



# Project Information Document (PID)

Appraisal Stage | Date Prepared/Updated: 11-Feb-2020 | Report No: PIDA27853



**BASIC INFORMATION**

**A. Basic Project Data**

Country Malawi	Project ID P167860	Project Name Malawi Watershed Services Improvement Project	Parent Project ID (if any)
Region AFRICA	Estimated Appraisal Date 20-Feb-2020	Estimated Board Date 31-Mar-2020	Practice Area (Lead) Water
Financing Instrument Investment Project Financing	Borrower(s) Republic of Malawi	Implementing Agency Ministry of Agriculture, Irrigation and Water Development	

Proposed Development Objective(s)

Increase adoption of sustainable landscape management practices and improve watershed services in targeted watersheds

Components

Scaling up Landscape Restoration  
Improving Watershed Services  
Technical and Project Management Support

**PROJECT FINANCING DATA (US\$, Millions)**

**SUMMARY**

<b>Total Project Cost</b>	160.00
<b>Total Financing</b>	160.00
<b>of which IBRD/IDA</b>	157.00
<b>Financing Gap</b>	0.00

**DETAILS**

**World Bank Group Financing**

International Development Association (IDA)	157.00
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IDA Credit	157.00
<b>Non-World Bank Group Financing</b>	
Counterpart Funding	3.00
Borrower/Recipient	3.00
Environmental and Social Risk Classification	
Substantial	
Decision	
The review did authorize the team to appraise and negotiate	

Other Decision (as needed)

## B. Introduction and Context

### Country Context

1. **Malawi is a small, peaceful, and democratic country with a population of about 17 million people.** Most of the people (85 percent) lives in rural areas. The population growth rate is 2.8 percent per annum. At this growth rate, Malawi’s population will reach 23 million by 2025. The country is land-locked and is highly vulnerable to climatic shocks. Despite a recent difficult economic period, Malawi has a stable democratic political system and has initiated economic and political reforms.

2. **However, over half of its population is living in poverty.** In 2017, poverty headcount at US\$1.9/day (2011 PPP) remained stubbornly high at 70 percent of the population<sup>1</sup>. Gross National Income (GNI) per capita<sup>2</sup> was estimated at US\$320 in 2017. Malawi is ranked 170 out of 188 countries on the United Nations Human Development Index, and 125 out of 157 on the World Bank’s Human Capital Index. Almost half (47 percent) of the children under age five in Malawi are short for their age due to long-term effects of malnutrition and 20 percent are severely stunted. Malawi’s economic growth rates have fallen below the average of 2.8 percent in non-resource rich African economies during the last twenty years. Real per capita Gross Domestic Product (GDP) has grown at an average of just above 1.5 percent per year between 1995 and 2014. With these persistent low growth rates, successive governments in Malawi have struggled to lift people out of poverty. Wealth accounting data<sup>3</sup> shows that more than half of Malawi’s wealth (estimated at US\$10,442 per capita in 2014) is renewable natural capital, mainly cropland with smaller shares contributed by pastureland, forests and protected areas. The natural capital base however is under extreme pressure due population growth, agricultural expansion and climate change. There is also a strong correlation between areas with highly

<sup>1</sup> World Bank (2017). Malawi Economic Monitor – Unleashing the Urban Economy, Macroeconomics and Fiscal Management Global Practice, Washington, DC: The World Bank.

<sup>2</sup> GNI per capita - atlas method (current US\$)

<sup>3</sup> Lange et al. (2018). The Changing Wealth of Nations 2018: Building a Sustainable Future. Washington, DC: World Bank



degraded land and those with a high incidence of poverty, although there is currently insufficient evidence to point to a causal link<sup>4</sup>.

**3. Natural resources underpin Malawi's productive sectors and are the main source of livelihood for over 80 percent of the population.** Water-reliant sectors contribute an estimated 35 percent of the country's GDP. 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. The forestry sector contributes 6.2 percent to the GDP (and this does not account for the value of non-wood forest products, processed timber or the enormous informal trade in wood fuel and charcoal). Some 33,000 jobs are heavily dependent on the existence of Malawi's forests. Forests provide a range of environmental services, such as GHG mitigation, watershed regulation, climate regulation, soil and water conservation, biodiversity support and nutrient cycling. The nine protected areas in the Shire river basin store an estimated 80 million tons of CO<sub>2</sub>e<sup>5</sup>. Malawi is also heavily dependent on hydropower for its energy needs, with about 98 percent (358 MW) of current electricity generation coming from run-of-river<sup>6</sup> hydropower plants on the Shire River.

