

**SADC SUB-REGIONAL TRANSPORT AND TRADE
FACILITATION PROJECT — PHASE II (P-Z1-DB0-279)**

**STAKEHOLDER ENGAGEMENT PLAN
(SEP)**



Road Authority (Malawi)
Private Bag B346,
Lilongwe 3
Malawi
Tel: +265 1 753 699
ra@ra.org.mw

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Table of Contents

Acronyms and Abbreviations	5
Executive Summary	7
CHAPTER 1: INTRODUCTION, BACKGROUND AND PROJECT DESCRIPTION	8
1.1 Introduction and Background to the Project	8
1.2 Project Proponent and Financing	8
1.3 Project Location and Area of Influence	9
1.4 Project Description and Scope of Works	10
1.5 Environmental and Social Risk Categorisation	11
1.6 Summary of Anticipated Environmental and Social Impacts	11
1.7 Purpose and Objectives of this SEP	12
1.8 Guiding Principles for Stakeholder Engagement	12
1.9 Source Documents Underpinning this SEP	13
CHAPTER 2: POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK	14
2.1 Introduction	14
2.2 National Policy Framework	14
2.3 National Legal Framework (Malawi)	14
2.3.1 <i>Constitution of the Republic of Malawi (1995)</i>	14
2.3.2 <i>Environment Management Act (EMA), 2017</i>	15
2.3.3 <i>Land Act (1967, as revised 2016) and Registered Land Act (1967, as amended 2017)</i>	15
2.3.4 <i>Land Acquisition Act (1970, as amended 2017)</i>	15
2.3.5 <i>Public Roads Act (1962, as amended 2017)</i>	15
2.3.6 <i>Physical Planning Act (2016, as amended 2022)</i>	15
2.3.7 <i>Mines and Minerals Act (2023)</i>	16
2.3.8 <i>Other Applicable Legislation</i>	16
2.4 African Development Bank Integrated Safeguards System (ISS)	16
2.4.1 <i>Operational Safeguard 1 (OS1) – Assessment and Management of Environmental and Social Risks and Impacts</i>	16
2.4.2 <i>Operational Safeguard 2 (OS2) – Labour and Working Conditions</i>	16
2.4.3 <i>Operational Safeguard 5 (OS5) – Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</i>	16
2.4.4 <i>Operational Safeguard 7 (OS7) – Vulnerable Groups</i>	17
2.4.5 <i>Operational Safeguard 10 (OS10) – Stakeholder Engagement and Information Disclosure</i>	17
2.5 Institutional and Regulatory Bodies with a Role in this Framework	17
2.6 Comparative Gap Analysis: Malawian Legislation and AfDB Safeguards	19
CHAPTER 3: STAKEHOLDER IDENTIFICATION AND ANALYSIS	21
3.1 Approach to Stakeholder Identification	21
3.2 Categories of Stakeholders	21
3.3 Identified Stakeholder Groups	21
3.3.1 Stakeholder Mapping Matrix (Influence / Interest)	24
3.4.1 <i>Baseline Vulnerability Indicators from the Original RAP Socio-Economic Survey</i>	26
3.5 Stakeholder Representatives and Verification of Representation	26
CHAPTER 4: STAKEHOLDER ENGAGEMENT CONDUCTED TO DATE	27

4.1 Overview	27
4.1.1 Antecedent RAP-Stage Consultations and Compensation-Process Issues (2022–2024)	27
4.2 ESIA-Stage Consultations (2023)	28
Follow-up District- and Community-Level Consultations	29
4.3 RAP Addendum-Stage Consultations (June 2024 – December 2025)	29
4.4 Achievements and Lessons Learnt	31
CHAPTER 5: STAKEHOLDER ENGAGEMENT PROGRAMME GOING FORWARD	32
5.1 Objectives of the Ongoing Engagement Programme	32
5.2 Engagement Methods and Dimensions	32
5.3 Engagement Matrix by Project Phase	33
5.4 Differentiated Measures for Vulnerable and Disadvantaged Groups	35
CHAPTER 6: INFORMATION DISCLOSURE	37
6.1 Information to be Disclosed	37
6.2 Disclosure Methods, Formats and Languages	37
6.3 Disclosure Schedule	37
6.4 Confidentiality	38
CHAPTER 7: GRIEVANCE REDRESS MECHANISM	39
7.1 Overview and Objectives	39
7.2 Guiding Principles	39
7.3 Institutional Structure	39
7.3.1 Community / Project Level	39
7.3.2 District Level	40
7.4 Grievance Uptake Channels	41
7.5 Grievance Redress Process and Timeframes	41
7.6 Handling of GBV, SEA, Sexual Harassment, and VAC Grievances	41
7.7 Labour-Related Grievances	42
7.8 Grievances from Utility and Service Providers	42
7.9 Summary of Grievances Received To Date	42
7.10 Recourse Beyond the Project GRM	43
CHAPTER 8: INSTITUTIONAL ARRANGEMENTS AND ROLES AND RESPONSIBILITIES FOR SEP IMPLEMENTATION	44
8.1 Overview and Institutional Set-Up for SEP Implementation	44
8.2 African Development Bank (AfDB)	44
8.3 Roads Authority (RA) / Project Implementation Unit (PIU) — SEP Owner	44
8.4 Supervising Consultant / Resident Engineer	45
8.5 Contractors	45
8.6 Ministries, Departments, and Agencies (MDAs)	45
8.7 Nkhotakota District Council	46
8.8 Other District-Level Stakeholders, Including African Parks (Nkhotakota Wildlife Reserve)	46
8.9 Utility and Service Providers	47
8.10 Malawi Environmental Protection Authority (MEPA)	47
8.11 Traditional Authorities, Group Village Heads, VDCs, Market Committees and Community Grievance Redress Mechanism Committee (C-GRMc)	47

8.12 Project-Affected Persons, Communities and Civil Society	47
8.13 GBV/SEA/SH, Child Protection and Health Service Providers	47
8.14 Media.....	48
8.15 Capacity, Training and Resourcing Commitments	48
CHAPTER 9: MONITORING, EVALUATION AND REPORTING.....	49
9.1 Monitoring Indicators	49
9.2 Reporting.....	49
9.2.1 Monthly Reports	49
9.2.2 Quarterly and Annual Reports	49
9.2.3 Reporting Back to Communities	49
CHAPTER 10: IMPLEMENTATION BUDGET	50
REFERENCES.....	51
ANNEX 1: PHOTO LOG AND ATTENDANCE REGISTERS	53
1.1 Photo Log.....	53
1.2 Attendance Register.....	54
ANNEX 2: STAKEHOLDER REGISTER TEMPLATE.....	56
ANNEX 3: GRIEVANCE LOG AND RESOLUTION FORM TEMPLATE	57
3.2 RESOLUTION FORM.....	58
ANNEX 4: SEP DISCLOSURE AND UPDATE RECORD	59

Acronyms and Abbreviations

Acronym	Meaning
ADC	Area Development Committee
AfDB	African Development Bank
CESMP	Contractor's Environmental and Social Management Plan
CGRMC	Community Grievance Redress Management Committee
DC	District Commissioner
DGRMC	District Grievance Redress Management Committee
EAD	Environmental Affairs Department
EIA	Environmental Impact Assessment
EMA	Environment Management Act, 2017 (Malawi)
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
FGD	Focus Group Discussion
FPIC	Free, Prior and Informed Consent
GBV	Gender-Based Violence
GRM	Grievance Redress Mechanism
GVH	Group Village Head
IRM	Independent Recourse Mechanism (AfDB)
ISS	Integrated Safeguards System (AfDB)
KII	Key Informant Interview
LRP	Livelihood Restoration Plan
MDAs	Ministries, Departments, and Agencies
MEPA	Malawi Environmental Protection Authority
MGDS	Malawi Growth and Development Strategy
NGRC	National Grievance Redress Committee
OS	Operational Safeguard (AfDB)
OSC	One Stop Centre
PAP	Project-Affected Person
PIU	Project Implementation Unit
RA	Roads Authority

Acronym	Meaning
RAP	Resettlement Action Plan
RFA	Roads Fund Administration
RoW	Right of Way
RWG	Resettlement Working Group
SADC	Southern African Development Community
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
SEP	Stakeholder Engagement Plan
TA	Traditional Authority
ToR	Terms of Reference
VAC	Violence Against Children
VDC	Village Development Committee
WGRMC	Workers Grievance Redress Management Committee

Executive Summary

The Government of Malawi (GoM), through the Roads Authority (RA), with financing support from the African Development Bank (AfDB) under the SADC Sub-Regional Transport and Trade Facilitation Project, Phase II (Multinational, AfDB project code P-Z1-DB0-279), is undertaking the rehabilitation and upgrading of the Nkhotakota – Dwangwa (M005) road section, together with associated feeder roads, in Nkhotakota District, Central Region of Malawi. The project forms part of the wider SADC Sub-Regional Transport and Trade Facilitation Project connecting the Malawian lakeshore road network to Mozambique. The road traverses the Traditional Authorities (TAs) of Malengachanzi, Mphonde and Kanyenda.

Works comprise widening of the carriageway to a 7 m sealed surface with 2 m sealed shoulders, upgrading of bridges, rehabilitation of drainage structures and culverts, improvement of eleven associated feeder roads, and ancillary works including a weighbridge near Dwangwa, contractor campsites, quarry and borrow sites, and road diversions. The project is classified as an AfDB Category 1 operation on account of its potential environmental and social risks and impacts, including involuntary resettlement, and therefore requires a full Environmental and Social Impact Assessment (ESIA), a Resettlement Action Plan (RAP), and this comprehensive, stand-alone Stakeholder Engagement Plan (SEP).

This SEP has been prepared in fulfilment of the requirements of the AfDB's Integrated Safeguards System (ISS), Operational Safeguard 10 (OS10) Stakeholder Engagement and Information Disclosure and its 2024 Borrower Guidance Note, read together with OS1 (Environmental and Social Assessment), OS2 (Labour and Working Conditions), OS5 (Involuntary Resettlement) and OS7 (Vulnerable Groups). It is equally grounded in Malawi's national legal and regulatory framework, principally the Constitution of the Republic of Malawi (1995), the Environment Management Act (2017) and its associated Guidelines for Environmental Impact Assessment in Malawi, the Land Acquisition and Compensation Act (2022), the Land Act (2022), and the Public Roads Act (2014). Chapter 2 of this SEP includes the policy and legal framework, together with a detailed comparative gap analysis between national law and AfDB safeguards and the measures adopted to apply the higher of the two standards throughout.

The SEP consolidates, updates, and carries forward the stakeholder engagement and grievance redress commitments already documented in the ESIA for the Benga–Dwangwa Road and Associated Feeder Roads (December 2023/March 2024) and the subsequent Resettlement Action Plan (RAP).

This SEP is the operational instrument that will guide the RA, the Supervising Consultant, and the Contractors in engaging central and local government institutions; Traditional Authorities and community structures; Project-Affected Persons (PAPs); vulnerable and disadvantaged groups; civil society; utility and service providers; and the general public throughout the remaining preparation, construction, operation, and maintenance phases of the project. Effective implementation of this SEP is expected to build and sustain trust between the project and affected communities; reduce the risk of grievances and project delays, ensure that the views of women, youth, persons with disabilities, the elderly and other vulnerable groups are reflected in project design and mitigation measures, and contribute to the overall environmental and social sustainability, safeguards compliance and acceptability of the SADC Sub-Regional Transport and Trade Facilitation Project Phase II in Malawi.

CHAPTER 1: INTRODUCTION, BACKGROUND AND PROJECT DESCRIPTION

1.1 Introduction and Background to the Project

The Government of Malawi (GoM), through the Roads Authority (RA) and with financial support from the African Development Bank (AfDB), is implementing the SADC Sub-Regional Transport and Trade Facilitation Project—Phase II (Multinational), AfDB project code P-Z1-DB0-279. The Malawi component of the project comprises the rehabilitation and upgrading of the Nkhonkhotakota – Dwangwa (M005) road section in Nkhonkhotakota District, Central Region. The project forms part of the SADC Regional Trunk Road Network and the Nacala Road Corridor and is aligned with the 2006 SADC Protocol on Transport, Communications, and Meteorology, the SADC Regional Infrastructure Development Master Plan (2012–2027), the PIDA Priority Action Plan II (2021–2030), and Malawi's Vision 2063, which seeks to develop world-class road infrastructure connecting rural and urban areas to local and international markets.

An Environmental and Social Impact Assessment (ESIA) for the road and feeder roads was completed in December 2023 and finalised in March 2024. The original Resettlement Action Plan (RAP) – Rehabilitation of Benga to Dwangwa M005 Road Section and Associated Feeder Roads (Kandoli Consulting Engineers/AES Joint Venture, February 2024), applied a cut-off date of 1 April 2022 and identified Project-Affected Persons (PAPs) across both project phases requiring compensation and resettlement assistance, at a total estimated implementation cost in the order of MWK 11.83–13.4 billion (approximately USD 7.9 million), including a 10% contingency.

Further engineering design work carried out between 2024 and 2025 led to several revisions to the project scope. These changes required a RAP Addendum, informed by extensive stakeholder consultations conducted between June 2024 and December 2025. The project description reflects this expanded scope, designed to enhance functionality, safety, and economic impact while closing previously identified gaps.

This Stakeholder Engagement Plan (SEP) sets out the approach to stakeholder engagement for the Malawi component of the SADC Sub-Regional Transport and Trade Facilitation Project – Phase II (Multinational), AfDB project code P-Z1-DB0-279. It consolidates all prior engagement and disclosure commitments from the Environmental and Social Impact Assessment (ESIA) and the Update Resettlement Action Plan (RAP) and RAP Addendum into a single operational document covering the remainder of the project lifecycle.

The SEP is built on a commitment to inclusive, transparent, and continuous stakeholder participation, ensuring that Project-Affected Persons (PAPs), communities, government agencies, and other interested parties are meaningfully engaged throughout planning, implementation, monitoring, and closure. This supports the project's dual objective: improving road infrastructure while minimising adverse environmental and social impacts and maximising development benefits.

