

National Action Plan for the Artisanal and Small-scale Gold Mining (ASGM) Sector in Malawi

Review CEO Endorsement and Make a recommendation

Basic project information

GEF ID
12370
Countries
Malawi
Project Name
National Action Plan for the Artisanal and Small-scale Gold Mining (ASGM)
Sector in Malawi
Agencies
UNEP
Date received by PM
6/9/2026
Review completed by PM

Program Manager
Itsuki Kuroda
Focal Area
Chemicals and Waste
Project Type
EA

Expedited Enabling Activity req (CEO)

Section I - Enabling Activity Summary

Funding elements.

Is the enabling activity aligned with the relevant GEF funding elements as indicated in Table A and as defined by the GEF-8 Programming Directions? Is the General Enabling Activity Information table correctly populated?

Secretariat's Comments

Yes

Agency's Comments

Cost Ranges.

If there was a deviation in the cost range, was this explained?

Secretariat's CommentsNA

Agency's Comments

Enabling activity summary.

Is the enabling activity summary clear? Are the components in Table B and as described in the enabling activity request sound, appropriate, and sufficiently clear to achieve the project objectives?

Secretariat's Comments

6/15 PM confirmed with thanks

Yes.

1. Please clarify if initial legislative assessment has already been conducted and the activities are built upon the previous work.

2. Please clarify if the activities analyze a level of formalization and support the formalization of the sector.

3. Please clarify if public health assessments including a rapid health situation review in ASGM communities is conducted, in addition to institutional assessment.

4. Please ensure that the EA will provide a foundation for future interventions aligned with national strategies and its commitments under the Convention and support broader environmental and health benefits through reduced mercury exposure and responsible mining practices.

On gender:

5. Please ensure there is gender expertise and go beyond women's representation or gender parity

6. Please ensure that there is monitoring and reporting of gender-specific results (in PIR and in TE)

7. Please ensure gender equality and the inclusion of vulnerable groups.

8. Please ensure women's roles and challenges in ASGM sector in Malawi will be addressed through targeted strategies and inclusive participation.

On Environmental and Social Safeguards : We note that UNEP has attached Safeguard Risk Identification Form (SRIF). However, the attached Safeguard Risk Identification Form (SRIF) is not completed.

9. Please provide a completed Safeguard Risk Identification Form (SRIF) with environmental and social risk classification, signature and review by the Safeguard team.

10. Please clarify how vulnerable groups will be engaged in governance mechanisms and development of National Action Plan for the artisanal and small-scale gold mining sector. It is also critical to conduct health impact assessments on local communities as a part of developing national action plans. Please clarify whether health impact assessments are conducted or are going to be conducted as a part of the project.

Agency's Comments

Response:15/06/2026

1. The revised text under Section ??Eligibility criteria?? confirms that an initial legislative assessment was conducted under the MIA. The NAP activities will build on this previous work and expand the analysis specifically in relation to Article 7 and Annex C.

2. The revised text under Section ??Eligibility criteria?? explains that the NAP process will assess the current level of formalization of the ASGM sector, existing barriers, and practical strategies to enhance it.

3. The revised text under Section ??Eligibility criteria?? states that public health impacts have not yet been systematically assessed and that the NAP will include a dedicated public health assessment as part of the baseline as well as concrete public health strategies developed.

4. The revised text under Section ??Eligibility criteria?? confirms that MEPA, which hosts the Minamata Convention focal point, will ensure that the NAP and future ASGM-related interventions are aligned with national strategies and Malawi's commitments under the Convention, while supporting broader environmental and health benefits.

5. Please note that as indicated in Section ??Institutional framework?? a dedicated gender expert will be recruited to support the integration of gender consideration across activities and within the NAP itself. This will include ensuring that gender dimensions of ASGM are reflected in stakeholder engagement, baseline assessment, consultations, strategy development and final NAP recommendations. Furthermore, as stated in the project document, institutions mandated with gender equality, women's groups and women-led organizations, and other relevant stakeholders will be engaged throughout the project.

6. Monitoring and reporting of specific gender results was already foreseen. However, an explicit mention has been included in Section ??Monitoring and Evaluation Plan??.

7. This is noted and already included as part of the proposal. However, explicit references to the identification and inclusion of vulnerable groups have been incorporated in Section ??Institutional framework??.

8. A gender strategy to be implemented throughout the project will be developed and shared at the inception event. A dedicated gender expert will be recruited, and a focal point within the national coordination mechanism will be designated to monitor its progress. As already stated in the project documents, gender dimensions of ASGM will be reflected in stakeholder engagement, baseline assessment, consultations, strategy development and final NAP recommendations.

9. The revised SRIF including the classification, signature, and review by the Safeguard team has been uploaded.

10. Vulnerable groups, including women, youth, and affected local communities, will be engaged through inclusive consultations and governance mechanisms during the NAP development process. The Ministry of Gender, Disability and Community Development is one of the proposed members of the national coordination mechanism and specific interest groups will be invited to participate in the stakeholder advisory group. Their perspectives will inform the baseline and the identification of priority actions. A dedicated public health assessment has not yet been conducted and will be included as part of the project. This will comprise a rapid health situation review in ASGM communities and an institutional capacity assessment.

