



Eastern Produce Malawi

Women's Empowerment Initiative
Verification Report – February 2022

Sarai Chisala-Tempelhoff
Sylvia Namakhwa
Lloyd Lipsett

Table of Contents

Table of Contents	2
About TRA	3
Overview	4
Methodology.....	5
EPM Management Cooperation and Support	6
Progress Update on the Women’s Empowerment Initiative	6
A. Civic Education Programme	7
B. Female Leadership Development Programme	9
C. Gender Equality Scholarships	11
D. Boma Victim Support Units.....	12
E. Makwasa Primary School.....	13
F. Water Boreholes	14
Conclusions	15

About TRA

TRA is a collective of social performance and human rights experts that supports companies in their efforts to reduce human rights risk and ensure positive relations with local communities, civil society organizations, and government stakeholders. We want to see business deliver on its promise to drive respect for human rights and have a net positive impact on society.

Our human rights practice and our social performance practice work in tandem to achieve these goals. While they apply different lenses, we see our human rights and social performance practices as complementary to each other. We have deep experience in working on human rights and social issues at the site-level in Africa (and elsewhere around the world), including in terms of assessment, design and support for operational grievance mechanisms for natural resource companies.

Overview

Eastern Produce Malawi (EPM) has committed to make a number of social investments that will support broad objectives related to women’s empowerment in the local communities near the EPM estates broadly over a three-year period from 2021 to 2024 (the “Women’s Empowerment Initiative”). EPM is also implementing a number of separate but complementary initiatives that are aimed at empowering women and strengthening the protection of their rights, including (a) an initiative for “Future Working Practices” that provides additional safeguards to female workers over a one-year period; and (b) further development of EPM’s operational grievance mechanism (OGM), pursuant to recommendations made by TRA in August 2021.

This is the Second Verification Report for the Women's Empowerment Initiative prepared by TRA, which follows six months after an initial status report prepared in August 2021 (the First Verification Report).

The following text box outlines the different social investment projects and programmes that fall under the Women's Empowerment Initiative and the Future Working Practices.

Overview of the Women’s Empowerment Initiative (TRA)
Civic Education Programmes on Gender-Based Violence and Gender Equality
Female Leadership Development Programme
Gender Equality Scholarships (for 3 years)
Construct Boma Victim Support Unit in Mulanje, Thyolo and Mimosa
Relocate Makwasa Primary School
Drill 2-3 Water Bore holes per year (for 3 years)
Overview of the Future Working Practices (Independent Monitor)
Create Women's Safeguarding Supervisor Role (50 people)
Enhanced and Proactive Training for Female Employees
Install CCTV Cameras
Install Personal Attack Alarms

The different projects and programmes that make up the Women’s Empowerment Initiative have progressed significantly in the last 6 months from the planning and consultation stage to the implementation and execution stage—including in terms of financial expenditures. While there have been some challenges in spending the full amounts that were budgeted for the first year of the Women’s Empowerment Initiative, these have been discussed at length with EPM management and TRA is satisfied that they are due to factors beyond EPM’s control and that corrective action plans are in place to bring the spending in line with the amounts budgeted annually and for the overall projects and programmes. The status of each of the projects and programmes—as well as the agreed corrective actions—are discussed in further detail below.

Methodology

The methodology for the review and verification of the Women’s Empowerment Initiative included the following key activities:

- Desktop review of the key documents related to the Women’s Empowerment Initiative.
- Financial verification of the amounts invested by EPM in the Women’s Empowerment Initiative to date. This included review of internal EPM budget trackers that were cross-checked against accounting entries, receipts and invoices from service providers.
- Stakeholder engagement and verification activities at the EPM estates by TRA’s local experts, Sarai Chisala-Tempelhoff and Sylvia Namakhwa, with remote support from Lloyd Lipsett. The field mission was conducted from January 19 to 28, 2022 and included site visits at a number of different estates in Mulanje and Thyolo Districts, document review and engagement with a broad range of internal and external stakeholders.¹

Stakeholders interviewed included EPM managers, external stakeholders, participants and beneficiaries of the various projects and programmes under the Women’s Empowerment Initiatives. The following table provides an overview of the stakeholders engaged about the Women’s Empowerment Initiative.

