INTEGRATED SAFEGUARDS DATASHEET APPRAISAL STAGE 74321

Report No.: NA

Date prepared/updated: May 11, 2012

I. Basic Information

1. Basic Project Data

Country Molecular	Day 14 ID. D110110		
Country: Malawi	Project ID: P110112		
Additional Project ID (if any): NA			
Project Name: Effective Management of the Nkhotakota Wildlife Reserve			
Task Team Leader: Cary Anne Cadman and Iris	S Dueker (co-TTLs)		
Estimated Appraisal Date: NA Estimated Board Date: NA			
Managing Unit: AFTEN	Lending Instrument:	GEF MSP	
Sector: General agriculture, fishing and forestry	sector (100%)		
Theme: Biodiversity			
IBRD Amount (US\$m.): NA			
IDA Amount (US\$m.): NA			
GEF Amount (US\$m.): 0.845			
PCF Amount (US\$m.): NA			
Other financing amounts by source:			
Government 1.244			
Borrower/ Recipient: 0.840			
NGO (identified): 0.150			
Corporate: <u>0.227</u>			
2.461			
Environmental Category: B			
Is this a transferred project	Yes [x]	No []	
Simplified Processing	Simple []	Repeater []	
Is this project processed under OP 8.00 (Rapid F	Response to Crises	Yes [] No [x]	
and Emergencies)			

2. Project Objectives:

The objective of the project is to ensure effective management of the Nkhotakota Wildlife Reserve through a sustainable management model focusing on its Bua watershed area.

3. Project Description:

The EMNWR project is comprised of three components: Reserve management; Revenues for improved reserve support; and Project management. All components will be financed by GEF/DNPW. WESM will be the implementing agency and DNPW the executing agency.

Component 1: Reserve Management. Under this component, NWR management will be improved through enhanced planning and implementation capacity.

Subcomponent 1.1: Planning

This subcomponent will finance development of the planning instruments for improved reserve management. The project will conduct a baseline biological resource inventory for the Bua watershed area in year 1 to inform the 5-year operational management plan for the entire reserve.

The NWR management plan will provide an overview of all relevant baseline data. It will define rules and limits for biological resource use within the reserve; and priority monitoring and management activities, particularly for the Bua watershed area, along with an implementation plan. A training plan for NWR staff will be part of the priority activities. The reserve management plan will be discussed with stakeholders such as district authorities and the private sector, and submitted to DNPW for approval.

The GEF project will support: (a) preparation of a biological inventory of the Bua watershed area; and (b) development of the 5-year management plan.

Subcomponent 1.2: Management plan implementation

This subcomponent will support implementation of priority activities of the management plan identified for the Bua watershed area including activities related to reserve infrastructure, wildlife and biological resource monitoring, fire monitoring and control, law enforcement, transportation and overall reserve management. DNPW's development investments in the reserve include the construction and rehabilitation of scout camps, roads, gates and bridges, water supply for scout camps, and transportation. The project aims to increase staff numbers and capacity for reserve monitoring and management, including training reserve staff and prosecutors and magistrates to enhance the efficacy of law enforcement.

GEF funds will support: (a) implementation and monitoring of priority activities for the Bua watershed by DNPW and WESM; (b) construction of 1 scout camp in the Bua watershed for six families; (c) purchase of 1 4x4 vehicle and 2 motorcycles for law enforcement in the reserve; (d) training for reserve field staff, management staff, prosecutors and magistrates; and (e) field equipment for reserve scouts such as GPS units, radios and backpacks.

DNPW support for this component will include: 1 new entrance gate, rehabilitation of 2 old scout camps, renovation of 200 km of roads, renovation of bridges, purchase of 2 vehicles, 2 motorcycles, drilling of 5 boreholes and the scout camp tsetse fly control program.

Component 2: Revenues for improved reserve support. Under this component the project will support strengthening business opportunities to improve reserve support through tourism operations and revenue retention. The reserve is seen as having excellent potential to contribute to regional development through tourism operations. There are currently two tourism concessions in NWR along the Bua River that can benefit from the development and implementation of the NWR tourism and management plans. A comprehensive tourism assessment and tourism plan will be produced based on the findings and recommendations of the reserve management plan and national guidelines for ecotourism in protected areas.