1.2 Project Proponent and Financing

The project proponent is the Government of Malawi, acting through the Roads Authority (RA), with co-financing from the African Development Bank (AfDB) and, for the portion financed domestically, the Government of Malawi. Details of the proponent are as follows:

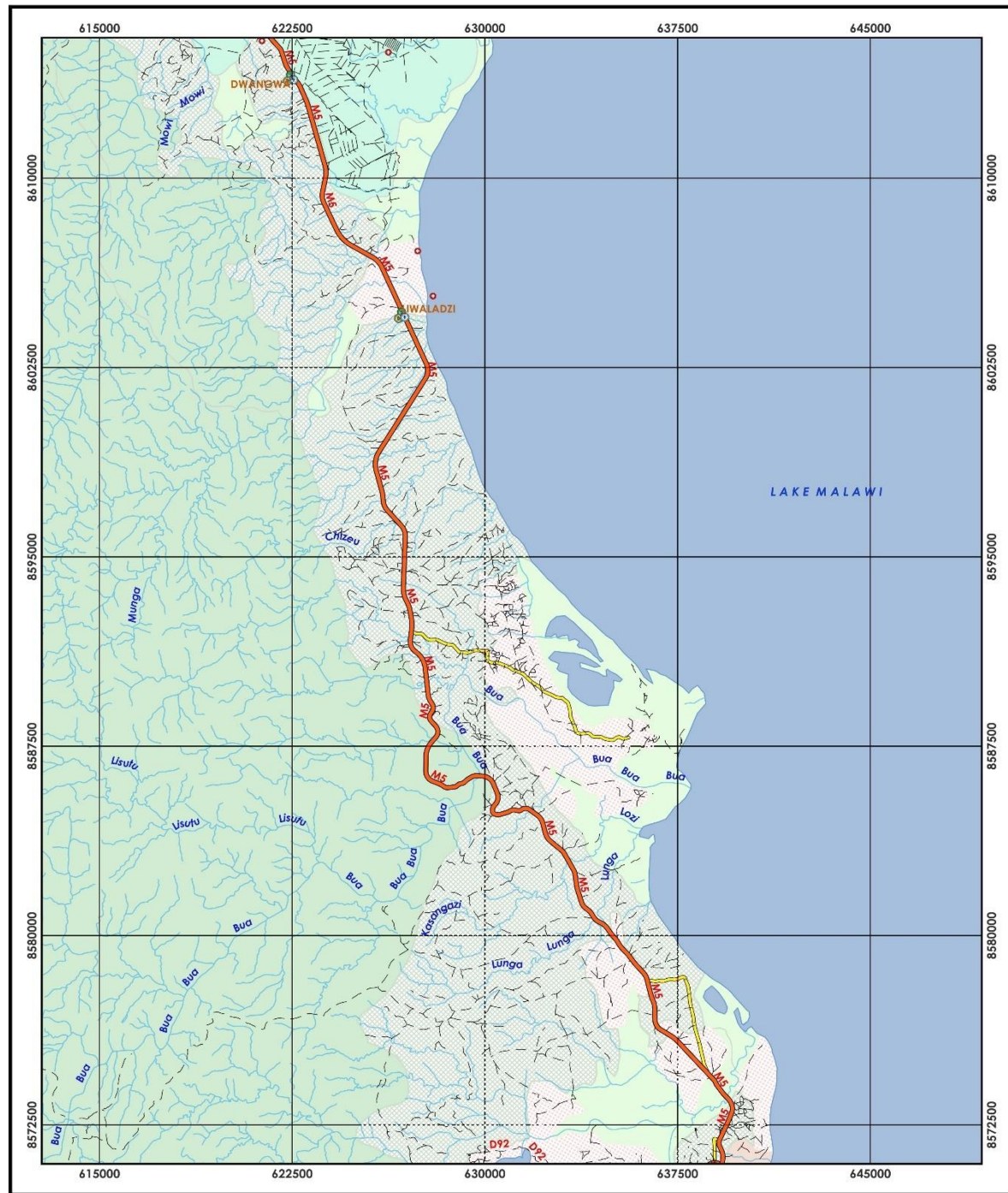
Item	Detail
Proponent name	Roads Authority (RA), Malawi
Contact person	The Chief Executive Officer, Roads Authority
Physical address	Functional Building, Off Paul Kagame Road, Lilongwe
Postal address	Private Bag B346, Lilongwe 3, Malawi
Telephone	+265 1 753 699
Fax	+265 1 750 307
Email	ra@ra.org.mw
Co-financier	African Development Bank (AfDB) Group, together with the Government of Malawi (GoM); ADF and OPEC financing arrangements apply to defined sections of the works, with GoM financing the balance
Implementing/supervising entity for E&S compliance	AFRISA Consulting Ltd, as Supervising Consultant to the Roads Authority, providing dedicated Environmental, Social and Health & Safety (E&S/H&S) supervision Contractor: CCECC

1.3 Project Location and Area of Influence

The Nkhotakota – Dwangwa (M005) road traverses the Traditional Authorities (TAs) of Malengachanzi, Mphonde and Kanyenda in Nkhotakota District, approximately 200 km northwest of Lilongwe. It forms part of the lakeshore road network and the Nacala Road Corridor (SADC Regional Trunk Road Network Route 20), linking Mozambique (via the Mandimba/Chiponde border) with Zambia (via the Mchinji/Chipata border) along the western shore of Lake Malawi. The road's area of influence includes numerous trading centres, sugar plantations, fishing communities, and skirts the periphery of the Nkhotakota Wildlife Reserve.

Key coordinates and locations referenced in this SEP include: the weighbridge site near Dwangwa/Vitekete (approximately 12°34'50"S, 34°8'19"E); the Dwangwa road extension, chainage KM 162+000, covering the Dwangwa Trading Centre; the Mpondagaga legacy grievance area (approximately 12°27'59"S, 34°06'23"E); the Lot 1 contractor campsite (KM88+000); and the Lot 2 contractor campsite/quarry (KM130+020).

PHASE TWO PROJECT LOCATION MAP - NKHOTAKOTA TO DWANGWA



Legend

- | | | | |
|-----------------|--------------|----------------------------|---------------|
| Trading Centers | Feeder Roads | Wetlands | Built-up area |
| Main Road | Contours | Land Cover | Forest |
| unclassified | Lakes | Agriculture in forest area | Water surface |
| | Rivers | Agriculture/settlement | |



Scale
1:135,000

1 0 1 2 3 4 km

A geographical map showing the extent of the Phase II M005 road construction

1.4 Project Description and Scope of Works

The project comprises the following principal components:

- Widening of the carriageway to a 7 m sealed surface with 2 m sealed shoulders along the full 55.5 km alignment;
- Upgrading of bridges, including construction of new double-lane bridges and retention/rehabilitation of existing structures at Bua, Dwangwa and Liwaladzi;
- Rehabilitation of drainage structures and culverts along the corridor;
- Construction of a permanent weighbridge facility near Dwangwa/Vitekete (2.316 ha), including vehicle queue lanes and a security buffer zone, to enforce axle-load limits and protect the rehabilitated pavement;
- A 1.5 km extension of the road alignment into Dwangwa Trading Centre to connect the Dwangwa Bridge to Dwangwa Market;
- Ancillary works including contractor campsites, quarry and borrow-pit sites, stockpile sites, and temporary road diversions during construction.

The works will generate substantial local employment, with a minimum of 70% of positions targeted for local residents and a minimum of 40% participation by women, consistent with commitments in the ESIA/ESMP and this SEP's engagement program.

1.5 Environmental and Social Risk Categorisation

In accordance with the AfDB's Integrated Safeguards System (ISS) Initial Environmental and Social Screening Checklist, the project is classified as an AfDB Category 1 operation, on account of its potential to generate significant environmental and social impacts, including physical disturbance of the project site and surroundings, displacement of affected populations, changes in socio-cultural patterns, potential adverse effects on vulnerable groups, and increased health and safety risks. Category 1 classification requires the preparation of a full ESIA (including an Environmental and Social Management Plan, ESMP), a RAP, and, under OS10, a comprehensive, stand-alone Stakeholder Engagement Plan with several formal points of engagement and ongoing information dissemination throughout the project cycle. This SEP has accordingly been prepared as a full, stand-alone instrument consistent with that classification, rather than being subsumed within the ESMP.

1.6 Summary of Anticipated Environmental and Social Impacts

Positive impacts are anticipated at different stages of the project, alongside negative impacts arising from the scale and nature of the construction works. These impacts vary in intensity depending on the activities undertaken at each phase, the sensitivity of the receiving environment along the corridor, and the socio-economic profile of the communities affected. The full technical detail of these impacts and their corresponding mitigation measures is addressed in the ESIA and its accompanying ESMP. This SEP, by contrast, focuses specifically on the engagement, disclosure, and grievance-handling measures needed to support effective management of these impacts and to secure community buy-in for the mitigation hierarchy applied across the project's pre-construction, construction, and post-construction phases.

During pre-construction, surveying, census, and land acquisition activities cause localised vegetation and soil disturbance at test-pit and auxiliary sites, alongside community anxiety, disputes over eligibility, and disruption to displaced households, businesses, and service infrastructure; this is offset by the trust-building value of early engagement and the livelihood support that full compensation provides.

During construction, works along both project lots generate vegetation clearance, noise, dust, waste, and water quality impacts, alongside social risks including STI/HIV transmission, GBV/SEA, child labor, traffic disruption, and occupational health and safety concerns, balanced local employment, business opportunities, and skills transfer for host communities.

During post-construction, operation and maintenance of the completed road and weighbridge will bring largely positive outcomes: improved connectivity, safety infrastructure, and access to services tempered by risks of short-term accident increases, encroachment, and the need to sustain maintenance funding and keep the grievance mechanism active for any outstanding concerns.

1.7 Purpose and Objectives of this SEP

The purpose of this SEP is to define a systematic, inclusive and gender-responsive approach for engaging all project stakeholders throughout the remaining project preparation, construction, operation and maintenance phases, and to describe the mechanisms through which the project will disclose information and receive, manage and resolve grievances. Specifically, the SEP aims to:

- Identify all categories of project stakeholders, in particular Project-Affected Persons (PAPs) and vulnerable or disadvantaged groups, and build and maintain constructive, trust-based relationships and channels of communication with them;
- Assess stakeholder interest in, and concerns about, the project, and ensure that stakeholders' views are reflected in project design, mitigation measures and implementation arrangements;
- Promote safe, effective and inclusive engagement with project-affected parties — including women, youth, the elderly, persons with disabilities, and economically vulnerable groups such as market vendors — free from reprisal, throughout the project life cycle;
- Enhance project benefits (employment, local business opportunities, improved connectivity) and mitigate harm to local communities, including resolution of legacy grievances such as the Mpondagaga compensation matter;
- Ensure that appropriate project information on environmental and social risks, impacts, entitlements and opportunities is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format, in relevant local languages;
- Provide project-affected parties with accessible, inclusive and safe means to raise questions, proposals, concerns and grievances, and ensure that the RA, Consultant and Contractors respond to and manage such grievances in a timely and transparent manner, consistent with both AfDB OS10 and the Malawi Guidelines for Environmental Impact Assessment; and
- Set out the institutional arrangements, and the human, technical and financial resources required, to implement stakeholder engagement activities across the remaining life of the project.

1.8 Guiding Principles for Stakeholder Engagement

Engagement under this SEP is guided by the following principles, drawn from AfDB OS10, its Borrower Guidance Note, and the Malawi Guidelines for Environmental Impact Assessment:

- **Inclusiveness:** engagement will be open to all stakeholders, including disadvantaged, marginalised or vulnerable individuals and groups, without discrimination or fear of reprisal, at no cost to the stakeholder, and in a socially and culturally appropriate manner.

- **Gender-responsiveness:** stakeholder identification, planning and engagement will take account of the differentiated roles, concerns and constraints of women and men, including separate engagement with women where required to enable free expression of views.
- **Timeliness and accessibility:** information will be disclosed early enough, and in formats and languages that stakeholders can understand, to allow meaningful input into decisions.
- **Freedom from manipulation, coercion, discrimination, intimidation and reprisal:** all stakeholders, including those critical of the project, will be able to participate and express views freely and safely.
- **Transparency and accountability:** engagement activities, feedback received and the project's response to that feedback will be documented and disclosed.
- **Proportionality:** the intensity and frequency of engagement will be proportionate to the Category 1 scale of the project and the significance of its environmental and social risks and impacts, with a higher level of engagement applied to PAPs and vulnerable groups.
- **Legal compliance:** engagement will at all times apply the higher of the two applicable standards where Malawian law and AfDB safeguards diverge, consistent with the gap analysis at Section 2.7.

1.9 Source Documents Underpinning this SEP

This SEP draws on and consolidates the principal safeguard instruments prepared for the project to date:

- **(i)** the ESIA for the Benga – Dwangwa Road and Associated Feeder Roads (December 2023, finalised March 2024), including its Chapter Eight on Stakeholder Engagement and Grievance Mechanism;
- **(ii)** the Resettlement Action Plan for the Rehabilitation of Benga to Dwangwa MO05 Road Section and Associated Feeder Roads (Kandoli Consulting Engineers/AES Joint Venture, February 2024), prepared through a desktop policy and literature review, transect walks, a two-day consultative workshop with the Nkhotakota District Environmental Sub-Committee and NGO representatives, focus group discussions with Village Development Committees across the six Traditional Authorities, a household socio-economic survey, and a Ministry of Lands verification and valuation survey;
- **(iii)** the AfDB Borrower Guidance Note for E&S Operational Safeguard 10 – Stakeholder Engagement and Information Disclosure (First Edition, 2024), including its Annex 1 on the Optimum Content of a Standard SEP; and
- **(iv)** the Guidelines for Environmental Impact Assessment in Malawi, issued by the Malawi Environmental Protection Authority (MEPA), including Appendix 12 (Guidelines on Public Participation) and Appendix 25 (Terms of Reference for a Grievance Redress Mechanism).

CHAPTER 2: POLICY, LEGAL AND INSTITUTIONAL FRAMEWORK

2.1 Introduction

This chapter presents the policies, legal and institutional framework within which this Stakeholder Engagement Plan (SEP) will be implemented. Malawi has various policies, laws, environmental impact assessment guidelines, and an institutional and regulatory set-up governing the management of its environment and natural resources, and, additionally, the African Development Bank's Integrated Safeguards System (ISS) and applicable Operational Safeguards (OSs) will be utilised to ensure the project is socially inclusive and environmentally sustainable. Where gaps exist between Malawian law and AfDB safeguard requirements, this SEP applies the higher, more stringent standard.