Stakeholders	Sub-categories	# People
WEI Participants and Beneficiaries	<ul style="list-style-type: none">• Experts and civil society organizations implementing the WEI projects• Participants in the implementation of the WEI projects• Beneficiaries of the WEI projects	16
Communities	<ul style="list-style-type: none">• Community representatives• Local government officials• NGOs	68
EPM Management and Workforce	<ul style="list-style-type: none">• Senior managers• Key managers responsible for WEI projects (Gender and Welfare Manager, Human Rights Manager, etc.)• Estate managers and supervisors• Women’s Welfare Committee members	40
TOTAL		124

¹ Given Sarai and Sylvia's experience with field-based verification activities at EPM, as well as the interconnections between the Women’s Empowerment Initiative, Future Working Practices and Operational Grievance Mechanism, TRA proposed that they conduct verification for both TRA and the Independent Monitor. Both TRA and the Independent Monitor provided separate instructions and oversight for their respective mandates and scopes of work for the local experts.

EPM Management Cooperation and Support

At the outset, TRA acknowledges and appreciates the support received from EPM management and staff during the latest verification mission. It must be highlighted that the verification took place during the latest wave of the COVID-19 pandemic related to the Omicron variant, which affected Malawi quite seriously in terms of the number of positive cases and international travel restrictions, and therefore required a greater degree of effort to conduct the verification remotely with the support of TRA's local experts and to coordinate between the verification of the Women's Empowerment Initiative and the Future Working Practices.²

As was the case during TRA's initial scoping and verification visit to the EPM estates, managers provided a conducive environment for the interviews with stakeholders. They provided unrestricted access to the EPM estates and local communities, and encouraged people to speak freely to our local experts. EPM facilitators also ensured that they left the TRA team to engage with the particular stakeholders without their presence – after introductions and assuring the stakeholders that they were free to discuss with the TRA team freely and without any fear of repercussions.

EPM's senior management, including the new Managing Director, also welcomed discussion about the Women's Empowerment Initiative and had a constructive attitude about potential areas for improvement. In addition, the EPM managers and consultants who are implementing the Women's Empowerment Initiative provided valuable input about their current priorities for implementation and evaluation of the different projects and programmes.

Progress Update on the Women's Empowerment Initiative

The main finding from TRA's review is that the Women's Empowerment Initiative has been taken seriously by EPM and the different projects and programmes that collectively form the Women's Empowerment Initiative have progressed well since our initial verification in August 2021.

Overall, the following factors (related to the COVID-19 pandemic, enhanced consultation and participation in the development process, and regulatory requirements) have been considered in our assessment of the challenges and delays in spending the full amounts planned for the first year of the Women's Empowerment Initiative:

- The ongoing COVID-19 pandemic, including the recent spike related to the Omicron variant, continues to affect Malawi and EPM very tangibly and adversely. Not only have there been serious illnesses and fatalities on the EPM estates, but there have been ongoing restrictions on meetings and gatherings,

² It had been agreed with EPM that Lloyd Lipsett would lead this round of field-based verification activities at the EPM estates. When it became clear that international travel to Malawi would not be possible during the relevant timeframe, EPM cooperated with TRA and the Independent Monitor to reorganize the verification activities with the support of our local experts.

which have inevitably slowed the pace of all manner of activities. In the context of the Women’s Empowerment Initiative, this has included challenges in conducting consultations to develop the specific projects; delays related to permitting and construction activities for the Makwasa Primary School and Victim Support Units; travel restrictions that have prevented external facilitators to come to the estate for Female Leadership Development training activities; and, closure of educational institutions in Malawi such that beneficiaries of Gender Equality Scholarships have not been able to start their courses. TRA is sensitive to the reality of these COVID-19 challenges, as they have also adversely affected our local experts and the ability of our international team members to come to Malawi.