Specifically, GEF funds under this component will support: (a) development of the tourism assessment and management plan; (b) ecotourism training of reserve scouts; and (c) initial development of additional ecotourism activities in partnership with the concessionaires such as sign posts, tourist walking trails and information boards.

Private tourism operators under concession agreements with DNPW have been investing in the construction of two lodges and campsites at sites along the Bua River. The construction of Bua River Lodge is completed and the lodge started operating in mid 2010. Tongole Lodge is currently under construction. Both Tongole and Bua River Lodges are situated at former scout camp areas. The owners signed a concession agreement with DNPW thereby agreeing to adhere to an environmentally friendly business operation.

Component 3: Project management. As the project Implementing Agency, WESM will provide general administration of the project, working closely with DNPW field staff, including the NWR Manager to deliver project results. WESM will be responsible for procurement and financial management coordination, annual audits and annual stakeholder consultations. WESM will organize World Bank supervision missions and biannual Project Advisory Committee (PAC) meetings and prepare annual work plans, budgets and reports in close collaboration with DNPW.

The GEF will fund: (a) a contribution to WESM operating expenditures related to project administration such as utilities, office supplies, IT equipment; (b) annual audits; (c) procurement processing fees; (d) annual stakeholder consultations; and (e) PAC meetings.

4. Project Location and salient physical characteristics relevant to the safeguard analysis:

The project will be implemented inside the Nkhotakota Wildlife Reserve (NWR) in Malawi. The Reserve is the largest (1,802 km²) wildlife reserve of Malawi, located in the center of the country. The Reserve is one of four Malawian areas of global biodiversity significance and is considered one of the most important and pristine wildlife areas in the country. The Reserve encompasses important watersheds, including the lower portions of the Bua River; the second largest in the country. The Bua River bisects the Reserve and is a significant tributary of Lake Malawi. It is one of the few rivers where Lake Salmon spawn.

There are two Forest Reserves adjacent to the NWR, Ntchisi and Dwambazi, increasing available habitat for large African mammals that exist in the Reserve such as elephant, roan, sable and lion.

5. Environmental and Social Safeguards Specialists on the Team:

Cornelie van der Feen, Environmental and Social Safeguards Consultant (AFTEN)

6. Safeguard Policies Triggered (please explain why)	Yes	No
Environmental Assessment (OP/BP 4.01)	Х	
Natural Habitats (OP/BP 4.04)	Х	
Forests (OP/BP 4.36)	Х	
Pest Management (OP 4.09)	Х	
Physical Cultural Resources (OP/BP 4.11)	Х	
Indigenous Peoples (OP/BP 4.10)		Х
Involuntary Resettlement (OP/BP 4.12)	Х	
Safety of Dams (OP/BP 4.37)		Х
Projects on International Waterways (OP/BP 7.50)		Х
Projects in Disputed Areas (OP/BP 7.60)		Х

II. Key Safeguard Policy Issues and Their Management

A. Summary of Key Safeguard Issues

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

The project is classified as a Category B operation since all envisaged adverse environmental and social impacts that may be generated by specific project activities are expected to be small in scale, site specific, time bound (construction period only) and readily mitigated.

Based on the scope, scale and nature of specific project investments, the project triggers the following World Bank Safeguard Policies: OP 4.01 Environmental Assessment; OP 4.04 Natural Habitats; 4.09 Pest Management, 4.11 Physical Cultural Resources, 4.12 Involuntary Resettlement and 4.36 Forests.

Environmental Assessment (OP/BP 4.01) is triggered since the project involves small and medium scale civil works (reserve entrance gates and scout camps), rehabilitation and maintenance of reserve roads, reserve gates and scout housing. All adverse impacts associated with these works are expected to be site specific, time bound (i.e., during construction phase only), small in scale and readily mitigated through implementation of appropriate measures. The ESMF is designed to address the specific considerations of OP 4.01 as they pertain to this project.

Natural Habitats (OP/BP 4.04) is triggered since the NWR is a recognized critical natural habitat. The project aims to enhance its conservation status but there is a possibility that some of the proposed project activities may result in temporary ecosystem disturbance. The ESMF presents the appropriate screening, assessment and mitigation measures to address such impacts.

