Mozambique Agribusiness Value Chains Development Program -MozAgribiz (P513560)

Program for Results (PforR)

Environmental and Social Systems Assessment (ESSA) Report

May 2026

(DRAFT 2)

Prepared by the World Bank

Executive Summary

This Environmental and Social Systems Assessment (ESSA) is disclosed in draft form to support stakeholder consultations. The findings, risk assessments, and proposed Program Action Plan (PAP) actions are preliminary and will be refined based on stakeholder feedback and ongoing technical review prior to finalization.

1. Program Background and Purpose of the Assessment

The Mozambique Agribusiness Value Chains Development Program (MozAgribiz) is supported through Program-for-Results (PforR) Financing as Phase 1 of a ten-year Multi-Phase Programmatic Approach, with an IDA allocation of US$250 million covering 2026–2031 and a complementary US$20 million Investment Project Financing (IPF) component for technical assistance, capacity building, and systems strengthening. The Program Development Objective is to increase productivity, commercialization, and job creation in selected agribusiness value chains in strategic economic corridors across Mozambique.

This Environmental and Social Systems Assessment (ESSA) assesses the adequacy of Mozambique's existing environmental and social (E&S) management systems and their consistency with the World Bank's six PforR Core Principles[1]. It identifies E&S risks and benefits, evaluates legal and institutional system performance, diagnoses capacity and coordination gaps, and recommends targeted system-strengthening measures consolidated in a twenty-three action Program Action Plan (PAP).

2. Program Description

MozAgribiz operates across three strategic development corridors — Nacala (Nampula, Niassa, Zambezia), Beira (Sofala, Manica, Tete), and Maputo-Limpopo (Gaza, Maputo) — encompassing six priority value chains: maize, rice, livestock (poultry and red meat), fish, horticulture, and forestry. The Program is structured around three mutually reinforcing Results Areas.

Results Area 1 supports increased productivity and commercialization through market-oriented seed system strengthening, support to 500 farmer organizations and 500 MSMEs, and irrigation Public-Private Partnerships (PPPs) targeting at least 10,000 irrigated hectares by end of Phase 1. Results Area 2 supports development of a digital agriculture platform targeting 425,000 registered users and small-scale productive infrastructure, including cold storage and warehouse facilities. Results Area 3 supports systemic policy reforms covering seed legislation, cooperatives regulations, agricultural risk insurance, and artisanal fisheries revenue transfers to community fishing councils.

Implementation is led by MAAP through UGISA, with delivery across multiple national directorates and decentralized provincial and district institutions under a One World Bank Group approach combining IDA, IFC advisory support, and potential MIGA guarantees.

3. Environmental and Social Context

Mozambique's environmental context is defined by high natural resource dependence, pronounced climate vulnerability, and differentiated ecological sensitivity across the Program corridors. Agricultural production is largely rainfed and dependent on soil fertility and water availability, with the priority corridors experiencing land degradation, deforestation pressures, and competition for water resources.

[1] The six (6) Core Principles (CP) are the following: CP1: Environmental and Social Assessment and Management; Systems CP2: Natural Habitats and Physical Cultural Resources; CP3 : Worker and Community Health, Safety, and Labour Conditions Public and Worker Safety; CP4 — Land Acquisition and Loss of Access to Natural Resources; CP5: Indigenous Peoples / Vulnerable Groups & Equitable Access to Benefits; CP6: Social Conflict & Fragility

Mozambique is among the countries most exposed to climate extremes — including cyclones, floods, and droughts — heightening the importance of climate-resilient infrastructure design and sustainable land and water management. The forestry value chain introduces risks of progressive encroachment on forest resources and biodiversity interfaces.

The social context is shaped by rural poverty, gender inequality, land tenure complexity, and widespread informality in labour markets. Women account for the majority of agricultural labour but face structural barriers to land, finance, technology, and market access; female-headed farms are on average 24% less productive than male-headed farms. GBV is widespread and deeply entrenched: the majority of GBV cases recorded at the Integrated Care Centre in Sofala carry a documented labour dimension, confirming a direct and institutionally unaddressed relationship between agricultural labour concentration in the Program corridors and community safety outcomes. Child labour risks exist on a continuum from culturally normalized family agricultural participation to exploitative labour, compounded by limited empirical evidence and low institutional awareness. Labor recruitment networks with trafficking dimensions have been documented in Sofala Province.

4. Environmental Risks and System Assessment

The Program's environmental risks operate at two distinct levels.

- At the investment level, risks are moderate and manageable through well-structured ESMPs. They include localized pollution, construction impacts, agrochemical exposure across the maize, rice, and horticulture value chains, livestock waste management, aquaculture effluent and phytosanitary risks, and Encroachment pressures on biodiversity-sensitive areas arising from forestry value chain development
- At the corridor scale, a structurally more severe category of risk exists that the current project-level EIA system cannot detect: cumulative biodiversity fragmentation in areas proximate to transfrontier conservation complexes, and cumulative water over-abstraction in shared catchments where individual EIAs do not assess sub-catchment water balance and no INIR-ARA coordination mechanism currently exists.

Mozambique's environmental management system is adequate in formal design but structurally constrained in performance.

Seven critical gaps are identified:

- AQUA´s laboratory analytical deficit prevents independent quantitative compliance monitoring;
- The absence of a formal DINAMC-AQUA coordination protocol for post-licensing enforcement creates accountability gaps;
- The non-functionality of district-level environmental oversight due to systemic absence of transport, equipment, and ESMP access leaves investments unmonitored at the site level;
- The absence of a cumulative water abstraction coordination mechanism between INIR and the ARAs makes over-abstraction in shared catchments invisible to the system;
- The absence of critical habitat screening tools, provincial forest maps, and invasive species screening in the EIA process structurally limits biodiversity risk avoidance; and
- The absence of corridor-wide comprehensive environmental baselines makes cumulative landscape-level impacts undetectable regardless of individual project compliance.
- Additionally, no SEA capacity exists for corridor-level appraisal, and social dimensions are not incorporated into the EIA framework as a mandatory pre-screening obligation.

5. Social Risks and System Assessment

Social risks also require disaggregated characterization:

- Land access and labour risks at the investment level are moderate and manageable under the conditions identified by the ESSA.
- GBV and trafficking risks are not moderate and require dedicated Program-level responses not available in the current baseline system. Land access risks are structurally elevated by the sequencing disconnect between DUAT attribution and the EIA process: community consent to land cession is formalized before resettlement entitlements are defined, rendering consent effectively irrevocable even when project conditions later diverge from community understanding. District authorities are not systematically notified of environmental license issuance, and verification of investment eligibility against existing community rights remains operationally unreliable.

Four critical social system gaps are identified:

- The DUAT-EIA sequencing disconnect — combined with non-enforcement of the 20% community participation threshold and the documented practice of waiving Simplified EIAs for some Category B projects — leaves communities without substantive participation guarantees at the point of highest vulnerability.
- The systemic exclusion of the informal sector from IGT's inspection mandate leaves seasonal workers, outgrower household members, and women contributing labour under contract arrangements outside systematic inspection coverage.
- The absence of GBV risk assessment requirements in the EIA framework means that the primary project appraisal instrument does not capture the community safety risk that agricultural labour concentration most predictably generates; dedicated referral pathways for GBV, child labour, and trafficking are not consistently accessible in rural corridor areas.
- The existing GRM architecture remains fragmented and siloed, without a unified entry point or case management: the MAAP GRM operationalized under PROCAVA received no complaints over two years of operation, and the DNTDT land conflict mechanism operates entirely outside the GRM architecture.

Several existing mechanisms demonstrate functional capacity when adequately resourced. The Reference Group, the Multi-Sectoral GBV Mechanism, the *Fala Criança* line (116), NRM Committees, and the extensionist detection model represent tested, operationally accessible components that the Program must strengthen rather than replace.

6. Legal and Institutional Framework

Mozambique has an established legal and regulatory framework governing environmental management, biodiversity protection, land administration and resettlement safeguards, labor conditions, cultural heritage, community health and safety, and stakeholder engagement. These frameworks provide the statutory basis for managing environmental and social (E&S) risks associated with agribusiness development, infrastructure investments, and policy reforms supported under the MozAgribiz Program. The framework comprises national laws, regulations, sectoral decrees, and implementing instruments, supported by designated institutions at central, provincial, and district levels.

Two concurrent institutional transformations are analytically significant:

- The consolidation of agriculture, environment, land, fisheries, and climate mandates under MAAP – formalized by the RI MAAP (Ministerial Diploma 119/2025) – creates structural opportunity for

integrated E&S risk management and establishes the RSSA as the first unit in MAAP's structure with an explicit mandate for E&S safeguards and grievance management. However, the RSSA's safeguards clearance function lacks a binding legal instrument, and its operational capacity remains under consolidation. The 2019 sub-national governance reform establishes a dual provincial architecture whose coordination is managed informally;

- The pending presidential reform to extinguish State Representation services would resolve the overlap but introduces further transition uncertainty that the Program must monitor.

The Draft New Land Law (Draft 03, June 2025) remains unratified and introduces five material transition risks: the institutional void created by the planned but not yet operationalised new land administration authority; extensive reliance on future secondary instruments for the operationalisation of key safeguard provisions; insufficiently mandatory integration of environmental screening into land use authorisation processes; the absence of a clear hierarchy between overlapping cadastral systems in the Program corridors; and the potential adverse application of the draft law's 12-month idle land deadline to areas of seasonal communal use or informal customary occupation. The current Land Law and its implementing regulation remain the operative legal baseline for all Program sub-projects until the new law enters into force.

7. Compliance with Core Pinciples

Mozambique's legal and regulatory framework provides a broadly adequate statutory basis for managing Program-related E&S risks, vis-à-vis the six PforR Core Principles, despite some legal gaps that can be addressed through Program-level measures, not requiring any revision or enactment of legal nature. For the most part, the legal framework effectiveness is constrained by limited institutional capacity, fragmented inter-agency coordination, insufficient field presence, and the absence of program-scale instruments such as a strategic environmental assessment and an integrated grievance redress mechanism. There are, however, two areas that require legislative or regulatory action: the conclusion and approval of the MAAP E&S Safeguards Policy and the revision of the EIA Directive to ensure that social safeguards are properly integrated into project design, screening, impact assessment and monitoring.

8. Program Boundary and Exclusions

The PforR boundary is clearly defined and appropriate for a PforR operation. Excluded activities include Category A and A+ EIA-classified investments; activities requiring the physical displacement of persons from their dwellings; activities in or adjacent to protected areas, critical natural habitats, or permanently protected forest zones; large-scale forestry extraction or natural forest conversion; activities generating hazardous waste or pollution risks beyond system management capacity; and irrigation PPP arrangements requiring new water abstraction infrastructure with unassessed cumulative shared-catchment impacts. E&S Screening and escalation of screening finding operate at two levels — central RSSA review and sub-national provincial pre-screening — with clear pathways for exclusion or referral to the IPF component. The ESSA confirms these mechanisms are conceptually sound but require consistent application at decentralized levels, particularly for irrigation PPP activities where informal or customary users without documented DUATs may occupy scheme-adjacent areas.

9. Stakeholder Consultations

Stakeholder consultations were conducted in two phases. Phase 1 comprised structured interviews and focus group discussions at central, provincial, and district levels between 23 March and 13 April 2026, covering Maputo, Beira (Sofala Province), and Dondo District. Phase 2 comprises a formal stakeholder meeting to be held in June 2026 with virtual participation by all eight corridor provinces and Dondo District, followed by a written comment period closing 10 working days after the meeting. The draft ESSA and PAP

were disclosed 10 working days prior o the meeting on the World Bank and Government of Mozambique websites. Consistent themes raised during Phase 1 included staffing and resource constraints at provincial level as the primary obstacle to E&S oversight; operational constraints on monitoring and inspections; complexity of multi-authority coordination; limited E&S institutional capacity independent of external financing; and concern by provincial directorates about insufficient involvement in Program design. No stakeholder inputs identified issues that would preclude reliance on country systems.

The second round of stakeholder consultation will be used to validate key findings of the ESSA, including identification of vulnerable groups, adequacy of current systems, and prioritization of Program Action Plan measures. Feedback received will inform refinement of inclusion targeting mechanisms, grievance redress arrangements, and institutional strengthening actions.

10. Overall Risk Assessment and Program Action Plan

The overall E&S risk of the MozAgribiz Program is assessed as **Substantial**. This reflects the Program's decentralized implementation across multiple corridors, the cumulative and structurally undetectable character of corridor-scale biodiversity and water resource risks, the confirmed but institutionally unaddressed relationship between agricultural labour concentration and GBV outcomes, the structural dependency of all implementing institutions on external Program support, and a subset of regulatory design absences that capacity support alone cannot address.

These risks are manageable within existing country systems, provided the PAP is implemented in full. The ESSA concludes that Mozambique's systems provide a sound and appropriate basis for PforR financing and supports reliance on country systems, subject to the twenty-three system-strengthening measures set out in the PAP. The PAP addresses seven critical environmental system gaps (above referred in section 5) and four critical social system gaps (referred in section 6) through actions organized across three priority tiers: Critical Pre-Effectiveness actions (PAP-01 and PAP-02) addressing screening and stakeholder consultation standards; Critical Pre-DLI actions (PAP-03 and PAP-20) addressing the Program GRM and Strategic Environmental Assessment; and High and Medium priority actions covering environmental monitoring, water governance, biodiversity, land access, labour, GBV, OHS, information systems, institutional governance, and cultural heritage.

The ESSA also identifies transitional legislative risks — particularly the pending new Land Law and the provincial governance reform — and recommends that the Program maintain structured dialogue with legislative bodies, define clear triggers for formal review of Program documents upon enactment of relevant legislation, secure dedicated legal advisory capacity, and implement targeted community communication on potential changes to land rights or administrative arrangements. Program sub-project preparation schedules must be aligned with mandatory DUAT consultation timelines, water use licensing requirements, and environmental licensing procedures to prevent scheduling shortfalls and ensure the validity of required authorizations.

11. Traceability of ESSA Findings to PAP and DLIs

The ESSA establishes a traceability framework linking identified environmental and social gaps to specific PAP actions, DLIs, and IPF support, ensuring weaknesses are addressed through concrete, monitorable measures. Proposed DLIs include:

1. Functional GRM with defined response/resolution standards.
2. Appointment of dedicated gender/social specialist for the RSSA and E&S focal points for implementing institutions.

3. Operationalization of formal DINAMC–AQUA coordination protocol with enforcement and emergency response obligations.
4. Quarterly E&S monitoring visits and institutionally budgeted district monitoring.
5. Independent AQUA provincial delegations' verification function fully operational
6. Operationalize DINASAB provincial inspection capacity;
7. Corridor monitoring function operational within DINAMC;
8. DINAMC SEA operational capacity confirmed by mid-Program
9. Extensionist coverage of outgrower schemes with labour standards sensitization.
10. IPM adoption rate among Program beneficiaries following IPF baseline.

This framework ensures systemic risks are matched to actionable, proportionate measures, strengthening safeguards and institutional capacity throughout Program implementation.

12. The Program Action Plan

The PAP's twenty-four actions can be understood across seven areas of commitment.

Protecting land rights (PAP-06, PAP-07, PAP-08, PAP-09, PAP-10): The Program is expected to ensure that that community consultation records accompany DUAT documentation before environmental licensing begins; avoid investment approvals in areas with unresolved land conflicts; apply a conflict sensitivity screening tool before any land or EIA process begins; promote updates to territorial plans in the corridors; and encourage cross-checks between agricultural and mining land titles as a standard step for all investments.

Protecting workers and preventing GBV (PAP-11, PAP-12, PAP-13, PAP-14, PAP-15): The Program will support the establishment of a framework covering worker codes of conduct, ethical recruitment, GBV prevention, and supply chain due diligence. All EIAs will be expected to include a dedicated chapter specifically assessing GBV and community health risks. The Program will support GBV prevention and survivor support services across all three corridors. The Program will support the expansion of labour inspections to anchor investor sites and outgrower schemes, as well as the commissioning of child labour prevalence studies before baselines are set.

Making the grievance system work (PAP-02, PAP-03): The Program will promote the establishment of an unified, accessible grievance mechanism across all three corridors, using NRM Committees as first-level contact points, with district agricultural services focal points for escalation, a 21-day response standard, and a 70% case resolution target. Minimum participation thresholds and gender balance requirements will be promoted across all stakeholder consultation processes. Sensitive cases involving GBV, child labour, and trafficking are expected to have dedicated referral pathways. A functioning grievance mechanism is expected to serve as a key precondition for the release of Program disbursements.

Strengthening environmental oversight (PAP-01, PAP-16, PAP-17, PAP-18): The Program's screening and licensing procedures are expected to be updated to incorporate an exclusion list and to discourage the practice of waiving Category B Simplified EIAs. District-level monitoring capacity will be supported through the provision of transport, equipment, and improved access to management plans. A coordination protocol between DINAMC and AQUA for post-licensing enforcement is planned to be developed and published. Laboratory capacity for independent environmental testing will be progressively strengthened across all three corridors.

Managing water resources and biodiversity (PAP-19, PAP-20, PAP-21): A formal coordination mechanism between INIR and the ARAs is envisaged to be developed to track cumulative water withdrawals. EIAs for irrigation investments are expected to include sub-catchment water balance assessments. A biodiversity

screening checklist, updated provincial forest maps, and invasive species risk protocols are planned to be integrated into the EIA process. A consultation protocol between DINAMC and the National Conservation Areas Administration (ANAC) is anticipated to be established for EIA review.

Commissioning corridor-scale assessments (PAP-22): A SEA covering all three corridors - including ecological, hydrological, and land-use baselines – is planned to be commissioned at Program effectiveness. This action is considered high-priority in the technical assistance component and is expected to be completed before investments scale across the corridors. Its findings are intended to serve as guiding parameters for all individual project EIAs.

Building institutional capacity (PAP-04, PAP-05, PAP-23): Environmental and social focal points with formal terms of reference are planned to be established in all implementing agencies. A MAAP Safeguards Policy designating RSSA as clearance authority is expected to be developed and approved. Occupational health and safety guidelines are anticipated to be updated to cover outdoor agricultural conditions. Cultural heritage chance-find procedures are intended to be embedded in all works contracts. An integrated information system is envisaged to be established to publicly disclose EIAs, licenses, management plans, and monitoring reports, and to track commitments made to communities.

Operationalizing Inclusion in Project Design (PAP-24): The Program is expected to generate positive social benefits, including for women, youth, and vulnerable and disadvantaged groups. Specific targeting criteria and operational measures to ensure inclusion (including for women, informal workers, and other vulnerable populations) will be further defined and integrated into Program implementation arrangements following stakeholder consultations.