2.2 National Policy Framework

The project and this SEP are further guided by the following national policy instruments:

- **Malawi Vision 2063:** the Government of Malawi's long-term development roadmap, which under its Goal 10 commits to a world-class, well-maintained road network connecting urban and rural areas to local and international markets, transitioning Malawi from a land-locked to a land-linked economy. The Benga-Dwangwa Road project is a direct contribution to this goal.
- **Malawi Growth and Development Strategy (MGDS):** which prioritises sustainable economic development, infrastructure development, social protection and development, and good governance, with sub-thematic areas including environmental protection, disaster preparedness and HIV/AIDS prevention, all of which inform this SEP's engagement content.
- **National Environmental Policy (2004):** promoting sustainable social and economic development through the sound management of the environment, and providing the policy basis for the Environment Management Act (2017).
- **National Gender Policy (2000, revised):** requiring gender mainstreaming in development projects, directly informing the gender-responsive stakeholder identification and differentiated engagement measures in Chapters 3 and 5.
- **National Land Policy (2002) and National Water Policy (2005):** informing land acquisition, compensation and utility/water infrastructure engagement addressed in this SEP.
- **National HIV & AIDS Policy (2012) and National Sanitation Policy (2006):** informing the health-related engagement and disclosure content addressed alongside GBV/SEA/SH provisions in Chapter 7.
- **Roads Authority Environmental and Social Management Guidelines in the Road Sector:** sector-specific guidance applied by the RA across all AfDB- and GoM-financed road projects, including this one.

2.3 National Legal Framework (Malawi)

The following national legislation is directly applicable to stakeholder engagement, information disclosure and grievance redress for this project:

2.3.1 Constitution of the Republic of Malawi (1995)

The Constitution is supreme over any Act or policy in Malawi (Section 5); any inconsistent law is invalid to the extent of the inconsistency. Section 12(iii) establishes that the authority to exercise State power is conditional upon sustained public trust, maintained through open, accountable and transparent government and informed democratic choices — a foundational principle for this SEP's approach to disclosure and consultation. Section 13(d) provides for responsible environmental management and underpins the National Environmental Policy. Sections 28 and 44 guarantee the right to property and provide that no person shall be arbitrarily deprived of property without adequate compensation, and that expropriation is permissible only for public use accompanied by fair compensation — the constitutional basis for the RAP and RAP Addendum compensation framework that this SEP's engagement and disclosure provisions support.

2.3.2 Environment Management Act (EMA), 2017

The EMA is Malawi's principal environmental legislation, establishing the Malawi Environmental Protection Authority (MEPA) and requiring public consultation as an integral part of the environmental and social impact assessment process. Section 32 of the EMA empowers the Director General, in consultation with relevant lead agencies, to carry out periodic environmental and social audits, to require developers to keep environmental performance records and submit reports, and to require developers to take reasonable measures — including measures not foreseeable at ESIA stage — to mitigate undesirable effects on the environment and social well-being. The EMA and its accompanying Guidelines for Environmental Impact Assessment in Malawi (see Section 2.5) are the principal domestic source of the stakeholder engagement and grievance redress obligations addressed throughout this SEP.

2.3.3 Land Act (1967, as revised 2016) and Registered Land Act (1967, as amended 2017

The Land Act categorises land into public, private and customary tenure. It governs the negotiation and compensation arrangements applicable to customary land required for contractor camps, borrow pits and the weighbridge site, requiring engagement with Traditional Authorities and affected landholders as set out in Chapters 3 and 5 of this SEP. The Registered Land Act governs formal title registration and is applied, together with the Land Survey Act (2016), where boundary demarcation or registered title is relevant to verifying a PAP's claim during compensation or grievance investigation.

2.3.4 Land Acquisition Act (1970, as amended 2017)

This Act sets out the procedures for compulsory land acquisition and compensation, emphasising fair market value and disturbance allowances. It applies to the compensation framework administered under the RAP and RAP Addendum, and this SEP's disclosure provisions (Chapter 6) ensure PAPs are informed of valuation methods, compensation schedules and their rights under this Act.

2.3.5 Public Roads Act (1962, as amended 2017)

This Act establishes the RA's mandate to maintain and regulate road reserves, defines the road reserve boundary, and provides for compensation of affected utilities and assets within it. It underpins the RoW expansion (18 m to 25 m) addressed in Section 1.6 and the utility/service-provider engagement arrangements in Chapters 3, 5 and 7.

2.3.6 Physical Planning Act (2016, as amended 2022)

Section 43A of the Physical Planning Act (as amended, 2022) prohibits development within the road reserve without approval, reinforcing the RA's mandate under the Public Roads Act to identify

and formalise the removal of, and compensation for, encroachments identified after the applicable cut-off date.

2.3.7 Mines and Minerals Act (2023)

This Act, which replaced the earlier Mines and Minerals Act (2019), classifies borrow pits and quarry sites as mining activities and requires environmental rehabilitation plans for such sites, relevant to the contractor associated facilities identified in Section 1.6 and the stakeholder engagement undertaken with landowners at borrow, quarry and campsite locations.

2.3.8 Other Applicable Legislation

Additional legislation informing sector-specific engagement and safeguard requirements includes: the Gender Equality Act (2014); the Occupational Safety, Health and Welfare Act (1997); the HIV and AIDS (Prevention and Management) Act (2018); the Water Resources Act (2013) and Water Works Act (1995); the Forestry Act; and the Monuments and Relics Act, relevant to any chance archaeological or cultural heritage finds.

2.4 African Development Bank Integrated Safeguards System (ISS)

The AfDB's Integrated Safeguards System (ISS) sets out ten Operational Safeguards (OS1–OS10) that Borrowers must apply to Bank Group-financed operations. Given the project's Category 1 classification, the following Operational Safeguards are directly applicable to this SEP.

2.4.1 Operational Safeguard 1 (OS1) — Assessment and Management of Environmental and Social Risks and Impacts

OS1 is the overarching safeguard, mainstreaming environmental and social (E&S) considerations, including gender inequality, climate vulnerability and cumulative impacts, into project design and implementation. It sets out the Borrower's responsibility to assess, manage and monitor E&S risks and impacts at every stage of the project, applying a mitigation hierarchy that seeks first to avoid, then minimise, then mitigate and, where significant residual impacts remain, compensate or offset them. Critically for this SEP, OS1 requires that Borrowers provide opportunity for stakeholder engagement and consultation in assessing and managing E&S risks and impacts, a requirement operationalised throughout Chapters 3 to 7 of this document.

2.4.2 Operational Safeguard 2 (OS2) — Labour and Working Conditions

OS2 governs the treatment of project workers, including occupational health and safety, terms and conditions of employment, and the establishment of a distinct workers' grievance mechanism, separate from the community-facing GRM. This SEP incorporates OS2 requirements through the Workers Grievance Redress Management Committee (WGRMC) described in Chapter 7, and through the Contractor's obligations under Chapter 8.

2.4.3 Operational Safeguard 5 (OS5) — Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

OS5 governs the management of physical and economic displacement arising from project-related land acquisition, restrictions on land use, and involuntary resettlement. Its objectives are to: avoid involuntary resettlement where feasible, or minimise it where unavoidable; ensure resettlement plans are informed by social assessments; avoid forced eviction; mitigate unavoidable adverse impacts through timely compensation at full replacement cost and resettlement assistance to restore or improve livelihoods; improve the living conditions of poor or vulnerable persons who are physically displaced; and ensure that resettlement activities are planned and implemented with

appropriate disclosure of information, meaningful consultation, and the informed participation of those affected. As displacement under this project is predominantly economic (loss of vending space, business premises and trees within the road reserve) rather than physical, OS5's consultation and disclosure requirements are given full effect through this SEP, read together with the RAP and RAP Addendum.

2.4.4 Operational Safeguard 7 (OS7) — Vulnerable Groups

OS7 requires Borrowers to identify individuals or groups who, because of their particular circumstances, may be vulnerable, and to apply differentiated measures to ensure their effective, safe and inclusive participation in stakeholder engagement, consultation, and access to project benefits and grievance redress. OS7's requirements inform the vulnerability analysis in Chapter 3 and the differentiated engagement measures in Chapter 5.

2.4.5 Operational Safeguard 10 (OS10) — Stakeholder Engagement and Information Disclosure

OS10, together with its 2024 Borrower Guidance Note, is the primary safeguard governing this SEP. OS10 requires Borrowers to: (a) engage stakeholders throughout the project life cycle, commencing as early as possible and in a manner proportionate to project risk; (b) identify and analyse stakeholders, distinguishing project-affected parties from other interested parties and identifying vulnerable or disadvantaged groups; (c) prepare and disclose a Stakeholder Engagement Plan (SEP) describing the timing, methods and content of engagement; (d) disclose relevant project information in an accessible, timely, non-technical and culturally appropriate manner, before Bank appraisal and on an ongoing basis thereafter; (e) undertake meaningful consultation — a two-way process, free of manipulation, coercion, discrimination, intimidation and reprisal — that begins early, is based on prior disclosure, and considers and responds to stakeholder feedback; (f) establish and maintain an accessible, proportionate and culturally appropriate Grievance Redress Mechanism (GRM); and (g) maintain and disclose a documented record of stakeholder engagement, including who was consulted, what feedback was received, and how it was taken into account.

The Borrower Guidance Note further specifies that, for high-risk (Category 1) operations such as this one, projects should include several formal points of engagement and ongoing information dissemination throughout the project cycle, and may require engagement of independent third-party specialists to support stakeholder identification and analysis; a standard this SEP meets through the engagement of AFRISA Consulting Ltd as Supervising Consultant with dedicated Environmental, Social and Health & Safety (E&S/H&S) personnel across both project lots. Annex 1 of the Borrower Guidance Note, setting out the Optimum Content of a Standard SEP, has directly informed the structure of this document (see Section 1.12).

2.5 Institutional and Regulatory Bodies with a Role in this Framework

- The following bodies have defined roles under the policy and legal framework described above; their specific responsibilities for implementing this SEP are set out in full in Chapter 8:
- African Development Bank (AfDB): financier and safeguards overseer, responsible for review and clearance of this SEP and ongoing supervision of OS10 compliance.
- Malawi Environmental Protection Authority (MEPA): national environmental regulator responsible for EMA/EIA Guidelines compliance, supported by its Advisory Committee and Board.

- Roads Authority (RA): project proponent and SEP owner, acting through its Project Implementation Unit (PIU).
- Ministry of Lands, Housing and Urban Development: responsible for land valuation and compensation technical support.
- Roads Fund Administration (RFA): independent financial agent for disbursement of compensation payments.
- Nkhosakota District Council: local government authority facilitating community mobilisation, local administration and grievance support.
- Supervising Consultant (AFRISA Consulting Ltd) and Contractor (CCEEC): responsible for day-to-day E&S supervision and CESMP/GRM implementation respectively.
- Ministry of Water and Sanitation / National Water Resources Authority (NWRA): responsible for water abstraction permits and effluent discharge consents, and for water supply infrastructure affected by the works.
- Central Region Water Board (CRWB): owner/operator of water supply infrastructure within the road reserve, responsible for relocation of affected water mains.
- ESCOM (Electricity Supply Corporation of Malawi): owner/operator of power infrastructure within the road reserve, responsible for relocation of affected power lines and poles.
- Telecommunications operators (Open Connect Limited, Airtel Malawi, Camusat): owners/operators of fibre and telecom infrastructure within the road reserve, responsible for relocation of affected lines.
- Ministry of Gender, Community Development and Social Welfare (including District Gender and Social Welfare Office): technical guidance on gender equality, GBV/SEA prevention and response, and social welfare issues affecting vulnerable groups.
- Ministry of Labour (including Nkhosakota District Labour Office): work permits, monitoring of labour conditions, and support to the Workers' Grievance Redress Management Committee.
- Ministry of Health (including Nkhosakota District Health Office/District Hospital): oversight of occupational and community health and safety risks arising from construction.
- Department of Forestry (under Ministry of Natural Resources and Climate Change): tree/vegetation clearance oversight and replanting requirements.
- Department of Mines (under Ministry of Natural Resources, Energy and Mining): licensing of quarry and borrow-pit operations.
- Department of Museums and Monuments: oversight of cultural heritage sites and graveyards affected by the works, in coordination with the District Council.
- Malawi Police Service / Nkhosakota Police Station (including Victim Support Unit): security support and handling of GBV/protection-related grievances referred through the GRM.
- Magistrate Court: final point of recourse for grievances not resolved through the project or district-level GRM structures.
- Traditional Authorities (Malengachanzi, Mphonde, Kanyenda) and Group Village Heads: customary authority over land and community mobilisation within their jurisdictions.
- Community, Workers' and District Grievance Redress Management Committees (CGRMC, WGRMC, DGRMC): tiered structures responsible for receiving, hearing and resolving project-related grievances.

- African Parks (Nkhotakota Wildlife Reserve), RIPPLE AFRICA, NAWIRA, and Nkhotakota Youth Code: local NGOs/CSOs with an interest in environmental, social or youth-related project impacts.

2.6 Comparative Gap Analysis: Malawian Legislation and AfDB Safeguards

A detailed review of Malawian legislation and policies, conducted for the original RAP, identified specific gaps between national requirements and AfDB ISS requirements as they relate to stakeholder engagement, consultation, vulnerable groups, grievance redress, eligibility, and compensation. Table 2.2 presents these gaps and how this SEP, read together with the RAP Addendum, resolves each of them by applying the more protective standard, consistent with AfDB policy.

Table 2: Comparative Gap Analysis — Malawian Legislation vs AfDB ISS

Aspect	Malawian Legislation	AfDB Policy (ISS)	Identified Gap	How the SEP Resolves the Gap
Consultation	Requires consultation under the EMA (2017); limited emphasis on livelihood restoration.	Requires inclusive, culturally appropriate consultation with all PAPs, particularly vulnerable groups, throughout the project life cycle.	Malawian law does not require livelihood restoration as part of the consultation obligation.	This SEP ensures inclusive, culturally sensitive consultation throughout project preparation, construction and operation (Chapters 4–5), with vulnerable groups engaged directly in decision-making (Section 5.4).
Livelihoods	Focus on fair compensation for lost assets; no mandate for livelihood restoration.	Requires livelihood restoration or improvement, with monitoring of outcomes.	No legal provision for livelihood restoration.	The RAP includes a dedicated Livelihood Restoration Plan (LRP) for informal traders and other vulnerable groups; this SEP's engagement programme (Section 5.4) and monitoring indicators (Section 9.1) track LRP uptake and outcomes.
Vulnerable groups	Protects vulnerable groups only in general constitutional terms.	Requires targeted assistance and engagement to improve or restore livelihoods for vulnerable groups.	No explicit requirement for targeted assistance in resettlement or compensation.	Vulnerable groups identified during consultation (Section 3.4) receive additional support, including priority access to livelihood restoration programmes and differentiated engagement measures (Section 5.4).