#### Sectoral and Institutional Context

**4. Malawi's water resources are under threat from severe land degradation and loss of forest cover.** Critical watersheds are becoming degraded leading to reduced water availability, deteriorating water quality, increased vulnerability to droughts and floods, reduced energy security and reduced agricultural productivity. Malawi has a large network of surface waterbodies covering about 21 percent of the country's total area; about 20 percent of this area is Lake Malawi itself. Malawi's drainage system is divided into 17 Water Resources Areas (WRAs)<sup>7</sup>. Major river systems include Shire (WRA 1), Ruo (WRA 14), Linthipe (WRA 4), Bua (WRA 5), Dwangwa (WRA 6), South Rukuru (WRA 7), North Rukuru (WRA 8) and Songwe (WRA 9). Most of the rivers are subject to natural seasonal flows but maintain at least some base flow (at least in their lower reaches) throughout the dry season. The total renewable water resource available in Malawi is estimated at 17.3 km<sup>3</sup>/year, or 1,027 m<sup>3</sup>/capita/year. While availability of water resources in the aggregate is considered satisfactory, per capita water availability has been declining at a rapid rate. Malawi is now dangerously close to becoming water scarce<sup>8</sup>. Further, water resources in Malawi are highly variable between wet and dry seasons and from year to year, and the country's stock of water storage infrastructure is one of the lowest in the region. GoM's Water Resources Investment Strategy (WRIS, 2011) identifies poor catchment conditions and deteriorating water quality as significant risks to water resources and associated infrastructure (dams, hydropower plants, irrigation systems), and recommends investments in catchment management in strategically important WRAs.

**5. Land degradation<sup>9</sup> in Malawi's most important watersheds has reached alarming levels, with major impacts on water security, agricultural productivity, and hydropower generation.** Recent studies suggest that

<sup>4</sup> World Bank (2018). Malawi Country Environmental Analysis. October 2018 (under preparation)

<sup>5</sup> Bayliss (2015). Carbon Storage Analysis of select Protected Areas under the SRBMP. Report to Government of Malawi

<sup>6</sup> 'Run-of-river' means that there is little or no storage capacity upstream of the power plant except small pondage for peaking. The amount of electricity that can be produced depends on the daily flow of the river.

<sup>7</sup> A Water Resources Area is essentially a single large, or in some cases a collection of smaller, hydrological catchments.

<sup>8</sup> Under the Falkenmark definitions of water scarcity, a country with a total renewable water resource of less than 1000 m<sup>3</sup>/capita/year is considered water scarce

<sup>9</sup> Defined here as: "the reduction or loss of the biological or economic productivity and complexity of rainfed cropland, irrigated cropland, or range, pasture, forest or woodlands resulting from natural processes, land uses or other human activities and habitation patterns such as land contamination, soil erosion and the destruction of the vegetation cover"



land degradation hotspots cover about half (41 percent) of the land area in the country<sup>10</sup>. Soil erosion and nutrient depletion are major forms of land degradation that are reported to affect more than 60 percent of the entire land area. The average annual national soil loss rates in 2014 was 29 tons per hectare<sup>11</sup>. Chemical land degradation, including soil pollution and salinization/alkalization, has led to 15 percent loss in the arable land in Malawi in the last decade alone. Projections for future land degradation and soil loss under different climate and population growth rate scenarios suggest that land degradation will become increasingly severe, with one study suggesting that overall rates of soil loss will increase by between three and four times 2010 baseline levels<sup>12</sup>. The Shire River Basin (WRA 1) remains the most prominent hotspot of land degradation. High loads of sediment are deposited in river beds, reservoirs and floodplain wetlands, affecting irrigation canals, fisheries and hydropower generation. Existing hydropower plants on the Shire River are often unable to meet peak demand, partly due to low flows and sediments in the river caused by degradation of catchments upstream of the plants<sup>13</sup>.