Summarized Program Action Plan (PAP)

PAP Ref	Domain	PforR Component — Summary	IPF Component — Summary	Lead Institutions	Priority/Timeline	Monitoring (verification & completion indicators)
PAP-01	Screening & Environmental Licensing	Update the Program Operations Manual to include a binding exclusion list, a social risk screening tool aligned with Decree 54/2015, mandatory SPA environmental licensing for all sub-projects, and a strict ban on waiving Category B Simplified EIAs. Review DLI timelines to prevent pressure for shortcuts in project categorization.	Develop comprehensive exclusion thresholds for the program. Develop screening tools, ESMP templates, and social risk pre-screening checklists; train RSSA, SDPI, and SDAE staff across all corridors. Issue a joint RSSA-DINAMC guidance note confirming Category B Simplified EIAs cannot be waived. Support independent verification missions for DLI compliance.	DINAMC, RSSA	Critical / Pre-Effectiveness	**PforR:** POM approved at effectiveness, including exclusion list, social risk screening tool, and binding ban on Category B EIA waivers. **IPF:** Training completion records confirming all targeted staff trained on screening tools and ESMP templates (verified before effectiveness, updated annually thereafter).
PAP-02	Stakeholder Consultation	Embed in the Program Operations Manual (with PAP-01) a minimum participation threshold of 20% of affected populations per Ministerial Directive 130/2006 and a binding gender balance requirement with a defined minimum representation threshold for all consultations.	Develop monitoring tools for gender parity and minimum participation requirements. Support DINAMC, SPA, and RSSA to actively review submitted consultation reports against these standards.	DINAMC, RSSA	Critical/Pre-Effectiveness	**PforR:** POM includes binding 20% minimum participation threshold and gender balance requirement, confirmed by RSSA at effectiveness. **IPF:** At least one consultation report per corridor reviewed against the new standards, with documented findings (verified annually from Yr1 Q3).
PAP-03	GRM Design, Operationalization & Accessibility	Build an integrated GRM using existing mechanisms (including the DNTDT land conflict channel) with NRM Committees as first-tier entry points, escalation to SDAE focal points, and mandatory community feedback. Set performance standards: 21-day response, 70% resolution rate, coverage across all Program districts. Make a functional GRM a hard precondition for DLI compliance.	Set up and test the GRM platform (Green Line/Survey123 interoperability); train district focal points; produce awareness materials in local languages. Establish referral protocols for sensitive cases (GBV, child labour, trafficking) and integrate the DNTDT land conflict mechanism into the GRM architecture. Conduct a third-party GRM accessibility assessment before first DLI verification.	RSSA, UGISA, DINAMC, District Administrations, DPGCAS & SDSMAS (sensitive referral), DNTDT (land conflict)	Critical/ Pre-DLI	**PforR:** Third-party GRM accessibility assessment completed with satisfactory rating before first DLI verification; GRM performance standards (21-day response, 70% resolution rate) confirmed operational (before first DLI verification). **IPF:** Referral protocols for sensitive cases (GBV, child labour, trafficking) documented, tested, and integrated into the GRM architecture(Yr1 Q2).
PAP-04	E&S Focal Points & Institutional	Establish E&S focal points with formal Terms of Reference in all implementing agencies as DLI-verifiable results.	Provide temporary funding for E&S focal point positions while institutions build recurrent budget capacity. Design	RSSA, all implementing institutions	High/Yr 1	**PforR:** E&S focal points with formal ToRs established in all implementing agencies; gender

	Safeguards Capacity	Allocate non-project operational budgets for focal point activities. Create a formal inter-agency coordination mechanism with documented minutes and workplans. Establish a dedicated gender and social specialist position within RSSA.	and deliver Training of Trainers programs for each agency. Support the inter-agency coordination platform with administrative backing.	(central and provincial)		and social specialist position filled within RSSA (confirmed by Yr1 Q1) **IPF:** Training of Trainers program delivered to all agencies, confirmed by training records and post-training assessments (confirmed by Yr1 Q3).
PAP-05	District-Level Monitoring Operational Capacity	Require district services to receive and file EIA reports and ESMPs as a standard compliance condition. Require SPA/DPDTA to notify districts of license issuance within 30 days. Set a minimum quarterly monitoring visit frequency for all Program investments as a DLI-verifiable result. Transition to institutionally budgeted district monitoring from Year 3.	Provide transport, fuel, per diem, and field equipment to SDPI and SDAE across all corridor provinces. Train SDPI/SDAE staff on ESMP monitoring and incident reporting; configure a MIS to track visits, notifications, and ESMP receipts.	SDPIs, SDAEs, RSSA, UGISA, DINAMC	High/Yr 1	**PforR:** Minimum quarterly monitoring visits conducted for all Program investments, confirmed by visit records in MIS (annual verification). **IPF:** MIS configured to track visits, license notifications, and ESMP receipts, confirmed by system operational status report (Yr1 Q2)
PAP-06	Analytical Compliance Capacity — Laboratory & Environmental Monitoring	Require AQUA-certified laboratory service agreements before approving investments with significant agrochemical or effluent risk. Require documented sample submission and chain-of-custody protocols as binding compliance standards. Ensure AQUA provincial delegations conduct independent environmental verification as a DLI-verifiable result.	Procure water quality monitoring equipment for AQUA provincial offices in all three corridors. Negotiate and finance certified laboratory service contracts per corridor province. Train AQUA provincial staff on field sampling and chain-of-custody compliance.	AQUA (central and provincial), RSSA, DINAMC, UGISA, ARAs	High/Yr 1	**PforR:** AQUA-certified laboratory service agreements in place before investment approvals in sub-catchments with significant agrochemical use, confirmed by signed agreements (Prior to first investment in relevant sub-catchments). **IPF:** Water quality monitoring equipment procured for AQUA provincial offices in all three corridors, confirmed by procurement records (Yr1 Q3).
PAP-07	Land Access, DUAT Verification & Resettlement Framework	Require community consultation records to accompany DUAT documentation at the start of environmental licensing, as binding eligibility conditions and inputs to Resettlement Plans. Bar investment approvals in areas with documented unresolved land conflicts. Apply a conflict sensitivity pre-screening tool at investment origination, before DUAT and EIA processes begin.	Develop a DUAT pathway verification checklist integrated into PAP-01 screening tools. Develop a conflict sensitivity screening tool and train RSSA and SDPI officers across all corridor provinces.	MAAP, DNTDT, RSSA, DPDTA, SPA, District Administrations	High/Yr 1	**PforR:** Community consultation records required as binding eligibility conditions for all investment approvals; conflict sensitivity pre-screening applied at investment origination, confirmed by RSSA screening records (Yr1 Q1). **IPF:** Water quality monitoring equipment procured for AQUA provincial offices in all three

						corridors, confirmed by procurement records (Yr1 Q2)
PAP-08	Labour Standards, Child Labour, GBV Prevention, Labour Influx & Outgrower Inclusivity	Establish a program-level framework covering a worker code of conduct, ethical recruitment, GBV prevention protocols, and supply chain due diligence. Require sex-disaggregated household member registration. Prohibit undocumented labour intermediaries. Implement trafficking prevention protocols for seasonal recruitment. Include labour standards sensitization in outgrower schemes as a DLI-verifiable result.	Commission child labour prevalence studies in all three corridors. Produce labour rights awareness materials in local languages. Design and operationalize IGT joint monitoring protocols, including financed inspection visits to anchor investor sites and outgrower schemes.	MTGAS, MAAP, DINAE, DINAG, Anchor Investors, INAS, RSSA, UGISA, IGT Provincial Delegations	High/Yr 1	**PforR:** Program-level labour framework adopted (including code of conduct, GBV prevention protocols, and supply chain due diligence); labour standards sensitisation included in outgrower schemes, confirmed by framework document (Yr1 Q2). IPF: Child labour prevalence studies commissioned in all three corridors; IGT joint monitoring protocols operational with at least one documented inspection visit per corridor (Yr 2 Q1).
PAP-09	Corridor-wide Environmental Baselines & Monitoring Function	Establish an operational corridor monitoring function within DINAMC's Environmental Evaluation Department as a DLI-verifiable result. Produce annual corridor environmental assessments reported to a multi-institutional body. Transition financing to institutional recurrent budgets from Year 3.	Commission ecological, hydrological, and land-use baselines for all three corridors (with ARA as co-author of the hydrological baseline). Strengthen the Environmental Evaluation Department with staff, methodology, and monitoring tools. Finance RSSA corridor monitoring missions across all three corridors.	DINAMC, RSSA, ARAs, AQUA (all corridor provinces), IIAM, ANAC, DINASAB	High/Yr 1	**PforR:** Corridor monitoring function operational within DINAMC Environmental Evaluation Department; first annual corridor environmental assessment produced and submitted to multi-institutional body (Y1 Q4) **IPF:** Ecological, hydrological, and land-use baselines completed for all three corridors, confirmed by baseline reports (Yr1 Q3).
PAP-10	Water Resource Governance & Catchment-Level EIA Requirements	Create a formal INIR-ARA coordination mechanism with information-sharing protocols and joint cumulative abstraction assessments. Include quantified water efficiency conditions in ARA licenses for irrigation sub-projects. Require cumulative sub-catchment water balance chapters in EIAs for high-risk sub-catchments and formal ARA catchment consultations before approving irrigation investments above a defined threshold.	Assess priority catchments in all three corridors covering water balance, allocation registers, and over-abstraction risk. Provide technical assistance for ARA-AQUA protocol development and integrate catchment monitoring data into the Program MIS.	MAAP, ARA Centro, ARA Norte, ARA Sul, AQUA (all corridor provinces), DINAMC, RSSA, UGISA, INIR	High/Yr 1	**PforR:** Formal INIR–ARA coordination mechanism established with documented information-sharing protocols (Yr1 Q2); cumulative water balance chapters required in EIAs for defined high-risk sub-catchments, confirmed by EIA review records (annually from Yr1 Q2). **IPF:** Priority catchment assessments completed for all three corridors covering water balance, allocation registers, and over-abstraction risk, confirmed by assessment reports (Yr 1 Q4)

PAP-11	GBV Prevention, Community Health & Social Protection Integration	Require all EIAs to include a dedicated health impact chapter specifically addressing GBV risks, worker safety, and disease transmission as a binding eligibility condition across all three corridors.	Support DPGCAS to deliver GBV prevention and community sensitization activities across all corridor provinces, including survivor referral pathways and documentation of referral routes to PRM. Provide operational budget support to SDSMAS in all corridor provinces.	DPGCAS, SDSMAS, PRM, RSSA, DINAE, UGISA	Medium/Yr 1–2	**PforR:** All approved EIAs include a health impact chapter addressing GBV risks, worker safety, and disease transmission, confirmed by RSSA EIA review records (Ongoing, from first EIA approval). **IPF:** DPGCAS GBV prevention activities operational across all corridor provinces with documented survivor referral pathways, confirmed by activity reports (Yr1 Q3).
PAP-12	Agricultural Inputs, IPM Standards & Chemical Waste Management	Develop a Program-level Pest Management Plan covering a restrictive pesticide list, an intra-MAAP OHS coordination protocol, and mandatory DINASAB participation in DINAE training cycles. Embed minimum input safety standards in anchor investor agreements. Track IPM adoption rates as a DLI-verifiable result. Document and test an animal health surveillance protocol before any livestock activities begin.	Procure chemical waste management infrastructure across all Program investment areas. Build and deliver IPM training through DINAE's cascade model. Develop and test an animal health emergency protocol for livestock components, including foot-and-mouth disease vaccination arrangements.	MAAP, DINAE, DINASAB, DNFFB, Anchor Investors, IIAM, RSSA	Medium/Yr 1–2	**PforR:** Program-level Pest Management Plan adopted with prohibited pesticide list; IPM adoption rate tracked among Program beneficiaries as a baseline, confirmed by PMP document and baseline survey (Y1 Q2). **IPF:** Chemical waste management infrastructure procured, confirmed by procurement records (Y2 Q1); IPM training delivered through DINAE cascade model, confirmed by training records (annually from Y2 Q1).
PAP-13	E&S Information Systems, Investment Register & Proactive Disclosure	Publicly disclose EIAs, environmental licences, ESMPs, and monitoring reports as a standard compliance condition. Produce and verify annual E&S compliance reports. Include a Program MIS function to track commitments made to communities.	Build a consolidated Program-level investment database covering E&S status across all corridors. Establish a web platform for proactive document disclosure. Integrate SGLA with SPA systems and design a MIS commitment tracking module linked to license notifications and monitoring visit checklists.	RSSA, DINAMC, UGISA, SPAs, DPDTAs, DNTDT	Medium/Yr 1–2	**PforR:** Program MIS operational with E&S status tracking across all corridors and public disclosure platform live (Yr1 Q3); first annual E&S compliance report produced (annually, from Yr1 Q4). **IPF:** Consolidated investment database built and community commitment tracking module operational, confirmed by system status report (Yr1 Q3*)*.
PAP-14	Post-Licensing Compliance — DINAMC–AQUA Sanctioning	Establish a binding DINAMC-AQUA protocol with defined timelines for information exchange, escalation criteria for sanctioning, emergency	Provide technical assistance for protocol design. Deliver joint DINAMC-AQUA training on procedures and emergency response obligations.	DINAMC, AQUA (central and provincial delegations)	High/Yr 1	**PforR:** DINAMC-AQUA coordination protocol published in a binding instrument and confirmed as a precondition for DLI

	Protocol & Coordination	response obligations, and license cancellation procedures. Publish the protocol in the official gazette before investments scale in ecologically sensitive sub-catchments. Confirm protocol implementation as a precondition for DLI verification of compliance monitoring outcomes.	Monitor protocol implementation through RSSA supervision missions from Year 1 with annual reporting of documented activation cases.			compliance verification *(*Before first DLI verification) **IPF:** Joint DINAMC-AQUA training on procedures and emergency response obligations delivered, confirmed by training records (Yr1 Q3)
PAP-15	Biodiversity Conservation & Invasive Species	Develop an integrated forest and biodiversity screening checklist operationalizing zone classification, permanent protection regimes, and critical habitat definitions. Set minimum biodiversity content standards for EIAs requiring multi-season field surveys, specialist input, and landscape connectivity assessments. Require pre-introduction invasive species risk assessments for all investments with documented invasive potential in tropical African ecosystems.	Develop minimum biodiversity EIA content guidance jointly with ANAC and formalize an ANAC-DINAMC consultation protocol for agribusiness EIA review. Develop an invasive species risk assessment protocol under DINASAB's mandate and train SPA, DPDTA, DINAMC, and SDPI staff on ecological risk identification.	DINAMC, DNFFB, ANAC, DINASAB, IIAM, RSSA, SPA, DPDTA, UGISA	High/Yr 1	**PforR:** Biodiversity screening checklist and minimum EIA content standards operational (annually from Yr1 Q2); ANAC-DINAMC consultation protocol formalized with agreed response timelines (Yr1 Q2). **IPF:** Minimum biodiversity EIA content guidance note developed jointly with ANAC (Yr 2 Q1); invasive species risk assessment protocol developed (Yr 2 Q1); and SPA, DPDTA and SDPI staff trained (annually from Yr 2 Q1)
PAP-16	Spatial Governance — Territorial Planning (PDUT) Updating & Spatial Compatibility Verification	Use PDUT validity status as a verifiable investment screening condition. Apply enhanced spatial compatibility checks — including field confirmation against updated cadastral data — in districts with outdated PDUTs. Prioritize PDUT updates across three corridors with defined timelines and budget commitments. Extend SIGIT to district level and complete critical modules for provincial reporting and MAAP systems interoperability.	Finance priority PDUT updates across corridor districts. Develop a field verification protocol enabling SDPI to confirm land use and rights consistency in districts without current PDUTs. Strengthen DPDTA spatial planning capacity and support SIGIT extension to district level.	DNTDT, DPDTA, SPA, District Administrations, SDPI, MAAP, RSSA, UGISA	High/Yr 1	**PforR:** PDUT validity status used as verifiable investment screening condition in all corridor districts, confirmed by screening records; SIGIT extended to district level and critical modules operational (Yr1 Q2). **IPF:** Priority PDUT updates financed and completed in at least one corridor district per corridor; field verification protocol for districts without current PDUTs developed and deployed (Yr 2 Q2)
PAP-17	Multi-Sector Resource Governance — Agriculture–Mining Cross-Cadastre Overlap Screening	Make cross-cadastre overlap checks between agriculture and mining a mandatory pre-screening step for all Program investments, before DUAT and EIA processes begin. Establish a formal requirement for districts to be notified of mining concession	Develop an overlap screening tool linking MAAP and MIREME cadastral systems. Train SDPI staff on overlap identification and escalation procedures. Conduct multisector conflict mapping in priority corridor districts to establish a baseline of active	DNTDT, MIREME, DPDTAs, SDPIs, RSSA, UGISA	High/Yr 1	**PforR:** Cross-cadastre overlap check mandatory for all Program investments with documented evidence in the eligibility file, confirmed by RSSA screening record (Yr 1 Q1).

		boundaries. Exclude investments in zones with active, unresolved mining-agriculture conflicts until formally resolved.	conflicts before investment approvals begin.			**IPF:** Overlap screening tool operational with data access protocol linking MAAP and MIREME cadastral systems; multisector conflict baseline mapping completed in priority corridor districts (Yr 1 Q3).
PAP-18	Institutional Governance — MAAP Binding Safeguards Policy Instrument	Approve a binding E&S Safeguards policy with a defined timeline, designating RSSA as clearance authority for all Ministry-managed or supervised project approvals. Incorporate requirements covering GBV, OHS, child labour, community safety, labour conditions, and land access into the revised EIA Directive. Cross-reference RSSA safeguards clearance as a condition for MAAP directorate investment approval decisions as an internal enforcement pathway pending adoption of the binding policy.	Provide technical assistance to draft the MAAP safeguards policy instrument, incorporating gender specialist input from PAP-04. Finance the EIA Directive revision process; formal initiation must occur before Year 1, Quarter 3.	MAAP, RSSA, DINAMC, UGISA	High/Yr 1	**PforR:** Binding MAAP E&S Safeguards policy instrument approved with RSSA designated as clearance authority, confirmed by official approval document (Yr 1 Q2). **IPF:** EIA Directive revision process formally initiated before Year 1, Quarter 3, confirmed by documented initiation record (Yr 1 Q3).
PAP-19	Agricultural Input Safety & Animal Health — DINASAB Operational Capacity	Operationalize DINASAB provincial inspection capacity through SPAEs and DPAPs as a DLI-verifiable result, with quarterly field visits achieving at least 60% execution in corridor provinces. Document and test an animal health emergency protocol before any Program livestock activity begins, including foot-and-mouth disease vaccination procurement. Include DINASAB as a standing partner in the Program's institutional coordination architecture for input supply chain compliance oversight.	Equip DINASAB provincial offices with vehicles, field inspection equipment, and communication tools to enable quarterly inspections and rapid outbreak reporting. Develop and test a livestock emergency protocol in coordination with DINAE and DPAPs.	DINASAB, MAAP, DINAE, DPAPs, SPAEs, UGISA	Medium/Yr 1–2	**PforR:** At least 60% of DINASAB provincial counterparts inspection plans executed annually in corridor provinces (annually from Y1 Q3); animal health emergency protocol documented and tested before any Program livestock activity begins (Yr1 Q2*)* **IPF:** DINASAB provincial counterparts equipped with vehicles and field inspection equipment; livestock emergency protocol developed in coordination with DINAE and DPAPs (Yr1 Q3)
PAP-20	Strategic Environmental Assessment — Normative Framework,	Commission and complete a Program-level SEA (or equivalent corridor-scale assessment) as a precondition for investment approval at scale, with SEA findings as binding parameters for	Commission the corridor SEA at Program effectiveness for all three corridors — the highest-priority IPF activity — delivering ecological and hydrological baselines, cumulative	DINAMC (Environmental Evaluation Department), RSSA, ARAs,	Critical/Pre-DLI	**PforR:** Program-level SEA completed as a precondition for investment approval at scale; DINAMC SEA operational capacity confirmed including designated