Aspect	Malawian Legislation	AfDB Policy (ISS)	Identified Gap	How the SEP Resolves the Gap
Grievances	Affected parties may access judicial or administrative remedies.	Requires a project-specific grievance mechanism that is accessible, culturally appropriate and free of charge.	No requirement for a specific project-level grievance mechanism under Malawian law.	A three-tier GRM (CGRMC/WGRMC – DGRMC – Courts/AfDB IRM) has been established and is described in full in Chapter 7, meeting both AfDB OS10 and Malawi EIA Guidelines Appendix 25 requirements (Section 2.4.3).
Eligibility	Only legal or customary landowners are eligible for compensation.	All persons affected before the cut-off date, including informal occupants and squatters, are eligible for compensation or resettlement assistance.	Informal traders, occupants and squatters are excluded under national law.	All affected persons, including informal vendors and squatters, are eligible for compensation based on the applicable cut-off date, in line with both national law and AfDB OS5; this is disclosed to stakeholders under Chapter 6.
Entitlements	Compensation typically provided as cash payments; differentiated rates by land tenure class.	Compensation at full replacement cost, regardless of land tenure classification.	In-kind compensation and full-replacement-cost valuation are not prioritised or required under Malawian law.	Compensation for all assets is calculated at full replacement cost without deduction for depreciation, disclosed transparently to PAPs (Chapter 6) and subject to grievance redress if disputed (Chapter 7).
Crop compensation	Compensation for crops is not explicitly mandated; PAPs may harvest crops before vacating.	Requires compensation for crops at full replacement cost, even for those without legal claims to the land.	No explicit provision for crop compensation at full replacement cost in national law.	Full compensation for affected trees and perennial crops, including those planted by informal land users, is provided and disclosed under the RAP Addendum and this SEP's information disclosure arrangements (Section 6.1).

CHAPTER 3: STAKEHOLDER IDENTIFICATION AND ANALYSIS

3.1 Approach to Stakeholder Identification

Stakeholders for the SADC Sub-Regional Transport and Trade Facilitation Project – Phase II have been identified through a combination of: stakeholder mapping conducted during the ESIA (2023) and the RAP (2022, 2024 and 2025); key informant interviews (KIIs) and focus group discussions (FGDs) at national, district and community levels; review of council and Traditional Authority records; and site-based census and socio-economic surveys of Project-Affected Persons. Stakeholder identification remains an iterative, open process: additional PAPs and interested parties identified during construction through review of the Right-of-Way boundary or through grievances will continue to be added to the stakeholder register maintained by the RA/PIU (Annex 1).

3.2 Categories of Stakeholders

Two broad categories of stakeholders are recognised, consistent with OS10 and the Malawi Guidelines:

- **Project-Affected Parties (Primary Stakeholders):** individuals, households, businesses or institutions likely to be directly or indirectly affected; positively or negatively by the project, including PAPs losing land, structures, crops, trees or business premises, and utility/service providers whose infrastructure lies within the road reserve.
- **Other Interested Parties (Secondary Stakeholders):** individuals, groups or institutions with an interest in, or influence over, the project but not necessarily directly affected — for example, government ministries, NGOs, academics, the media and the general travelling public.

3.3 Identified Stakeholder Groups

Table 3.1 presents the stakeholder groups identified to date, consistent with those already engaged during the ESIA and RAP Addendum consultation processes. This list will be updated throughout implementation as new stakeholders emerge, and is maintained in full in the living stakeholder register at Annex 1.

Table 3.1: Identified Stakeholders for the SADC Sub-Regional Transport and Trade Facilitation Project – Phase II (Nkhotakota – Dwangwa Road)

Stakeholder Group	Interest / Role in the Project	Area of Influence (Project Lifecycle Stage)	Roles and Responsibilities for Project Success
Roads Authority (RA) - Project Proponent	Project owner and client; responsible for providing project information for ESIA/RAP/SEP purposes, overall oversight and liaison with financiers and Government.	Entire project lifecycle: preparation, construction, operation and maintenance; holds decision-making authority over design, compensation and contract administration.	Disclose project information promptly and completely; enforce Contractor compliance with the CESMP/SEP/GRM; resolve legacy and cross-cutting grievances (e.g. Mpondagaga) without delay. Doing so protects RA's own financing

Stakeholder Group	Interest / Role in the Project	Area of Influence (Project Lifecycle Stage)	Roles and Responsibilities for Project Success
			relationship with the AfDB, its reputation as an implementing agency, and the project schedule.
Central Government Ministries	Ministry of Gender, Community Development & Social Welfare; Ministry of Water & Sanitation (Water Resources Department - Ground Water Division); Ministry of Lands; National Water Resources Authority; Malawi Environmental Protection Authority (MEPA). Policy holders and custodians of legal frameworks guiding ESIA/RAP compliance.	Project preparation and pre-construction (approvals, permits, valuation); ongoing regulatory oversight during construction and operation.	Issue approvals, permits and valuations within agreed timeframes; provide technical guidance consistent with sector policy; participate in the DGRMC and monitoring visits. Timely engagement protects each Ministry's own sector mandate and avoids project delays being attributed to their offices.
Nkhotakota District Council	Responsible for monitoring and reinforcing social and environmental management plans; departments include the District Gender Office, Office of the District Commissioner, and the Directorate of Planning & Development.	Across the lifecycle, with particular influence during community mobilisation, GRM operation, and post-construction maintenance planning.	Linking the Contractor to local communities; Mobilizing local communities in favour of the project implementation by communicating any intervention required from them; and Ensuring the implementation of project by making sure the contractors and subcontractors comply with laws, related ESHS requirements and programmes relating to protection, conservation and promotion of the environment
Other District-Level Stakeholders	African Parks (Nkhotakota Wildlife Reserve); Nkhotakota Youth Code; Central Region Water Board (CRWB); RIPPLE AFRICA; NAWIRA; Nkhotakota Police Station (including Victim Support Unit); Department of Forestry; District Labour Office; District Health Office.	Design and pre-construction (siting decisions near the Wildlife Reserve and water infrastructure); construction (encroachment monitoring, health, safety and policing support).	Share technical data (e.g. wildlife corridors, water infrastructure maps) early in design; participate in sensitisation and joint monitoring. Engagement reduces human-wildlife conflict, protects water and forestry assets, and strengthens each institution's standing with the communities it serves.
African Parks (Nkhotakota Wildlife Reserve)	Co-manages the Nkhotakota Game Reserve, in partnership with the	Design and pre-construction (alignment	Share Reserve boundary, wildlife corridor and

Stakeholder Group	Interest / Role in the Project	Area of Influence (Project Lifecycle Stage)	Roles and Responsibilities for Project Success
	Department of National Parks and Wildlife (DNPW), through which the MO05 road alignment directly passes; responsible for biodiversity conservation, anti-poaching operations, and protection of wildlife corridors within and adjacent to the Reserve.	siting review, identification of wildlife crossing points and sensitive habitat) Construction (encroachment control, speed and haulage management, wildlife-strike mitigation) Operation and maintenance (ongoing traffic management and monitoring along the Reserve boundary).	sensitive-habitat data early in design Participate in joint site inspections and toolbox talks on human-wildlife conflict mitigation Help define and enforce speed limits, signage and crossing points during construction and operation Sit on the DGRMC for grievances involving Reserve land or wildlife incidents
Utility and Service Providers	ESCOM (electricity), Central Region Water Board (water supply), Open Connect Limited (OCL) and Airtel (telecommunications infrastructure within the road reserve).	Detailed design and construction phases, specifically relocation and protection of infrastructure within the Right-of-Way.	Provide accurate as-built infrastructure data, assign personnel for joint site inspections, Relocation/protection costs and schedules promptly.
Traditional and Community Structures	Traditional Authorities (Mwadzama, Nkhanga, Kalimanjira, Malengachanzi, Mphonde, Kanyenda), Group Village Heads, Area Development Committees, Village Development Committees (VDCs, including Mphonde VDCs), Market Committees.	Throughout the lifecycle, particularly in stakeholder/asset verification, customary dispute resolution, and community mobilisation.	Verify PAP identities and customary land claims, mobilise community participation, and sit on CGRMCs and RWGs
Project-Affected Persons (PAPs)	Households and individuals losing land, structures, crops, trees or business premises, including market/RoW vendors, shop owners, taxi and bicycle-taxi (kabanza) operators, and holders of the Mpondagaga legacy grievance.	Central throughout the lifecycle, especially during census/valuation, compensation negotiation, relocation and livelihood restoration.	Provide accurate information during census and valuation, Participate in FGDs and individual consultations, and raise concerns promptly through the GRM.
Community Members (Non-PAP)	Men, women, youth and elderly residents of communities along the corridor who may benefit from or be indirectly affected by the project (e.g. through	Construction and operation phases, particularly local economic activity, employment and road safety.	Support fair local recruitment practices, report ESHS and safety concerns,

Stakeholder Group	Interest / Role in the Project	Area of Influence (Project Lifecycle Stage)	Roles and Responsibilities for Project Success
	employment, business opportunities, or traffic disruption).		Participate in awareness campaigns (HIV/AIDS, GBV, road safety).
Contractor(s) and Sub-contractors	Responsible for implementing the Contractor's ESMP (CESMP), engaging local labour, and participating in grievance resolution through Site/Workers committees.	Construction phase primarily, extending into demobilisation and the defects/maintenance period.	Implement the CESMP and worker Code of Conduct in full, Prioritise local and gender-balanced hiring, and respond to grievances within 24 hours.
Civil Society, NGOs and Service Providers	Local and national NGOs, GBV/SEA service providers, Technical Working Groups under the Ministry of Gender, One Stop Centres, and academic/research institutions with an interest in the project.	Throughout the lifecycle, particularly GBV/SEA referral pathways, vulnerable-group support, and independent monitoring.	Provide accessible referral services, participate actively in Technical Working Groups, support independent monitoring or audit functions.
Media	Print, radio, television and social media outlets used for disclosure and public awareness in the project area.	Throughout the lifecycle, particularly around disclosure milestones, construction milestones, and grievance escalation events.	Disseminate accurate, balanced and timely project information sourced from the RA/Consultant.

3.3.1 Stakeholder Mapping Matrix (Influence / Interest)

To define stakeholder relationships, vulnerability, and interest in and influence on Project activities, stakeholders were assessed and mapped. Mapping was done according to influence, interest, and the degree of potential impact based on the stakeholder mapping matrix as demonstrated in *Figure below*:

LOW INTEREST	HIGH INTEREST
MONITOR <i>Low Influence / Low Interest</i> - Civil Society, NGOs and Service Providers - Media	ENGAGE <i>Low Influence / High Interest</i> - Traditional and Community Structures - Community Members (Non-PAP) - Other District-Level Stakeholders
INFORM <i>High Influence / Low Interest</i> - Central Government Ministries - Utility and Service Providers	LEVERAGE <i>High Influence / High Interest</i> - Roads Authority (RA) - Project Proponent - Nkhotakota District Council

- African Parks (Nkhotakota Wildlife Reserve)
- Project-Affected Persons (PAPs)
- Contractor(s) and Sub-contractors

Category Definitions

- Monitor (low influence, low interest): limited interest and influence on the Project, e.g. media and NGOs. Track for awareness but engagement effort can remain light.
- Inform (high influence, low interest): potential to influence Project outcomes without a specific interest in impact-assessment issues, typically statutory consultees. Keep informed of progress.
- Engage (low influence, high interest): not adversely affected, but their interests mark them as stakeholders e.g. local communities not directly affected and authorities with limited influence. Maintain an open communication channel throughout.
- Leverage (high influence, high interest): can influence Project outcomes and hold a high level of interest, e.g. statutory approval bodies and affected communities. Engage continuously throughout the Project life cycle.

3.4 Vulnerable and Disadvantaged Groups

A socio-economic census found that male PAPs and male-headed households predominate numerically, but that women, the elderly, persons with disabilities, RoW vendors and legacy PAPs face particular vulnerabilities requiring differentiated engagement measures. These are summarised in Table 3.2.

Table 3.3: Vulnerable and Disadvantaged Groups Identified

Group	Basis for Vulnerability / Key Findings
Female-headed households	Higher rates of widowhood and divorce among female PAPs than male PAPs, combined with lower education levels, limit their ability to independently rebuild livelihoods and navigate compensation processes.
Elderly PAPs	Older women are disproportionately represented relative to older men, indicating heightened difficulty in restoring livelihoods and adapting to displacement at an advanced age.
Persons with disabilities	Physical impairments (e.g. limb impairment, deafness) among surveyed PAPs require targeted mobility support and livelihood-adaptation assistance to participate fully in engagement and resettlement processes.
Market and RoW vendors	Face temporary loss of trading space and income, requiring livelihood restoration support.
Children and youth	Vulnerable to disruption of schooling and increased risk of child labour linked to the influx of construction workers into the area.
Legacy PAPs (Mpondagaga)	Previously assessed for compensation under an earlier contractor's project but never paid, creating a trust deficit; represented primarily through Mphonde Village Development Committees and requiring priority resolution.
Large / low-income, households	Heavy reliance on firewood for cooking, limited access to lighting, and dependence on boreholes for drinking water reflect limited resilience to displacement and resettlement-related disruption.

In line with OS7 and OS10, and the Malawi Guidelines' emphasis on inclusive, culturally appropriate engagement, the project will apply differentiated engagement measures for these groups, including: holding separate women-only sessions where cultural norms limit women's

participation in mixed meetings; scheduling meetings at times and locations accessible to vendors and elderly persons; providing information in Chichewa and other locally understood languages and in oral/pictorial form for those with low literacy; ensuring gender-balanced engagement teams; and prioritising resolution of the Mpondagaga legacy grievance to rebuild trust ahead of further construction activity.

3.4.1 Baseline Vulnerability Indicators from the Original RAP Socio-Economic Survey

The original RAP's household survey (2022–2024) provides a complementary baseline that pre-dates and corroborates the Addendum-phase findings above: a significant share of PAPs had no or only primary-level education, with women disproportionately represented among those with low or no formal education, consistent with the Addendum finding that two-thirds of female PAPs have only primary schooling; approximately 5% of PAPs reported a disability; and the main occupations of PAPs were small-scale commerce (37%) and arable farming (35%), with a notably higher share of women than men relying on farming as their main livelihood. These findings reinforce the continued need for oral, pictorial and Chichewa-language disclosure materials, and for livelihood restoration measures that reflect gendered occupational patterns among PAPs. The Addendum-phase household survey further confirms that 72.2% of PAPs rely on small-scale commerce (roadside vending/shop-keeping) and 25% on arable farming as their primary livelihood, with 69.4% relying on firewood for cooking, 41.7% lacking access to electricity or solar lighting, and 72.2% dependent on boreholes for drinking water, underlining the infrastructure deficits and limited resilience of the project area's population.