6. **Forest degradation is a major contributor to land and water resources degradation.** Over the last 40 years, more than half of Malawi's forests and woodlands have vanished and those that remain are being 'thinned' through over-extraction and more frequent forest fires. Yet, forests make a substantial contribution to livelihoods and the economy and are needed to protect vital ecosystem services. They also provide the bulk of Malawi's energy supply in the form of charcoal and firewood. Wood fuels dominate Malawi's energy sector and are used by 98 percent of the population. The industry provides large numbers of jobs and is worth nearly US\$295 million per annum – equivalent to four percent of GDP<sup>14</sup>. Forests and woodlands also play a key role in protecting watersheds from erosion, sustain the biodiversity that underpins a large proportion of Malawi's tourism sector and make an important contribution to mitigating carbon emissions.

7. **The underlying drivers of land degradation in Malawi are well known.** These include a growing demand for agricultural land and wood fuels associated with a growing population; imperfect knowledge about sustainable farming practices; insecure land tenure which reduces incentives to invest in soil and water conservation measures; and limited access to markets and rural finance. The proximate causes of land degradation include a wide range of biophysical factors and poor land management practices. Important biophysical factors that affect land degradation include topography, land cover, climate change and soil erodibility.

8. **Efforts to address land degradation are hampered by a multitude of factors.** The major challenge is the weak institutional capacity for natural resource management at both national and local levels and the severe lack of funding for these activities in local government budgets. With insufficient resources, weak capacity and incentives, local governments are generally unable to play an effective role in addressing land degradation at the local level. In addition, changes to climate and weather patterns exacerbate the impacts of natural resources degradation, making it harder to address the problem. Future climate change scenarios suggest that Malawi will see increasing climatic variability, higher temperatures, longer dry periods, and more erratic and intense rainfall events<sup>15</sup>. More intense flood events will cause greater soil erosion and land degradation. Hotter and drier periods will contribute to forest fire risks. Droughts will continue to negatively impact food production,

<sup>10</sup> MoNREM (2017). Forest Landscape Restoration Opportunities Assessment of Malawi. Lilongwe, Ministry of Natural Resources, Energy and Mining, Government of Malawi.

<sup>11</sup> Vargus R. and Omuto, C. (2016). Soil Loss Assessment in Malawi. FAO, UNEP and UNDP and MoAIWD. Available at [http://unpei.org/sites/default/files/Soil\\_Loss\\_Assessment\\_in%20Malawi.pdf](http://unpei.org/sites/default/files/Soil_Loss_Assessment_in%20Malawi.pdf) [accessed on November 20, 2018]

<sup>12</sup> LTS (2013). Integrated Assessment of Land Use Options in Malawi. Report to the World Bank and Government of Malawi

<sup>13</sup> In 2017, Malawi's power generation utility (EGENCO) spent around US\$150,000 per ton on sediment management to enable operation of the hydropower facilities.

<sup>14</sup> World Bank (2018). Malawi Country Environmental Analysis. World Bank, October 2018

<sup>15</sup> Government of Malawi (2017). Strategic Program for Climate Resilience: Pilot Program on Climate Resilience (PPCR).



causing food insecurity and increased poverty. Increased poverty results in greater demand for agricultural land, thus exerting more pressure on the natural resources base. However, Malawi remains unprepared to anticipate and respond to the effects of climate change. While some investments have been made in revamping the country's most critical hydrological and meteorological monitoring network (especially within the Shire river basin)<sup>16</sup>, operation and maintenance of the network remains a challenge due to limited budgets. Moreover, there is still limited technical capacity to convert hydromet data into useful climate information products and services needed for building resilience.

9. **Reversing the rate of land degradation remains a government priority.** The Ministry of Agriculture, Irrigation and Water Development (MoAIWD) and the Ministry of Natural Resources, Energy and Mining (MoNREM) recognize the interdependence between natural resource management, agricultural production, water and energy security. Sound policies and institutional frameworks for natural resources management exist. A new Environmental Management Act 2017 has been enacted to strengthen environmental management and protection, while the Water Resources Act of 2013 provides for the management, conservation, use and control of water resources, including management of watersheds.