- The implementation of TRA’s main recommendation from the First Verification Report—to ensure stakeholder participation in the development of the various projects and programmes—also has caused delays in rolling out the Women’s Empowerment Initiative. However, it is our firm belief that consultation and participation is an essential part of a rights-based approach to development and will support better outcomes for the different projects and programmes. As an example, consultations with community and government stakeholders have resulted in a longer piloting phase for the Civic Education Programme, including initial evaluations of the pilots before rolling the programme out across the estates. However, the consultations have served to bring the district government stakeholders for Thyolo and Mulanje on board, which is essential for implementing the civic education activities in other locations in their district; and the initial evaluations of the pilot projects can only help to improve the process and outcomes going forward.
- Infrastructure-related projects (construction of Makwasa Primary School and Victim Support Units) have required environmental permitting processes, as well as inspections of the building blocks to be used for construction. Not only are these regulatory requirements, they are important processes to ensure that the infrastructure is safe and does not cause adverse environmental impacts. Furthermore, the environmental permitting processes adds another layer of consultation to the project development process. In the case of the Victim Support Units, this has resulted in an increase in the project budget, but presumably will contribute to Victim Support Units that are better fit for purpose.

Although it is not a cause of delay in the implementation of the Women’s Empowerment Initiative, it should be noted that EPM has appointed a full-time Gender and Welfare Manager during this reporting period. This appointment will be an important factor in accelerating the progress and supporting the impact of the Women’s Empowerment Initiative, including in terms of strategic planning, stakeholder participation and monitoring and evaluation. In addition to the tracking system developed for the Women’s Empowerment Initiative, the Gender and Welfare Manager also is preparing detailed quarterly reports that include valuable information for the purposes of monitoring and evaluation.

The following sub-sections of the report provide an overview of the progress on the different projects and programmes under the Women’s Empowerment Initiative.

A. Civic Education Programme

EPM is committed to implementing a Civic Education Programme on Gender-Based Violence and Gender Equality from 2021 to 2024 (Civic Education Programme).

In TRA's First Verification Report, it was noted that local partners (ArtGlo and WOLREC) had been selected for civic education activities and that project implementation had commenced.³

The Civic Education Programme continues to be implemented by ArtGlo and WOLREC in Thyolo and Mulanje districts. It is being implemented in a participatory manner with consultation with key community and government stakeholders.

The main technique for the Civic Education Programme is "theatre for development" that helps the community understand the negative impacts of Gender-Based Violence and the importance of gender equality in the community and on the estates.⁴ The "theatre for development" methodology uses ideas and scenarios from the community so that the theatre performances can help to promote concrete actions to address Gender-Based Violence. The following are examples of the content of these theatre performances from the piloting phase in Mulanje:

- The first performance (Gawanya Village) tackled issues about women facing financial abuse from their husbands and women facing abuse in tea estates.
- The second performance (Mchenga Village) tackled issues about rape and early child marriage.
- The third performance (Molofunya Village) tackled issues about abuse in marriage.
- The fourth performance (Ngwezu Village) tackled issues of incest and rape.

In terms of the implementation, local drama clubs were given 8 days of training on "theatre for development." They then conducted two rounds of pilot performances: the first took place in Mulanje (Mini Mini) in June and September 2021 and the second took place in Thyolo (Makwasa) in December 2021 and January 2022. This piloting phase has resulted in the development of training and programme manuals that will be used to support the civic education activities on other estates.

In terms of the preliminary outcomes of the pilot projects, the evaluation report from the Mulanje pilot highlights some promising results in terms of reach (over 1,100 community members attended the 4 performances) and action-orientation (community action plans were generated after each performance).

Based on feedback from our local experts, TRA recommends that EPM consider the following points as part of this initial evaluation of the pilot performances:

- The theatre performances provide an important opportunity for communications about the respective roles and responsibilities of EPM, government and other stakeholders (e.g. traditional leaders, community policing officers, local government gender officials, child protection officials, local NGOs, etc.) when it comes to confronting Gender-Based Violence and promoting gender equality. It is

⁴ In addition to the theatre for development conducted by ArtGlo and WOLREC, EPM has also supported training on sexual harassment and gender equality for workers on the estates, and has contributed to civic education and awareness-raising events with workers and communities such as the "16 Days of Activism against Gender-Based Violence."

important to use these opportunities to manage community expectations about EPM's role and responsibility vis-à-vis other actors.

- The “theatre for development” approach is intended to be action-oriented and to source ideas for follow-up actions from the community members who attend the performance. It is important that these proposed actions continue to be captured in community action plans and are followed-up so that the theatre performances lead to positive outcomes.