3.5 Stakeholder Representatives and Verification of Representation

Where engagement relies substantially on community representatives; Group Village Heads, Traditional Authorities, Village Development Committees and Market Committees, the RA and Consultant will make reasonable efforts to verify that such representatives genuinely reflect the views of the individuals and communities they claim to represent, including women, youth and vulnerable PAPs, and will supplement representative-led consultation with direct engagement (e.g. household-level consultation, FGDs) where representation appears incomplete. This is consistent with OS10's requirement (Section 2.2.5) that Borrowers verify representativeness where community representatives lead consultation, and reflects lessons already incorporated into the design of the Grievance Redress Mechanism committees (GRMCs) described in Chapter 7, whose fifteen-member composition specifically includes gender, youth and disability representation alongside Traditional Authority representatives.

CHAPTER 4: STAKEHOLDER ENGAGEMENT CONDUCTED TO DATE

4.1 Overview

The project has already undertaken three substantial rounds of stakeholder consultation, in addition to routine engagement embedded in the original RAP process: (i) antecedent consultations during the original RAP process (2022–2024); (ii) consultations conducted during preparation of the ESIA (November–December 2023, and subsequent follow-up); and (iii) a dedicated, extensive round of consultations conducted during preparation of the RAP Addendum (June 2024 – December 2025). This chapter records the methods used, the stakeholders reached, and the issues raised and responses provided.

4.1.1 Antecedent RAP-Stage Consultations and Compensation-Process Issues (2022–2024)

In addition to the ESIA-stage and RAP Addendum-stage consultations recorded below, the original RAP (February 2024) documents an earlier round of consultations conducted between 2022 and 2024 during the property inventory, valuation verification and household socio-economic survey. These included a two-day consultative workshop with the Nkhotakota District Environmental Sub-Committee and NGOs (including CISP), engagement with previously unreached stakeholders (NAWIRA, Nkhotakota Police Station, Central Region Water Board), and FGDs with Village Development Committees across the six Traditional Authorities.

Beyond the environmental and wildlife-related issues reflected in Table 4.2, PAPs raised a distinct set of compensation-process and administrative concerns during the household survey, summarised in Table 4.1. These issues remain directly relevant to the design of the GRM in Chapter 7, particularly regarding record-keeping, next-of-kin verification and payment methods.

Table 4.1: Compensation-Process Issues Raised During Original RAP Consultations (2022–2024)

Issue Raised by PAPs	RA Response / Action
Compensation should be sufficient for full replacement, paid before displacement.	PAPs compensated at full replacement cost before assets are taken and before works begin, for each phase.
Previous compensation pay-outs did not match the extent of loss (e.g. cost of rebuilding a shop).	RA holds records of prior payments; this RAP update exercise was initiated specifically to address such discrepancies.
Fruit trees undervalued given their income-generating value.	RA applies market value; valuation approach kept under review.
Compensation should account for devaluation of the Kwacha.	RA to factor currency devaluation into compensation calculations.
Some previously identified PAPs never received compensation.	RA holds records of prior payments; this exercise updates the RAP to capture outstanding cases.
Data collected from an absent household head's spouse could not be used to process compensation.	RA conducted, sensitisation meetings on the importance of providing accurate, up-to-date information during data collection.

Issue Raised by PAPs	RA Response / Action
Some registered PAPs died before pay-out, with no next-of-kin recorded.	RA verifies next of kin with evidence from all relevant parties, including chiefs, before making payments.
Some assets were omitted during valuation.	RA reviewing and updating the valuation process to ensure all eligible assets are considered.
Names misspelled during PAP registration prevented payment.	RA correcting misspelled names and maintaining accurate records for compensation.
Confusion over why tenants (not only landowners) were registered as PAPs.	RA to clarify the inclusion of tenants in the registration process through sensitisation meetings.
Dust from construction will affect businesses and households just outside the road reserve.	Dust suppression measures included in the ESIA/ESMP; affected parties informed of precautions.
Cases of people registering claims against other people's property.	RA investigates and rectifies false registrations and emphasises the importance of accurate information.

4.2 ESIA-Stage Consultations (2023)

Consultations for the ESIA followed the Environmental Impact Assessment Guidelines, the Environmental and Social Management Framework, and the Resettlement Management Framework. National-level consultations comprised 8 Key Informant Interviews (6 male, 2 female); district-level consultations comprised 9 KIIs and 2 Focus Group Discussions engaging 21 participants; and community-level consultations comprised 17 FGDs involving 112 male and additional female participants across the project's trading centres and villages. Consultations began with a visit to Nkhotakota District Council and the District Environmental Officer, followed by engagement with the Malawi Police Service and the District Grievance Redress Management Committees.

Table 4.2: Issues Raised During Initial ESIA Stakeholder Consultations

Stakeholder	Major Issue Raised	Suggested Enhancement / Mitigation
Nkhotakota Wildlife Reserve (Park Manager)	Soil erosion affecting fish habitats and spawning zones; increased visibility of human presence disturbing wildlife.	Avoid gravel extraction inside the park; consult agriculture/fisheries departments on breeding-site management; minimise tree cutting.
Nkhotakota District Council (DESC)	Increased business activity and improved transport; risk of HIV/AIDS transmission and GBV; increased accidents from speeding.	Provide loan facilities for business upgrades; implement road safety measures; sensitise locals and workers on HIV/AIDS and GBV risks.
Community men (FGD)	Demolition of houses/buildings; compensation concerns; spread of HIV/AIDS and COVID-19.	Compensate affected persons before works begin; conduct sensitisation campaigns; establish a compensation management committee.

Stakeholder	Major Issue Raised	Suggested Enhancement / Mitigation
Community women (FGD)	Increased spread of HIV/AIDS and COVID-19; disturbance to marriages and school classes.	Conduct HIV/AIDS and COVID-19 sensitisation meetings; monitor school children's activities.
Community market committees (FGD)	Loss of business; boost in tourism; increased demand for rent and food.	Provide alternative trading spaces and compensation; promote tourism investment; monitor recruitment for local employment.
Community youth (FGD)	Increased employment opportunities; enhancement of technology.	Involve local structures in recruitment; use updated machinery for technological advancement.
Department of Forestry (Deputy Director)	Removal of vegetation during construction; illegal movement of forestry resources; erosion and siltation.	Plan for tree replacement; involve communities in forestry protection; design drainage to minimise siltation.
Ministry of Transport, Roads Department (Deputy Director)	Poor condition of single-lane bridges; cargo overload; employment and skills-transfer opportunities.	Replace single bridges with double lanes; construct weighbridges to manage overloading; support women-owned businesses.

Follow-up District- and Community-Level Consultations

Follow-up district-level engagement raised concerns about potential human-wildlife conflict near the Nkhotakota Wildlife Reserve, deforestation and soil degradation, resettlement grievance handling, uncovered borrow pits, disruption from unresolved compensation issues, and boreholes/water infrastructure removal all of which informed the establishment of the Resettlement Working Group (RWG) structure and specific ESMP mitigation measures. Follow-up community-level consultations raised concerns about death of a PAP before payout, prioritisation of local labour, VDC involvement in valuation, timeliness of compensation, rushed valuation exercises, unclear land limits, and awareness of grievance-reporting procedures — each of which is directly addressed through the GRM design (Chapter 7) and the information disclosure arrangements (Chapter 6) of this SEP.

4.3 RAP Addendum-Stage Consultations (June 2024 – December 2025)

A further, structured and extensive round of consultations was conducted by the Roads Authority between June 2024 and December 2025 to inform the RAP Addendum, covering Dwangwa Township, the Weigh Bridge area, Liwaladzi, Nkhotakota Boma, and the trading centres of Loko, Yusufu, Chota, Sani, Kalimanjira, Chia and Thawe, as well as targeted engagement with utility companies (ESCOM, OCL, CRWB) and with landowners at campsites, borrow sites and quarry sites. Approximately 60% of participants were men and 35% women, with youth and children representing approximately 5% of attendance; participant ages ranged from 18 to 86 years. The process followed a phased approach — initial notification, property inspection, census, disclosure and negotiation, verification, and final consent signing — to ensure Free, Prior and Informed Consent (FPIC) at each stage. Focus Group Discussions were held with vendors and business owners, while shop and property owners received individual consultations; the District Commissioner's Office facilitated community notification through public meetings and formal evacuation notices to already-compensated PAPs. The consultation team comprised representatives from the District Commissioner's Office, the RA Project Implementation Unit, the

Roads Fund Administration, the Lands Department, Grievance Redress Mechanism Committees, local market committees, and traditional leaders.



Table 4.3: Key Issues Raised and Responses During RAP Addendum Consultations

Issue Raised / Stakeholder	Response / Recommendation	Resolution
Money vendors (Airtel, TNM, etc.), fear of loss of livelihood during relocation	Once compensated, PAPs must vacate to allow construction; all measures taken to help find alternative places and support continuation of business.	PAPs compensated, avoiding loss of livelihood.
Fruit and vegetable sellers - request for alternative trading place nearby	Market Committee to provide alternative places; a disturbance allowance paid to ease relocation.	RA to work with local structures to publicise new marketing places.
Second-hand cloth vendors - dust may soil goods and reduce business	Dust suppression at trading centres to be a priority during construction.	RA to work with GRM committees to ensure the issue is addressed.
Taxi and minibus drivers - need advance vacation notice; fear of losing customers/accidents	Vacation notices via District Council; disturbance allowance; alternative places via market committees; safety measures and diversion routes.	Community sensitisation to be done jointly with the District Council.
Market Committees - concerns on compensation delays, notice periods, committee remuneration	Grievance committees established and trained along the entire road section; DC office also receives and resolves grievances; advance notification for future meetings; market committees closely involved in all stages.	A modest budget for market committees may be considered if necessary.
ESCOM- power lines within road reserve	Project to allocate funds for protective works for all affected infrastructure.	Ongoing coordination.
Mphonde VDCs (FGD) - past unresolved resettlement issues (Mpondagaga legacy)	Address prior grievances before new project activities.	RA resolved these grievances; PAPs have signed agreement forms.

Issue Raised / Stakeholder	Response / Recommendation	Resolution
PAPs - how will payments be made?	Explore digital or bank-based payment methods.	PAPs with compensation below MWK 100,000 paid cash; those above paid by cheque.
Mphikapika/ Kamwala School – learners’ safety from quarry and road construction activities	Contractor to enforce speed limits, clear signage and flagmen/controllers within the school zone Blasting and quarry activities scheduled outside school hours with advance warning given to the school administration Safe pedestrian crossing points and, where needed, temporary barriers provided near the school Road safety sensitization conducted for learners and teachers.	RE and Contractor conducting joint safety inspections with the School and District Education Office; school zone safety measures implemented and monitored on an ongoing basis.
Market vendors, - loss of livelihood	A Livelihood Restoration Plan prepared and implemented targeting vulnerable groups.	Livelihood restoration measures included to prevent PAPs being worse off than before.

4.4 Achievements and Lessons Learnt

The Addendum-phase consultations achieved complete identification Project-Affected Persons associated with the revised project scope, while embedding FPIC principles throughout. Key lessons for the forward engagement programme under this SEP (Chapter 5) include: the importance of adequate advance notice for meetings (a concern specifically raised by the Market Committees); the need to resolve legacy grievances (Mpondagaga) before new project activities proceed, in order to maintain community trust; the value of involving Village Development Committees and Market Committees directly in asset verification and communication; and the need for a functioning, adequately resourced and closely monitored Livelihood Restoration Plan for displaced vendors and traders.

CHAPTER 5: STAKEHOLDER ENGAGEMENT PROGRAMME GOING FORWARD

5.1 Objectives of the Ongoing Engagement Programme

Building on the consultations already documented in Chapter 4, the Roads Authority, Supervising Consultant and Contractors will continue engagement throughout the remaining preparation, construction and operation phases of the project, with the objectives of: maintaining transparency and accountability for environmental and social performance; providing continuing opportunities to discuss interests and concerns and resolve issues; and working in partnership with communities so that the project contributes to their own development priorities.

5.2 Engagement Methods and Dimensions

The project will apply a range of complementary consultation methods, selected according to stakeholder type, literacy, gender and power dynamics, and the objective of each engagement. The following channels, several of which are already in use, will be maintained and expanded as required:

- **Community meetings:** structured gatherings involving the RA/Contractor, stakeholders and, where relevant, government representatives, for two-way exchange of information, views, concerns and suggestions.
- **Focus Group Discussions (FGDs):** targeted sessions with specific interest groups (e.g. women, youth, vendors, the elderly, persons with disabilities) to eliminate power barriers and enable full participation.
- **A Contractor field team / site liaison committee** that collaborates with nearby communities, local authorities, PAPs and other stakeholders to maintain community relations and provide a forum for exchange on ESHS performance.
- **A Contractor office** in the project area providing information on employment, procurement and contracting opportunities and responding to public queries.
- **Guided site tours and open houses** at key construction milestones, displaying project sketches, maps and information with representatives present to answer questions.
- **Presentations and formal meetings** with stakeholder groups, business groups, and district/sector officials.
- **Advisory/liason committees** comprising a balanced cross-section of affected people, groups and organisations, providing an ongoing forum for exchange of information and views.
- **Project email address and dedicated phone line(s)** for stakeholders to express views, concerns or requests for information.
- **Public notice boards, radio announcements, local print media** and, where feasible, the RA/project website.
- **Correspondence** (telephone, SMS, email, WhatsApp) for institutional stakeholders and utility/service providers.
- **Door-to-door and small-group engagement** for PAPs, vendors and vulnerable groups who may not be reached effectively through public meetings.
- **Public hearings**, convened where necessary by MEPA following ESIA/SEP submission, to assess public opinion prior to decision-making.