Forests (OP/BP 4.36) is triggered since the project will be active in an area with standing primary forest and bordering two forest reserves. The overall environmental assessment is that all impacts on forests are expected to be positive, but careful consideration through the ESMF is given to identify and mitigate potential adverse impacts on forests that may be generated either directly or indirectly by the project.

Pest Management (OP 4.09) is triggered since the project will procure, distribute, apply and dispose of known pesticides on a limited scale as part of the NWR scout camp tsetse control program. The ESMF is designed to address the specific considerations associated with this program to ensure it reflects international best practice and WHO guidelines.

Physical Cultural Resources (OP/BP 4.11) is triggered since the project's area contains known physical cultural resources. The project's ESMF addresses the specific considerations for PCRs by ensuring that none of the project interventions will be implemented near or affect in any way known PCRs. The ESMF also includes chance finds procedures for those PCRs that may be identified during project implementation.

Indigenous Peoples (OP/BP 4.10) is not triggered.

Involuntary Resettlement (OP/BP 4.12) is triggered, because although the project will not involve any resettlement, there is a small chance that bordering communities may lose their former illegal access to resources in the reserve. This will be mitigated by the expansion of community user zones in the reserve financed by the project. The PF sets out guidance to address the considerations of this OP as they pertain to this project.

Safety of Dams (OP/BP 4.37) is not triggered.

Projects on International Waterways (OP/BP 7.50) is not triggered.

Projects in Disputed Areas (OP/BP 7.60) is not triggered.

The policy considerations related to this project will be addressed through an Environmental and Social Management Framework (ESMF) and Process Framework (PF) prepared by the Government of Malawi and WESM.

The main safeguards considerations are related to Component 1 activities, and include: (a) implementation and monitoring of priority activities of the management plan identified for the Bua watershed area by DNPW and WESM including: activities related to wildlife and biological resources monitoring, fire monitoring and control, law enforcement, transportation and overall management; (b) construction of 1 scout camp in the Bua watershed for six families; (c) purchase of 3 4x4 vehicles and 4 motorcycles for law enforcement in the reserve; (d) training for reserve field staff; (e) procurement of field equipment for reserve scouts such as GPS units, radios and backpacks; (f) construction of 1 new reserve entrance gate; (g) rehabilitation of 2 existing scout camps; (h) renovation of 200 km of gravel road and 300kms of existing bush tracks; (i) renovation of bridges; (j) drilling of 5 boreholes; and, (k) strengthening the scout camp tsetse fly control program.

The proposed construction works to be financed by the project will cover a small area of the reserve. One small construction project is planned for a new area (1 scout camp) covering less than 4 ha (0.008% of the entire reserve which is 180,200 ha). A second construction project involves rehabilitation of an existing scout camp. Minor site specific environmental impacts may be generated by these investments. Game viewing and management roads will be rehabilitated on existing tracks. No new roads will be financed by the project.

The proposed baseline data collection, management plan and implementation and improved law enforcement activities to be financed by the project will lead to better protection of the reserve, thus to the increased preservation of habitats, water retention and biodiversity. Better reserve protection and improved law enforcement may also result in increased animal populations. Fish stocks including Lake Salmon in the Bua River system will also be conserved in the long term thus contributing to the survival of this important part of the Malawian economy.

Funding for reserve management as well as community based natural resources management is expected to increase to some extent as a result of improved tourism and concession revenues as well as through the existing DNPW PA related retention system in NWR.

With regard to the *socio-economic impacts*, a positive overall balance can be expected from the proposed project. It is expected that the positive impacts will outweigh the negative ones.

Although some individuals might lose their previous (illegal) access to the reserve's resources, this will be replaced by legally regulated access to reserve resources for a larger portion of the community through village user zones.

In order to mitigate the adverse impacts that may be generated by the project, WESM will use the ESMF and PF to guide implementation of appropriate mitigation measures. However, it is expected that the combined ecological and socio-economic impacts of the project will be positive.

Specifically, potential environmental and social impacts, include:

The EMNWR Project is expected to result in overall positive environmental and social impacts, however, some interventions may lead to small-scale, time-bound and site specific adverse impacts that would need to be assessed and mitigated appropriately in line with national laws and World Bank safeguard policies.