10. **The recent establishment of the National Water Resources Authority (NWRA)<sup>17</sup> is expected to help strengthen multi-sectoral planning and management of water resources in the country and pave the way for the establishment of sustainable watershed management institutions at the community level.** Land reforms introduced in 2016 are expected to improve land tenure security and strengthen incentives for small-holder farmers and businesses to invest in sustainable land and water management practices. Further, a new National Charcoal Strategy has been approved, which for the first time, provides an opportunity to legalize the charcoal value chain and move towards more sustainable charcoal production, and thus reducing pressure on forests and community woodlands. However, the ability to implement policy and legislation, both nationally and locally, remains weak. Monitoring is often limited and ineffective, compliance is low and the structures necessary for providing guidance and procedures are not in place. Weak institutional capacity is particularly acute at district and local levels, partly because of the slow pace of decentralization and severe under-funding<sup>18</sup> which constrains the effective functioning of institutions at district and local level, limiting their ability to implement policy.

11. **To reverse landscape degradation and protect watersheds, Malawi needs to invest at scale in the protection of renewable natural resources and their restoration where appropriate and cost-effective, using a broad suite of interventions.** These will include sustainable forest management and restoration interventions, development of water management infrastructure, scaling-up of climate smart agriculture and resilient livelihoods. At the same time, GoM needs to invest in strengthening institutions and improving the monitoring, management and use of hydro-meteorological information. GoM's National Forest and Landscape Restoration Strategy (NFLRS), published in July 2017, proposed that land restoration should be elevated to a higher national priority level, backed by financial investment to implement a large-scale national program for land restoration. In this regard, GoM has committed to restore 4.5 million hectares<sup>19</sup> of degraded landscape by 2030, through a combination of interventions, including soil and water conservation, river and stream bank restoration,

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<sup>16</sup> A network of 100 hydromet monitoring stations (75 meteorological and 25 hydrological) across the basin has recently been revamped as part of SRBMP. Plus, modern hydromet equipment and associated software have been installed to enable access to hydromet data in near real time. More investments in network expansion are underway under M-CLIMES project implemented by UNDP)

<sup>17</sup> GoM recently appointed the governing board for NWRA – a move that is seen as an important milestone in operationalizing the institutional framework for water resources management as laid out in the Water Resources Act of 2013.

<sup>18</sup> For instance, the share of agricultural spending on extension support – a critical service for promoting the uptake of SLM practices – reduced from 25 percent in 2005 to just 5 percent in 2012.

<sup>19</sup> This represents about half of the entire land area in Malawi



conservation agriculture, farmer-managed natural regeneration and agroforestry; natural forest management; community forests and private woodlots. GoM is currently in the process of mobilizing finance from development partners to support implementation of the strategy, either through a new large-scale national program or a series of separate programs targeting major river basins. One such program which GoM implemented successfully from 2012-2018 with World Bank support is the Shire River Basin Management Program (SRBMP). The proposed project will build on the success of the SRBMP and scale landscape restoration in the other degraded hotspots in the Shire River Basin and elsewhere in line with the national landscape restoration strategy.

12. The project is the first in a ‘Series of Projects’ (SoP) aimed at supporting the implementation of the National Forest Landscape Restoration Strategy (NFLRS). SoP-1 (2020-2025) will target the Shire River Basin (middle and upper Shire) in the southern region of Malawi; SoP-2 (2023-2028) will target the Linthipe, Bua and Dwangwa river basins in the Central Region; and SoP3 (2026-2030) will target North Rukuru and Lufilya river basin in the northern region.