TRA noted that the amount spent during the first year of the Civic Education Programme was below its initial target. TRA has discussed this with EPM management and can confirm the following:

- Above and beyond the COVID-related challenges, the main reason for delay in rolling out the Civic Education Programme has been related to completing the initial piloting phase in Mulanje and Thyolo, which has involved additional time for developing and piloting the training materials for the local theatre clubs, and for engaging with local District Councils to build their understanding and buy-in for the overall initiative.
- EPM has worked with ArtGlo/WOLREC to develop an action plan to accelerate the roll-out of the Civic Education Programme as follows: 2 more estates (Gotha and Lauderdale) will be covered by April; 4 further estates (Nasonia, Limbuli, Kumadzi and Ruo) will be covered by November; and 2 further estates (TBD) will be covered by the end of the next verification cycle. Including the pilot projects already completed, this will bring the total to 10 estates covered by the Civic Education Programme, leaving 8 more estates to be covered in the third year of the Programme.
- Furthermore, EPM is in discussion with another civil society organization (UFULU Malawi) that operates on and around the EPM estates about developing additional civic education activities using different methodologies and networks.⁵

B. Female Leadership Development Programme

EPM is committed to implementing a Female Leadership Development Programme from 2021 to 2024.

In TRA's First Verification Report, it was noted that a pool of prospective female leaders had been identified and trained through the related initiative for the Women's Safeguarding Supervisor Role⁶ (also referred to

⁵ UFULU runs workshops which distribute female sanitation products (cups) and provide information on how to use them. We introduce the women and girls to cups, explaining what they are made of, how they work and how easy they are to use. We work with small groups, to ensure that the women feel comfortable and relaxed. Most groups consist of friends from the same village, church or extended family.

⁶ The Female Leadership Development Programme and the Women's Safeguarding Supervisor Role have important interconnections. Additional information about the Women's Safeguarding Supervisor Role is provided in the Independent Monitor's verification report about the Future Working Practices.

as Women's Safeguarding Capitaos or WSCs) and that an additional training needs assessment was being undertaken.

All of the prospective candidates for the WSCs were provided with 3 weeks of training in 2 cohorts (one for prospective candidates for Mulanje and one for prospective candidates for Thyolo). These trainings were provided at the facilities of the Tea Research Foundation, which are near the EPM estates.

In addition to this sort of group training, EPM has been identifying high potential candidates for additional post-secondary educational support to facilitate career progression in senior management. This aspect of the Female Leadership Development Programme has been socialized through Women's Welfare Committee meetings and has registered positive response from female employees. Mapping on career needs has been conducted and guidance provided for female employees who are interested in upgrading their educational qualifications. A staff development gap analysis form has been developed and approved by management to use.

Prospective female leaders can apply for financial support for further individual training or education to enable career progression. Based on consultation with female workers, this includes post-tertiary education (e.g. Masters' degree), as well as vocational training (e.g. plumbing) for women in lower employment categories. At present, one female employee has been awarded a scholarship for studies at the Masters' level.⁷ Furthermore, another female employee was supported for attendance in a specialized professional certification course (FSSC). While the TRA assessment was being conducted, EPM management also identified and committed to supporting another Masters' level candidate for her studies, and has set aside funding for other individual educational and training support.

There are a number of other interested candidates who may benefit from individual training or educational support to progress their careers. For example, there are a number of female candidates (16 candidates) with Bachelor's degrees who may be interested in pursuing Master's level degrees; however, the candidates also questioned whether pursuing a Master's degree was the most effective option for career progression, especially depending on whether their Bachelor's degree was in a subject matter that is relevant to EPM's business or the tea and agricultural industry more broadly. Furthermore, some candidates are reluctant to return to being a student when their focus is on working and earning money for their families.

As a result, the identification and recruitment of potential candidates for individual training or educational support has been slow and has not translated into spending at the levels anticipated. From these discussions with prospective candidates and EPM management, it appears that collective management skills training should be accelerated as the main focus for the Female Leadership Development programme. Such individual training or educational support will be maintained, but will be a complementary piece of the Female Leadership Development programme.

EPM had already scheduled an intensive round of on-site management skills training to all the female managers and trainees (approximately 25 of the 40-50 staff noted below). This was scheduled in November 2021 with an expert trainer from South Africa, but this was postponed due to the COVID-19 situation related to the Omicron variant. This training is currently being rescheduled for March 2022. There will be 8 days training for managers and 5 days for trainees.