Project activities with a potential **adverse impact** on the natural and/or social environment are:

- > Upgrading of 200 kms of existing gravel roads
- Rehabilitation and maintenance of 300 km of bush tracks
- > Construction of 2 new scout camps
- ➤ Rehabilitation of 2 old scout camps
- > Construction of 1 new reserve gate
- > Scout camp tsetse fly control program
- ➤ Reduced (former illegal) access to resources in the reserve

Project activities with a potential **positive impact** on the natural and/or social environment are:

- > Intensified law-enforcement activities
- > Intensified fire-management
- Capacity building of DNPW staff in environmental law enforcement and monitoring procedures in the Reserve
- ➤ Participatory planning, management and monitoring of natural resources
- Expansion of and legal access to community resources user zones in reserve

Positive impacts

Environmental

The global environmental (biodiversity-related) benefits expected from the project will be an improved protection status of the reserve with improved habitat quality in the Bua Watershed Area.

Improved law enforcement in the reserve is anticipated to lead to reduced extraction of trees for firewood, timber or charcoal production, less environmentally damaging fires and reduced poaching activities. As a result, there will be less habitat destruction and increased carrying capacity for wild animals. Ecological values will increase or at least be maintained at the present status. Reserve management will become more efficient in the long term as a result of structured data collection feeding into a tourism management plan.

An increase in tourism activities is anticipated to contribute to further protection of the reserve as concessionaires have a stake in maintaining a pristine natural environment and thriving wildlife populations. The current concession holders have committed themselves to assist DNPW with reserve management including early burning which will assist to reduce the incidence of damaging late fires.

Enhanced preservation of vital breeding habitat and control of illegal fishing in the Bua watershed are expected to increase the population of endemic Lake Salmon and other fish species. The widespread use of fish poison (using high concentrations of cotton pesticides) inside and outside the reserve will be curbed by intensified law enforcement - thereby reducing potential long lasting damage of the Bua river ecosystem. Watershed protection is further expected to increase water quantity and quality and reduce the level of siltation at the river mouth, hence contributing to maintaining the integrity of the Lake Malawi ecosystem, where the vast majority of fish species are endemic.

Socio-economic

The project is expected to contribute to poverty reduction in the communities surrounding the reserve through limited job creation in tourism and construction works, access to community user zones and the formation and training of Natural Resources Committees involved in the management of these zones.

DNPW has committed to employ 15-20 additional wildlife field staff and 2-4 additional technical staff for the reserve. The tourism operators are expected to employ 40-50 permanent staff in hospitality services. As for the maintenance of reserve roads, 300 casual workers will be recruited over the next 3 years. WESM will employ one project manager and one accountant as well as accountant services.

DNPW and the two tourism operators have pledged to buy food and scout rations as much as possible from local producers, thus contributing to the local economy. Around 50 families are assessed to benefit from the regular sale of rations and food supplies to DNPW and the tourism

operators. Tourism operators have also pledged to assist community producer groups with quality control with a long term view to achieve a sustainable income. Employment in rural areas may lead to a rural economic spin-off as employees tend to hire other community members to work on their land, and spend part of their salary in rural shops.

Negative impacts

Environmental

Construction

Minor site-specific clearance of vegetation and soils will be unavoidable during construction works. As per DNPW guidelines, careful consideration must be taken when choosing sites for the construction or rehabilitation of scout camps, entrance gates and access roads. Where possible, the project strives to allocate construction sites at previously occupied areas. The ESMF environmental and social screening form should be used before any construction site is selected and an EMP completed, as required, before any works begin. Vulnerable habitats such as dambo's and riverine forests should be identified and protected from any development. Buildings and especially toilets should be constructed away from any source of drinking water to avoid contamination.

Construction works and associated site clearing and vehicle movements may cause minor environmental impacts which can be mitigated by avoiding construction works in the rainy season as well as keeping vegetation clearance to a minimum.