### C. Proposed Development Objective(s)

Development Objective(s) (From PAD)

Increase adoption of sustainable landscape management practices and improve watershed services in targeted watersheds

#### Key Results

- **70%** of target farmers adopting sustainable landscape management practice;
- **95,000ha** of land area under sustainable landscape management practices;
- **50,000ha** of land area showing an increase in Normalized Difference Vegetation Index (NDVI) and the Land Surface Water Index (LSWI), correcting for short-term climate effects<sup>20</sup>;
- **42,000** people gaining access to water for productive use
- **50%** of target farmers benefiting from an increase in production sold to the markets and/or an increase in income from marketed products

### D. Project Description

#### Component 1 – Scaling up Landscape Restoration (US\$53 million)

13. This component aims to scale up landscape restoration interventions in the middle and upper Shire River Basin while enhancing the livelihoods of small-holder farming communities, addressing climate change vulnerabilities and improving and/or preserving the carbon sequestration capacity of the watershed. Specifically, the component will finance (i) **performance-based grants** for restoration of approximately **95,000 ha** of degraded landscapes in the middle and upper Shire; (ii) **matching grants** for 200 farmer groups and 60 agri-enterprises to enhance agricultural-based livelihoods and boost household incomes; (iii) **advisory services and capacity building** on sustainable landscape management practices, including climate smart agriculture practices and silvicultural techniques, targeting approximately **15,000** people and comprising of farmers, agri-

<sup>20</sup> Both NDVI and LSWI are measures of increased vegetation cover and soil water content. NDVI uses the visible and near-infrared bands of the electromagnetic spectrum to analyze remote sensing measurements (based on satellite imagery data) to determine the extent to which a target contains live green vegetation. LSWI uses the shortwave infrared and near-infrared bands of the electromagnetic spectrum to analyze remote sensing measurements (based on satellite imagery data) to determine the amount of water in vegetation and soil.



entrepreneurs, private tree growers and associations of smallholder tree growers, catchment management committees (CMCs), village natural resource management committees (VNRMCs) and district extension workers; (iv) a **social marketing campaign** to influence farmer behavior with respect to adoption of sustainable landscape management practices; (v) support to undertake **local-level participatory land-use planning, land demarcation, adjudication and registration** of **20,000 ha** of land in the target area to provide security of tenure for approximately **16,000** small-holder farmers.

### **Component 2 – Improving Watershed Services (US\$82 million)**

14. This component aims to maximize the benefits people and communities obtain from managing watersheds sustainably, as a basis for developing institutional and financing mechanisms needed to sustain restoration activities beyond the project period. The project will invest in improving watershed services, focusing primarily on provisioning services and regulating services, and to some extent cultural, recreation and amenity services, given that Malawi's most iconic national parks and wildlife reserves are located in the Shire River basin. More specifically, the component will finance (i) **performance-based grants to selected watershed management institutions** to implement their institutional development plans aimed at improving watershed services; (ii) technical assistance and the initial capital required to establish a **pilot market-based mechanism for the provision and maintenance of selected watershed services**; and (iii) a package of **enabling infrastructure and climate information services** to maximize the livelihood benefits from improved watersheds, and to enhance the resilience of both the farming community and the watershed.

15. Enabling infrastructure investments will include (a) development of **38** multipurpose water source infrastructure (i.e. 10 small dams, 20 rain water harvesting structures and 8 high yielding boreholes etc) and associated conveyance infrastructure to increase access to water for multi-purpose use for approximately **42,000 people** (of which 50 percent women), while at the same time protecting people from the destructive impacts of water (floods); and (b) last-mile infrastructure to support small-holder producer groups to improve productivity, add value to their produce and gain access to markets, including construction of 10 small-medium scale irrigation systems to provide irrigation services on approximately **2,400 ha** of cropland and benefiting approximately **5,000 farmers**; construction of rural feeder roads, bridges and market centers to improve access to markets; and potable water for value addition, where required.

16. To improve climate information services, the component will finance competitive grants to private sector innovators to develop and market a suite of hydrological, weather and climate products and services to enable climate-informed decision-making by different watershed users (including small holder farmers and agri-enterprises, energy and water utilities, dam operators, insurance companies etc) using data from the existing and/or improved ground-based observation network managed by both the Department of Climate Change and Meteorological Services (DCCMS) and NWRA, and supplemented as necessary with other sources (e.g. satellite-based data). At least one of the product/services developed will be an agro-weather service, capable of serving at least 8,000 farmers with agro-weather information services.