5.3 Engagement Matrix by Project Phase

Table 5.1: Engagement Activities During Project Preparation / Pre-Construction

Stakeholder Group	Information to Convey / Collect	Method	Timing / Frequency	Responsibility
Roads Authority / PIU, AfDB	Progress on outstanding compensation (incl. Mpondagaga legacy), updated RAP Addendum, revised construction schedule	Formal correspondence, one-on-one meetings, joint review meetings	Monthly and at key milestones	RA / PIU
Nkhotakota District Council	Final designs, construction schedule, list of PAPs, coordination of GRM	Formal meetings, letters, workshops	Prior to mobilisation and quarterly thereafter	RA / District Council
Traditional Authorities, GVHs, VDCs, Market Committees	Compensation schedules, relocation timing, alternative trading sites, RoW boundaries	Community meetings, chiefs' barazas, door-to-door notices	Prior to site handover; ongoing	RA / District Council / Consultant
PAPs (incl. vendors, taxi/kabanza operators, Mpondagaga legacy PAPs)	Compensation entitlements, payment schedule, disturbance allowance, livelihood restoration options, vacation notices	Individual consultations, public notices, FGDs, radio announcements	Before site handover; individualised notice before relocation	RA / District Lands Office / Consultant
Utility and service providers (ESCOM, CRWB, OCL, Airtel)	RoW infrastructure mapping, relocation/protection plans, cost estimates	Joint site visits, formal letters, technical meetings	Prior to construction start; as needed	RA / District Council

Stakeholder Group	Information to Convey / Collect	Method	Timing / Frequency	Responsibility
African Parks (Nkhotakota Game Reserve)	Reserve boundary and wildlife corridor data, sensitive habitat locations, alignment siting review, proposed encroachment-control and speed-management measures, Notification for blasting at Mphikapika Quarry site.	Joint site visits, technical meetings, formal correspondence	Prior to construction start; as needed during detailed design	RA / Consultant / African Parks
Vulnerable groups (women, elderly, PWDs, RoW vendors)	Tailored information on entitlements, livelihood restoration, GBV/SEA referral pathways	Separate/women-only sessions, home visits, oral/pictorial materials	Ongoing, with priority before relocation	Consultant Social/Gender Specialist, GBV Service Provider

Table 5.2: Engagement Activities During Construction

Stakeholder Group	Information to Convey / Collect	Method	Timing / Frequency	Responsibility
Communities along the corridor	Construction schedule and traffic diversions, employment/procurement opportunities, ESHS performance, GRM access	Contractor site notices, community meetings, contractor liaison office, radio	Continuous throughout construction; at least monthly	Contractor / Consultant
Nkhotakota District Council, Traditional Authorities	Progress updates, emerging issues, GRM performance	Formal meetings, monthly reports	Monthly / quarterly	RA / Consultant / Contractor
PAPs and vulnerable groups	Compensation status, livelihood restoration progress, GBV/SEA referral information	Individual follow-up, FGDs, GRM committees	Ongoing	Consultant Social Specialist, Contractor
Workers (Contractor and sub-contractor employees)	Code of conduct, workers' GRM, HIV/AIDS and GBV awareness, occupational health and safety	Induction training, toolbox talks, grievance boxes	At induction and ongoing	Contractor HR / HSE Officer
Utility and service providers	Coordination of relocation works, conflict resolution	Joint inspections, formal correspondence	As needed, target 2-week response	RA / Contractor
African Parks (Nkhotakota game Reserve)	Progress on encroachment control, wildlife crossing points, speed-limit enforcement, wildlife-strike incidents and human-wildlife conflict mitigation, Notification	Joint site inspections, toolbox talks on human-wildlife conflict, formal correspondence	Monthly, and immediately as incidents arise	Contractor / Consultant / African Parks

Stakeholder Group	Information to Convey / Collect	Method	Timing / Frequency	Responsibility
	for Blasting at Mphikapika Quarry site			
General public / road users	Traffic management, diversion routes, safety	Road signage, radio, press notices	Ongoing during civil works	Contractor

Table 5.3: Engagement Activities During Operation / Post-Construction

Stakeholder Group	Information to Convey / Collect	Method	Timing / Frequency	Responsibility
Communities, District Council, Traditional Authorities	Completion handover, maintenance arrangements, residual grievances, road safety	Public meetings, completion report, radio	At project completion and annually during defects/maintenance period	RA / District Council
PAPs and vulnerable groups	Outcomes of livelihood restoration, closure of outstanding grievances	Follow-up visits, GRM records review	Post-construction monitoring period (as defined in RAP M&E plan)	RA / Independent M&E
African Parks (Nkhotakota Game Reserve)	Post-construction performance of wildlife crossing points and speed-management measures, residual conservation concerns, road safety adjacent to the Reserve	Follow-up meetings, joint monitoring visits, monitoring reports	At project completion and periodically during the defects/maintenance period	RA / District Council / African Parks

5.4 Differentiated Measures for Vulnerable and Disadvantaged Groups

The following differentiated measures will be applied throughout implementation:

- Separate engagement sessions for women where cultural norms limit their ability to speak freely in mixed-gender settings, facilitated where possible by female team members;
- Priority, individualised engagement with legacy PAPs at Mpondagaga to close out the outstanding 2019 compensation matter and rebuild trust before further works proceed in that area;
- Advance, written vacation notices (through the District Commissioner's Office) for vendors, taxi and bicycle-taxi (kabanza) operators, with disturbance allowances and identification of alternative trading/parking sites through Market Committees before relocation;
- Accessible formats (oral briefings, pictorial materials, local language) for PAPs with low literacy, and provisions (e.g. sign-language interpretation on request) for persons with sensory disabilities;
- Referral pathways to GBV/SEA/SH service providers and One Stop Centres for survivors, coordinated through the Ministry of Gender, Community Development and Social Welfare's Technical Working Groups; and

- Monitoring of the Livelihood Restoration Plan's uptake by vulnerable vendors to confirm that relocation measures are not leaving them worse off than before the project.
- Joint monitoring with African Parks of wildlife crossing points and speed-management measures adjacent to the Nkhotakota Wildlife Reserve, to confirm that mitigation is protecting both road users and wildlife.

CHAPTER 6: INFORMATION DISCLOSURE

6.1 Information to be Disclosed

The project will provide stakeholders with access, in non-technical form, to the purpose, nature, and scale of the project and its area of influence; the duration of proposed activities; risks and impacts on local communities and proposed mitigation, including impacts that may disproportionately affect vulnerable groups; opportunities and development benefits; the stakeholder engagement process and how stakeholders can participate; locations where disclosed information can be reviewed; the time and venue of public consultation meetings and how they will be notified, conducted and reported; and the process for raising and resolving grievances, including access to the project GRM and the AfDB's Independent Recourse Mechanism (IRM).

6.2 Disclosure Methods, Formats and Languages

Information will be disclosed in Chichewa and English, and in formats appropriate to different stakeholder groups, including non-technical summaries, leaflets, posters, radio announcements, oral briefings and, where literacy is low, pictorial or model-based materials. Materials will be made available through district and community notice boards; chiefs' and Group Village Heads' offices, local radio, the Contractor's site office, and (where accessible) the RA/project website. Where materials contain personally identifiable information, such as individual compensation amounts, these will be disclosed to the individual concerned and redacted before any public disclosure of aggregate data.

6.3 Disclosure Schedule

Table 6.1: Key Documents and Disclosure Arrangements

Document / Information	Disclosure Channel	Language / Format	Timing
This SEP (draft and final)	RA/District Council notice boards, project website (where available), community meetings, district workshops, AfDB website	English and Chichewa	Prior to further construction activity, with updates as required
ESIA and ESMP summaries	Non-technical summaries, community meetings, MEPA/District Council offices	English and Chichewa	Already disclosed; re-disclosed on request
RAP and compensation schedules	Individual disclosure to PAPs, public notices for aggregate information (personal data redacted), District Council	English and Chichewa, oral explanation where needed	Already disclosed
Construction schedule, traffic diversions and safety information	Site notices, radio, contractor liaison office, community meetings	English and Chichewa	Updated monthly and at key milestones

Document / Information	Disclosure Channel	Language / Format	Timing
Employment and procurement opportunities	Contractor office, community meetings, notice boards	English and Chichewa	At mobilisation and as vacancies arise
Grievance mechanism procedures, and contact points	Posters at trading centres and campsites, community meetings, GRM committee members	English and Chichewa	Ongoing, reinforced through sensitisation campaigns
Monitoring and progress reports	District Executive Committee meetings, community feedback sessions, annual stakeholder engagement report	English and Chichewa (summary)	Quarterly / annually

6.4 Confidentiality

The project will balance transparency with the protection of personal data. Names, addresses, telephone numbers, income and health information collected during census, valuation and grievance-handling processes will be treated as confidential and will not be disclosed in a manner that identifies specific individuals or households, except where disclosure is required by law or with the individual's explicit consent.

CHAPTER 7: GRIEVANCE REDRESS MECHANISM

7.1 Overview and Objectives

The project's Grievance Redress Mechanism (GRM) is a set of structures, procedures and processes through which complaints, queries, or clarifications about the project are received, tracked, and resolved. It provides a platform for stakeholder engagement in the management of grievances and helps improve the project's social performance. It does not replace, and does not prevent access to, national judicial or administrative remedies or the AfDB's Independent Recourse Mechanism (IRM); rather, it seeks to resolve issues quickly, fairly and at no cost to the complainant before resort to the formal court system or IRM becomes necessary.

7.2 Guiding Principles

- Fairness, objectivity and independence;
- Simplicity and accessibility, including for illiterate, disabled, and geographically remote PAPs;
- Responsiveness and efficiency, with defined resolution timeframes;
- Speed and proportionality to the nature of the grievance;
- Participation and social inclusion, including incorporation of Traditional Authority and Area Development Committee members, given that communities traditionally approach traditional leaders to resolve land, tree and housing disputes;
- Confidentiality, including for the complainant's identity where requested; and
- No cost to the complainant, and no retaliation or reprisal against anyone who raises a grievance.

7.3 Institutional Structure

The GRM operates at two formal levels namely community/project level and district level.

7.3.1 Community / Project Level

Two committees operate at the community/project level as the first point of entry for grievances:

Community Grievance Redress Management Committee (CGRMC): handles community issues including environmental concerns (e.g. dust at diversions, competition for water), social issues (land acquisition, property damage, sexual harassment, child labour, security, GBV/VAC), local employment, and unfulfilled development commitments.

CGRMC Membership

CGRMC Membership
Business Men Representative
Youth Representative
Women Representative
Local NGO Representative
Religious Representative

CGRMC Membership
Community (Village) Leader, e.g. Group Village Head
Community Policing Representative
Social Welfare Officer
Child Protection Officer
GBV Service Provider

Workers Grievance Redress Management Committee (WGRMC): the primary reference point for Contractor and sub-contractor workers' complaints, concerns, injustices, or working-condition issues. Grievance boxes are provided at strategic locations to facilitate anonymous reporting.

WGRMC Membership

WGRMC Membership
Finance and Administration Personnel
Human Resources Officer
Health and Safety Officer
Social Specialist
Environmental Specialist
Workers' Representatives (1 per section / group of workers)

7.3.2 District Level

The District Grievance Redress Management Committee (DGRMC) handles grievances not resolved at the community/project level, reviews CGRMC/WGRMC decisions, and serves as an appeal point before resort to the Courts of Law.

DGRMC Membership

DGRMC Membership
Director of Public Works
District Gender and Social Welfare Officer
District Lands Officer
District Labour Officer
NGO Representative
District Environmental Officer
Police Officer (Victim Support Unit)
Roads Authority Representative
Magistrate

DGRMC Membership

District Health Officer

7.4 Grievance Uptake Channels

Grievances may be lodged verbally to any member of a GRM committee, the Contractor or the Consultant; in writing (including via grievance/suggestion boxes at trading centres, campsites and the Contractor's site office); by phone, SMS or WhatsApp message; by writing to the RA Project Coordinator; or through GBV/HIV-AIDS service providers for sensitive cases. PAPs unable to write may seek assistance and confirm the grievance note with a thumbprint

7.5 Grievance Redress Process and Timeframes

Table 7.1: GRM Process Stages

Stage	Description	Indicative Timeframe
1. Complaint uptake	PAPs present complaints/grievances to the CGRMC/WGRMC or RWG in their locality, in writing, orally, by phone/SMS/WhatsApp, or via grievance boxes at trading centres and campsites. Anonymous complaints are accepted.	At point of grievance
2. Registry	All grievances are recorded in a Grievance Community Log and Resolution Form (triplicate) and entered into an accessible registry maintained at both project/community and district levels.	Within 24 hours of uptake
3. Assessment, acknowledgement and response	The CGRMC/WGRMC/RWG investigates the complaint, liaising with the RA and District Lands Officer as needed to verify claims, and provides an initial response.	Within 7–14 days (up to a full growing season for complex land/property valuation cases)
4. Resolution or closure	Where the complainant accepts the resolution, they sign the resolution/closure section of the Grievance Log; the Chairperson and Secretary countersign. Unresolved cases are referred to the DGRMC, and ultimately to the Courts of Law if not resolved administratively.	At agreement; case remains open pending referral otherwise
5. Evaluation	Grievance data are analysed periodically (alongside routine M&E) to identify trends, systemic issues and lessons for the engagement programme.	Quarterly / alongside project M&E cycle

As a general standard, the project targets resolution within 7 days at the community/project level and a further 7 days at the district level; more complex land, tree, or property valuation grievances may require up to a full agricultural season to allow PAPs adequate time to present their case, consistent with local practice, provided the complainant is kept informed on a weekly basis of progress.

7.6 Handling of GBV, SEA, Sexual Harassment, and VAC Grievances

All Gender-Based Violence, Sexual Exploitation and Abuse, Sexual Harassment, and Violence Against Children (GBV/SEA/SH/VAC) grievances are referred to the designated GBV Service Provider, working with Technical Working Groups under the Ministry of Gender, Community

Development and Social Welfare, and, where criminal conduct is alleged, to the Malawi Police Service (including One Stop Centres where available). GRM committee members receiving such a disclosure will react calmly and listen without judgment; reassure the complainant of their right to raise the concern and of confidentiality; ask only the questions necessary to refer the case; prioritise the survivor's safety and access to services (including medical attention via the GBV referral pathway); record information accurately for potential disciplinary or legal action while protecting the survivor's dignity; and inform the complainant of next steps.

Survivors retain the right to decline to have parts of their story documented, to decline any question, to pause the process, to request a different caseworker, and to access or request the deletion of their personal data. Case files are stored individually, are not labelled with the client's name on the outside, and are kept in locked storage accessible only to authorised personnel.

7.7 Labour-Related Grievances

Individual labour disputes (e.g. relating to pay, conditions or dismissal) and collective labour disputes are channelled first through the WGRMC and were unresolved, referred to the Nkhotakota District Labour Office for resolution in accordance with Malawi's labour laws, the District Labour Officer being a member of the DGRMC.