The current tourism operators in NWR both signed concession agreements with DNPW wherein they agreed to specific operating procedures with respect to waste water, litter, lighting, heating, mechanical equipment, fuel and chemicals; all to be managed in an environmentally friendly manner. As for firewood collection, it has been agreed that in the near term both lodges only use dead firewood collected from inside the Reserve. They will also set up a woodlot outside the reserve which will provide firewood for use by both lodges over the long term.

Roads

The renovation and maintenance of reserve roads needs special attention as the NWR terrain is rugged and sensitive to erosion. Movement of heavy vehicles and equipment will result in soil compaction and should be restricted as much as possible. Fragile areas like steep slopes, erosion prone soils and scarce vegetation should be treated with caution. Vegetation clearance should be avoided and construction works should only be done in the dry season. Road construction must always include essential drainage systems. Throughout the year, heavy vehicles (> 3 ton) should be allowed only on main roads – to be specified in the Reserve management plan. No new roads will be constructed under this project only existing roads will be renovated.

Tourism and reserve management operations

There is a small chance that improved access to the reserve as a result of better roads will lead to an increase in poaching. However, results in other PA's have shown that the positive impact of improved access for law-enforcement personnel outweighs the negative impact of improved access for illegal hunters; with an overall result of better reserve protection.

The baseline survey will reveal whether late, early or no burning has been the practice over the past few years. The introduction of an early burning regime could have a negative impact on the environment if there was no burning before. An assessment of vegetation damage due to burning provides information for development of a controlled burning regime.

Scout Camp Tsetse fly control program

Tsetse fly control is aimed at the reduction of sleeping sickness as part of a national campaign by the GoM. The system is being implemented and monitored by DNPW, and requires the use of insecticide *glossinex deltamethrin* and an attractant acetone on flags. Staff involved in the application will be issued safety clothing. The WHO toxicity rating for this insecticide is listed as Moderately Hazardous.

Known impacts of glossinex deltamethrin, include:

- Irritation of skin and eyes.
- Irritability to sound or touch, abnormal facial sensation, sensation of prickling, tingling or creeping on skin, numbness.
- Headache, dizziness, nausea, vomiting, diarrhea, excessive salivation, fatigue.
- In severe cases: fluid in the lungs and muscle twitching may develop. Seizures may occur and are more common with more toxic cyano-pyrethroids.

Insecticides such as deltamethrin have extremely high levels of toxicity for most insects, including tsetse, are very stable, and are only mildly toxic to mammals. They are, therefore, relatively safe to handle and are less likely to have undesirable effects on other non-target animals, particularly mammal and bird species. The properties of deltamethrin make it the most suitable of all known insecticides for tsetse control. Currently, in the NWR, 67 flags are placed along the main reserve roads – this will be expanded under this project at scout camp sites. The flags are treated annually. The system has been tried for 2 years in NWR and has shown good results.

Socio-economic

The project is small in scale and its contribution to NWR related tourism is not expected to attract large numbers of tourists. Moreover, the type of tourism one can expect is mid-upper market tourism with an emphasis on nature experiences and game viewing. Therefore, no major impacts are expected on the local social and traditional organisation and behaviour over the 3 year implementation period.

A potential negative impact could be an increase in human-wildlife conflicts as a result of an increase in animal populations in the reserve. Elephants are already considered a nuisance by community members, as they tend to leave the reserve during harvest time and raid farmers' crops. A long term solution to this will be addressed in the Reserve management plan. Alternatives such as chilli fences, chilli briquettes and bee hive fences will be considered by communities in partnership with the Reserve management team.

Assessment

The combined ecological impacts from the project are expected to result in a positive overall balance.

The construction works and associated vegetation clearance cover a small proportion of the reserve. The new construction projects involving a new area (1 reserve gate and 2 scout camps) each cover less than 4 ha.

The new reserve gate will be at the Liwala river in the NW section of the reserve along the main entrance road. Accessibility and reduced chance of erosion (i.e., not on a slope) are criteria for gate site selection. As for the new scout camps it has been agreed that a matrix with possible locations will be provided by DPNW together with pros and cons of each site. A final decision about the locations will be made by WESM and DPNW based on the ESMF screening form of each site.

Game viewing and management roads will be rehabilitated over existing old tracks - no new roads will be opened thus ensuring the least amount of environmental disturbance.