⁷ Note that these scholarships are distinct from the Gender Equality Scholarships that are discussed in the following section. Those scholarships are focused on providing opportunities for young women who are children of EPM employees or community members.

In addition, through discussion with EPM management, it has been decided to offer an intensive round of on-site leadership skills training as a comprehensive and effective way to accelerate the Female Leadership Development. This is a 2 day programme on “Leadership for Development for Women,” which will be given to all female managers and monthly paid non-management staff including teachers and clinical staff (40-50 staff). This training will be provided by Prosperity Leadership Development South Africa (PLDSA).

It is hoped that this leadership training with the intensive round of management skills training will serve to identify and motivate some candidates to pursue further individual training or educational initiatives in support of their career progression.

Furthermore, for the coming years of the Female Leadership Development Programme, a promising idea is being developed of building an on-site training facility with computers and internet access that can be used for computer literacy and business communication training, as well as for accessing online professional certification course. This may very well support female leadership candidates in pursuing individualized training or educational courses while continuing to work. TRA has recommended that EPM management consult with the WSCs during the forthcoming management skills trainings to ensure there is buy-in for this initiative.

C. Gender Equality Scholarships

EPM is committed to awarding 10 Gender Equality Scholarships over three years (i.e. 10 scholarships for a 4-year programme for each scholar).

The Gender Equality Scholarships are intended to provide opportunities to local female students to pursue undergraduate studies in various universities or colleges accredited by the National Council for Higher Education in Malawi. The selection criteria for the scholarships are focused on female children of the very low paid EPM employees such as guards, pluckers and sorters, as well as to young women from the surrounding communities.

In TRA’s First Verification Report, it was noted that adverts had been posted for the first round of scholarships and were being promoted within the community and the workforce at the EPM estates. A limited number of applications were received by the time that the first round of scholarships were awarded, but EPM has continued to work with workers and community representatives to further promote the Gender Equality Scholarships and it is anticipated that there will be more candidates for the next round of scholarship awards. As will be explained below, 4 scholarships have been already awarded and it is anticipated that 6 more will be awarded for the next academic year (hopefully commencing in September 2022), with adverts to be circulated in April and the selection to be awarded in the summer.

From the first round of applicants, five young women were awarded scholarships, comprising three children of employees and two community recipients. However, one of the recipients subsequently received a government scholarship and no longer needed EPM’s assistance.

The 4 beneficiaries / scholars for the 2021-2022 academic year include:

- The daughter of an EPM guard who has received a scholarship for Luanar University, Bachelor of Science in Agricultural Extension.
- The daughter of an EPM employee from Likanga who has received a scholarship for Malawi University of Science and Technology, Bachelor of Science in Science Education

-
- The daughter of an EPM tea sorter from Ruo who has received a scholarship for Mzuzu University, Bachelor of Science in Renewable Energy and Resources
 - A female community member who has received a scholarship for Holy Family College of Nursing, Diploma in Nursing.

In terms of the spending component of the Gender Equality Scholarships, there has been a delay in terms of financial disbursements because the 2021-2022 academic year was adversely affected by school closures related to the COVID-19 pandemic. Currently, only one of the beneficiaries of the scholarships has been able to begin her studies, while the others will begin their studies when universities re-open in April 2022.⁸

D. Boma Victim Support Units

EPM is committed to constructing Boma Victim Support Units in Mulanje, Thyolo and Mimosa between 2021-2024.

These Victim Support Units provide a safehouse for victims of Gender-Based Violence. As the Victim Support Units are attached to the local police stations, they are intended to provide greater safety to victims and should encourage reporting and follow-up of incidents that warrant police investigation.

In TRA's First Verification Report, it was noted that stakeholder consultations had begun in relation to this project, and that concept notes had been received from the Mulanje and Thyolo Police Units. These consultations and concept notes have resulted in an increase in the anticipated budget for the Victim Support Units. The increase in the cost is related to having larger Victim Support Units with more rooms, as well as more stringent conditions related to the building design and materials.⁹

For the Mulanje Victim Support Unit, the regulatory processes for public infrastructure development have been conducted and the relevant approvals have been obtained for construction.¹⁰ This included environmental screening and then approval of the engineering design. Furthermore, the building blocks that will be used for construction have been assessed for strength and safety by the Malawi Bureau of Standards. The construction of this Victim Support Unit will commence as soon as the rainy season is over and will be completed in 2022.