7.8 Grievances from Utility and Service Providers

Utility and service companies with infrastructure affected by the works (ESCOM, Central Region Water Board, Open Connect Limited, Airtel) may raise concerns through formal letter or email to the RA or Consultant. RA representatives will engage the affected company for discussion and consensus, aiming to close issues within two weeks or provide weekly status updates where resolution takes longer. Emergency procedures are in place between the project and these companies for urgent infrastructure issues.

7.9 Summary of Grievances Received to Date

During the RAP Addendum process, the project received 21 resettlement-related grievances through the six Community Grievance Redress Committees and a further 500 through the District Council, most relating to PAPs believing they had been omitted from the census, assets not captured, or confusion about compensation for relocation within the 60 m road reserve versus the 36 m corridor. Grievances relating to omissions were resolved by capturing the affected PAPs and assessing their assets; misunderstandings about the road reserve are being addressed through targeted awareness campaigns. Table 7.2 summarises grievance categories recorded by GRMC by location. The legacy Mpondagaga grievance (60 PAPs, 2019 Mota-Engil contract) has been resolved in principle, with signed agreement forms, pending disbursement of payment.

Table 7.2: Sample of Grievances Received from Nkhotakota DGRC and CGRCs

GRMC	Location	Classification	Nature of Grievance	Corrective Measures Adopted
Mphonde	Lozi	Name mismatch; stakeholder engagement; eviction concerns	Name mismatches for two PAPs; community concerns over who will be affected by eviction notices.	Community sensitisation planned.

GRMC	Location	Classification	Nature of Grievance	Corrective Measures Adopted
Mphonde	Pendwe	Incomplete assessment; compensation (missed assets); livelihood-related	shops missed during initial assessment; market shade for traders not assessed.	Assessment of all traders, including market shade and kiosks.
Kanyenda	Mphikapika	Stakeholder engagement; livelihood-related	Market/shed of traders along the road not captured.	Assessment of all traders with a market shade; assessment of kiosks.
Kanyenda	Kautaka	Incomplete assessment; compensation (missed assets); livelihood-related	shops missed in initial assessment; market shade for traders not captured.	Assessment completed.
Kanyenda	Liwalazi	Incomplete assessment; compensation (missed assets)	Market shade and kiosks for traders not assessed but eviction notices received.	Assessment of all traders with a market shade and kiosks.

7.10 Recourse Beyond the Project GRM

Where a complainant is not satisfied with the outcome at the community or district level, they retain the right to pursue redress through Malawi's formal court system, and, in respect of AfDB-financed activities, may also access the AfDB's Independent Recourse Mechanism (IRM). Use of the project GRM does not preclude, delay, or prejudice access to these external mechanisms.

CHAPTER 8: INSTITUTIONAL ARRANGEMENTS AND ROLES AND RESPONSIBILITIES FOR SEP IMPLEMENTATION

8.1 Overview and Institutional Set-Up for SEP Implementation

Unlike the institutional arrangements for RAP implementation (which centre on compensation, valuation and resettlement delivery, and are set out in full in the RAP and RAP Addendum), this chapter defines institutional arrangements and roles and responsibilities specifically for implementing this Stakeholder Engagement Plan that is, for stakeholder identification and analysis, information disclosure, consultation, and grievance redress, across the remaining project life cycle. It responds directly to OS10's requirement that Borrowers define clear roles, responsibilities and authority, and designate specific personnel with competency and experience in stakeholder engagement, to be responsible for implementing and monitoring stakeholder engagement activities and for compliance with OS10, backed by sufficient dedicated human, technical and financial resources clearly designated in the project budget (see Chapter 10).

8.2 African Development Bank (AfDB)

- Review and clear this SEP, and any subsequent significant updates, prior to disclosure and prior to project appraisal/further implementation, consistent with OS10 paragraph 15;
- Supervise RA compliance with OS10, OS1, OS2, OS5 and OS7 commitments made in this SEP, including through periodic supervision missions;
- Provide the Independent Recourse Mechanism (IRM) as a recourse channel of last resort for stakeholders dissatisfied with the project-level GRM outcome (Chapter 7).

8.3 Roads Authority (RA) / Project Implementation Unit (PIU) — SEP Owner

The RA, acting through its PIU, is the institutional owner of this SEP and bears ultimate responsibility for its implementation. Specific SEP-related responsibilities are to:

- Designate a named SEP Focal Point within the PIU, with the competency and experience in stakeholder engagement, responsible for day-to-day oversight of SEP implementation and serving as the primary liaison with the AfDB on SEP matters;
- Provide overall oversight of this SEP, ensuring compliance with contractual obligations, national law and AfDB Operational safeguards;
- Liaise between project entities, financiers (AfDB) and the Government of Malawi on stakeholder engagement and disclosure matters;
- Approve and clear updates to the SEP with the AfDB, and ensure any significant update is publicly disclosed;
- Lead resolution of legacy and cross-cutting grievances (e.g. Mpondagaga) and coordinate with the District Council and Roads Fund Administration on compensation disbursement as it relates to grievance closure;
- Maintain the living stakeholder register (Annex 1) and the consolidated grievance database across all GRM tiers;

- Ensure adequate budget is allocated and disbursed for SEP implementation, consistent with Chapter 10.

8.4 Supervising Consultant / Resident Engineer

The Supervising Consultant, through its dedicated Environmental and Social Supervision Team, is responsible for the operational, day-to-day implementation of this SEP's engagement, disclosure and GRM support functions:

- Maintain dedicated Environmental, Social and Health & Safety (E&S/H&S) personnel, responsible for reviewing and supervising the Contractors' implementation of the stakeholder engagement and GRM components of their respective CESMPs;
- Act as the day-to-day point of contact for consultation and feedback between the RA/PIU, stakeholders and the general public;
- Support and verify the Contractors' community liaison, disclosure and grievance-uptake activities described in Chapters 5 and 7;
- Compile and submit monthly, quarterly and end-of-project E&S/H&S and stakeholder engagement reports to the RA, consistent with Chapter 9;
- Provide social and gender specialist support for differentiated engagement with vulnerable groups (Section 5.4) and support GBV/SEA/SH referral pathways (Section 7.6).

8.5 Contractors

- Develop and implement the Contractor's Environmental and Social Management Plan (CESMP), aligned with the ESIA, ESMP and this SEP, including establishment and resourcing of the Workers Grievance Redress Management Committee (WGRMC) and site-level GRM channels (grievance boxes, liaison office);
- Establish and staff a Contractor field team / site liaison office as described in Section 5.2, providing information on employment, procurement and contracting opportunities and a point of contact for community queries;
- Provide a safe working environment and communicate ESHS requirements, including the project Code of Conduct on GBV/SEA/SH and child protection, to all workers and sub-contractors, through induction training and ongoing toolbox talks;
- Prioritise local hiring (minimum 70%) and gender-balanced employment (target 40% women), and disclose employment/procurement opportunities per Section 6.3;
- Report ESHS incidents and grievances to the Consultant within 24 hours of occurrence, and support timely resolution consistent with Chapter 7 timeframes;
- Coordinate directly with utility and service providers on relocation/protection works affecting their infrastructure (Section 7.8).

8.6 Ministries, Departments, and Agencies (MDAs)

- The Ministry of Lands, Housing and Urban Development provides technical valuation expertise underpinning the compensation-related information disclosed to PAPs under Chapter 6, and supports verification of PAP identity and asset ownership in coordination with the CGRMC during grievance investigation (Section 7.5);

- The Ministry of Gender, Community Development and Social Welfare chairs and resources the Technical Working Groups that support GBV/SEA/SH referral pathways (Section 7.6) and provides technical guidance on gender-responsive engagement (Section 5.4);
- The Ministry of Water and Sanitation (Water Resources Department – Ground Water Division) and the National Water Resources Authority provide technical clearance and guidance where project works intersect boreholes, water points or watercourses, and participate in relevant joint site inspections (Section 7.8);
- Roads Fund Administration (RFA) acts as the independent financial agent for compensation disbursement, informing the disclosure schedule at Table 6.1 and grievance resolution timelines linked to payment;
- All listed Ministries and bodies participate as needed in DGRMC deliberations (Section 7.3.2) and district monitoring visits, and are kept informed through the quarterly and annual reporting cycle (Section 9.2.2).

8.7 Nkhotakota District Council

- Link the Contractor and RA to local communities and Traditional Authorities for engagement and disclosure purposes;
- Mobilise communities in support of the project and facilitate public meetings and evacuation notices (Section 4.3, Section 5.3);
- Participate in the DGRMC and report on ESHS law/policy compliance to the District Executive Committee;
- Manage the two vendor transition hubs at Nkaika and Nkhotakota Boma (Section 5.4);
- Support verification of PAPs and community representatives, and coordinate with utility/service providers on infrastructure relocation.

8.8 Other District-Level Stakeholders, Including African Parks (Nkhotakota Wildlife Reserve)

The Other District-Level Stakeholders identified are engaged proportionately to their sectoral interest, principally by sharing technical data early in design, participating in sensitisation and joint monitoring, and (for the Police Victim Support Unit and District Labour Office) supporting GBV/SEA/SH and labour grievance referral pathways under Sections 7.6 and 7.7 respectively.

African Parks, as co-manager of the Nkhotakota Wildlife Reserve through which the alignment passes, warrants distinct, dedicated engagement given the scale of its interest and influence, and is engaged specifically to:

- Share Reserve boundary, wildlife corridor and sensitive-habitat data with the RA and Consultant early in design and prior to any works adjacent to the Reserve boundary;
- Participate in joint site inspections and Contractor toolbox talks on human-wildlife conflict mitigation, particularly regarding haulage routes and borrow/quarry sites near the Reserve;
- Help define and enforce speed limits, signage and designated wildlife crossing points during both construction and operation; and
- Sit on the DGRMC, or be consulted directly, for any grievance or incident involving Reserve land, wildlife strikes, or encroachment attributable to the project.

8.9 Utility and Service Providers

ESCOM, the Central Region Water Board, Open Connect Limited (OCL) and Airtel each hold infrastructure within the road reserve and are engaged as a distinct stakeholder group, consistent with Table 3.1, to:

- Provide the RA and Contractor with accurate as-built infrastructure data ahead of construction in their respective sections;
- Assign personnel for joint site inspections prior to and during relocation/protection works (Section 7.8);
- Confirm relocation and protection costs and schedules promptly, and notify the RA/Consultant of any emergency infrastructure issues arising during construction.

8.10 Malawi Environmental Protection Authority (MEPA)

Consistent with its role under the Malawi Guidelines for Environmental Impact Assessment (Section 2.5.1), MEPA supported by its Advisory Committee on Environmental and Social Assessment and its Board, retains national regulatory oversight of this SEP's parent ESIA and its stakeholder engagement/disclosure provisions, including the authority to invite public comment or convene a public hearing on the ESIA under Section 4.6.7 of the Guidelines, and to conduct or commission periodic environmental and social audits under EMA Section 32. RA and the Consultant will provide MEPA with copies of this SEP, engagement records and grievance summaries on request, and will notify MEPA of any significant SEP update alongside AfDB disclosure (Annex 3).

8.11 Traditional Authorities, Group Village Heads, VDCs, Market Committees and Community Grievance Redress Mechanism Committee (C-GRMc)

- Facilitate community-level notification, mobilisation and consultation;
- C-GRMc- (one per Traditional Authority) receive, deliberate on and help resolve land/property grievances, and assist in verifying property ownership;
- Market Committees coordinate with vendors on alternative trading sites and disturbance allowances;
- Support enforcement of RoW boundaries and reporting of encroachment to the RA/District Council.

8.12 Project-Affected Persons, Communities and Civil Society

- Participate in public consultations, sensitisation sessions and training;
- Communicate concerns and grievances through the established GRM channels described in Chapter 7;
- Participate in grievance redress committees (CGRMC) where selected as representatives, subject to the representativeness safeguards at Section 3.5;
- Civil society organisations and NGOs may monitor SEP/RAP implementation and advocate for PAP rights, consistent with their role identified in Table 3.1.

8.13 GBV/SEA/SH, Child Protection and Health Service Providers

- Implement, monitor and report on GBV/SEA/SH and child-labour related interventions and referral pathways described in Section 7.6;
- Provide HIV/AIDS and other communicable-disease prevention and response services to project workers and communities, feeding into the disclosure and engagement content of Chapters 5 and 6.

8.14 Media

Print, radio, television and social media outlets are engaged as a distinct disclosure channel (Section 6.2) and are expected to disseminate accurate, balanced and timely project information sourced from the RA or Consultant, particularly around disclosure milestones, construction milestones and any grievance-escalation events

8.15 Capacity, Training and Resourcing Commitments

The RA/PIU will ensure that: the designated SEP Focal Point and Consultant Social Specialists have written job descriptions and clear lines of authority and responsibility; GRM committee members receive periodic refresher training on GRM procedures, confidentiality and GBV/SEA/SH referral protocols; and third-party specialists (e.g. GBV/SEA service providers, gender specialists) supplement RA/Consultant/Contractor capacity where required, without the RA outsourcing overall ownership of the engagement process. Budget provision for these capacity commitments is set out in Chapter 10.

CHAPTER 9: MONITORING, EVALUATION AND REPORTING

9.1 Monitoring Indicators

Implementation of this SEP will be monitored using indicators including, but not limited to:

- Number and type of engagement activities held per quarter, disaggregated by stakeholder group and by sex;
- Number of grievances received, resolved and outstanding, disaggregated by category (land/compensation, environmental, labour, GBV/SEA/SH, utility) and by resolution timeframe achieved against target;
- Proportion of grievances resolved within the target timeframe (7–14 days at community/district level);
- Number and outcomes of GBV/SEA/SH cases referred to service providers;
- Status of the Mpondagaga legacy grievance and other outstanding legacy issues;
- Uptake and outcomes of the Livelihood Restoration Plan among vulnerable vendors and PAPs;
- Frequency and coverage of information disclosure activities against the schedule at Table 6.1; and
- Number and representativeness (gender, vulnerability) of members serving on GRM committees and RWGs, consistent with Section 3.5.

9.2 Reporting

9.2.1 Monthly Reports

The Consultant's Environmental and Social Specialists will compile monthly ESHS and stakeholder engagement reports summarising engagement activities undertaken, grievances received and their status, and any emerging issues requiring RA or AfDB attention.

9.2.2 Quarterly and Annual Reports

Quarterly and annual stakeholder engagement reports will be submitted to the RA and shared with the AfDB, summarising engagement trends, grievance statistics, and the effectiveness of mitigation measures, and will inform any necessary updates to this SEP.

9.2.3 Reporting Back to Communities

The RA, Consultant and Contractors will report back to communities and PAPs on how their feedback has been incorporated into project and mitigation design, through community meetings, radio broadcasts and notices at trading centres and campsites, at least annually and whenever significant changes are made to the project or this SEP.