As for the new GEF funded scout camp location, it was agreed that DNPW will develop a matrix showing possible locations including their positive and negative impacts, after which a decision will be made by DNPW and WESM following application of the ESMF screening form.

The proposed baseline data collection, reserve management plan, staff capacity building efforts as well as improved law enforcement initiatives will lead to better protection of the reserve – thus to the preservation of habitats, water retention and biodiversity. Fish stocks including Lake Salmon in Lake Malawi and the Bua River system will be conserved on the long term thus contributing to the survival of this important part of the Malawian economy.

For tsetse control, various methods are available including aerial spraying, sterile insect technique, odour bait tsetse traps and targets. In the case of NWR, the method that generates the least adverse impact will be applied: odour bait targets with deltamethrin. This insecticide falls under class II (moderately hazardous) WHO toxicity classification. Deltamethrin is a synthetic pyrethoid which are highly toxic to fish and possibly also to some birds and pollinating insects. However, pyrethroids are low to moderate toxic to mammals, biodegradable and generally considered the least harmful option in tsetse control. Careful adherence to mitigation measures such as location of targets and staff health measures will be taken to avoid a negative impact.

Better Reserve protection may result in increased animal populations. The carrying capacity of the reserve allows for an increase of various species.

With respect to social impacts, some individuals may lose their previous (illegal) access to the reserve's resources – this will be replaced by regulated access to reserve resources for a much larger portion of the community through collaborative management zones. Community groups will be assisted to adopt environmentally friendly livelihoods and sustainable management of natural resources. Villagers, especially women, will benefit from village woodlots thus reducing the walking distance to collect firewood.

The EMNWR Project has been planned in such a way that negative impacts on the environment and the surrounding communities are expected to be minimal and positive impacts maximized. Throughout project preparation, stakeholders at national and local level were consulted and participated in the planning. The project has been designed in accordance with the laws of the Government of Malawi and World Bank safeguard policies.

Figure 1 presents an overview of project activities that may generate adverse environmental and social impacts.

Figure 1: Project Activities that may generate adverse impacts

Environmental	Planned Activities	Environmental	Social
Screening		Impacts	Impacts
Environmental	Construction of	Increase in	Restricted
Impact Assessment	new facilities	human	areas, could
(EIA) including		disturbances,	cause
Environmental	Construct 1 scout	loss of trees and	antagonism
Management Plan	camp of 6 staff	habitat in	with park
(EMP).	families each	affected area	authorities
EMP to be		Restricted	
prepared and		wildlife access to	
approved before		resource	
works begin.		requirements	
Environmental	Linear	Potential	Increased
screening and	Infrastructure	erosion,	undesired
application of	rehabilitation	soil/water loss.	human
appropriate		Increased access	immigration
mitigation	Rehabilitate 300	for illegal	into area.
measures	km of existing bush	extraction of	
	tracks	natural	Increased
		resources in the	exposure to
	Rehabilitate 200km	NWR.	illegal
	of existing gravel		markets.
	road inside the	Silting of	
	NWR	streams.	
		Increased	
		wildlife	
		disturbance near	
		water holes and	
		feeding grounds.	
		Potential	
		destruction of	
		natural	
		vegetation and	
	l	regetation and	

	Rehabilitation of facilities Rehabilitate 1 scout camp	habitat during construction. Increased human impact on vegetation and wildlife movements. Loss of habitat in affected area	None identified
No environmental analysis required.	Increased law enforcement	Nil	Reduced income from illegal use of natural resources from the Reserve
	Increased fire management control	Nil	Possible fines
	Increased controls on tree cutting and collection of firewood in park	Nil	Possible fines, reduced access to natural resources
	Controlled access to natural resources	Nil	Loss of income and food
Environmental screening and application of appropriate measures as	Implementation of tsetse control program Expand and	May impact vulnerable species such as fish and amphibia.	Health risk for staff handling pesticide.
outlined in the pest management approach section of the ESMF	maintenance of tsetse baits	•	Reduced incidence of sleeping sickness in reserve and tourism staff and visitors.

In order to mitigate the adverse impacts that may be generated by the project, WESM will use the ESMF and PF to guide implementation of appropriate mitigation measures. However, it is

expected that the combined ecological and socio-economic impacts of the project will be positive.

