance Mechanism (GM). Under the current parent SSRLP program, a Grievance Redress Mechanism has been set up and is in its initial stages of implementation across all districts. The borrower has, therefore, built on the Parent SSRLP GRM and developed a harmonized GM platform for interventions under this project. The borrower has strengthened social accountability within the GM to empower households to voice their complaints, concerns, queries, clarifications and increase awareness about the features of the program and their entitlements. The GM platform seeks 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, if it will be required. The GRM will empower the relevant stakeholder to be able to lodge sensitive grievances related to corruption, SEA/GBV, child defilement and oppression of the ultra poor and vulnerable.

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 entail a significant amount of community labor as the project aims at Enhanced and Climate Smart Public Works activities. However, these works will entail short term temporary employment for poor households with labor capabilities and proper management of these community workers will be required. Hence, the borrower will apply the relevant provisions of this ESS and EHSs 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 with regard to risks related to excavations, moving construction vehicles and plant, chemical hazards, fire, falling objects, falling into trenches, dust and noise, among others. The Borrower, therefore, will utilize an updated ESMF and Labor Management Procedures (LMP) of the parent SSRLP, for implementation in the AF2, which will detail mechanisms through which such OHS risks and impacts will be managed. The health and safety of workers, including of women involved, will be assessed and outlined in the LMP and ESMF and further addressed in the Environmental and Social Management Plans (ESMPs) in relation to community labor. The updated LMPs will also clearly identify the terms and conditions on which community labor will be engaged, including the amount and method of payment, times of work, and zero tolerance to and prevention of GBV/SEA/SH in project activities. It will also outline measures of preventing and minimizing risks of child labour and forced labour. The E&S tools shall also include emergency procedures that will guide on how to handle any emergency e.g. accident or incident that occurs



during implementation of activities, which requires urgent attention (e.g. medical treatment) and subsequent reporting as per the defined incident reporting procedures. In addition, the updated LMP will also specify the manner in which community workers can use the existing GRM to raise grievances in relation to the project. The LMP will take into 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. The labour opportunities will include opportunities for disabled persons.

ESS3 Resource Efficiency and Pollution Prevention and Management

The nature of the proposed AF2 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, open pits, water pollution and sediment acculation downstream, and in case of urban areas water contamination could endanger people through drinking water supply. Therefore, appropriate waste disposal practices, and proper and authorized disposal sites for waste and inert materials will be required in-line with the provisions of the ESF. The project may include community-selected livelihood microprojects in and adjacent to agricultural lands, public roads and pathways, and community forests. Construction materials such as sand and gravel will be sourced locally and will be subject to the national permitting requirements as well as included in the site screening/ESMP development. Both the ESMF and ESMPs will clearly underscore the need for efficient use of such resources during implementation of project activities. Furthermore, the updating of the ESMF will include ESHGs requirements for purposes of providing guidance on how to manage ESHS related risk and impacts. In subprojects where pesticides or chemicals will be in use, the Environmental and Social Management Plans will specify the use, application and storage mechanisms of the same.

ESS4 Community Health and Safety

As can be expected, physical civil works can pose risks to local communities' health and safety. In that regard, the Environmental and Social impact assessments will include eligibility criteria for exclusion of sub-projects or areas that are prone to high risk of natural disasters; as well as requirements for Community Health and Safety including HIV/STI Social Mitigation Measures; GBV/SEA prevention; Dust Management; Traffic/Road/Accident 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 be updated to ensure that the general and sector-specific ESHGs for the identified subprojects in relation to community health and safety are taken into account. As there may potentially be some negative effects associated with an injection of cash into poor rural households and communities including exacerbating intra household and community tensions and increasing the risk of GBV, the GBV/SEA/SH risk assessment and Action Plan will be developed as part of the ESMF in accordance with the World Bank's Good Practice Note. Based on the nature and scope of activities and in accordance to the World Bank's labour influx guidance note, the operation is not expected to generate any labour influx as the public works are minor and will be rehabilitated through community led approaches. In addition, GBV will be assessed and specific mitigation measures provided for in the Environment and Social Impact Assessments/Environmental and Social Management Plans that will be prepared for specific subprojects during implementation.



ESS5 Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

The nature of sub-projects 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 or economic 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 update the parent SSRLP Resettlement Policy Framework (RPF) in-line with the scope of in the AF2 and to guide the preparation of subprojects site specific Resettlement Plans, if these will be required at implementation. The requirement to prepare subproject specific resettlement plans is also outlined in the updated Environmental and Social Commitment Plan for the AF2.

ESS6 Biodiversity Conservation and Sustainable Management of Living Natural Resources

The project will not involve primary production and/or harvesting of living natural resources. The project will include the rehabilitation of small rural and urban access roads and pathways, as well as forest restoration, and soil and water conservation activities. For the latter, eligibility criteria will be applied with a view to ensuring that no invasive species are introduced in forest restoration activities, and undertake biodiversity assessments, and where applicable, develop biodiversity management plans. The rehabilitation activities would be done through small community-selected sub-projects and would not involve the building and construction of new infrastructure. The rehabilitation activities are not likely to generate substantial adverse environmental effects as their footprint is considered localized with impacts that are site specific and manageable. While sub-project sites are not yet identified, selected locations will avoid critical habitat areas. Should works be identified in protected areas, areas of critical habitat will be excluded, compliance with National legislation and obtaining relevant permits and authorization will be obtained prior to works commencing. Any conditions of these permits will be included into the subproject ESMPs.

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 enhanced public works program and climate smart enhanced public works, some 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 heritage resources including grave sites/yards. 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. This procedure, together with a template, will be included in the updated ESMF, as well as reflected in the Environmental and Social Management Plans for the sub-projects, as applicable.

ESS9 Financial Intermediaries



This standard is not applicable to this operation.

C. Legal Operational Policies that Apply

OP 7.50 Projects on International Waterways

OP 7.60 Projects in Disputed Areas

B.3. Reliance on Borrower’s policy, legal and institutional framework, relevant to the Project risks and impacts

Is this project being prepared for use of Borrower Framework? No

Areas where “Use of Borrower Framework” is being considered:

None

IV. CONTACT POINTS

World Bank

Contact: Chipo Msowoya Title: Senior Social Protection Specialist

Telephone No: 5394+3210 / - -5394+3210 Email: cmsowoya@worldbank.org

Contact: Ivan Drabek Title: Sr Social Protection Specialist

Telephone No: 5240+7255 Email: idrabek@worldbank.org

Borrower/Client/Recipient

Borrower: The Republic of Malawi

Implementing Agency(ies)

Implementing Agency: Malawi National Local Government Finance Committee

V. FOR MORE INFORMATION CONTACT

Public Disclosure



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):	Chipo Msowoya, Ivan Drabek
Practice Manager (ENR/Social)	Iain G. Shuker Cleared on 10-Nov-2022 at 11:49:27 GMT-05:00
Safeguards Advisor ESSA	Peter Leonard (SAESSA) Concurred on 18-Nov-2022 at 19:27:22 GMT-05:00