### **Component 3 – Technical and Project Management Support (US\$25 million)**

17. This component aims to strengthen MoAIWD's capacity to implement the proposed project (and subsequent projects in the series) in partnership with other line ministries, departments, and agencies, and to monitor and evaluate its development impact. The component will finance (i) **technical assistance** for preparation of future phases of the project, including delineation of priority (hotspot) catchments in Linthipe, Bua and Dwangwa river basins; forming CMCs, preparing catchment management plans and micro-catchment





plans; and carrying out feasibility studies and engineering designs for enabling infrastructure investments identified in the catchment management plans; (ii) technical assistance and capacity building on **biophysical and ecological monitoring** to track changes in the targeted landscapes as a result of project interventions; (iii) **impact evaluations** to build the evidence-base to inform future projects in the SoP; (iv) **project management support** to the multi-sectoral technical team on project management, financial management, procurement, monitoring and evaluation, and environmental and social standards implementation; and (iii) **incremental operating costs** associated with day-to-day management of the project and for coordination with different sectoral agencies/departments at national, district and local levels.

Legal Operational Policies

	Triggered?
Projects on International Waterways OP 7.50	Yes
Projects in Disputed Areas OP 7.60	No

Summary of Assessment of Environmental and Social Risks and Impacts

18. Overall the project is expected to have a positive environmental impact by improving agricultural land management, reducing erosion and sedimentation, and increasing forest cover. The interventions with anticipated environmental and social impacts focus on landscape and watershed management where the project will fund the construction and rehabilitation of landscape and watershed management infrastructure. These will include water harvesting and associated conveyance infrastructures, small scale irrigation systems; infrastructure for better market access; the development of community-level infrastructure; small-scale water management infrastructure for storing, and delivering water for people, livestock and agriculture, including small-to-medium earth dams, small sand and sub-surface dams, rock catchments and high yielding boreholes. Possible adverse impacts include physical and economic displacement, potential labor influx from outside of the project area exacerbating the risks associated with disease transmission and spread of HIV, illicit behaviour and potential for Gender Based Violence and Sexual Exploitation and Abuse, etc., possible use of child labour and potential weaknesses in the targeting of beneficiaries in relation to vulnerable individuals and households. Additional impacts related to civil works may include localized changes in water use and distribution, unregulated wood cutting in areas with improved access (absent adequate control measures), potential damage to remnant patches of natural habitat, nuisance of dust and noise, localized erosion and spillage of oils and fuels. The projects worksites also have the potential for generating construction related health and safety concerns for both laborers/workers and surrounding communities.

19. 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.. Based on the screening mechanism outlined in the ESMF and depending on the subproject type and environmental/social context, these instruments would be subproject-specific Environmental and Social Impact Assessments (ESIAs), Environmental and Social Management Plans (ESMPs), and/or Resettlement Action Plans (RAPs) 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. In addition, Labour Management Procedures (LMP) and Stakeholder Engagement Plan (SEP) have been prepared. An Environmental and Social Commitment Plan (ESCP), 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 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.

## E. Implementation

### Institutional and Implementation Arrangements

20. **The project will adopt the same implementation arrangements used for SRBMP.** MoAIWD is the lead implementing ministry for the project. However, individual project components, sub-components and activities will be implemented through relevant departments, other ministries and local governments, as appropriate. MoAIWD will sign memorandum of understanding with each participating ministry or department or agency. The existing multi-sectoral Technical Team (TT) comprising staff from various ministries and departments, will be retained and strengthened to provide coordination support for the project. The TT will be led by a Project Coordinator, either seconded from MoAIWD or competitively recruited from the market. To address some of the project management weaknesses noted during implementation of SRBMP, a team of project management consultants will be recruited to support the TT on project management, financial management, procurement, monitoring and evaluation, and environmental and social safeguards implementation. The existing Project Steering Committee (PSC) and the Project Technical Committee (PTC) will also be retained to provide overall policy and technical guidance respectively. District local governments will continue to play a critical role in providing extension services to farming communities in the target watersheds and will be incentivized through performance-based grants. Catchment Management Committees (CMCs) will be formed in line with the Water Resources Act 2013 to spearhead implementation of landscape restoration activities, working with existing Village Natural Resources Management Committees (VNRMCs) at the micro-catchment level.

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**Borrower/Client/Recipient**

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**Implementing Agencies**

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**APPROVAL**

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