There are no large-scale, significant or irreversible impacts that will be generated by the project.

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

There are no potential indirect and/or long term impacts anticipated due to future activities in the project area. Indeed, all project activities are expected to strengthen sustainable and effective management of the Nkhotakota Wildlife Reserve and generate positive environmental and social outcomes over the medium and long term.

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

Not applicable.

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

The Grant Recipient has prepared an Environmental and Social Management Framework and Process Framework to address the main considerations of the set of safeguard policies triggered by the project.

Both frameworks will be applied in tandem by the Grant Recipient, the Wildlife and Environmental Society of Malawi, under general oversight of the Government of Malawi through its Ministry of Tourism, Wildlife and Culture and its Department of National Parks and Wildlife.

The Grant Recipient's capacity to implement and monitor the project's safeguard tools is limited. In order to strengthen their capacity, the Bank will provide ongoing training to WESM staff on Bank safeguard policies and project specific safeguard tools throughout project implementation to ensure the project remains in full compliance with Bank policies.

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

Key project stakeholders include:

- 1. The Government of Malawi, specifically the Ministry of Tourism, Wildlife and Culture and its Department of National Parks and Wildlife.
- 2. The Wildlife and Environmental Society of Malawi.
- 3. The Nkhotakota Wildlife Reserve Concessionaires Tongole Lodge and Bua River Lodge owners and operators.
- 4. Traditional Authorities and communities bordering the Bua River area of the Nkhotakota Wildlife Reserve
- 5. Private sector tourism operators along the Bua River-Lake Malawi corridor in Nkhotakota.

Mechanisms for consultation and disclosure: Public consultations on the project document and safeguard frameworks were conducted throughout project preparation as detailed in the ESMF.

The grant recipient has made the ESMF and PF publically available in country and both have been disclosed in the InfoShop.

B. Disclosure Requirements Date	
Note: GEF Medium Size Projects do not follow the standard IL/GEF FSP project cycle and do not entail formal appraisal.	
Environmental Assessment/Audit/Management Plan/Other:	
Was the document disclosed <i>prior to appraisal?</i>	NA
Date of receipt by the Bank	12.28.2011
Date of "in-country" disclosure	1.24.2012
Date of submission to InfoShop	1.24.2012
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	NA
Resettlement Action Plan/Framework/Policy Process:	•
Was the document disclosed <i>prior to appraisal?</i>	NA
Date of receipt by the Bank	12.28.2011
Date of "in-country" disclosure	1.24.2012
Date of submission to InfoShop	1.24.2012
Indigenous Peoples Plan/Planning Framework:	
Was the document disclosed <i>prior to appraisal?</i>	NA
Date of receipt by the Bank	
Date of "in-country" disclosure	
Date of submission to InfoShop	
Pest Management Plan:	

Was the document disclosed <i>prior to appraisal?</i>	NA		
Date of receipt by the Bank			
Date of "in-country" disclosure			
Date of submission to InfoShop			
* If the project triggers the Pest Management and/or Physical Cultural Resources policies,			
the respective issues are to be addressed and disclosed as part of the Environmental			
Assessment/Audit/or EMP.			
If in-country disclosure of any of the above documents is not expect	ed, please explain why:		

C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting)

OP/BP 4.01 - Environment Assessment			
Does the project require a stand-alone EA (including	Yes [x]	No []	N/A []
EMP) report?			
If yes, then did the Regional Environment Unit or Sector	Yes		
Manager (SM) review and approve the EA report?			
Are the cost and the accountabilities for the EMP	Yes		
incorporated in the credit/loan?			
OP/BP 4.04 - Natural Habitats			
Would the project result in any significant conversion or	Yes []	No [x]	N/A []
degradation of critical natural habitats?			
If the project would result in significant conversion or	NA		
degradation of other (non-critical) natural habitats, does			
the project include mitigation measures acceptable to the			
Bank?			
OP 4.09 - Pest Management			
Does the EA adequately address the pest management	Yes [x]	No []	N/A []
issues?			
Is a separate PMP required?	Yes []	No [x]	N/A []
If yes, has the PMP been reviewed and approved by a	NA		
safeguards specialist or Sector Manager? Are PMP			
requirements included in project design? If yes, does the			
project team include a Pest Management Specialist?			
OP/BP 4.11 – Physical Cultural Resources			
Does the EA include adequate measures related to	Yes [x]	No []	N/A []
cultural property?			
Does the credit/loan incorporate mechanisms to mitigate	Yes		
the potential adverse impacts on physical cultural			
resources?			
OP/BP 4.10 - Indigenous Peoples			