CHAPTER 10: IMPLEMENTATION BUDGET

The table below sets out the estimated budget for implementation of the stakeholder engagement and grievance redress activities described in this SEP, consistent with the budget already provided in the ESIA and to be read alongside the resettlement and livelihood restoration budgets set out in the RAP Addendum.

Note on scope: the budget below is specific to stakeholder engagement and GRM operation under this SEP. It is distinct from and additional to: (i) the compensation, livelihood restoration, and resettlement assistance budgets set out in the RAP Addendum (inclusive of a dedicated Stakeholder Engagement covering consultations, awareness raising, disclosure and grievance management within that instrument); and (ii) the broader RAP implementation budget set out in the original RAP (February 2024), which itself included a dedicated stakeholder engagement budget line covering the Resettlement Steering Committee, PIU, PAP Committee and Implementing Agent under the original institutional design described in Section 8.12. RA and AfDB should ensure these budget lines are reconciled across instruments and not double-counted.

Table 10.1: Budget for Implementation of the Stakeholder Engagement Plan and GRM

Item	Description	Total Cost (MWK)	Total Cost (USD)	Source of Financing
1	Stakeholder engagement activities (public meetings, FGDs, radio, printed materials, disclosure)	72,000,000	42,774.88	AfDB credit / GoM
2	Implementation and monitoring of the GRM (committee operations, training, logbooks, grievance boxes)	72,000,000	42,774.88	AfDB credit / GoM
3	Livelihood restoration support for vulnerable vendors and PAPs	As costed in RAP Addendum / Livelihood Restoration Plan	–	AfDB credit / GoM
4	GBV/SEA/SH and child-protection service provision and referral pathways	As costed in ESMP	–	AfDB credit / GoM
5	Grievance Redress Committees (GRMCs) operations across the District and Community Level	As costed in RAP Addendum	–	AfDB credit / GoM
	Sub-total	144,000,000	85,567.64	
	Contingency (10%)	14,400,000	8,557.81	
	TOTAL	158,400,000	94,142.90	

This budget will be reviewed and updated periodically; budget adequacy will be reviewed as part of the quarterly reporting cycle described in Section 9.2.2.

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Nkhotakota District Council (2017), Socio-Economic Profile, 2017–2022, Government of Malawi, Nkhotakota.

ANNEX 1: PHOTO LOG AND ATTENDANCE REGISTERS

1.1 Photo Log





1.2 Attendance Register

REVIEWING AND UPDATING OF ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT AND RESETTLEMENT ACTION PLAN FOR THE
REHABILITATION OF BENGWA DWANGWA STRETCH OF M5 ROAD PROJECT

ESHS Consult
DATE: 01.12.2023
T/A: Mphonde
VENUE: TA OFFICE

DZINA	(M/F)	UDINDO	GVH	TELEPHONE
1 PETER MAULIBI	M	VDC CHAIR	KAFITA	0993371197
2 Kaya Bwaka	F	VDC CHAIR	Lichumbwa	0990266798
3 Joyce msisi	F	VDC CHAIR	Makaka	0993583227
4 LASHON MATANI	M	Chief Clerk	Mphonde Office	0996957301
5 ANDREW CHITAGI	M	CHIEF CLERK	CHUMBUKWA	0990657441
6 Gloria Banda	F	VDC CHAIR	selemani	0998301302
7 Hagola Malizani	F	VDC CHAIR	khutu	0992493612
8 Madalato Banda	M	VDC CHAIR	chikanda	0996651942
9 LEVENORE MASHA	M	VDC MEMBER	Kampanje	0991761374
10 ISHMAEL BANANA	M	VDC CHAIR	Mukomboti	0990758804
11 ERICK CHITAGI	M	VDC CHAIR	Mtamboko	0993969444
12 Charles Chigora	M	Kampanje VDC	Kampanje	0994322316

COMMUNITY LEADERS' SIGNING SHEET

REVIEWING AND UPDATING OF ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT AND RESETTLEMENT ACTION PLAN FOR THE
REHABILITATION OF BENGWA DWANGWA STRETCH OF M5 ROAD PROJECT

ESHS Consult
DATE: 01.12.2023
T/A: Mphonde
VENUE: TA OFFICE

DZINA	(M/F)	UDINDO	GVH	TELEPHONE
13 Charles Banda	M	Chair	Mtamboko	0991027465
14 Charles Kamits	M	Chair	Chuboko	0997497186
15 Anna mtee	F	VDC	Kampanje	099624987
16 Mercy Chagunda	F	VDC CHAIR	Mtamboko	0991971124
17 Hanifa Sijame	F	Chair	chikombe	0993089840
18 Adija Chiga	F	VDC CHAIR	Mphonde	0996020636
19 Anderson Tsang	M	Chair	Chitambo	0995755187
20 S. Chier Mphonde	M	S. Chier	Mphonde	0993748247

COMMUNITY LEADERS' SIGNING SHEET

REVIEWING AND UPDATING OF ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT AND RESETTLEMENT ACTION PLAN FOR THE
REHABILITATION OF BENGWA DWANGWA STRETCH OF M5 ROAD PROJECT

ESHS Consult
DATE: 30 NOVEMBER 2023
T/A: KANYENGA
VENUE: TDC WALEMELA

DZINA	(M/F)	UDINDO	GVH	TELEPHONE
Emelda Kalisa	F	VDC Chairperson	SINDE	0999714500
CATHERINE MATHASI	F	ABC V. Chair	KANYENGA	0996102004
WILLIAM KANYENGA	M	VDC Chair	CHISA	0991313181
One Chirwa	F	VDC CHAIR	TSAMBEORA	0993243052
BLANYS PHIRI	F	VDC CHAIR	Katapiya	0995567296
Boulos Nkhata	M	VDC Chair	ARON	0991311433
Simon Chikanga	M	VDC CHAIR	MEMBOKI VDC	099231963
Martha Towle	F	VDC CHAIR	LOKORE	0994405527
Edward Solomon	M	VDC CHAIR	Mtamboko	0998027719
Edward Eford	M	VDC CHAIR	GITO	0996953663
Agness Tawani	F	Member	Chitamboko	0994337304
Stanley Kaunda	M	member	Mtamboko	0996780929

COMMUNITY LEADERS' SIGNING SHEET

REVIEWING AND UPDATING OF ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT AND RESETTLEMENT ACTION PLAN FOR THE
REHABILITATION OF BENGWA DWANGWA STRETCH OF M5 ROAD PROJECT

ESHS Consult
DATE: 1 DECEMBER 2023
T/A: MALENGA CHANZI
VENUE: LINDA (AKHITAKA) EPA OFFICES

DZINA	(M/F)	UDINDO	GVH	TELEPHONE
1 FRANCIS ZULU	M	CHAIR	MAKUTA	0995973281
2 ABUL KAREEM LASSI	M	VDC CHAIR	KAMANGE	0997776160
3 MUKOO ZINGA	M	VDC CHAIR	Mtamboko	0997094640
4 GOMAS WABATULU	M	VDC CHAIR	CHITULA	0999390695
5 Ndlovu Muzoni	F	VDC CHAIR	LEMBOKI	0991335073
6 Cuthbert Vungu	F	VDC VICE	NGOMA	0994024307
7 Zambab Layab	F	VDC CHAIR	Malenga Chani	0998307070
8 M'SOLVER MUKHANGE	M	VDC CHAIR	Mtamboko	0992941294
9 Janny Masimani	F	VDC CHAIR	CHISA	0998559855
10 MENDY MUKHANGE	M	ABC CHAIR	MALENGA CHANZI	099251918

COMMUNITY LEADERS' SIGNING SHEET

SADC SUB REGIONAL TRANSPORT AND TRADE FACILITATION PROJECT (P-Z1-DB0-253)

SITE ACTIVITIES SIGNING SHEET

NAME OF ACTIVITY TRAINING OF GRMC - KANYENDA

DATE 25/04/2025

NO	NAME	POSITION	ORGANIZATION	PHONE #	SIGNATURE
1	ANDREW NAMARE	SECRETARY	KANYENDA AGRC	099372955	<i>[Signature]</i>
2	Mphahleli Mphahleli	Chair	Kanyenda "	0991955018	<i>[Signature]</i>
3	Catherine Mphahleli	vice chair	Kanyenda "	0997610200	<i>[Signature]</i>
4	Emmanuel Mphahleli	Member	Kanyenda AGRC	099126152	<i>[Signature]</i>
5	Samuel Mphahleli	Treasurer	Kanyenda	099135351	<i>[Signature]</i>
6	Charity Mphahleli	Member	Kanyenda	0993821542	<i>[Signature]</i>
7	Simon Tembo	Member	Kanyenda	099191493	<i>[Signature]</i>
8	Emmanuel Mphahleli	Chair	Kanyenda	099191493	<i>[Signature]</i>
9	Joseph Mphahleli	Driver	Kanyenda	0991300960	<i>[Signature]</i>
10					
11					
12					
13					
14					
15					

SADC SUB REGIONAL TRANSPORT AND TRADE FACILITATION PROJECT (P-Z1-DB0-253)

SITE ACTIVITIES SIGNING SHEET

NAME OF ACTIVITY D-GRMC

DATE 24/04/2025

TRAINING OF GRMC

NO	NAME	POSITION	ORGANIZATION	PHONE #	SIGNATURE
1	Reuben Mphahleli	EMO	NK-DC	099444200	<i>[Signature]</i>
2	Samuel Mphahleli	R/T	NK-DC	099333569	<i>[Signature]</i>
3	Andreas Mphahleli	MDA	NK-DC	099333569	<i>[Signature]</i>
4	David Mphahleli	EMO	NK-DC	099333569	<i>[Signature]</i>
5	Dans Mphahleli	EMO	NK-DC	099333569	<i>[Signature]</i>
6	Samuel Mphahleli	EMO	NK-DC	099333569	<i>[Signature]</i>
7	Victor Mphahleli	EMO	NK-DC	099333569	<i>[Signature]</i>
8	Peter Mphahleli	EMO	NK-DC	099333569	<i>[Signature]</i>
9	Emmanuel Mphahleli	EMO	NK-DC	099333569	<i>[Signature]</i>
10	Andreas Mphahleli	EMO	NK-DC	099333569	<i>[Signature]</i>
11	Andreas Mphahleli	EMO	NK-DC	099333569	<i>[Signature]</i>
12	Andreas Mphahleli	EMO	NK-DC	099333569	<i>[Signature]</i>
13	Andreas Mphahleli	EMO	NK-DC	099333569	<i>[Signature]</i>
14	Andreas Mphahleli	EMO	NK-DC	099333569	<i>[Signature]</i>
15	Emmanuel Mphahleli	EMO	NK-DC	099333569	<i>[Signature]</i>

SADC SUB REGIONAL TRANSPORT AND TRADE FACILITATION PROJECT (P-Z1-DB0-253)

SITE ACTIVITIES SIGNING SHEET

NAME OF ACTIVITY MPHONDE GRMC

DATE 25/04/2025

TRAINING OF GRMC

NO	NAME	POSITION	ORGANIZATION	PHONE #	SIGNATURE
1	Samuel Mphahleli	EMO	Mphonde	0992820233	<i>[Signature]</i>
2	Rajab Kagwank	GRMC chair	Mphonde	0992820233	<i>[Signature]</i>
3	Emmanuel Mphahleli	Treasurer	Mphonde	099236531	<i>[Signature]</i>
4	Grace Kagwank	SECRETARY	Mphonde	0994605500	<i>[Signature]</i>
5	Edward Mphahleli	GRMC chair	Mphonde	099609021	<i>[Signature]</i>
6	Cyril Mangoch	GRMC member	Mphonde	099250771	<i>[Signature]</i>
7	Andreas Mphahleli	GRMC	Mphonde	0995708630	<i>[Signature]</i>
8	Andreas Mphahleli	S.C. MPHONDE	Mphonde	0995718249	<i>[Signature]</i>
9	Emmanuel Mphahleli	EMO	RA	0994210993	<i>[Signature]</i>
10	David Mphahleli	EMO	RA	099333569	<i>[Signature]</i>
11	Oscar Chitowe	Driver	U-Plus	0997260110	<i>[Signature]</i>
12					
13					
14					
15					

ANNEX 2: STAKEHOLDER REGISTER TEMPLATE

The RA/PIU will maintain a living stakeholder register, updated throughout implementation, using the template below (columns to be populated and expanded as needed).

Name / Organisation	Category (PAP / Other Interested Party)	Group (e.g. vendor, TA, utility)	Contact Details	Vulnerability Flag	Date Added

ANNEX 3: GRIEVANCE LOG AND RESOLUTION FORM TEMPLATE

3.1 Community Grievance Log & Resolution Form

District Name: _____

Community Name: _____

Name of Catchment:		Sub Project Name				Dates:	
Names Dr/Mr/Ms/Mrs)		Address/Contact		TA& VGE		Contacts/Email	
Ref No.	Date of Grievance	Official Recording	Grievance/Complaint	Follow-up/Investigation		Resolution Made	Referred to
				Date	Person Assigned		
G1							

If case is closed, GRM Committee members & complainant to sign below

GRM Committee Chair _____

Name & Signature of PAP _____

GRM Committee Secretary _____

Date: _____

Referred to Area/ Council

Ref No.	Date of Referral	Official Referring:	Name of Complainant:

3.2 RESOLUTION FORM

This form (or its digital equivalent) will be used by the CGRMC, WGRMC, and DGRMC to record and track each grievance from uptake to closure.

Field	Entry
Grievance Reference Number	
Date received	
Name of complainant (optional – anonymous complaints accepted)	
Contact details (optional)	
Village / Traditional Authority	
Method of uptake (verbal / written / phone-SMS / grievance box / WhatsApp)	
Description of grievance	
Category (land/compensation, environmental, labour, GBV/SEA/SH, utility, other)	
Received by (Committee / Name)	
Date of acknowledgement to complainant	
Investigation / assessment notes	
Resolution proposed	
Date resolution communicated	
Complainant's acceptance (signature / thumbprint)	
Countersigned by (Chairperson / Secretary)	
Date closed, or referred to (DGRMC / Court / AfDB IRM)	

ANNEX 4: SEP DISCLOSURE AND UPDATE RECORD

Any significant update to this SEP will be disclosed publicly and recorded below.

Version	Date	Summary of Changes	Disclosure Method
Draft 1	2026	Initial SEP prepared	Submitted to AfDB E&S Team for review; to be disclosed to MEPA, District Council and communities on clearance