	Institutional Mandate & Program-Level Application	individual project EIAs. Confirm DINAMC Environmental Evaluation Department's SEA operational capacity as a DLI-verifiable result, including designated SEA specialists and at least one completed SEA by mid-Program.	impact thresholds, corridor-specific EIA parameters, spatial zoning, and monitoring indicators (ARA contributing as co-author of the hydrological baseline). Train DINAMC and RSSA staff on SEA methodology and embed SEA findings in PAP-01, PAP-09, PAP-10, and PAP-15.	MAAP, UGISA, AQUA, MOPHRH		specialists and approved methodology (Yr2 Q2). **IPF:** Corridor SEA inception report delivered at Program effectiveness; final SEA report covering all three corridors completed with ecological, hydrological, and cumulative impact components (Yr2 Q4)
PAP-21	OHS and MAAP-MTGAS Coordination — Joint Technical Working Group and Field Guidelines	Establish a MAAP-MTGAS joint technical working group for Program sub-projects. Create an information-sharing and referral protocol covering OHS in agro-industry and agrochemical operations, gender in agriculture, child labour, and labour influx management. Produce supplementary Program-level OHS guidelines covering heat stress, agrochemical handling, PPE for outdoor conditions, and emergency response.	Develop a single integrated operational guide covering OHS, gender, child labour, and labour influx safeguards. Train DINAMC/RSSA, DINASAB, DINAE, and MTGAS staff on its application across all corridor contexts.	MAAP (DINAMC/RSSA, DINAE, DINASAB), MTGAS, UGISA	High/Yr 1	**PforR:** MAAP–MTGAS joint technical working group established with Terms of Reference; supplementary Program-level OHS guidelines published (Yr 1 Q2). **IPF:** Integrated operational guide developed and staff from DINAMC/RSSA, DINASAB, DINAE, and MTGAS trained on its application, confirmed by training records (Yr 1 Q4).
PAP-22	Artisanal Fisheries — CCPs: Legal Status, Operational Capacity, and Integration	Clarify the legal status of Community Fisheries Councils (CCPs) and integrate them into Program implementation instruments as a PforR institutional result. Complete CCP capacity assessments across all three corridors. Define and operationalize the framework linking CCPs to Local Councils in fisheries sub-project consultation and appraisal. Integrate CCPs into the Program GRM escalation pathway as a disbursement condition.	Train RSSA and DINAMC staff to conduct and interpret CCP capacity assessments as a recurring E&S monitoring function. Train CCP members and RSSA/DINAMC counterparts on GRM escalation procedures and their roles in the referral pathway.	MAAP, DINAPA, UGISA, Local Councils	High/Yr 1	**PforR:** CCP legal status clarified and CCPs integrated into Program implementation instruments and GRM escalation pathway, confirmed by implementation instrument and GRM documentation (Yr 1 Q2). **IPF:** CCP capacity assessment completed across all three corridors; CCP members and RSSA/DINAMC counterparts trained on GRM escalation procedures (Yr1 Q3).
PAP-23	Cultural Heritage — Chance Find Procedures, Socio-Cultural Impact Assessment, and MEC/DNPC-DINAMC Coordination	Incorporate standardized chance find procedures into all Program works contracts, reviewable at each supervision mission as a PforR result. Establish a coordination protocol between MEC/DNPC heritage licensing and DINAMC EIA licensing to ensure	Develop standardized chance find procedures, minimum standards for pre-construction archaeological surveys, and a socio-cultural impact assessment methodology; revise cost templates to include the statutory 0.5% survey contribution. Formalize the MEC/DNPC-DINAMC coordination	UGISA, MEC/DNPC, ARPAC, MAAP/DINAMC, District Administrations and traditional authorities	High/Yr 1	**PforR:** Standardized chance find procedures incorporated into all Program works contracts and verified at each supervision mission; MEC/DNPC–DINAMC coordination protocol established (Before first works contract; Ongoing).

		aligned processes and clear responsibilities.	protocol and develop traditional authority engagement guidance for use in corridor sub-project consultations.	(three corridor provinces)		**IPF:** Pre-construction archaeological survey standards and socio-cultural impact assessment methodology developed; works cost templates revised to include the statutory 0.5% survey contribution (Yr 1 Q2).
PAP-24	Inclusion of Vulnerable Groups	Ensure that program design and execution explicitly apply targeting criteria for women, youth, informal workers, and vulnerable groups. Embed these measures into the results framework so that inclusion outcomes are tracked and incentivized.	Finance technical assistance to define detailed targeting criteria and operational measures. Support stakeholder consultations to refine inclusion strategies. Provide resources for piloting, training, and institutionalizing these mechanisms within implementing agencies.	MAAP (DINAMC/RSSA) MTGAS DPGCAS SDSMAS UGISA	PforR actions 1 and 2: Critical/Pre-Effectiveness ---------- Remaining PforR and IPF actions: High/ Year 1 (with progressive operationalization)	**PforR:** Inclusion indicators integrated into the Program results framework and, where relevant, DLI verification protocols, confirmed by results framework document (by Effectiveness); Inclusion outcomes tracked in Program results framework (Yr1 Q2). **IPF:** Targeting criteria defined, operational manuals and outreach protocols developed, and inclusion mechanisms piloted in at least one corridor, confirmed by pilot report (Yr1 Q4).

The Summarized PAP does not contain all detailed sub-actions, qualifiers and conditions, and internal PAP cross-references. Additionally, it a reduced institutional specificity. The detailed PAP Is presented in Section 11.3 of the Main ESSA Report.

List of Abbreviations and Acronyms

AGRA	Alliance for a Green Revolution in Africa
ANAC	National Administration of Conservation Areas (*Administração Nacional das Áreas de Conservação*)
APSA	Agricultural Production Support Activity
APPSA	Agricultural Productivity Program for Southern Africa
AQUA	National Agency for Environmental Quality Control (*Agência Nacional para o Controlo da Qualidade Ambiental)*
ARA	Regional Water Administration (*Administração Regional de Águas*)
ARA Centro	Regional Water Administration – Centre
ARA Norte	Regional Water Administration – North
ARA Sul	Regional Water Administration – South
ARPAC	Archive of Cultural Heritage
AVZ	Vale do Zambeze Development Agency (*Agência de Desenvolvimento do Vale do Zambeze*)
Bt	Bacillus thuringiensis
CBD	Convention on Biological Diversity
CCP	Community Fisheries Council
CEDAW	Convention on the Elimination of All Forms of Discrimination Against Women
CEP	Provincial Executive Council (*Conselho Executivo Provincial*)
CFM	Mozambique Railways (*Caminhos de Ferro de Moçambique*)
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
COMAL	Labour Mediation and Arbitration Commission
CRC	Convention on the Rights of the Child
CTGRD	Technical Council for Disaster Risk Management (*Conselho Técnico de Gestão de Riscos de Desastres*)
DINAE	National Directorate of Agricultural Extension (*Direcção Nacional de Extensão Agrária*)
DINAG	National Directorate of Gender
DINAMC	National Directorate of Environment and Climate Change (*Direcção Nacional de Ambiente e Mudanças Climáticas)*
DINAPA	National Directorate of Fisheries and Aquaculture (*Direcção Nacional de Pescas e Aquacultura*)
DINASAB	National Directorate of Agricultural Health and Biosafety (*Direcção Nacional de Saúde Agrária e Biossegurança*)
DLI	Disbursement-Linked Indicator
DNC	National Children's Directorate (*Direcção Nacional da Criança*)
DNFFB	National Directorate of Forestry and Wildlife
DNG	National Gender Directorate (*Direcção Nacional do Género*)
DNPC	National Directorate of Cultural Heritage
DNTDT	National Directorate of Land and Territorial Development (*Direcção Nacional de Terras e Desenvolvimento Territorial*)
DPAP	Provincial Directorate of Agriculture and Fisheries (*Direcção Provincial de Agricultura e Pescas*)

DPDTA	Provincial Directorate of Territorial Development and Environment (*Direcção Provincial de Desenvolvimento Territorial e Ambiente*)
DPGCAS	Provincial Directorate of Gender, Children and Social Action (*Direcção Provincial de Género, Criança e Acção Social*)
DPIC	Provincial Directorate of Industry and Commerce *(Direcção Provincial da Indústria e Comércio*)
DPJED	Provincial Directorate of Justice, Employment and Labour (*Direcção Provincial da Justiça, Emprego e Trabalho*)
DUAT	Right of Land Use and Benefit (*Direito de Uso e Aproveitamento da Terra*)
E&S	Environmental and Social
EDM	*Electricidade de Moçambique* (Mozambique's National Electricity Utility)
EIA	Environmental Impact Assessment
ESMP	Environmental and Social Management Plan
ESRM	Environmental and Social Risk Management
ESS7	Environmental and Social Standard 7 (World Bank Environmental and Social Framework)
ESSA	Environmental and Social Systems Assessment
FPIC	Free, Prior and Informed Consent
GBV	Gender-Based Violence
GHG	Greenhouse Gas
GM	Genetically Modified
GMO	Genetically Modified Organism
GRM	Grievance Redress Mechanism
ICESCR	International Covenant on Economic, Social and Cultural Rights
IDA	International Development Association
IDEPA	Institute for Artisanal Fisheries Development
IFC	International Finance Corporation
IFAD	International Fund for Agricultural Development
IGT	General Labour Inspectorate (*Inspecção Geral do Trabalho*)
IIAM	Institute of Agricultural Research of Mozambique (*Instituto de Investigação Agrária de Moçambique*)
ILO	International Labour Organization
INAS	National Institute of Social Action (Instituto Nacional de Acção Social)
INGD	National Institute for Disaster Risk Management and Reduction (*Instituto Nacional de Gestão e Redução do Risco de Desastres*)
INIR	National Irrigation Institute (*Instituto Nacional de Irrigação*)
IPF	Investment Project Financing
IPM	Integrated Pest Management
IRRIGA	Irrigation Development Project
MAAP	Ministry of Agriculture, Environment and Fisheries (*Ministério da Agricultura, Ambiente e Pescas*)
MADER	Ministry of Agriculture and Rural Development
MDR	Ministerial Complaint and Claim Mechanism (*Mecanismo de Denúncia e Reclamação*)

MEC	Ministry of Education and Culture
MICOA	Ministry for the Coordination of Environmental Affairs
MIGA	Multilateral Investment Guarantee Agency
MIMAIP	Ministry of the Sea, Inland Waters and Fisheries
MIREME	Ministry of Mineral Resources and Energy
MIS	Management Information System
MITADER	Ministry of Land, Environment and Rural Development
MOPHRH	Ministry of Public Works, Housing and Water Resources
MozAgribiz	Mozambique Agribusiness Value Chains Development Program
MPA	Multi-Phase Programmatic Approach
MRL	Maximum Residue Limit
MSME	Micro, Small and Medium Enterprise
MTA	Ministry of Land and Environment
MTGAS	Ministry of Labour, Gender and Social Action
NBSAP	National Biodiversity Strategy and Action Plan
NCCAMS	National Climate Change Adaptation and Mitigation Strategy
NDC	Nationally Determined Contribution
NRM	Natural Resource Management
ODS	Ozone-Depleting Substances
OHS	Occupational Health and Safety
OIM	International Organization for Migration (*Organização Internacional para Migrações*)
PforR	Program-for-Results
PAP	Program Action Plan
PASP	Productive Social Action Program (*Programa de Acção Social Produtiva*)
PDO	Program Development Objective
PDUT	District Land Use Plan (*Plano Distrital de Uso de Terras*)
PEDSA	Strategic Plan for Agrarian Sector Development (*Plano Estratégico de Desenvolvimento do Sector Agrário*)
ESMP	Environmental and Social Management Plan
PIU	Project Implementation Unit
PNISA	National Agrarian Sector Investment Plan (*Plano Nacional de Investimento do Sector Agrário*)
POPs	Persistent Organic Pollutants
PPE	Personal Protective Equipment
PPP	Public-Private Partnership
PPZ	Partial Protection Zone
PRM	Police of the Republic of Mozambique (*Polícia da República de Moçambique*)
PROCAVA	Program for Agricultural Value Chain Competitiveness
PRODAPE	Artisanal Fisheries Development Program

PROPEIXE	Fisheries Development Project
PSSB	Basic Social Subsidy Program (*Programa de Subsídio Social Básico*)
RAP	Resettlement Action Plan
RI MAAP	Internal Regulation of MAAP (*Regulamento Interno do Ministério da Agricultura, Ambiente e Pescas*)
RSSA	Environmental and Social Safeguards Division (*Repartição de Salvaguardas Ambientais e Sociais*)
SDAE	District Services of Economic Activities (*Serviços Distritais de Actividades Económicas*)
SDS	Safety Data Sheet
SDSMAS	District Services of Health, Women and Social Action (*Serviços Distritais de Saúde, Mulher e Acção Social*)
SDPI	District Services of Planning and Infrastructure (*Serviços Distritais de Planeamento e Infra-estrutura*)
SEA	Strategic Environmental Assessment
SGLA	Agrarian Land License Management System
SIGIT	Integrated Land Management Information System
SME	Small and Medium Enterprise
SPA	Provincial Services of Environment (*Serviços Provinciais do Ambiente*)
SPAE	Provincial Services of Economic Activities (*Serviços Provinciais de Actividades Económicas*)
SPJT	Provincial Services of Justice and Labour (*Serviços Provinciais de Justiça e Trabalho*)
SUSTENTA	Sustainable Agricultural Land Management Program
SWIOFish	Southwest Indian Ocean Fisheries Project
TASC	Community Social Action Technician (*Técnico de Acção Social Comunitária*)
UGISA	Agriculture Sector Investments Management Unit
UNCCD	United Nations Convention to Combat Desertification
UNCLOS	United Nations Convention on the Law of the Sea
UNFCCC	United Nations Framework Convention on Climate Change
US$	United States Dollar

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1 Introduction

1.1 Purpose and Objectives of the Environmental and Social Systems Assessment

This Environmental and Social Systems Assessment (ESSA) has been prepared for the Mozambique Agribusiness Value Chains Development Program (MozAgribiz), to be supported through Program-for-Results (PforR) Financing. The objective of the ESSA is to assess the adequacy and performance of Mozambique's existing environmental and social (E&S) systems relevant to the Program and to determine whether these systems are consistent with the World Bank's PforR Core Principles.

Specifically, the ESSA aims to:

- Identify the potential environmental and social risks and impacts associated with the Program;
- Assess the legal, regulatory, institutional, and implementation capacity of national and subnational systems to manage these risks;
- Identify system strengths and gaps that may affect Program implementation; and
- Recommend practical and prioritized measures to strengthen system performance, including inputs to the Program Action Plan (PAP) and, where relevant, linkages to Disbursement-Linked Indicators (DLIs).

The ESSA is not a project-level environmental or social assessment. Rather, it focuses on the country systems that will be relied upon during Program implementation, consistent with the nature of PforR financing.

1.2 Program-for-Results Instrument and ESSA Scope

The MozAgribiz Program is a PforR operation structured as Phase 1 of a ten-year Multi-Phase Programmatic Approach (MPA). Phase 1 covers the period 2026–2031, with an IDA allocation of US$250 million. Phase 2, covering 2031–2036, is expected to carry a further US$250 million allocation. The PforR is complemented by a US$20 million Investment Project Financing (IPF) component to support technical assistance, capacity building, and systems strengthening. The PforR will finance eligible expenditures under the Government of Mozambique's agricultural sector program — the Strategic Plan for Agrarian Sector Development (PEDSA II, 2023–2030) and its implementing National Agrarian Sector Investment Plan (PNISA) — aimed at increasing productivity, commercialization, and job creation in prioritized agribusiness value chains across strategic development corridors.

In line with the PforR Policy, this ESSA:

- Covers only activities financed under the PforR component of the operation;
- Assesses environmental and social (E&S) systems that are applicable to Program-supported activities, including policy actions, institutional reforms, and physical investments of limited scale and complexity;
- Explicitly considers Program boundaries and exclusions, ensuring that activities with potentially significant, irreversible, or unprecedented impacts are not supported under the PforR instrument; and
- Examines the interface between the PforR and the IPF component, particularly where the IPF is intended to mitigate capacity constraints or manage higher-risk activities outside the PforR boundary.

1.3 ESSA Methodology and Analytical Framework

The ESSA was prepared following the World Bank's guidance on Environmental and Social Systems Assessments for PforR operations. The assessment applied a systems-based analytical approach, focusing on how environmental and social risks are identified, managed, monitored, and enforced through existing country systems. The methodology included:

- Review of relevant legal and regulatory frameworks and analysis of institutional mandates, coordination arrangements, and capacity, with particular attention to decentralized implementation at provincial and district levels;
- Review of recent analytical work, sector assessments, and World Bank–supported diagnostics relevant to environmental and social risk management;
- Primary data collection at national and subnational levels to assess institutional capacity and validate system performance, including interviews with Program implementers and institutions responsible for E&S risk management (see Annex C for detailed methodology).
- Consideration of stakeholder perspectives, including government institutions, development partners, and non-state actors, as reflected in existing consultation processes; and
- Assessment of system performance against the six PforR Core Principles, with a focus on risk proportionality and implementation realism (see Annex A for detailed assessment).

The ESSA emphasizes practical, implementable findings, avoiding duplication with broader sector diagnostics or policy analyses already available.

1.4 Limitations and Adaptive Nature of the ESSA

The ESSA has been prepared at the Program preparation stage, based on information available at the time of drafting. While the Program design, Results Areas, and institutional arrangements are sufficiently defined to allow a robust systems assessment, some elements—such as final DLIs, verification protocols, and detailed implementation modalities—may continue to evolve during preparation.

As detailed in Annex C, the assessment was constrained by low questionnaire returns, scarce documentation, and institutional unavailability, yet triangulation with secondary sources and diverse interviews ensured consistent, credible, and balanced conclusions.

Accordingly, the ESSA is intended to be a living analytical instrument, with its conclusions and recommendations refined, as necessary, during stakeholder consultation, appraisal and negotiation. Any material changes to Program scope or risk profile will be reflected through updates to the ESSA findings and associated Program Action Plan measures.

1.5 Structure of the ESSA Report

The ESSA is organized as follows: Section 2 describes the Program and its institutional and geographic scope, including the borrower's implementation experience ; Section 3 reviews the Program's expected E&S effects, baseline context, risks, induced activities, and climate change considerations; Section 4 covers the legal and institutional framework; Sections 5–6 assess E&S management systems and performance; Section 7 presents the summarized analysis of existent systems vis-à-vis the six PforR Core Principles; Section 8 defines Program boundaries, exclusions, and risk escalation; Section 9 summarizes stakeholder consultations; Section 10 presents key findings and risk ratings; and Section 11 provides conclusions, recommendations, the Program Action Plan, and the implementation support plan. Annexes A–F present

the Detailed Core Principles Compliance Analysis, stakeholders consultation summaries, the primary data collection methodology, references, the detailed analysis of policy and legal framework and institutional capacity and system performance.

2 Program Description and Strategic Context

2.1 Program Overview

The MozAgribiz Program's Development Objective is to increase productivity, commercialization and job creation in selected agribusiness value chains in strategic economic corridors in Mozambique. The Program adopts a results-based approach, focusing on strengthening institutions, policies, coordination mechanisms, and service delivery systems that underpin inclusive, climate-resilient agribusiness development.

The Program is implemented through a One World Bank Group approach, combining IDA financing with IFC investments and advisory support for agribusiness firms, financial institutions, and agricultural technology firms in priority value chains, with potential MIGA guarantees for foreign investment in processing and cold chains. This integration is relevant to the ESSA's treatment of induced and associated activities, as IFC and MIGA activities may generate E&S risks managed through regulatory systems alongside those used under the PforR.

2.2 Program Results Areas and Intervention Logic

The Program is structured around three mutually reinforcing Results Areas, each with distinct implementation modalities and E&S risk profiles.