For the Thyolo Victim Support Unit, the pre-construction work is progressing with the site selection and environmental screening underway. It is also anticipated that the construction of this Victim Support Unit will be completed in 2022.

For the Mimosa Victim Support Unit, EPM will carry out stakeholder consultations about the proposed building plans in 2022, which will be an extension of the police station that was renovated in recent years with support from the Tea Research Foundation. The plan is to construct the Victim Support Unit in 2023.

⁸ The academic year for university courses was meant to begin in September 2021, but this was delayed until January 2022 because of COVID-19, and then again to April 2022 because of the Omicron variant. Only the candidate in a nursing programme has been able to begin her studies.

⁹ Building conditions included that the foundation must have concrete footing; the sub-structure must have concrete blocks and the holes filled with concrete; superstructure must have a reinforced ring beam; the soil stabilized blocks and concrete blocks must conform to MBS; and, environmental and safety permits must be obtained.

¹⁰ EPM received the authority to proceed with construction of the Mulanje VSU by letter from the District Council on November 26, 2021.

Based on feedback from our local experts, the construction of the Victim Support Units is progressing as quickly as possible given the need for cooperation with government authorities for planning and various regulatory approvals associated with the development of public infrastructure. Despite the initial delays associated with regulatory approvals, there is confidence that the commitment to build the 3 Victim Support Units will be completed within the overall timeframe for this investment.

As noted above, the cost of the Victim Support Units has increased from the initial budget in response to the larger size and more stringent building specifications. To cover this potential cost overrun, TRA has discussed with EPM management the possibility of using the cost savings associated with this year's borehole drilling programme. This discussed in sub-section F below.

E. Makwasa Primary School

EPM is committed to relocating the Makwasa Primary School, which is on one of the EPM estates. This relocation is intended to move the school away from a busy road into a location that is safer for the students—including young girls—and is more propitious for learning. Furthermore, EPM will build a meeting hall for community education, including IDH programmes. Initially, it was planned that the new primary school and meeting hall will be built together, but this approach was reconsidered for safeguarding reasons (i.e. concerns that children could be vulnerable to people attending activities at the meeting hall), and therefore current plans are to build the primary school at one location and the meeting hall at another.

In TRA's First Verification Report, it was noted that the planning for the school relocation had been completed and the final site has been selected, and that an environmental screening process was required to be undertaken. In the meantime, the building blocks for construction were being prepared pending the environmental screening process.

The environmental screening process has been completed in November 2021 and site clearing has commenced for the construction of the new school.¹¹ Similar to the Mulanje Victim Support Unit discussed in the section above, 60% of the building blocks that will be used for the construction of the school have been assessed for strength and safety and approved by the Malawi Bureau of Standards in January 2022. The construction of the new school building will begin as soon as the rainy season is over with completion targeted for the fall of 2022.

Despite the rains, the clearing of the site has already commenced and a plan for replanting indigenous trees and additional fruit trees for the school is being implemented. TRA's local experts were able to inspect the new school site, the location of the existing school and to engage with key stakeholders about the impending move and expansion of the curriculum of the school (i.e. the addition of year 5 to the curriculum as the current school only goes as far as year 4).

Based on feedback from our local experts, the construction of the new school building is progressing as quickly as possible given the need for cooperation with government authorities for planning and various regulatory approvals associated with public infrastructure. Despite the initial delays associated with the environmental screening process, there is confidence that the commitment to build a new primary school will be completed in 2022. This will be followed by the construction of the new community meeting hall.

¹¹ EPM received the authority to proceed with construction of the Makwasa Primary School by letter from the District Council on November 25, 2021. This letter confirms that the construction is subject to an Environmental and Social Management Plan (ESMP) prepared by the Thyolo District Environmental Officer.

Learning from the experience with the Victim Support Units and primary school, the site selection and environmental permitting process will be taken into account in the planning and will be commenced as soon as possible.

F. Water Boreholes

EPM is committed to drilling 2-3 water boreholes per year between 2021 and 2024.