Has a separate Indigenous Peoples Plan/Planning	Yes []	No []	N/A [x]
Framework (as appropriate) been prepared in			
consultation with affected Indigenous Peoples?			
If yes, then did the Regional unit responsible for	NA		
safeguards or Sector Manager review the plan?			
If the whole project is designed to benefit IP, has the	NA		
design been reviewed and approved by the Regional			
Social Development Unit?			
OP/BP 4.12 - Involuntary Resettlement			
Has a resettlement plan/abbreviated plan/policy	Yes [x]	No []	N/A []
framework/process framework (as appropriate) been			
prepared?			
If yes, then did the Regional unit responsible for	Yes		
safeguards or Sector Manager review and approve the			
plan/policy framework/process framework?			
OP/BP 4.36 – Forests			
Has the sector-wide analysis of policy and institutional	Yes []	No []	N/A[x]
issues and constraints been carried out?			
Does the project design include satisfactory measures to	NA		
overcome these constraints?			
Does the project finance commercial harvesting, and if	NA		
so, does it include provisions for certification system?			
OP/BP 4.37 - Safety of Dams			
Have dam safety plans been prepared?	Yes []	No []	N/A [x]
Have the TORs as well as composition for the	NA		
independent Panel of Experts (POE) been reviewed and			
approved by the Bank?			
Has an Emergency Preparedness Plan (EPP) been	NA		
prepared and arrangements been made for public			
awareness and training?			
OP/BP 7.50 - Projects on International Waterways	1		
Have the other riparians been notified of the project?	Yes []	No []	N/A [x]
If the project falls under one of the exceptions to the	NA		
notification requirement, has this been cleared with the			
Legal Department, and the memo to the RVP prepared			
and sent?			
What are the reasons for the exception? Please explain:	NA		
Has the RVP approved such an exception?	NA		
OP/BP 7.60 - Projects in Disputed Areas	1		
Has the memo conveying all pertinent information on the	Yes []	No []	N/A [x]
international aspects of the project, including the	-~ []	с ј	L •• J
procedures to be followed, and the recommendations for			
dealing with the issue, been prepared			
arming with the house, oven propured	<u>i</u>		

Does the PAD/MOP include the standard disclaimer	NA	
referred to in the OP?		
The World Bank Policy on Disclosure of Information		
Have relevant safeguard policies documents been sent to	Yes [] No [X] N/A []	
the World Bank's Infoshop?		
Have relevant documents been disclosed in-country in a	The ESMF and PF are currently	
public place in a form and language that are	under review by the RSA and once	
understandable and accessible to project-affected groups	cleared will be disclosed both in	
and local NGOs?	country and at the Bank's InfoShop.	
All Safeguard Policies		
Have satisfactory calendar, budget and clear institutional	Yes [x] No [] N/A []	
responsibilities been prepared for the implementation of		
measures related to safeguard policies?		
Have costs related to safeguard policy measures been	Yes	
included in the project cost?		
Does the Monitoring and Evaluation system of the	Yes	
project include the monitoring of safeguard impacts and		
measures related to safeguard policies?		
Have satisfactory implementation arrangements been	Yes	
agreed with the borrower and the same been adequately		
reflected in the project legal documents?		

D. Approvals

Signed and submitted by:	Name	Date
Task Team Leader:	Cary Anne Cadman	3 Dec. 2012
Environmental Specialist:	Cornelie van der Feen	3 Dec. 2012
Social Development Specialist	Cornelie van der Feen	3 Dec. 2012
Additional Environmental and/or		
Social Development Specialist(s):		
Approved by:		
Regional Safeguards Coordinator:	Alexandra Bezeredi	3 Dec. 2012
Comments:		
Sector Manager:	Magda Lovei	5 Dec. 2012
Comments:		