Results Area 1: Increased Productivity, Commercialization and Inclusive Partnerships supports agribusiness value chains through three streams: (i) strengthening market-oriented seed and breeding systems, via public-private partnerships (PPP) and strengthened seed inspection, certification and traceability functions within MAAP, along with livestock genetic improvement and improved broodstock production for aquaculture development; (ii) building capacity and finance access for agribusiness actors, including strengthening 500 farmer organizations and cooperatives, supporting 500 MSMEs and agro-industry actors, catalytic support for youth agribusiness incubation, and expanded access to finance, with implementation coordinated through independent service providers, financial institutions, insurance partners, and the Catalytic Fund for Innovation and Development; (iii) increasing utilization of irrigated areas through PPP models coordinated by the National Irrigation Institute (INIR), targeting at least 10,000 hectares of irrigation schemes by end of Phase 1. Interventions under this Results Area are generally non-infrastructure-intensive but may give rise to E&S risks related to agricultural practices, agrochemical use, labour conditions, land access, and social inclusion. The inclusion of forestry as a priority value chain introduces specific considerations for forest-adjacent land tenure, habitat interface, and compliance with forest governance instruments that require particular attention in the E&S risk assessment.

Results Area 2: Improved Digital and Resilient Infrastructure for Agribusiness Value Chain Development supports two streams: (i) development of a digital agriculture platform, with a farmer registry linked to the national digital ID system, data-sharing protocols to enable private sector innovation and improved access to finance and services, and user-facing digital applications delivering advisory, weather, and market information services, targeting at least 425,000 registered users by end of Phase 1; (ii) small-scale, demand-driven infrastructure, including cold storage for fisheries and horticulture and small warehouses for grains, to be operated by farmer organizations or under PPP arrangements, with at least five facilities completed and operational by end of Phase 1. Digital activities carry negligible direct environmental risk.

The infrastructure activities are limited in scale and introduce construction-related environmental, occupational health and safety, and community risks manageable through existing country systems.

Results Area 3: Improved Policy Reforms and Enabling Environment for Agribusiness supports four reforms: a new seed law and implementing regulations to strengthen certification and align with regional standards; cooperatives regulations to operationalize cooperatives policy, clarify governance procedures, and establish a clear tax regime for farmer organizations; an agricultural risk insurance policy to protect agribusiness actors against climate and other shocks; and a Ministerial Diploma to operationalize the transfer of 15 percent of artisanal fisheries license revenues to community fishing councils. Interventions under this Results Area are systemic in nature, with indirect E&S implications related to regulatory enforcement, institutional capacity, equity of access, and accountability.

2.3 Geographic Scope and Strategic Corridors

While national in scope, the Program focuses on three strategic corridors: Nacala (covering the provinces of Nampula, Niassa, Zambezia), Beira (Sofala, Manica, Tete), and Maputo-Limpopo (Gaza and Maputo). Together, these eight provinces concentrate Mozambique's key agribusiness potential, infrastructure, and market connectivity, making them priority areas for value chain development and private sector engagement.

The six priority value chains—maize, rice, livestock (poultry and red meat), fish, horticulture, and forestry—are selected for their job creation and food security potential, based on analytical evidence, agronomic viability, and off-taker linkages. Maize, livestock, horticulture, and forestry have strong employment potential; fish supports food security and exports; and rice addresses significant import substitution needs (US$441 million in imports in 2024). Forestry is also prioritized for timber import substitution but raises specific considerations for forest governance, land tenure, and biodiversity, requiring close attention in the ESSA.

Program implementation across these eight provinces implies significant reliance on decentralized administrative systems, particularly for environmental licensing, land administration, labour oversight, occupational health and safety, and grievance redress. Consequently, the ESSA places strong emphasis on subnational system performance, institutional coordination, and enforcement capacity.

2.4 Institutional and Implementation Arrangements

The Program will be implemented through multiple government institutions operating at central, provincial, and district levels, under the leadership of the Ministry of Agriculture, Environment and Fisheries (MAAP). Day-to-day coordination, monitoring, and reporting will be undertaken by UGISA (the Agriculture Sector Investments Management Unit within MAAP), which has been identified as the primary implementing coordinator for the PforR. National directorates within MAAP are responsible for delivering results — including DLIs, results framework indicators, and PAP actions — under each Results Area. A revamped Program Implementation Committee, comprising relevant directors and supported by additional technical assistants to address capacity gaps, will provide day-to-day technical oversight and coordination, including for the IPF component, with capacity gradually transferred during Phase 2.

2.5 Program Boundary and Excluded Activities

In line with the PforR Policy, the MozAgribiz Program excludes activities that may result in significant, irreversible or unprecedent environmental or social impacts. Activities that are not eligible for financing under the PforR include, inter alia:

- Large-scale or complex infrastructure requiring full environmental and social impact assessments;

- Activities involving significant land acquisition, physical displacement or complex resettlement;
- Activities located in protected areas, critical natural habitats or areas of high biodiversity sensitivity; and
- Activities associated with substantial pollution, hazardous materials, or high safety risks.

The ESSA assesses the adequacy of screening, exclusion, and escalation mechanisms to ensure that ineligible activities are not financed under the PforR and that higher-risk interventions are appropriately managed outside the Program boundary.

2.6 Interface between the PforR and the IPF Component

The MozAgribiz operation includes a complementary IPF component, designed to support technical assistance, capacity building, and systems strengthening. The IPF component does not function as a parallel investment window but rather as an enabling instrument to reinforce the effectiveness and sustainability of the PforR.

The IPF component supports:

- Technical assistance to institutions responsible for agribusiness development, environmental management, land administration, and related functions;
- Development and operationalization of guidelines, tools, and procedures relevant to environmental and social risk management;
- Capacity building and training at central, provincial, and district levels; and
- Strengthening of coordination, monitoring, and learning mechanisms underpinning Program implementation.

From an E&S perspective, the IPF component serves as a risk-mitigation and system-strengthening complement to the PforR. While the PforR relies on existing country systems to manage moderate and decentralized risks, the IPF addresses structural and capacity gaps that cannot be fully mitigated through results-based incentives alone.

Activities financed under the IPF are subject to the World Bank's Environmental and Social Framework and are expected to entail moderate and manageable risks, primarily associated with institutional reform and advisory support. Importantly, the IPF does not expand the scope of activities eligible under the PforR. Activities exceeding acceptable PforR risk thresholds remain outside the Program boundary and are addressed, where relevant, through separate processes.

The ESSA explicitly considers this interface to ensure that reliance on country systems remains proportional, realistic, and coherent, and that system-strengthening measures are consistently reflected across the ESSA, the Program Action Plan, and IPF-supported activities.

2.7 Implications for the ESSA Scope

Based on the Program design and implementation arrangements, the ESSA focuses on system-level performance rather than project-specific mitigation measures; the ability of country systems to manage moderate, cumulative, and decentralized environmental and social risks arising from activities across six priority value chains and three corridors; institutional capacity and coordination challenges associated with decentralization, recent sector restructuring, and the multi-directorate delivery model coordinated

through UGISA; and identification of practical, prioritized system-strengthening actions to be reflected in the Program Action Plan.

2.8 Borrower's Implementation Experience and Track Record

MAAP, through its predecessor institutions MADER, MIMAIP and MTA, has accumulated substantial experience in managing environmental and social (E&S) risks through public investment programs financed by the World Bank operations and other donor-supported initiatives. This experience has largely been developed under IPF or similar modalities, with strong reliance on donor safeguard frameworks, rather than under PforR approaches. While there is broad familiarity with project-based safeguards, at central, provincial and district levels, there is no direct track record of implementing PforRs in the agriculture, fisheries, land, and environmental sectors, making the MozAgribiz Program a transition toward system-based E&S management. Stakeholders have noted that this shift is welcome, as reliance on external standards has, sometimes, created inconsistencies with national legislation.

Flagship programs such as the World Bank–financed SUSTENTA, MozRural, MozNorte, MozLands, IRRIGA, SWIOFish and APPSA, along with initiatives supported by other partners including AGRA, PROCAVA, PRODAPE, and PROPEIXE, were repeatedly highlighted during interviews and serve as strong evidence of institutional performance. Through these programs, sector institutions have operationalized environmental screening systems, built practical experience in stakeholder engagement and community consultation (particularly in rural development, value chain integration, and natural resource management) and strengthened capacities in land administration (DUAT processes), including community delimitation and facilitation of land access. They have also established project-level grievance redress mechanisms (GRMs) and progressively integrated E&S considerations into small-scale infrastructure, irrigation, and agribusiness investments.

These programs have also contributed to incremental strengthening of public sector systems. Training, technical assistance, and hands-on experience have improved E&S risk management capacity across administrative levels, with district-level staff, particularly extension workers, gaining practical experience in screening, consultation, and grievance handling. Project-specific GRMs and stakeholder engagement practices have increased institutional familiarity with structured approaches, while E&S considerations are increasingly recognized within sector planning processes. Efforts such as the establishment of E&S safeguards units in MADER and MIMAIP—now consolidated under the Environmental Licensing Department—reflect growing institutional awareness.

While the existing track record provides a solid foundation, it also highlights gaps in institutionalization and the need for sustained system strengthening and capacity development, particularly at decentralized levels, to ensure that E&S risks are effectively managed under a programmatic, results-based approach.

3 Environmental and Social Effects: Benefits, Risks and Baseline Context

3.1 Anticipated Environmental and Social Benefits

The MozAgribiz Program is expected to generate meaningful positive environmental and social effects alongside the risks and impacts discussed in subsequent subsections. Explicitly identifying these benefits is important both for assessing the overall balance of effects and for ensuring that Program systems are designed to realize, as well as protect, positive outcomes.

Anticipated E&S benefits include increased productivity and incomes for smallholders, producer organizations, and women- and youth-led enterprises across six priority value chains. The Program's primary social outcome is job creation, driven by productivity, commercialization, and institutional

reforms. Improved market access, services, and finance for marginalized actors will be supported through farmer organization strengthening, Micro, Small and Medium Entreprises (MSME) development, and expanded credit, insurance, and guarantees. The digital agriculture platform will reduce information gaps and transaction costs, expand access to advisory services, and improve availability of weather, market, and financial information. Irrigation PPPs will enhance water-use efficiency, climate resilience, and income stability. Strengthened capacity in environmental management, land administration, and labour oversight will improve governance beyond the Program, while fisheries revenue reforms will bolster community fishing councils.

These benefits provide context for the risk assessment and inform the assessment of inclusion and equity dimensions, particularly where Program design choices may affect the distribution of benefits among different social groups.

3.2 Environmental Context

Mozambique's environmental context is characterized by high natural resource dependence, pronounced climate vulnerability, and spatially differentiated ecological sensitivity, all of which are directly relevant to agribusiness value chain development. Agricultural production is largely rainfed and highly dependent on soil fertility, surface and groundwater availability, and ecosystem services. Many of the Program's priority corridors overlap with areas experiencing land degradation, deforestation pressures, and competing demands for water resources. While these pressures are not caused by the Program alone, they form an important backdrop against which incremental agribusiness investments and policy reforms may generate cumulative environmental effects.

Mozambique is among the countries most exposed to climate variability and extreme weather events, including cyclones, floods, and droughts. Climate change is already affecting agricultural productivity, infrastructure durability, and water availability, particularly in low-lying coastal zones and semi-arid inland regions. These risks heighten the importance of climate-resilient infrastructure design, sustainable land and water management practices, and adaptive institutional capacity, all of which are central to the Program's objectives.

Biodiversity and natural habitats remain significant national assets, but pressures from agricultural expansion, infrastructure development, and natural resource extraction persist. While the Program is not expected to finance activities in critical habitats or protected areas, screening and enforcement systems are essential to ensure that localized agribusiness investments do not encroach on environmentally sensitive areas. The inclusion of forestry as a priority value chain is particularly relevant in this context: timber processing and commercial plantation activities in the Nacala and Beira corridors introduce habitat interface risks that require careful attention within existing licensing and forest governance frameworks.

Along Mozambique's three corridors, smallholders cultivate staple crops under low-input, rain-fed conditions marked by low productivity and high climate exposure. Confined Bt2 cotton field trials remain the primary entry point for GM technology, with commercial adoption held back by regulatory caution and limited biosafety capacity. Civil society organizations contest GMO introduction on grounds of seed sovereignty, while government and research institutions argue the technology should remain an option for improving yields and resilience — a contested landscape directly relevant to the Program's seed system interventions under Results Area 1.

[2] Bt cotton refers to a genetically modified variety of cotton that has been engineered to express a protein derived from the soil bacterium Bacillus thuringiensis.

3.3 Environmental Risks Relevant to the Program

Against this baseline, and considering the confirmed activity portfolio, the Program may be associated with moderate and manageable environmental risks, primarily arising from cumulative and decentralized activities rather than from large-scale investments. Key environmental risks are:

- Agricultural intensification risks — including increased use of fertilizers and pesticides — are relevant across the maize, rice and horticulture value chains, with implications for soil health, water quality, and human exposure if not properly managed.
- The use of genetically modified organisms place the environment at risk because they can potentially lead to the standardization of plant varieties and to the disappearance of biodiversity.
- The livestock value chain, encompassing poultry and red meat production, introduces specific risks related to animal waste management and effluent from agro-processing facilities that are distinct from crop-based intensification and require attention within the agrochemical and pollution prevention framework.
- Aquaculture development introduces phytosanitary, water quality and effluent management risks at both production and processing stages, particularly in wetland and coastal environments relevant to the fisheries value chain.
- The forestry value chain introduces risks of progressive encroachment on forest resources and biodiversity interfaces.
- Water resource pressures are relevant particularly where irrigation PPP models encourage increased water abstraction in shared catchments across the Maputo-Limpopo, Beira and Nacala corridors. Construction-related impacts (dust, noise, waste generation, and localized habitat disturbance) are expected to be limited in scale, as the confirmed infrastructure portfolio is restricted to small cold storage units and warehouses.

The digital platform activities under Results Area 2 carry negligible direct environmental risk. Cumulative effects, where multiple small investments within the same corridor may collectively stress local ecosystems or resources, remain a concern across all value chains operating in the three corridors.

3.4 Social Context

Mozambique's social context relevant to the Program is shaped by rural poverty, informality, land tenure complexity, and uneven access to services and markets. A large proportion of the population depends on small-scale agriculture and informal agribusiness activities for livelihoods, but operates largely without access to the infrastructure, services, and markets that would make agricultural production economically viable. Land tenure is governed through the DUAT system, which provides use rights rather than private ownership. While the legal framework recognizes community and customary rights, implementation challenges persist, particularly in areas experiencing increased commercial interest. Labor markets in agribusiness value chains are characterized by high levels of informality, seasonal employment, and limited enforcement of labour standards.

Gender inequality is a structural feature of the agricultural economy with direct Program relevance. Women account for the majority of agricultural labour but face significant structural barriers that constrain their productivity and participation in agribusiness. Female-headed farms are on average 24 percent less productive than male-headed ones, driven by lower access to labour, mechanization, finance, land, technology, and cash crop markets, compounded by restrictive social norms and limited decision-making

power. Women own approximately one quarter of formal SMEs and are significantly underrepresented in farmer organizations and cooperatives. Access to formal financial services and land titles remains particularly low among women. These gender gaps are directly relevant to the ESSA's assessment of inclusion and equity risks and inform the social risk characterization across all three Results Areas.

GBV in Mozambique is widespread and deeply rooted in social, cultural, and economic structures. Women and girls face heightened risks of domestic violence, sexual abuse, early marriage, and exploitation, with weak law enforcement and entrenched norms often perpetuating silence and impunity. Rural poverty, land insecurity, and displacement intensify vulnerabilities, and women are often exposed to harassment in public and workplace settings. Despite these challenges, community initiatives and institutional actors are working to strengthen prevention and support, though gaps in awareness and resources remain significant.

Children's participation in family-based agriculture in Mozambique's program corridors lies within a cultural and social grey zone. It is widely perceived as family solidarity, a way to build skills, and a channel for passing agricultural knowledge across generations. Yet this engagement exists on a continuum that can easily shift into exploitative child labour once tasks begin to undermine a child's health, schooling, or overall development. The difficulty of defining that threshold is compounded by scarce empirical evidence on children's agricultural roles in rural areas and by limited awareness among families, communities, and local authorities of what legally and ethically constitutes child labour.

3.5 Social Risks Relevant to the Program

The Program's interventions may give rise to moderate social risks, primarily related to access, labour conditions, and community interactions. The confirmed activity portfolio allows for more precise characterization of key social risk dimensions, which include:

- Land access and use conflicts may arise where infrastructure, irrigation PPP arrangements, or commercial agribusiness activities intersect customary land rights. The irrigation PPP model carries the risk of unequal distribution of irrigated land within shared DUATs, as well as the risk of exclusion of informal or customary users from scheme areas who may not hold formally documented DUATs or who occupy scheme-adjacent land under customary use arrangements not fully reflected in cadastral records. Land-related screening for irrigation PPP activities therefore requires particular attention within the DUAT and community consultation framework.
- Labor and working conditions risks, including OHS, child labour, GBV and unfair employment practices in agribusiness and construction activities, are relevant across all three corridors. Cultural norms that frame child work as family contribution may mask actual child labour, requiring explicit attention in labour standards and community engagement within labour-intensive value chains.
- The scale-up of agro-processing under the livestock and forestry value chains, combined with construction activities under Results Area 2, increases the risk of labour influx associated with seasonal and contract employment, with attendant risks of GBV, community-worker tensions, and erosion of community cohesion. These risks are not adequately addressed by the current regulatory baseline and require Program-level supplementation.
- Community health and safety risks extend beyond construction to include agrochemical misuse, unsafe container reuse and disposal, food residue contamination, and poorly managed veterinary drugs. Risks of zoonotic disease are higher in dense or peri-urban livestock operations. These require integrated measures for chemical management, food safety, and disease prevention within the Program.

- The digital platform may exclude users with low digital literacy, particularly women, elderly smallholders, and remote communities, affecting equity and inclusion and further exacerbating vulnerabilities. These risks require accessible design, targeted outreach, and deliberate measures to ensure benefits reach less-resourced actors.

3.6 Institutional and Capacity Context

The Mozambique E&S system formal legal architecture has not kept pace with its own institutional reorganizations. Mozambique has undergone repeated ministerial restructurings — including the successive reconfigurations of environment, land, and spatial planning mandates across MICOA, MITADER, MOPHRH, and their successor arrangements — each of which left coordination seams that the legislative framework did not automatically close.

At the national level, the recent consolidation of agriculture, environment, land, fisheries, and climate mandates under MAAP — with its internal architecture now defined by the RI MAAP (Ministerial Diploma 119/2025) - represents a significant structural opportunity for integrated E&S risk management. Environmental licensing is exercised by MAAP through DINAMC, with environmental quality and pollution control inspections, auditing and enforcement functions exercised by the National Agency for Environmental Quality Control (AQUA), established under Decree 80/2010.

At the sub-national level, the dual provincial architecture established by Decree 63/2020 and Decree 64/2020 distributes E&S-relevant functions across two parallel institutional structures — the elected Provincial Executive Council and the State Representation structure — whose functional overlap is largely managed through informal arrangements that remain fragile and non-binding. A presidential reform proposal to extinguish the eight provincial State Representation services, announced during ESSA preparation, introduces further transitional uncertainty at the sub-national level that must be tracked.

These institutional conditions are central to the ESSA. Sections 5 and 6 present a detailed analysis and the Program Action Plan in Section 10 translates the resulting gap findings into prioritized, time-bound strengthening actions.

3.7 Induced, Indirect, and Associated Activities

In line with the Program-for-Results (PforR) Policy and ESSA Guidance, this ESSA also considers induced, indirect, and associated activities that may be reasonably expected to occur as a result of the MozAgribiz Program, including activities that are not directly financed under the PforR but may be required to achieve the Program Development Objective (PDO) or Disbursement-Linked Indicators (DLIs).