The purpose of this programme is to reduce the burden that women and girls have for fetching water from sources that are far away from the community. This contributes to women's empowerment by reducing Gender-Based Violence in households and in communities. In addition, better access to water will improve the quality of life of women in terms of time management, health and hygiene, and through a decrease in the number of diarrhea cases and school dropouts.

In TRA's First Verification Report, it was noted that 3 sites had been selected in consultation with affected stakeholders and were being surveyed. The selection of sites reflects a combination of community requests for boreholes made to EPM, feedback from women during consultations by the Gender and Welfare Manager about their preferred locations, along with technical aspects related to finding viable sources of water.

Since then, 4 boreholes have been drilled in the following locations:

- Borehole at Mitochi in Mulanje
- Borehole at Nthulo Primary School in Thyolo
- Borehole at Eldorado in Mulanje.
- Borehole at Thornwood in Mulanje.

Based on feedback from our local experts, there has been very positive feedback about the water boreholes that aligns with the objectives of the programme to improve the quality of life of women in terms of time management, health and hygiene, and through a decrease in the number of diarrhea cases and school dropouts. In some locations, electric water pumps have been installed instead of traditional boreholes with hand-pumps. Feedback indicates that this set-up is preferable because electrical pumps can provide multiple water access points, which diminishes the time that women and girls spend waiting for their turn to access the water and potential conflicts between them.

The water borehole programme has surpassed the initial target of 2-3 boreholes and has completed 4 boreholes in the first year. This is in part because the water sites selected have not been too deep or challenging from a drilling perspective. This has also reduced the anticipated cost of the boreholes. In other words, EPM was able to drill more boreholes for less than the budget because of favourable drilling locations. This will not necessarily be the case in subsequent years.

In discussion with EPM management, it has been requested that the cost savings associated with the borehole programme be allocated to the anticipated cost overrun for the construction of the Victim Support Units. TRA is of the opinion that this is a reasonable re-allocation of this cost savings in line with the agreed projects and programmes in the Women's Empowerment Initiative. As noted above, the shortfall in other projects and programmes are to be accelerated within those specific projects and programmes and should not be reallocated. The reallocation of the borehole cost savings is reasonable because the target for the number of boreholes has been exceeded. This will be re-assessed in the

following verification cycle. Other investments in the borehole programme (e.g. installation of pumps or protective infrastructure around the boreholes and pumps to prevent them from being damaged), may also be considered if there are cost savings related to favourable drilling conditions in the future.

Conclusions

TRA's main conclusion in this Second Verification Report is that EPM continues to make good progress on the implementation of the projects and programmes in the Women's Empowerment Initiative. At this point in time, it appears that EPM is on track to meet its overall commitments, subject to the corrective action plans to increase the financial expenditures. From our experience with corporate social investment projects and international development programming, it takes time to ramp up spending for multi-year projects and it is quite normal for there to be less spending in early years of a project or programme and more spending in latter years. Furthermore, there was nothing observed in TRA's engagement with EPM management that causes us to question the company's commitment to make the Women's Empowerment Initiative a success or to fulfill the overall spending requirements.

While there have been delays in execution of the two infrastructure projects (Mulanje and Thyolo Victim Support Units and Makwasa Primary School Relocation), these relate primarily to regulatory requirements related to environmental screening processes and significant spending is anticipated to follow in the coming months. Furthermore, the shortfalls related to financial expenditures in other projects and programmes are understandable in relation to COVID-19 challenges and the need for enhanced consultation and participation. As noted above, TRA has had discussions with EPM management to discuss these challenges and delays and is reassured that there are corrective action plans in place to bring the spending in line with targets.

From the perspective of effectiveness, rights-compatibility and good practices for sustainable development, TRA is pleased to note that our earlier recommendation of adopting a more participatory approach for the implementation of the Women's Empowerment Initiative has been heeded in the development of the different projects and programmes. While the overall thrust of this Second Verification Report is to accelerate the implementation and execution of the Women's Empowerment Initiative—including in relation to financial expenditures—we stress the importance of maintaining a participatory approach and to balance the need to demonstrate progress on activities and spending with the ongoing involvement of the beneficiaries and other stakeholders in these projects and programmes in order to support their empowerment.