Section 2 - Enabling Activity Supporting Information

Eligibility Criteria.

Is this enabling activity eligible for GEF funding?

Secretariat's CommentsYes

Agency's Comments

Institutional framework.

Are the institutional arrangements for implementation adequately described?

Secretariat's CommentsYes

Agency's Comments

Monitoring and Evaluation.

Does the project include a budgeted M&E Plan?

Secretariat's CommentsYes

Agency's Comments

Section 3. Information Tables

GEF resource availability.

Is the proposed GEF financing in Table F (including the Agency fee) in line with GEF policies and guidelines?

Secretariat Comment at PIF/Work Program Inclusion

6/15 PM confirmed with thanks

1. Please list each position on a separate line in the budget table.

Contractual Services – Individual	Int'l consultant 1 (inventory training and NAP development review)	\$ 30,000	\$ -	\$ -	\$ -	\$ 30,000	MEPA
	National consultant(s) (at least 4 experts including technical ASGM expertise, socioeconomic/gender, institutional and public health) (refer to Annex J consultants)	\$ 15,000	\$ 70,000	\$ -	\$ -	\$ 85,000	MEPA

2. Please provide a detailed description for the ?training, workshops, meetings?, and ?travel? budget categories.

Trainings, Workshops, Meetings	National training	\$ 30,000	\$ 60,000	\$ -	\$ -	\$ 90,000	MEPA
	National inception	\$ 25,000		\$ -	\$ -	\$ 25,000	MEPA
	National validation		\$ 25,000	\$ -	\$ -	\$ 25,000	MEPA
Subtotal Trainings,		\$ 55,000	\$ 85,000	\$ -	\$ -	\$ 140,000	
Travel	Travel	\$ 15,000	\$ 50,000	\$ -	\$ -	\$ 65,000	MEPA
Subtotal Travel		\$ 15,000	\$ 50,000	\$ -	\$ -	\$ 65,000	

3. Upon resubmission, we will conduct a full review of the budget table again and provide any additional comments.

Agency Response

Response:15/06/2026

1. Individual positions have been outlined under ??Contractual Services ? Individuals??. These experts have been identified based on past NAPs implemented.

2. A description of the ?training, workshops and meetings? budget category has now been included in the budget table. At this stage, it is not possible to provide a specific number of meetings, workshops or consultations, as this will depend on the size and geographic dispersion of the ASGM sector, as well as the specific needs of national institutions identified during project implementation.

An explanation of the ?travel? budget category has also been included in the budget table. Kindly note that this refers to in-country travel required for site visits, baseline data collection and stakeholder consultations. ASGM sites are often located in remote areas with difficult access, which may result in higher travel costs due to longer travel times and additional logistical requirements.

Are they within the resources available from (mark all that apply):
STAR allocation?

Secretariat's CommentsNA

Agency's Comments
Focal Area allocation?

Secretariat's CommentsYes

Agency's Comments
LDCF under the principle of equitable access?

Secretariat's CommentsNA

Agency's Comments
SCCF (Adaptation or Tech Transfer)?

Secretariat's CommentsNA

Agency's Comments
Focal Area Set Aside?

Secretariat's CommentsNA

Agency's Comments
Rio Markers.
Are the Rio Markers for CCM ,CCA, BD and LD presented?

Secretariat's CommentsNA

Agency's Comments
Country endorsement.

Has the project been endorsed by the country's GEF Operational Focal Point at the time of the EA submission and has the name and position been checked against the GEF database? Are the endorsed amounts consistent with the amounts included in Portal

Secretariat's CommentsYes

Agency's Comments
Response to Comments

Are all the comments adequately responded to? (only as applicable)
Gef Secretariat comments

Secretariat's Comments

Agency's Comments
Other Agencies comments

Secretariat's Comments

Agency's Comments
Council comments

Secretariat's Comments

Agency's Comments
STAP comments

Secretariat's Comments

Agency's Comments
Convention Secretariat comments

Secretariat's Comments

Agency's Comments
CSOs comments

Secretariat's Comments

Agency's Comments
Project Budget Table.

Is the project budget table attached? Are the activities / expenditures reasonably and accurately charged to the three identified sources (Components, M&E and PMC)?

Secretariat's Comments

Agency's Comments
Environmental and Social Safeguards.

If there are screening documents or other ESS documents available, have these been attached? (only as applicable)

Secretariat's Comments

Agency's Comments
**GEFSEC DECISION
RECOMMENDATION.
Is CEO endorsement/ approval recommended?**

Secretariat's Comments

REVIEW DATE(S)

**Secretariat Comment at CEO
Endorsement**

**Response to Secretariat
comments**

First Review

**Additional Review (as
necessary)**

Secretariat Comment at CEO
Endorsement

Response to Secretariat
comments

Additional Review (as
necessary)

Additional Review (as
necessary)

Additional Review (as
necessary)