Such activities may include, inter alia, privately financed agro-processing facilities, storage and logistics infrastructure, small-scale irrigation, and market facilities catalysed by Program supported policy reforms, service delivery improvements, or infrastructure investments within strategic development corridors. While these activities fall outside the PforR expenditure framework, they may give rise to environmental and social risks similar in nature to those associated with Program financed activities, including land access pressures, labour and occupational health and safety risks, community health and safety concerns, and cumulative environmental effects.

The ESSA assesses whether existing country systems—particularly environmental screening, land administration, labour oversight, and grievance redress mechanisms—are adequate to identify, manage, and mitigate risks associated with such induced or associated activities, and whether screening, exclusion, and escalation mechanisms are sufficient to ensure that activities presenting significant, irreversible, or unprecedented impacts are not supported, directly or indirectly, under the PforR. Where higher risk

activities are identified, these are expected to be addressed through separate instruments or processes, including, where relevant, the complementary Investment Project Financing (IPF) component.

3.8 Climate Change and Greenhouse Gas Considerations

Mozambique's high exposure to climate variability and extreme weather events is a key contextual risk factor for the Program. The ESSA assesses whether existing E&S systems integrate climate risks into screening, design, and implementation of Program-relevant activities. These risks are especially relevant for Results Area 2 (climate-resilient infrastructure and logistics) and for productivity interventions dependent on climate-sensitive resources such as land and water.

Program activities are not expected to generate significant greenhouse gas emissions, as the PforR excludes major industrial, energy, or large-scale infrastructure investments. GHG accounting is being undertaken as part of the Program's economic and financial analysis for the six priority value chains, and will confirm this assessment before appraisal. Potential GHG impacts are assessed as moderate and localized and not considered a material constraint to reliance on country systems. The ESSA nonetheless recognizes the importance of promoting climate-smart and resource-efficient practices through Program design and system-strengthening measures.

3.9 Implications for the ESSA

The environmental and social effects analysis underscores that:

- The Program offers meaningful development and sustainability benefits alongside moderate, cumulative, and decentralized risks rather than large-scale or site-specific impacts;
- Effective risk management depends primarily on the performance of existing country systems, particularly at subnational levels, across a confirmed portfolio of six priority value chains and small-scale infrastructure activities;
- Institutional capacity, coordination, and enforcement are the key determinants of outcome;
- System-strengthening measures should focus on practical improvements, proportional to risk and aligned with Program implementation realities across the three corridors and eight provinces.

These considerations inform the subsequent assessment of legal frameworks, institutional arrangements, and system performance in Sections 4 through 6 of this ESSA.

4 Legal, Regulatory, and Institutional Framework

4.1 Overview

Mozambique has an established legal and regulatory framework governing environmental management, cultural heritage protection, land administration, water resource use, labour conditions, occupational health and safety, and stakeholder engagement, providing the statutory basis for managing the environmental and social risks associated with the MozAgribiz Program. The full mapping and analysis of legal instruments, regulatory provisions, and institutional mandates is presented in Annex E. This section summarises the key findings of that analysis relevant to Program implementation.

Two concurrent and analytically significant transformations have recently reshaped the institutional architecture within which these frameworks are applied. First, the creation of MAAP has consolidated mandates across agriculture, environment, land, fisheries, and climate under a single ministry, whose internal organisation is now defined with regulatory specificity by the Internal Regulation of MAAP (RI

MAAP, December 2025). The RI MAAP is of central significance for this ESSA because it reveals both new institutional strengths — including a dedicated safeguards unit — and a series of internal coordination gaps directly relevant to Program risk management. Second, the 2019 sub-national governance reform has established a dual and parallel provincial architecture in which an elected Provincial Executive Council (CEP) and a central State Representation structure operate concurrently across the same territory, each holding substantive E&S-relevant functions. The implications of both transformations run throughout this section and the assessments in Sections 5 and 6.

4.2 Environmental Legal and Regulatory Framework

The environmental framework rests on a coherent and broadly adequate body of legislation covering environmental assessment, pollution control, biodiversity protection, forest governance, and water management. Its principal strengths are a proportionate four-tier environmental screening system applicable across the full range of Program activities; mandatory public consultation requirements with defined representativeness standards; a biodiversity mitigation hierarchy and offset regime; a permanent protection regime for mangroves and conservation forests; and a water use licensing and conflict resolution framework administered exclusively by the Regional Water Administrations (ARAs).

The RI MAAP strengthens the institutional architecture in three specific ways: a unit (Department Of Environmental Assessment) that has within its scope of work the promotion of cumulative impact assessment and SEA; a unit responsible for biodiversity offset evaluation and registration; and — most directly relevant to the Program — the E&S Safeguards Division (RSSA), which constitutes the first unit within MAAP's organic structure to carry an explicit statutory mandate for E&S safeguards and grievance management.

However, as detailed in Annex E2, the framework does not include explicit legal provisions to operationalise strategic environmental assessment or cumulative impact management at program or corridor level. While this is partially offset by the Environmental Assessment Department's institutional mandate, it still requires a Program-level cumulative assessment framework. The Water Law lacks procedures for cumulative impact management, shared basin abstractions, and efficiency standards. The agrochemical regulatory framework does not include specific provisions promoting integrated pest management or restricting highly hazardous pesticides, consistent with the Rotterdam and Stockholm Conventions.

The RSSA is a newly created unit resulting from the merger of two pre-existing safeguards structures from MADER and MIMAIP, whose operational capacity is still being consolidated, and its instruments remain oriented primarily towards agricultural activities, not yet fully reflecting the broader MAAP mandate encompassing fisheries and environment. Furthermore, a Safeguards Policy[3] has been drafted, but not formally approved, limiting the RSSA's capacity to enforce compliance with E&S safeguards across the sectors' activities in the absence of specific donor requirements. This is particularly relevant for the Program, as the current environmental licensing framework lacks clear provisions for integrating the social safeguards dimension—including gender, labour influx, community health and safety, and GBV—into screening, E&S evaluation, and monitoring instruments.

4.3 Cultural Heritage Protection Framework

The domestic cultural heritage framework provides legally grounded obligations for preconstruction archaeological survey, chance find management and a mandatory 0,5% survey cost contribution applicable

[3] The existence of the draft Safeguards Policy was mentioned during the DINAMC and RSSA interviews during the ESSA, but this document was not made available to the ESSA team, as requested.

to program earthwork subprojects. The socio-cultural impact assessment mandate of the Cultural Policy has not been operationalised through secondary legislation, and no coordination protocol exists between cultural heritage licensing and the EIA process for sub-projects requiring concurrent authorization.

4.4 Land Tenure and Land Administration Framework

The land governance framework is built on State ownership of land with community and customary rights formally recognised without requiring documentation. Its central strengths for Program implementation are the mandatory community consultation requirement before commercial land rights are granted, the formal recognition of customary tenure, and a structured domestic resettlement framework. The RI MAAP strengthens this picture by clarifying that MAAP's land directorate (DNTDT) now includes a specialised unit dedicated to land conflict management, with an explicit mandate to receive land-related complaints — a formal sectoral grievance channel that must be integrated into the Program's GRM architecture.

The procedural requirements established by Ministerial Diploma 158/2011 for community consultation in rural DUAT process — including a mandatory thirty-day minimum interval between the two consultation meetings an additional Consultative Counsel engagement requirement for applications above 100 Hectares, and an applicant caution deposit need to be mapped into the Program's sub-project preparation timelines, to avoid risks of scheduling shortfalls and consultation invalidity. The undefined relationship between the MD 158/2011 Consultative Councils and the Local Councils under Decree 63/2020, adds a further procedural ambiguity.

The land governance framework is, however, currently subject to active legislative transition. The Draft New Land Law (Draft 03, June 2025) remains unratified and may be amended before adoption. A preliminary legal assessment set out in full in Annex E2, identifies five material risks for the Program's E&S risk management architecture: the institutional void created by the planned but not yet operationalised new land administration authority; extensive reliance on future secondary instruments for the operationalisation of key safeguard provisions; insufficiently mandatory integration of environmental screening into land use authorisation processes; the absence of a clear hierarchy between overlapping cadastral systems in the Program corridors; and the potential adverse application of the draft law's 12-month idle land deadline to areas of seasonal communal use or informal customary occupation.

Additional material gaps in the draft New Land Law, unresolved in the version presented to Parliament, include: the absence of explicit mechanisms to ensure inclusive participation and evidence-based criteria for expanding buffer distances in protection zones, leaving PPZ governance open to inconsistency; ambiguity in the interaction of customary norms with statutory law in conflict resolution, with no practical guidance for harmonization and confusion between “community territory” and “community lands,” risking exclusion of certain areas; and unclear safeguards for resettlement in PPZs, where voluntary options remain impractical and benefit-sharing mechanisms lack fixed guarantees such as revenue or transfer percentages, leaving entitlements vague and unenforceable.

The current Land Law and its implementing regulation remain the operative legal baseline for all Program sub-projects until the new law enters into force. The Program’s response to this transition risk is addressed in the recommendations set out in Section 10.1.

4.5 Labor, Occupational Health and Safety, and Community Protection

The labour framework, anchored in the Labour Law and ratified ILO Conventions covering forced labour, child labour, freedom of association, and equal remuneration, establishes minimum employment rights, OHS standards, child and forced labour protections, and worker dispute resolution mechanisms. Labour

oversight rests with MTGAS through its constituent directorates and the General Labour Inspectorate, with the Labour Mediation and Arbitration Commission (COMAL) providing arbitration functions.

The RI MAAP reveals that responsibility for field-level agrochemical OHS within MAAP is distributed across three separate internal units — covering field extension, field inspection, and waste management norms respectively — without a coordination protocol between them or with the labour inspectorate. This coordination gap needs to be addressed through a joint technical working group, as indicated in Annex E2 and in the PAP.

The principal substantive weakness in the OHS framework is the outdated nature of the general workplace safety regulation relative to outdoor agribusiness risks: it lacks specific provisions on heat stress management, re-entry intervals after pesticide application, and spray drift buffer zones. The legal framework also lacks provisions for labour influx risk management and supply chain due diligence. These gaps will have to be addressed through Program-level supplementary OHS guidelines and a labour influx management framework.

4.6 Stakeholder Engagement, Grievance Redress, and Accountability

The national framework provides a layered architecture for public participation and grievance, grounded in constitutional rights to petition, operational consultation requirements under environmental assessment and land legislation, the free prior and informed consent principle newly codified in the forest governance regulation, and formal participation and transparency obligations for elected provincial governance bodies.

The RI MAAP adds three institutional grievance channels not previously identifiable from higher-order instruments: the RSSA's statutory mandate to establish an E&S safeguards claims and conflict resolution mechanism; MAAP's land directorate's dedicated unit for land-related complaints; and the MAAP inspectorate's function for receiving complaints about the administrative conduct of the ministry and its subordinate institutions. Together, these three mechanisms provide a more structured institutional basis for grievance management than was available under the previous agriculture, fisheries and environment sector architecture.

The national framework nonetheless falls short of PforR requirements: it does not mandate a standing, Program-wide GRM with defined response timeframes, gender-disaggregated tracking, anonymous submission protection, or targeted accessibility measures for marginalised groups.

4.7 Institutional Mandates and Coordination

As noted in Annex F3, with the exception of IDEPA, MAAP institutions central to program implementation lack dedicated and fully operational E&S systems. Safeguards are incorporated only within each sector's specific mandate—for example, agrochemical management, zoonotic diseases control, biodiversity protection, to mention a few—rather than through a comprehensive and integrated E&S framework. This incorporation, however, is inconsistent, often reliant on external funding, and largely delivered through donor-driven projects whose training and safeguards rarely persist beyond project closure. Although some institutions retain E&S capacity developed during these projects, such capacity is rarely institutionalized, leaving practice fragmented, unsystematic, and vulnerable to discontinuity once external support ends. For the most part, the integrated management of E&S risks relies upon the legal and regulatory framework governing E&S risk management as described above.

A structurally significant feature of Mozambique's E&S governance architecture — directly relevant to this Program — is that the large majority of E&S risk management functions implicated across the Program's

value chains are concentrated within MAAP: environmental licensing, forestry, conservation interface, aquaculture, livestock, agrochemical regulation, land administration, and irrigation. The principal institutional actors falling outside MAAP are MTGAS, which holds cross-cutting mandates for gender, labour, and OHS; the ARAs, which govern water resource management; and MEC/DNPC, which is the competent authority for cultural heritage. This concentration is structurally advantageous for integrated risk management, as it limits the number of inter-institutional coordination interfaces the Program must navigate. The MAAP consolidation therefore offers significant structural opportunity for integrated E&S risk management. However, as documented in Annex E, there are some coordination gaps that require Program attention: the distribution of agrochemical OHS responsibilities across two MAAP directorates without a coordination protocol between them; the absence of a formalised inter-ministerial mechanism between MAAP and MTGAS for cross-cutting E&S issues, including gender, child labour, and OHS; the absence of a formal coordination protocol between MAAP's irrigation body and the ARAs for cumulative water abstraction management; and the formal textual overlap between the mandates of the two parallel provincial structures established by the 2020 sub-national governance reform. These gaps are all addressed in the PAP.

On this last point, the empirical evidence gathered through structured interviews for Annexes F1, F2 and F3 shows that concerns about functional overlap between the two provincial structures are, in practice, largely overstated: informal coordination and accumulated institutional practice have largely compensated for the absence of formal protocols. Furthermore, enactment of the pending legislative reform proposed by the President, that would extinguish the State Representation services and potentially transfer their functions to the elected CEP, will resolve the overlaps The Program will need to closely monitor developments on the enactment of this reform and be prepared to make the adjustments accordingly. The full distribution of E&S-relevant functions across both provincial structures and central MAAP authorities is mapped in Table 1 of Annex E2.

A further institutional finding specific to the fisheries value chain concerns the Community Fisheries Councils (CCPs) — the community-level governance structures for artisanal fisheries — which face unresolved ambiguities about their legal personality and their relationship to the local governance system, compounded by a state of variable operational dysfunction resulting from non-compliance with revenue transfer obligations since 2018. These issues are directly relevant to the Program's GRM architecture and to the artisanal fisheries value chain.

5 Assessment of Environmental Management Systems

5.1 Overview of Environmental Management Systems Relevant to the Program

Mozambique's environmental management system is anchored in a nationally established framework for environmental assessment, licensing, monitoring, and enforcement. The system operates across multiple administrative levels and is intended to manage environmental risks associated with agricultural production, agro-industrial processing, and infrastructure development, all of which are directly relevant to MozAgribiz's corridor investment model.

For the purposes of this ESSA, environmental management systems are assessed based on their ability to:

- Screen and categorise Program-supported activities according to environmental and social risk, including landscape-level and biodiversity dimensions;
- Apply proportionate environmental assessment and licensing requirements, with adequate provision for community participation and social risk integration;

- Monitor compliance with licence conditions and ESMP commitments and enforce corrective measures across national, provincial, and district levels; and
- Manage pollution risks associated with agro-industrial processing and cumulative environmental risks arising from multiple investments distributed across corridor landscapes.

The institutional composition of the system — and the distribution of responsibilities across DINAMC, AQUA, SPAs, SDPI, SDAE, and RSSA — is examined in the subsections that follow.

5.2 Environmental Screening and Licensing

Environmental screening and licensing procedures are established under Decree 54/2015, which provides a tiered classification framework assigning categorisation and licensing responsibilities to DINAMC at national level, the SPAs at provincial level, and AQUA for inspection and enforcement. Activities are classified based on scale, location, and potential impacts, with corresponding requirements for environmental studies and public consultation. In practice, classification criteria are sufficiently broad to admit discretionary interpretation, and institutional capacity to apply them consistently varies across levels. Social dimensions are not incorporated into the EIA Directive as a binding pre-screening obligation, no Strategic Environmental Assessment capacity exists, and no enhanced biodiversity screening is triggered for ecologically sensitive zones.

In the context of the MozAgribiz Program:

- Small to medium-scale infrastructure and agro-processing activities will typically fall within Category B, where simplified EIA requirements apply but where waivers substituting the full simplified EIA for a basic ESMP may remove formal community participation from a substantial share of investments;
- RSSA's safeguards screening applies to MAAP-managed investments but lacks a binding legal instrument, meaning its application across directorates depends on voluntary adherence and donor pressure rather than mandatory compliance;
- Although no implementing institution has a self-financed, fully operational E&S management system, making performance dependent on external program support, most retain trained staff and existing coordination relationships that the Program can build upon; and
- Cumulative, synergistic and landscape-level risks will not be detected at screening stage and during the remainder EIA process, given the lack of a consistent and clear SEA framework.

Strengths

- Decree 54/2015 provides a formally clear tiered classification framework with defined institutional responsibilities across national, provincial, and district levels;
- Established procedures applicable across sectors and regions;
- RSSA is now formally integrated into MAAP's structure, with a clear mandate to operationalize E&S safeguards in screening, induction, monitoring, and reporting of environmental and social risks in projects managed or supervised by the Ministry; and
- RSSA has developed a Good Practice Manual and operational screening tools that provide a practical foundation for Program-level E&S management.

Key Constraints

- Screening criteria are broad enough to admit significant discretionary interpretation, leading to inconsistent application at decentralised levels where technical capacity and oversight are limited;
- The documented practice of waiving simplified EIA studies for some Category B projects removes formal community participation from a significant share of investments and creates conditions under which environmental and social impacts are not fully assessed;
- Social risk integration in pre-screening is not mandatory and no corrective revision is underway, leaving a structural gap in the identification of social impacts at entry;
- Absence of detailed and complete SEA framework and of institutional capacity to enforce DINAMC's Environmental Assessment Departments role of promoting SEA and cumulative risk assessment; and
- Landscape-scale and biodiversity risks remain outside the formal screening architecture, with no mechanism to trigger enhanced assessment for ecologically sensitive zones.

5.3 Environmental Monitoring, Compliance, and Enforcement

Environmental monitoring, compliance, and enforcement responsibilities are distributed across national, provincial, and district entities. At national level, RSSA has the mandate to perform safeguards clearance across MAAP directorates (but not yet materialized), DINAMC holds the post-licensing monitoring mandate, and AQUA carries inspection and sanctioning authority.

At provincial and district level, AQUA offices, SPAs, SDPI, and SDAE hold formal compliance and oversight responsibilities proximate to investment sites. In practice, enforcement capacity varies significantly across levels, with no formal coordination protocol between DINAMC and AQUA at central and provincial levels, and no dedicated laboratory capacity for environmental analysis within the system.

No corridor-wide monitoring function or baseline data currently exists, and pending legislative reforms — including the new Land Law and legislation to resolve the dual provincial licensing architecture — introduce transition risk to the current configuration.

For Program-relevant activities:

- Post-licensing monitoring is structurally uneven: DINAMC monitors but cannot sanction; AQUA can sanction but cannot cancel licences without DINAMC, creating accountability gaps in follow-up on licence conditions;
- Field oversight at provincial and district level is infrequent, resource-constrained, and largely concentrated on documentary review rather than site-based verification;
- Cumulative and landscape-level impacts across investment corridors cannot be tracked in the absence of comprehensive baselines or a corridor-wide monitoring system; and
- Across implementing agencies, practical monitoring and enforcement capacity remains dependent on external program support, though trained staff, informal oversight networks, and existing referral relationships provide a foundation to build upon.

Strengths

- Formal monitoring and enforcement mandates are defined and distributed across multiple institutional levels, providing a recognisable architecture on which Program support can build;
- DINAMC has acknowledged its post-licensing monitoring deficit and is actively working to correct it, indicating institutional self-awareness and reform openness;
- Existing referral relationships with external laboratories, and informal circulation of field-level information, provide a baseline on which more formalised analytical and oversight protocols could be developed; and
- SDPI and SDAE's physical proximity to investment sites represents a potentially significant extension of the Program's monitoring reach if provided with operational support.

Key Constraints

- RSSA's safeguards clearance function lacks a binding legal instrument, leaving cross-directorate integration dependent on voluntary compliance and donor pressure;
- The absence of a formal coordination protocol between DINAMC and AQUA creates accountability gaps that allow post-licensing violations to go unaddressed;
- The lack of laboratory capacity within AQUA and the absence of formalised external analytical protocols renders compliance monitoring for agrochemical, effluent, and soil quality risks effectively non-quantitative;
- Inspection frequency at provincial level is insufficient and driven by proponent events rather than independent oversight calendars;
- District-level monitoring is non-functional in practice due to the absence of transport, fuel, equipment, and systematic lack of access to ESMPs and licence conditions;
- The absence of comprehensive corridor-wide baselines means that cumulative landscape-level impacts attributable to Program investments would be undetectable regardless of individual project compliance; and
- The pending legislative reforms introduce transition risk that could render current institutional support investments misaligned with a framework that may change without a defined timeline.

5.4 Management of Pollution, Resource Use, and Biodiversity Risks

The environmental management system includes provisions for pollution prevention, waste management, pesticide and chemical input control, water resource protection, and biodiversity conservation. These are operationalised through the environmental licensing framework, ESMP commitments, and AQUA inspection protocols, though practical enforcement capacity varies significantly across the corridors.

In relation to the MozAgribiz Program:

- Agro-industrial facilities generate pollution loads across liquid effluent, chemical waste, and atmospheric emission pathways — each subject to regulatory standards but verified in practice through empirical observation rather than laboratory analysis;

- Chemical waste management, particularly pesticide container disposal, is inconsistent across corridors, with informal burning and open dumping posing documented risks to soils, water, and community health;
- All three corridors depend on catchment systems under pressure, with no quantitative water efficiency standards and no systematic assessment of allocation conflicts between irrigation expansion and existing users;
- Corridors overlap with ecologically significant landscapes — miombo woodland, montane forest fragments, and areas proximate to major transfrontier conservation complexes — where cumulative fragmentation in miombo transition zones and floodplain margins is undetectable through the current project-level EIA system; and
- No invasive species risk screening exists within the EIA review process, and the absence of finalised provincial forest maps and critical habitat screening guidelines further limits avoidance of sensitive areas at project level.

Strengths

- Formal regulatory standards cover all three pollution pathways, providing a compliance baseline for ESMP commitments;
- Organic byproduct management at anchor investor level is often commercially incentivised through energy and fertiliser recovery, creating a self-reinforcing compliance dynamic; and
- The existing ESMP framework and trained implementing agency staff provide a foundation for strengthening environmental monitoring with targeted Program support.

Key Constraints

- The laboratory analytical gap renders effluent compliance independently unverifiable, and the absence of a functional chemical waste disposal supply chain means pollution risk management depends on proponent commitment rather than enforceable oversight;
- No operational mechanism exists for managing cumulative abstractions in shared basins: individual EIAs do not address sub-catchment water balance impacts, ARA and AQUA lack formal data-sharing protocols, and no coordination mechanism between INIR and the ARAs has been established, creating invisible over-abstraction risk across corridors;
- No reviewing institution has ecologists, conservation biologists, or botanists on staff and biodiversity chapters in simplified EIA documents typically rely on single-season desktop assessments without specialist input, and wildlife governance outside gazetted protected areas lacks a clear institutional mandate; and
- The combined absence of provincial forest maps, critical habitat screening guidelines, and cumulative impact assessment requirements means that corridor-scale biodiversity fragmentation from agricultural expansion is structurally undetectable within the current environmental review system.

5.5 Environmental System Capacity and Performance Assessment

Overall, Mozambique's environmental management system is adequate in formal design but structurally constrained in performance, particularly in the agro-industrial corridor environments where MozAgribiz

investments will be concentrated. Legal frameworks, tiered institutional mandates, and ESMP instruments are in place, but their practical function is undermined by laboratory capacity gaps, coordination deficits between national and decentralised levels, and the absence of independent monitoring capacity across pollution, water resource management, licensing, and enforcement functions.

The ESSA concludes that:

- The system is capable of managing moderate environmental risks at investment level, provided that ESMP commitments are well-structured, ESMP compliance is actively tracked, and anchor investors maintain commercially incentivised management practices — conditions that hold unevenly across corridors and that do not extend to water allocation or biodiversity risks, where no equivalent self-correcting mechanism exists;
- Performance constraints relate primarily to capacity, coordination, and resourcing rather than to the absence of a legal framework — the regulatory architecture is largely in place, but the institutional infrastructure to operationalise it independently of external support is not; and
- The most critical structural gaps — the laboratory analytical deficit, the absence of a coordination protocol between DINAMC and AQUA, the non-functionality of district-level oversight, the absence of an operational coordination mechanism between INIR and the ARAs for cumulative water abstraction management, the absence of critical habitat screening tools, and the absence of comprehensive corridor-wide baselines — cannot be addressed through ESMP instrument design alone.

These findings inform the identification of priority actions to strengthen environmental system performance under the Program, with emphasis on closing the analytical gap in compliance monitoring, formalising inter-institutional coordination across pollution, water, and biodiversity functions, and extending decentralised oversight reach to investment sites.

6 Assessment of Social Management Systems

6.1 Overview of Social Management Systems Relevant to the Program

Mozambique's social management systems span land tenure administration, resettlement governance, labour regulation, occupational health and safety, community health and safety, stakeholder engagement, and grievance redress. These systems are implemented through a multi-institutional architecture that extends from central ministries — including DNTDT, AQUA, IGT, and DPGCAS — through provincial directorates to district-level structures including SDPI, SDAE and SDSMAS, and ultimately to community-level mechanisms such as Natural Resource Management Committees, customary authorities and local administrative bodies. Across all thematic areas, the normative framework is formally established and broadly consistent with international standards; the critical implementation gap lies in the translation of legal requirements into systematic, operationally effective practice at the corridor and community levels where Program investments are concentrated.

These systems are central to managing the social risks generated by agribusiness investment, outgrower and contract farming expansion, and irrigation infrastructure development in Program corridors. The structurally elevated risk profile of Program activities — combining community land access requirements, concentrated seasonal labour demand, recruitment networks with documented trafficking dimensions, and dispersed smallholder beneficiary populations — makes the effective performance of these systems a direct determinant of Program outcomes for the communities most exposed to its impacts.

The ESSA assesses these systems based on their ability to:

- Prevent and manage land-related conflicts, including those arising from the DUAT–EIA sequencing gap, the irrevocability of consent once formally recorded, and the operational unreliability of investment eligibility verification against existing community rights;
- Protect workers and communities from harm, including seasonal and informal workers excluded from IGT's inspection mandate, household members whose labour is rendered invisible under outgrower contract arrangements, and communities in Program corridors where agricultural labour concentration generates directly elevated GBV risk;
- Ensure inclusive access to Program benefits, including for women whose land rights, labour contributions, and grievance needs are institutionally under-represented at multiple points in the Program relationship; and
- Provide accessible and effective grievance redress across all corridors, including for the sensitive complaint categories — GBV, child labour, and trafficking — through existing referral pathways.

6.2 Land Access, Use, and Conflict Management

The land tenure system confers formal recognition of community and customary rights through a tiered DUAT attribution process requiring community consultation. Resettlement is governed by Decree 31/2012 and administered through the National Resettlement Commission at central, provincial, and district levels, with field inspection of Resettlement Action Plans held by AQUA. Conflict resolution operates through a layered architecture extending from community customary authorities and local administrative structures through district and provincial offices to DNTDT centrally and, ultimately, the formal judiciary. SIGIT functions as the national land information system, designed to integrate with other sectoral platforms, while land use plans managed by SDPI at provincial and district level provide the spatial reference for investment siting.

The most structurally significant gap is the sequencing disconnect between DUAT attribution and the EIA process: communities consent to land cession before resettlement entitlements and compensation terms are defined, making resulting disputes structurally difficult to resolve. Field evidence from the Dondo corridor confirms that a full sequential consultation process with district participation can produce genuine protective outcomes, including documented veto cases, but such participation and formal notification of licence issuance to district authorities are not systematically observed. AQUA's field inspection capacity is constrained by transport and operational budget limitations, and Decree 31/2012 does not differentiate between large-scale and minor resettlement processes and does not include comprehensive livelihood restoration guidelines; its review has stalled. Above community level, the conflict resolution pathway is sub-functional: judicial access is effectively inaccessible to most rural communities, the digital complaints platform is non-operational in several provinces, and SIGIT remains incomplete and non-interoperable with agricultural management systems. A large share of land use plans in Sofala Province require updating, and land inspection authority currently sits outside the land sector without a defined timeline for return.

In the context of the MozAgribiz Program:

- All investments requiring community land access are exposed to the structural risk created by the DUAT–EIA sequencing gap, as community consent may be formalised before resettlement entitlements and compensation conditions are defined;

- District authorities are not systematically included in the DUAT–EIA consultation sequence and are not formally notified of licence issuance, meaning supported investments may advance — and in documented cases have advanced to construction — without district knowledge;
- The two-track resettlement model, referenced during the Dondo Focus Group Discussion, from an existing photovoltaic investment in the area constitute an available operational reference for managing displacement risks within the corridor; and
- Verification of investment land access eligibility against existing community rights is operationally unreliable, as the full DUAT attribution pathway — including consultation records, documentation of pre-existing rights, absence of active disputes, and PDUT zoning compliance — is not consistently documented or treated as a continuing condition.

Strengths

- When the full DUAT–EIA sequence is observed with district participation, the system demonstrably delivers substantive community protection, as confirmed by veto outcomes in the Dondo corridor;
- The photovoltaic investment in Dondo has generated a replicable two-track resettlement model through the District Resettlement Commission, providing a tested implementation reference within the Program corridors;
- The review of Decree 31/2012 reflects institutional openness to reform and demonstrates a willingness to strengthen practices at both national. However, this has been constrained by lack of resources.

Key Constraints

- Formal procedural compliance with DUAT consultation requirements does not guarantee substantively informed consent: once validly recorded at the DUAT stage, community consent is effectively irrevocable even when project conditions later diverge from community understanding;
- The regulatory framework's failure to differentiate by resettlement scale, combined with AQUA's constrained field inspection capacity, creates conditions in which inadequate RAP responses can remain formally compliant;
- The inaccessibility of the dispute resolution pathway above community level — through district and provincial structures to DNTDT and the judiciary — concentrates conflict management at the point of lowest technical capacity, without a practical escalation route;
- The combination of SIGIT's incompleteness and non-interoperability, outdated land use plans in Sofala Province, and depleted district-level technical capacity in SDAE and SDPI makes operational verification of investment eligibility against existing community rights structurally unreliable; and
- The concurrent normative transition under the new Land Law and the undefined timeline for the return of land inspection authority to the land sector create a compounded period of enforcement and regulatory uncertainty extending into the Program's implementation phase.

6.3 Labor, Occupational Health and Safety, and Working Conditions

Labour regulation and OHS systems apply to agribusiness, contract farming, and irrigation activities supported under the Program. Under the Labour Law (Law 13/2023), labour inspection and enforcement — including child labour violations, workplace-based GBV, and forced labour — fall within the primary

mandate of IGT. The labour inspection system faces significant structural constraints that undermine effective enforcement nationwide. DPGCAS exercises a complementary social protection role, covering psychosocial support for child victims, GBV case management beyond the workplace context, and trafficking victim assistance, with both institutions coordinating responses through Reference Groups and a Multi-sectoral GBV Mechanism. Risks are heightened by the structural exclusion of the informal sector from inspection coverage, concentrated seasonal labour demand and influx, the invisibility of household labour under outgrower contract arrangements, the presence of recruitment networks with trafficking dimensions in Sofala Province, and the absence of supply chain due diligence requirements. Agricultural labour concentration in Program corridors directly elevates GBV risk for both workers and surrounding communities — female seasonal and contract workers face particular exposure, a risk compounded by informal employment status that discourages complaint — a dynamic relationship confirmed by the finding that at least 90% of cases presenting at the Integrated Care Centre in Sofala carry a labour dimension, yet no referral pathway or EIA requirement currently addresses this exposure.

Strengths

- The Labour Law, OHS regulations, and agricultural minimum wage diploma provide a formally adequate normative basis for Program-level labour standards without requiring new legislative development;
- The Reference Group mechanism has demonstrated capacity for coordinated multi-institutional child protection response (in cases of child labour), confirming the network can activate consistently with international standards when communication is functional; and
- The extensionist-as-detection-channel model, operationalised under SUSTENTA for child labour sensitisation and GBV referral, constitutes a tested methodology with documented outcomes within the Program's operational reach.

Key Constraints

- The exclusion of the informal sector from IGT's inspection mandate leaves seasonal workers, smallholder outgrowers, and household members contributing labour under contract arrangements outside the perimeter of systematic inspection;
- IGT's structural capacity constraints significantly compromise the detection of child labour violations and workplace-based GBV, including forced labour, a violation that already presents considerable identification challenges;
- The absence of supply chain due diligence requirements leaves the Program without a regulatory instrument on which to build investor accountability for indirect labour conditions;
- Household-level outgrower contracts and household-level beneficiary registration institutionally reproduce women's labour invisibility across all relevant value chains and at multiple points in the Program relationship;
- EIA requirements do not mandate GBV risk assessment, meaning the primary project appraisal instrument does not capture the risk that agricultural labour concentration most predictably generates;
- The absence of laboratory capacity means agrochemical exposure risk cannot be addressed through the formal inspection framework regardless of inspection frequency; and

- DPGCAS's operational infrastructure deficit and SDSMAS's insufficient budget in Program districts are binding institutional constraints that limit GBV and child protection response capacity independently of Program design choices.

6.4 Community Health and Safety

Community health and safety oversight in Program areas is anchored in the Multi-sectoral GBV Mechanism and Reference Groups operating at provincial and district level under DPGCAS. EIA regulations provide a formal appraisal entry point for identifying community-level risks associated with agribusiness and irrigation investments, though EIA requirements do not currently mandate GBV risk assessment as part of project appraisal. Concentrated seasonal labour demand (labour influx) in Program corridors generates direct community safety risks — most significantly, elevated GBV risk associated with agricultural labour concentration — for which dedicated reporting or referral pathway are largely inaccessible. DPGCAS operates without basic operational infrastructure, and SDSMAS carries insufficient budget in Program districts to sustain the inter-institutional coordination on which GBV detection and response depend in practice.

In the context of the MozAgribiz Program:

- Reviewed EIA documentation addresses vector-borne disease risk through generic statements lacking quantified exposure assessments, baseline disease burden data, and post-construction monitoring indicators, rendering mitigation measures unverifiable; AQUA's limited laboratory capacity further constrains independent detection of investment-linked changes in vector habitat, disease transmission dynamics, and agrochemical contamination in water bodies, leaving pollution pathways from agribusiness runoff effectively undetectable and unaccounted for in health risk assessments;
- As referenced in section 6.3, a vast majority of GBV cases presenting at the Integrated Care Centre in Sofala carry a labour dimension, confirming a direct relationship between agricultural labour conditions in Program corridors and community safety outcomes that no formal inter-institutional protocol, EIA requirement, or dedicated referral pathway currently addresses; and
- DPGCAS's operational infrastructure deficit and SDSMAS's budgetary constraints in Program districts limit the coordination architecture on which both GBV detection and child protection response depend.

Strengths

- The Reference Group mechanism has demonstrated capacity for coordinated multi-institutional response — including the documented interception and referral of children transported from Caia to Beira — confirming the network can activate consistently with international standards when communication is functional;
- During SUSTENTA, extensionists acted as first-line channels for detecting and referring GBV cases to the Office for Assistance to Families Victims of Violence within the PRM—a tested methodology with encouraging outcomes that lies within the Program's operational reach and can be replicated, provided it does not undermine their acceptability or the trust-building essential to their core community functions; and
- The Multi-sectoral GBV Mechanism at provincial and district level provides an existing institutional framework for coordinated community safety response without requiring new structural development.

Key Constraints

- EIA requirements do not mandate GBV risk assessment, meaning the primary project appraisal instrument does not capture the community safety risk that agricultural labour concentration in Program corridors most predictably generates;
- No reporting or referral pathway exists to address GBV risk arising specifically from labour concentration in Program areas; and
- DPGCAS's operational infrastructure deficit and SDSMAS's insufficient budget in Program districts are binding institutional constraints that limit community health and safety response capacity independently of Program design choices.

6.5 Stakeholder Engagement and Grievance Redress Mechanisms

Stakeholder engagement rests primarily on mandatory community consultation requirements embedded in the environmental licensing process, formalised through a Public Consultation Report reviewed by DINAMC as part of EIA approval. Grievance redress operates through several parallel and unintegrated channels: the DPGCAS complaint intake function via the Reference Group, the *Fala Criança* hotline (116), and community committees; the AQUA complaint-triggered inspection pathway; the ministerial Grievance Redress Mechanism (GRM), operationalised under PROCAVA through a green line, Survey 123 platform, and institutional email; and the DNTDT land conflict mechanism, structured as a tiered cascade from customary community authorities through district, provincial, and central levels. Multi-sectoral coordination is provided by the Reference Group, and by the Gender Department's Multi-Sectoral GBV Mechanism, at both provincial and district level. Natural Resource Management Committees function informally at community level as environmental and social reporting nodes, without integration into any formal escalation pathway.

The most critical gap in the consultation system concerns the non-enforcement of the twenty-percent representativeness threshold established in Ministerial Directive No. 130/2006. In practice, this minimum participation benchmark is not verified by any institution in the licensing chain: consultations are carried out by proponent-contracted consultants without independent oversight, attendance is recorded but not validated against the threshold, and no consequence attaches to non-compliance. The result is that the formal representativeness standard functions as a procedural formality rather than a substantive floor. This failure is compounded by the broader documented practice of waiving simplified EIA studies, removing formal consultations altogether for Category B projects when impacts are considered “already known”, which can remove community participation from the licensing process for a significant share of Program-supported investments.

The GRM system presents several interconnected and more fundamental failures that operate independently of the participation quality issues described above. First, no continuous, multi-sectoral Program-level GRM exists across all corridors. Existing channels — the MDR, the AQUA inspection pathway, the DNTDT tiered cascade, and community-level committees — operate in institutional silos, without a common entry point, shared case management, or cross-corridor consistency. Two years into PROCAVA's implementation, the MDR had received zero complaints through any channel. The green line is free only for Movitel subscribers, the Survey 123 platform and the green line are not technically integrated at DINAMC level, and the district focal point network has not been operationalised. Community commitment records are held by local governments and not shared with AQUA, DINAMC, or DPGCAS, leaving no institution with both the mandate and the information necessary to follow up. Transparency across all institutions follows a passive model that structurally limits community awareness of the project conditions against which any grievance would need to be assessed.

Second, and critically, no dedicated referral pathway exists for sensitive complaint categories — specifically GBV, child labour, and trafficking — within any of the Program's active grievance channels, and the DNTDT land conflict mechanism, which holds formal multi-level jurisdiction over the dispute type most predictable in agribusiness corridors, is not formally integrated into the GRM architecture. These two absences mean that the complaints carrying the highest protection risk and the complaints most directly generated by Program activities have no structured institutional path from intake to resolution, referral, or follow-up within the existing system.

Strengths

- Although the MDR was designed for sectoral rather than project-specific application, it is confirmed as available for Program adaptation by DINAMC, and provides a viable institutional foundation that MozAgribiz can build on without creating parallel structures;
- The *Fala Criança* line (116) achieves confirmed operational uptake in rural corridor contexts, demonstrating that nationally anchored, mobile-accessible mechanisms deliver real results in settings where physical and written mechanisms consistently fail;
- The Reference Group has demonstrated functional multi-institutional coordination capacity, with documented outcomes including the interception and referral of children transported across provincial boundaries — establishing a precedent for the kind of sensitive-case referral pathway the GRM currently lacks;
- Natural Resource Management Committees are already operational in several Program corridor localities, maintain community trust, and serve an environmental and social monitoring function, constituting a community-level GRM entry point with strong integration potential;
- The DNTDT tiered cascade holds formal multi-level jurisdiction over DUAT allocation disputes, boundary conflicts, and investment-driven land acquisition, and its existing architecture could be formally integrated into a Program-level GRM without structural duplication; and
- Multiple multi-sectoral coordination mechanisms — including the Reference Group, the GBV Mechanism, the Technical Council for Disaster Risk Management, the Land Consultation Forum[4], and the Technical Commission for Resettlement — constitute an existing institutional coordination architecture that can be formalised and resourced rather than built from scratch.

Key Constraints

- The twenty-percent representativeness threshold under Directive No. 130/2006 is unverified in practice, and no institution in the licensing chain holds an active mandate to enforce it — leaving the minimum participation standard without operational effect across Program corridors;
- No continuous, multi-sectoral Program-level GRM exists: existing channels are institutionally siloed, geographically uneven, and lack a common entry point, shared referral logic, or cross-corridor case management capacity;
- No trained referral pathway exists for sensitive complaint categories including GBV, trafficking, and child labour, and the land conflict mechanism most directly relevant to Program-generated disputes operates entirely outside the GRM architecture;

[4] *Fórum Consulta sobre Terras*

- The Gender Department manages the GBV mechanism without a computer, internet access, telephone credit, or dedicated meeting space — this directly constrains the referral capacity the Program most needs to establish; and
- Passive transparency practices across all institutions in the licensing chain deprive communities of the project information they would need to make effective use of any available grievance channel.

6.6 Social System Capacity and Performance Assessment

Mozambique's social management systems provide a formally adequate normative and institutional foundation across the thematic areas covered by the Program, but face structural implementation constraints — particularly in decentralised corridor contexts, the informal agricultural sector, and multi-institutional coordination — that reduce their effective protective value under current operating conditions.

The ESSA finds that:

- Social risks under the Program are significant but manageable, provided that the sequencing disconnect between DUAT attribution and EIA processes is addressed, minimum community participation standards are actively verified rather than formally recorded, and investment eligibility against existing land rights is treated as a continuing condition rather than a one-time procedural step;
- System weaknesses relate primarily to enforcement, coordination, and operational capacity rather than legal design: the normative frameworks governing land access, resettlement, labour, OHS, and community safety are broadly fit for purpose, and multiple institutional mechanisms — including the Reference Group, the Multi-Sectoral GBV Mechanism, and the DNTDT tiered cascade — demonstrate functional capacity when adequately resourced and activated; the critical gaps are the non-enforcement of the twenty-percent participation threshold, the absence of a continuous Program-level GRM across all corridors, and the absence of any structured referral pathway for sensitive complaint categories including GBV, child labour, and trafficking; and
- Strengthening existing systems is both feasible and preferable to constructing parallel arrangements: the MDR provides a viable and DINAMC-confirmed foundation for a Program-level GRM; the *Fala Criança* line, the extensionist detection model, and the Reference Group provide tested and operationally accessible components for sensitive-case referral; and the District Resettlement Commission model from Dondo provides a replicable implementation reference for displacement risk management within Program corridors.

These findings provide a clear basis for identifying targeted, realistic actions under the Program Action Plan that build on demonstrated institutional capacity rather than substituting for it.

7 Compliance with Core Principles

The table below presents the findings of the Environmental and Social Systems Assessment (ESSA) across the six Core Principles that govern PforR Program compliance. For each principle, the analysis examines the adequacy of the existing Mozambican legal and institutional framework, identifies the operational gaps and risks that prevent the system from functioning as intended, and draws an overall compliance conclusion. Across all six principles, a consistent pattern emerges: Mozambique's formal framework is broadly adequate at the legislative level, though its effectiveness is constrained by limited institutional capacity, fragmented inter-agency coordination, insufficient field presence, and the absence of program-scale instruments such as a strategic environmental assessment and an integrated grievance redress

mechanism. Some legal gaps have been identified, however, these can be addressed through Program-level measures, not requiring any revision or enactment of legal nature. The ESSA conclusions therefore do not recommend legislative reform as a precondition for Program effectiveness but instead identify a targeted set of Program Action Plan measures designed to close the gap between legal adequacy and operational sufficiency before investments are approved and implemented at scale. There are, nonetheless, two areas that require legislative or regulatory action: the conclusion and approval of the MAAP E&S Safeguards Policy and the revision of the EIA Directive to ensure that social safeguards are properly integrated into project design, screening, impact assessment and monitoring. The detailed Core Principles consistency analysis is provided in Annex A1.

Table 7-1: Core Principle Compliance Analysis

Core Principle	Summary of Mozambican Systems	Key Gaps & Risks Identified by the ESSA	ESSA Conclusion on Compliance
CP1 — E&S Assessment & Management	Comprehensive legal framework (Law 20/97, Decree 54/2015) establishes project classification, mandatory public consultation, and compliance oversight through DINAMC and AQUA. MAAP's RSSA holds a statutory safeguards mandate. No legislative reform required before Program proceeds.	No MAAP-level safeguards policy, leaving RSSA without a normative basis to apply and enforce requirements. Social dimensions inconsistently integrated at early screening. No SEA mechanism at program scale. Uneven safeguards quality, weak field monitoring, and fragmented DINAMC-AQUA-ARAs coordination.	**Legally adequate but operationally insufficient.** PAP should prioritize: adoption of a MAAP safeguards policy and standardised social risk screening; RSSA field monitoring budget; formalised inter-agency coordination; minimum ESMP content standards; corridor-level cumulative impact baseline.
CP2 — Natural Habitats & Physical Cultural Resources	Decree 54/2015 and the Forest Law prohibit critical habitat conversion with formally established screening thresholds. DINAMC licences biodiversity-sensitive projects; ANAC manages gazetted conservation areas. MEC/DNPC holds cultural heritage licensing authority covering archaeological surveys and chance-find procedures.	Biodiversity sections are consistently the weakest in reviewed EIAs; no ecologists in DINAMC or provincial SPAs. ANAC has no mandatory EIA role for agricultural projects outside gazetted areas. No corridor-level habitat mapping, no SEA instrument, and no procedural link between MEC/DNPC and DINAMC licensing.	**Broadly consistent with CP2 objectives, but constrained by limited field capacity and uneven compliance monitoring**. PAP actions: mandatory ANAC consultation thresholds (PAP-15), corridor spatial screening tool (PAP-15), minimum biodiversity EIA content standards (PAP-15), Program-level SEA (PAP-20), formal MEC/DNPC-DINAMC procedural interface (PAP-23).
CP3 — Worker & Community Health, Safety & Labour	Formally adequate framework: Labour Law (23/2007), OHS regulations, child labour laws implementing ILO Conventions 138 and 182, and anti-trafficking legislation. IGT provincial delegations hold enforcement mandate. Multi-sectoral GBV mechanism and DPGCAS Reference Group provide community protection.	No provisions governing labour influx or worker-community interaction. Labour inspection does not reach smallholder and outgrower workers. No independent pesticide residue verification capacity. Reference Group for child protection operates without resources or formal referral protocols. No GBV-labour inspection coordination protocol. Irrigation expansion increases vector-borne disease risk.	**Formally consistent but operationally insufficient.** Six PAP priority areas: agrochemical safety and field compliance verification (PAP-12); labour influx provisions (PAP-8); GBV coordination and women's contractual standing (PAP-11); child labour referral protocols (PAP-21); sensitive complaint referral design (PAP-03); vector-borne disease mitigation in irrigation EIAs (PAP-11).
CP4 — Land Acquisition & Loss of Access	Land Law (19/97) recognises DUATs including customary rights. Resettlement governed by Decree 31/2012 and MD 156/2014,	DUAT–EIA sequencing gap: communities consent before displacement impacts are fully defined. No consistent upfront	**Substantive formal protections broadly aligned with CP4 but undermined by the sequencing gap, limited field oversight,**

to Natural Resources	requiring RAPs and livelihood restoration. DNTDT holds land titling, consultation oversight, and conflict management mandates. Multi-level resettlement oversight commission in place.	screening before DUAT consultation commences. Replacement cost standard not confirmed in the legal framework. No livelihood restoration methodology. Dysfunctional MAAP GRM. Draft New Land Law introduces five material risks including an institutional void around the new AdNT.	**incomplete land information, and absent livelihood methodology.** PAP: harmonised screening protocol (PAP-7), replacement cost standard and livelihood framework (PAP-18), strengthened AQUA monitoring (PAP-6, PAP-14), Program GRM (PAP-3). Recommends a legislative monitoring protocol for the Draft New Land Law.
CP5 — Vulnerable Groups & Equitable Access to Benefits	No groups meeting ESS7 IP criteria identified in the Program footprint. Constitution establishes equality and non-discrimination; Land Law protects community rights regardless of formal demarcation. DPGCAS provides seasonal outreach and multi-sectoral referral capacity. A forthcoming gender parity requirement in the revised Land Law is the most significant normative development.	Women systematically excluded from land consultations; no feedback mechanism linking consultation outcomes to Program adaptation. Contract farming directs benefits to male household heads. Migrant workers lack institutional protection. RSSA lacks gender and social expertise. No accessibility requirements in agricultural training activities.	**Partial but insufficient basis for CP5.** Actions required: gender parity as an immediate Program eligibility condition (PAP-18); redesign of contract farming for women's individual contractual standing and migrant worker protection (PAP-8); embedding gender and social expertise in RSSA (PAP-4); accessibility and inclusion requirements across all training and extension activities.
CP6 — Social Conflict & Fragility	Framework rests on four pillars: DUAT community consultation requirements; resettlement framework with multi-level oversight; five-step EIA participatory cycle with representativeness thresholds; and sectoral GRM with three institutional channels within MAAP (DNTDT, RSSA, IAAP), complemented by sub-national governance mechanisms.	DUAT–EIA sequencing gap leaves communities without recourse when conditions change. Anchor investor model accelerates resource competition in corridors with overlapping agribusiness, mining, and conservation pressures. No cumulative conflict risk assessment mechanism. Investor-community commitments not systematically tracked, generating a social contract deficit. GRM fragmented and without defined resolution timeframes or gender-disaggregated tracking.	**Substantive but operationally insufficient.** Three required responses: (a) cumulative conflict assessment mechanism: cross-cadastre overlap screening (PAP-17), corridor baselines (PAP-09), Program-level SEA (PAP-20); (b) conflict-sensitivity pre-screening gate and formalisation of investor-community commitments as monitored obligations (PAP-07, PAP-13); (c) Program-wide integrated GRM with defined timeframes and gender-disaggregated tracking (PAP-03).

8 Program Boundary, Exclusions, and Risk Escalation

8.1 Definition of the Program Boundary

The MozAgribiz Program supported under the Program-for-Results (PforR) instrument is defined by a clearly delimited set of eligible expenditures and activities, aligned with the Program's Results Areas and consistent with the World Bank's PforR Policy.

The PforR finances expenditures associated with:

- Policy, institutional, and market reforms;
- Service delivery and capacity strengthening for agribusiness value chains; and

- Small to medium-scale infrastructure and productive investments with moderate and manageable environmental and social risks.

The ESSA confirms that the Program boundary is sufficiently well defined to enable reliance on existing country systems, provided that screening and exclusion mechanisms are consistently applied. The PforR is complemented by an IPF component subject to the World Bank's Environmental and Social Framework. Activities that exceed PforR eligibility thresholds are, where appropriate, addressed under the IPF component. The PAP measures —PAP-1, PAP-2, PAP-7, PAP-16, PAP-17, and PAP-18 — are designed to strengthen the systems that underpin reliance within the defined boundary, not to expand it. Where PAP measures are prerequisites for specific sub-project category approvals, this is reflected in the sub-project eligibility conditions set out in the Program Operations Manual.

8.2 Excluded Activities under the PforR

The exclusion framework operates across three layers: a primary EIA-based boundary; a resettlement-specific threshold; and activity-specific exclusions derived from the value chain and corridor risk analysis in Sections 3 to 6.

Primary EIA-Based Exclusion Boundary - Activities classified as Category A or Category A+ under Decree 54/2015 are excluded from PforR financing, as they require safeguard instruments whose consistent implementation at sub-national level cannot be assured given the documented capacity constraints along the three corridors and the operational immaturity of the RSSA. The PforR finances activities within Categories B and C, for which simplified instruments are proportionate to the risk profile involved.

Resettlement Exclusion Threshold - Activities requiring the physical displacement of people from their dwellings — and the consequent allocation of replacement land and housing – or significant land allotment — are excluded. This threshold reflects the Mozambican administrative reality that this type of resettlement triggers Category A classification under the national EIA framework. This is directly relevant to the irrigation PPP model under Results Area 1, where informal or customary users without documented DUATs may occupy scheme or scheme-adjacent areas. Activities involving temporary or voluntary land-use adjustments without physical relocation or formal land reallocation may remain within the PforR boundary and be managed through Category B activities and DUAT consultation procedures. The transitional uncertainty introduced by the Draft New Land Law — particularly the 12-month idle land deadline — reinforces the need to apply land-use threshold assessments against the currently operative legal baseline under PAP-7.

Value Chain and Corridor-Specific Exclusions - For the forestry value chain, activities involving large-scale timber extraction, natural forest conversion, or investments requiring concurrent vegetation clearance, EIA, and conservation area authorisations in or adjacent to protected areas are excluded. For aquaculture and fisheries, new production facilities in wetland or coastal environments where effluent risks cannot be managed within a Category B instrument are excluded. For poultry and livestock, large-scale processing with waste or effluent loads exceeding simplified instrument management capacity is excluded. For irrigation PPP activities, arrangements requiring new water abstraction infrastructure with cumulative shared-catchment impacts are excluded pending completion of the PAP-10 cumulative water assessment.

Additional Cross-Cutting Exclusions - Applicable irrespective of EIA category, these cover activities in or adjacent to legally protected conservation areas, critical natural habitats, or permanently protected forest and biodiversity zones; activities involving hazardous agrochemicals or persistent organic pollutants outside existing DINASAB registration and inspection systems; activities generating major pollution risks to shared catchment water bodies; activities with occupational or community safety profiles beyond IGT inspection capacity; and any activity resulting in irreversible or significant modification of critical natural

habitat requiring compensatory management, or net biodiversity loss of a scale or character requiring compensatory biodiversity offsetting. beyond the current operational capacity of country systems.

The ESSA confirms that screening and exclusion procedures at central and sub-national levels, supplemented by PAP-01, PAP-07, PAP-15, PAP-16, and PAP-17, are designed to identify and exclude ineligible activities at the earliest stage of sub-project preparation.

8.3 Screening, Escalation, and Risk Management

Environmental and social screening procedures are applied to all Program-supported activities to ensure alignment with PforR eligibility criteria, early identification of environmental and social risks, and appropriate exclusion or escalation of activities that exceed acceptable risk thresholds. Screening is conducted at two levels. At the central level, the RSSA reviews sub-project proposals against the exclusion criteria established in Section 7.2 and the EIA categorization framework under Decree 54/2015, applying the standard terms of reference to be developed under PAP-01. At the sub-national level, Provincial Environmental Services conduct site-specific pre-screening as part of the sub-project approval pipeline, with the inter-structure coordination protocols to be established under PAP-04, which explicitly establishes a formal coordination mechanism across agencies, providing the procedural basis for consistent screening practice across dual provincial architecture.

The escalation pathway operates as follows: Sub-projects classified as Category C that present no land, resettlement, or high safety risk indicators proceed through the standard simplified screening pathway. Sub-projects classified as Category B, or those presenting any indicator associated with the exclusion thresholds in Section 7.2 — including proximity to conservation areas, water abstraction in shared catchments, or land-use adjustments potentially affecting informal or customary users — are referred to the RSSA for enhanced review before approval proceeds. Sub-projects meeting or exceeding Category A classification thresholds, or triggering any of the activity-specific exclusions, are ineligible for PforR financing and are removed from the PforR pipeline. Where such activities are assessed as necessary to achieve Program objectives, they may, where appropriate, be addressed through the complementary IPF component or through other financing instruments subject to the applicable safeguard framework.

Operational readiness of the screening and escalation system is directly supported by PAP-04, which establishes the RSSA's minimum staffing and procedural standards as a prerequisite for sub-project approvals in higher-risk corridor contexts, and by PAP-20, which provides the corridor-level cumulative impact baseline against which individual sub-project screening assessments are calibrated.

8.4 Associated Facilities and Activities Required to Achieve Program Results

Consistent with ESSA Guidance, the Program boundary assessment explicitly considers activities that may be required to achieve the PDO or DLIs even where they are not financed under the PforR. This includes associated or enabling investments by public or private actors that may be induced by Program-supported reforms, service delivery improvements, or infrastructure investments — most notably private sector responses to PPP facilitation under Results Area 1 and to the market system strengthening measures across the six priority value chains.

The most significant associated facility risk arises in the context of irrigation PPP arrangements, where private operator investment in on-farm infrastructure, water abstraction, or upstream processing facilities may be induced by Program-supported scheme rehabilitation and PPP facilitation activities. Such investments are not financed under the PforR but may carry environmental and social risk profiles — including water resource competition, land-use change, and worker safety implications — that require management. The ESSA confirms that the cumulative water abstraction assessment under PAP-20 and the

INIR-ARAs coordination mechanism under PAP-10 are the primary instruments through which associated water resource risks in shared catchments are tracked and managed, even where the inducing investment itself falls outside the PforR boundary.

For the forestry value chain, Program-supported governance and institutional reforms may induce upstream logging and extraction activity by licensed private operators. While such activity is not financed under the PforR, the ESSA identifies the need for the corridor-level monitoring framework under PAP-09 to extend to associated extraction activity in order to maintain the integrity of the Program's natural habitat and biodiversity risk management.

The ESSA confirms that screening and exclusion procedures at central and sub-national levels are designed to identify activities that exceed acceptable PforR risk thresholds, including those arising from associated facilities. Where such activities are identified as necessary to achieve Program objectives, they are excluded from PforR financing and are expected to be addressed through separate financing instruments or regulatory processes, including, where applicable, the IPF component subject to the World Bank's Environmental and Social Framework.

8.5 Implications for Risk Management

The boundary framework established in Sections 7.1 through 7.4 has three direct implications for the Program's overall risk management posture. First, the clear definition of eligible activities, exclusion thresholds, and screening procedures ensures that PforR financing remains focused on moderate-risk, system-level interventions for which reliance on existing country systems is credible and proportionate. Second, the escalation and exclusion pathways ensure that high-risk activities — whether identified at design stage or emerging during implementation — are managed outside the PforR boundary through instruments appropriate to their risk profile, preserving the integrity of the results-based approach. Third, the PAP measures supporting the screening and escalation system — including PAP-01, PAP-20 and PAP-03 and the RSSA operational readiness requirements under PAP-04 — are sequenced to be in place before higher-risk sub-project categories enter the approval pipeline, ensuring that the boundary is operationally enforceable and not merely formally defined.

Taken together, these elements ensure that the Program's reliance on country systems remains proportionate and credible throughout the implementation period, and that the risk profile of PforR-financed activities remains consistent with the risk management capacity of the national and sub-national systems assessed in this ESSA.

9 Stakeholder Consultations

9.1 Consultation Scope, Timing, and Disclosure

Stakeholder consultations for the ESSA are planned in two phases during Program preparation. The first phase consisted of structured interviews and focus group discussions with key institutions at central, provincial, and district levels, conducted between 23 March and 13 April 2026. These consultations covered institutions responsible for E&S risk management and institutions that will be directly involved in Program implementation providing preliminary insights into institutional practices and constraints that directly informed the draft ESSA findings.

The second phase will comprise a formal stakeholder meeting to be held in June 2026 in Maputo, with virtual participation by provincial-level institutions from all eight corridor provinces — Maputo Province, Gaza, Sofala, Manica, Nampula, Zambezia, Tete and Niassa. The Dondo District Administration, including SDAE, SDPI, and SDSMAS, will also be invited to participate virtually, given their direct involvement in the

first-round focus group discussions. The meeting will focus on presentation and structured discussion of the ESSA findings and the Program Action Plan, with sufficient time allocated for thematic engagement beyond standard presentation and Q&A format. All views expressed, including concerns and alternative proposals, will be documented in the consultation record.

The draft ESSA and Program Action Plan will be disclosed ten working days prior to the formal meeting — uploaded to the World Bank external website and the Government of Mozambique's official website. A simplified summary in Portuguese will be distributed to all invited institutions alongside the formal invitation letter. Following the meeting, an additional ten working days will be provided for written comments, after which the final ESSA and PAP will be consolidated. The consultation record will be publicly available as an annex to the final ESSA on both the World Bank and Government websites, enabling stakeholders to verify how their inputs were addressed.

A summary of consultation phases and participating stakeholder categories is presented in Table 8.1 below. A full list of individuals and organizations consulted during the first round, as well as the details about main concerns raised during the consultation, is provided in Annex B.

Table 9-1: Summary of Stakeholder Consultation Process

Phase	Format	Date(s)	Geographic Coverage	Stakeholder Categories
Phase 1 — Interviews and focus groups	In-person structured interviews; district focus groups	23 March – 13 April 2026	Maputo (central); Beira (Sofala Province); Dondo District	Central government ministries and agencies; provincial directorates; district administration (SDAE, SDPI, SDSMAS)
Phase 2 — Formal meeting	In-person (Maputo) with virtual provincial connection	To be determined, but expected in June 2026	In person: Maputo Virtual: Gaza, Sofala, Manica, Nampula, Zambezia, Niassa and Tete provinces; Dondo District	Central implementing agencies; E&S risk management institutions; provincial directorates; district administration; development partners; civil society; private sector and academia.
Post-meeting comment period	Written submissions	10 working days after Formal Meeting	All	All stakeholder categories

9.2 Key Issues Raised

Stakeholder inputs during the first consultation round highlighted a consistent set of themes directly relevant to the ESSA findings. Central and provincial E&S risk management institutions consistently identified staffing and resource constraints at provincial level as the primary challenge for environmental and social oversight, particularly for EIA follow-up, environmental monitoring, and land administration in rural corridor areas. Provincial E&S risk management institutions also raised the operational constraints in conducting monitoring and inspections arising from lack of adequate financial and material resources, poor data management/sharing systems. the complexity of multi-authority coordination for activities touching both agricultural licensing and environmental clearance, with the dual DPDTA-SPA architecture flagged as a particular source of procedural uncertainty. Program implementing institutions, at both central and provincial level, confirmed the inexistence of a defined mandate to oversee E&S safeguards and their limited E&S capacities. These institutions highlighted that involvement in E&S risk management has been largely project-driven and financed and flagged operational constraints for core activities. Provincial directorates that will play a key role in the program expressed concern over their limited involvement in the ongoing discussions surrounding the Program's design. With dialogue concentrated

primarily at the central level, these institutions highlight that their exclusion risks overlooking critical provincial realities and operational challenges.

9.3 Integration of Stakeholder Feedback into the ESSA

Stakeholder feedback directly informed the identification of system weaknesses and capacity gaps documented throughout the ESSA; the prioritization and sequencing of Program Action Plan measures; and the emphasis on decentralized capacity, inter-institutional coordination, and practical implementation realities across Sections 4, 5, and 6. The Phase 1 consultations with sub-national institutions were particularly influential in shaping the assessment. The Phase 2 formal meeting will serve to validate the ESSA findings and PAP measures with a broader stakeholder group, generating additional inputs on the sequencing of PAP prerequisites for higher-risk sub-project categories.

Thus far, no stakeholder inputs identified issues that would preclude reliance on country systems for the implementation of the MozAgribiz Program. Stakeholders broadly affirmed the ESSA's system-strengthening approach, with consistent emphasis on the need for PAP measures to address decentralized capacity constraints before higher-risk sub-project categories enter the approval pipeline.

9.4 Use of Consultation Feedback

Stakeholder feedback so far has confirmed that the primary environmental and social challenges facing the Program relate to capacity and coordination constraints at decentralized levels — in environmental monitoring, land administration, social protection, labour inspection, and grievance management — rather than to fundamental gaps in the national regulatory framework as designed. This reinforced the ESSA's focus on practical, system-level strengthening measures rather than the introduction of new regulatory instruments or parallel oversight structures. Further inputs are expected from a broader group of stakeholders across the three corridors, including provincial institutions and civil society and private sector actors directly engaged in the priority value chains, to further ensure that ESSA risk assessments and PAP recommendations reflect implementation realities at the level where Program activities will be delivered.

The next round of Stakeholder consultations will be used to validate key findings of the ESSA, including identification of vulnerable groups, adequacy of current systems, and prioritization of Program Action Plan measures. Feedback received will inform refinement of inclusion targeting mechanisms, grievance redress arrangements, and institutional strengthening actions.

10 Key Findings and Risk Assessment

10.1 Overview

This section consolidates the findings of the Environmental and Social Systems Assessment (ESSA) and presents an integrated assessment of environmental and social (E&S) risks associated with the MozAgribiz Program. It focuses on system performance, implementation capacity, and risk management credibility, rather than on activity-level mitigation.

Overall, the ESSA finds that Mozambique’s existing environmental and social management systems are broadly adequate in design and appropriate for reliance under a Program-for-Results (PforR) operation, provided that targeted system-strengthening measures are implemented to address identified capacity and coordination gaps. The Program’s E&S risks are assessed as Substantial but manageable, consistent with the Program’s scope, scale, and decentralized implementation model.

10.2 Summary of Environmental Risk Findings

Nature of Environmental Risks

Environmental risks operate at two distinct levels.

- At the investment level, risks are moderate and manageable through well-structured ESMPs. They include localised pollution, construction impacts, agrochemical exposure, and organic waste from agro-industrial facilities.
- At the corridor scale, a more severe category of risk exists that the current project-level EIA system cannot detect. This includes cumulative biodiversity fragmentation in areas proximate to transfrontier conservation complexes, where no cumulative assessment requirement, provincial forest maps, critical habitat screening guidelines, or invasive species screening mechanism currently exist. It also includes cumulative water over-abstraction in shared catchments, where individual EIAs do not assess sub-catchment water balance and no coordination mechanism exists between INIR and the ARAs. These risks are difficult to detect by current system regardless of individual project compliance. They are not assessed as moderate and require dedicated corridor-scale measures under the PAP.

System Strengths

The ESSA identifies the following strengths in Mozambique's environmental management system:

- A comprehensive legal and regulatory framework governing environmental assessment, licensing, and enforcement;
- Established screening and permitting procedures applicable across sectors;
- Formal institutional mandates at central and decentralized levels; and
- Experience managing similar risks under other public investment programs.

These strengths provide a genuine foundation, but their practical effect depends on external activation and resourcing.

Key Environmental System Gaps

Seven structural gaps are assessed as critical:

- The laboratory analytical deficit - AQUA holds limited laboratory capacity for environmental analysis. Compliance monitoring for agrochemical residues, effluent quality, and soil contamination is therefore effectively non-quantitative, and proponent self-reporting cannot be independently verified;
- The absence of a formal coordination protocol between DINAMC and AQUA - No protocol governs information exchange, escalation, or joint enforcement. Violations can go unaddressed even when identified by one institution;
- The non-functionality of district-level environmental oversight due to the systematic absence of transport, fuel, equipment, and access to ESMPs - SDPI and SDAE represent a potentially significant monitoring extension, but that potential is currently unrealised;

- The absence of a coordination mechanism between INIR and the ARAs for cumulative water abstraction - No data-sharing or joint oversight protocol exists. Cumulative over-abstraction risk in shared basins is invisible to the current system regardless of individual project compliance;
- The absence of critical habitat screening tools - No provincial forest maps, critical habitat guidelines, or invasive species screening mechanism exist within the EIA review process. Reviewing institutions do not retain ecologists on staff. Biodiversity chapters rely on single-season desktop assessments. Avoidance of ecologically sensitive areas cannot be operationalised under current conditions; and
- The absence of corridor-wide environmental baselines - No corridor-wide monitoring function or baseline data exists. Cumulative landscape-level impacts are structurally undetectable regardless of individual project compliance.
- No SEA capacity exists for corridor-level appraisal. Social dimensions are not incorporated into the EIA framework as a binding pre-screening obligation. These cannot be addressed through the ESMP framework or capacity support alone.

10.3 Summary of Social Risk Findings

Nature of Social Risks

Social risks associated with the Program also require disaggregated characterisation:

- A moderate and manageable assessment applies to land access and labour risks at the investment level, provided the conditions identified by the ESSA are in place. It does not apply uniformly across all social risk categories; and
- GBV and trafficking risks are not moderate. The majority of reported GBV cases in Sofala carry a labour dimension, yet the higher risk of labour-related GBV often remains invisible in rural contexts where dispersed investments and limited reach of referral services constrain detection and response. Female seasonal and contract workers face particular exposure, compounded by informal employment status that discourages complaint. DPGCAS in Sofala Province reported recruitment networks with trafficking dimensions that operate beyond the effective oversight of authorities. There is no formal protocol or EIA requirement currently addressing these aspects, and dedicated referral pathways are not consistently accessible in rural areas. The Gender Department, which manages the GBV mechanism, operates without adequate resources to effectively fulfil its duties.

Land access risks are structurally elevated by the DUAT-EIA sequencing disconnect. Once community consent to land cession is formalised before resettlement entitlements are defined, consent is effectively irrevocable, even when project conditions later diverge from community understanding. District authorities are not are not formally notified of environmental licence issuance, after EIA approvals.

System Strengths

The ESSA identifies several strengths in Mozambique's social management systems:

- A legal framework recognizing customary land rights and requiring community consultation;
- Established labour laws and occupational health and safety standards;
- Formal grievance and dispute resolution mechanisms; and

- Institutional experience managing social risks in rural development contexts.

Several of mechanisms, such as the Reference Group, the Multi-Sectoral GBV Mechanism, the *Fala Criança* line (116), demonstrate functional capacity when adequately resourced. The priority is strengthening existing systems, not constructing new ones.

Key Social System Gaps

Four structural gaps are assessed as critical. Full analysis is provided in Section 6.

- On land access and community consultation, the central gap is the DUAT-EIA sequencing disconnect: community consent is formalised before resettlement entitlements are defined. Consultations lack independent oversight and the representativeness threshold is unverified. In some cases, Category B projects are exempted from formal community participation due to the discretionary waiving of the Simplified EIA, being replaced by ESMPs;

- On labour and OHS, the informal sector is categorically excluded from IGT's inspection mandate. Seasonal workers and outgrower household members are outside systematic inspection by design. Women's labour remains structurally invisible in outgrower contracts, and agrochemical exposure cannot be independently verified due to the absence of laboratory capacity;

- On community health and safety, EIA requirements do not mandate GBV risk assessment. Referral pathway for GBV risk arising from labour concentration in Program areas are challenging to access. The operational infrastructure deficit at DPGCAS and SDSMAS is a binding constraint on response capacity; and

- On grievance redress, the MAAP GRM conceived by the RSSA is not fully operational, as demonstrated by the experience with PROCAVA. Two years into program operation, no complaints have been received through the GRM.. Existing channels remain fragmented and lack a unified entry point, while the DNTDT land conflict mechanism operates entirely outside the GRM architecture. Existing channels are siloed and lack a common entry point. The DNTDT land conflict mechanism operates entirely outside the GRM architecture.

10.4 Institutional Capacity and Coordination

A cross-cutting finding of the ESSA is that institutional capacity and coordination are amongst the key determinants of E&S system performance under the Program.

Key institutional observations include:

- Across all implementing institutions — DINAMC, AQUA, SPAs, SDPI, SDAE, RSSA, IGT, DPGCAS, SDSMAS, and DNTDT — practical E&S management capacity is structurally dependent on external Program support. No institution currently operates a self-financed, fully functional E&S management system. Several critical gaps— are independent of application consistency and will not be resolved by capacity support alone;

- Decentralised authorities play a critical role in screening, monitoring, and enforcement, but face systematically uneven staffing, technical capacity, and operational resources. Their potential contribution can only be realised if they are provided with operational support, ESMP access, and a defined Program mandate;

- The absence of formal coordination protocols between key institutional pairs — DINAMC and AQUA, INIR and the ARAs, ARA and AQUA — creates structural accountability gaps that informal working relationships cannot reliably fill; and
- RSSA's safeguards clearance function lacks a binding legal instrument. Cross-directorate integration of E&S standards currently depends on voluntary adherence and donor pressure. This is a legal design gap, not a capacity gap.

The ESSA emphasises pragmatic system reinforcement over institutional redesign. However, a subset of identified gaps — including the absence of SEA, the absence of a mandatory GBV risk assessment obligation, the absence of a binding instrument for RSSA, and the categorical exclusion of the informal sector from IGT's mandate — cannot be addressed through capacity support. The PAP should distinguish clearly between these two categories.

10.5 Program Boundary and Risk Containment

The ESSA confirms that the MozAgribiz Program boundary is clearly defined and appropriate for a PforR operation. Activities with potentially significant, irreversible, or unprecedented environmental or social impacts are excluded from PforR financing.

Effective screening, exclusion, and escalation mechanisms—supported by the complementary IPF component—are essential to ensure that high-risk activities do not enter the PforR financing stream and reliance on country systems remains proportionate and credible.

The ESSA finds that these mechanisms are conceptually sound but require consistent application at decentralized levels, reinforcing the importance of PAP actions focused on screening and oversight.

10.6 Overall Risk Assessment

The overall environmental and social risk of the MozAgribiz Program is assessed as Substantial. This reflects the Program's decentralised implementation across multiple corridors; the cumulative and structurally undetectable character of corridor-scale biodiversity and water resource risks; the confirmed and institutionally unaddressed relationship between agricultural labour concentration and GBV outcomes; the structural dependency of all implementing institutions on external Program support; and the existence of a subset of regulatory and institutional design absences that capacity support alone cannot address.

These risks are manageable within existing country systems, provided PAP actions are implemented in full and actions targeting structural design gaps are not substituted by capacity support measures. The Programs risk management posture depends materially on whether the PAP closes the seven critical environmental gaps and four critical social gaps identified in Sections 5 and 6.

10.7 Implications for the Program Action Plan

PAP actions address the structural gaps identified in Sections 5 and 6. They reinforce country systems rather than replace them. Actions are differentiated between capacity and coordination measures and structural or regulatory design changes requiring amendments to institutional mandates or legal instruments.

On environmental system strengthening, priority actions cover: a laboratory analytical protocol for independent compliance verification; a formal DINAMC-AQUA enforcement coordination protocol; an INIR-ARA mechanism for cumulative water abstraction monitoring; operational support to SDPI and SDAE for district-level monitoring; and corridor-wide environmental baselines for cumulative impact tracking.

On biodiversity risk management, priority actions cover: critical habitat screening guidelines and provincial forest maps; invasive species screening in the EIA process; and a corridor-scale biodiversity monitoring function with specialist ecological input in sensitive zones.

On social system strengthening, priority actions cover: DUAT pathway biding verification requiring community consultation records at environmental licensing initiation and as inputs to Resettlement Plans; independent verification of the representativeness threshold and application of gender parity in stakeholder consultations; a continuous, multi-sectoral Program-level GRM built on the existing MAAP GRM and *Fala Criança* (116) infrastructure; integration of existing referral pathway for GBV, child labour, and trafficking within the GRM; formal integration of the DNTDT Land Conflict mechanism; and minimum operational infrastructure for the Gender Department. Inclusive implementation will be advanced by embedding clear targeting criteria and operational measures, ensuring benefits reach women, youth, informal workers, and vulnerable groups through both results-linked actions (PforR) and system-strengthening support (IPF).

On regulatory design gaps, the PAP records the steps required to: establish a binding legal instrument for RSSA's safeguards clearance function; introduce a comprehensive social risk assessment obligation (GBV, OHS, child labour, community safety, labour conditions, and land access) in the EIA framework through the revision of the EIA Directive.

10.8 Traceability of ESSA Findings to the Program Action Plan and DLIs

In line with the ESSA Guidance, the traceability framework maps each of the environmental and social gaps to a named PAP action and, where applicable, disbursement-Linked Indicators (DLIs) and/or support provided through the complementary Investment Project Financing (IPF) component, as presented in Annex A2. This traceability ensures that identified system weaknesses are addressed through concrete, monitorable, and proportionate measures during Program implementation. The following E&S risk management DLIs are proposed by the ESSA:

1. GRM functionality as a hard pre-condition for disbursement; response time ≤21 days; resolution rate ≥70%; geographic coverage across all Program districts;
2. Establish a dedicated gender and social specialist position within RSSA, and E&S Focal Points within Program implementing institutions;
3. Operationalization of formal DINAMC–AQUA coordination protocol covering licence documentation sharing, inspection finding notification, escalation criteria, and licence cancellation procedures; embed emergency response obligations for acute environmental events;
4. Minimum quarterly E&S monitoring visit frequency for all Program investments and institutionally budgeted district monitoring as a sustainability outcome;
5. AQUA provincial delegations' independent verification function fully operational;
6. Operationalize DINASAB provincial inspection capacity annually;
7. Corridor monitoring function operational within DINAMC, with annual corridor environmental assessments produced and corridor monitoring sustainability financing pathway established;
8. DINAMC SEA operational capacity confirmed by mid-Program;
9. Extensionist coverage of outgrower schemes with labour standards sensitisation; and
10. IPM adoption rate among Program beneficiaries, following IPF-financed baseline establishment

11 Conclusions and Program Action Plan

11.1 ESSA Conclusions and Recommendations

The ESSA concludes that Mozambique's existing environmental and social management systems provide a sound and appropriate basis for managing the risks associated with the MozAgribiz Program under PforR financing. The Program's E&S risks are assessed as Substantial, reflecting decentralized implementation across three corridors, the cumulative character of agribusiness-related activities, seven critical environmental gaps and four critical social gaps identified in Sections 5 and 6, including the and the absence of a Program-level GRM meeting Core Principle 5 requirements. These risks are driven primarily by uneven implementation, coordination, and enforcement rather than by legal or policy deficiencies, which directly shapes the design and sequencing of the Program Action Plan. However, the ESSA also recognize the some legal gaps which include: (a) the absence of a binding legal instrument for RSSA's safeguards clearance function, (b) the lack of integration of a comprehensive social risk framework in the screening and EIA licensing process, (c) the lack of explicit legal provisions to operationalize SEA or cumulative impact management at program or corridor level, (d) Cultural Policy mandate not operationalized through secondary legislation, (e) outdated general workplace safety regulation relative to outdoor agribusiness risks and(f) lack of legal provisions for labour influx risk management and supply chain due diligence.

Nonetheless, the ESSA finds that the legal and regulatory framework is broadly adequate and consistent with the six PforR Core Principles at the statutory level. Most of the legal gaps are addressed in the PAP with Program level measures, not requiring any revision or enactment of legal nature. The two exceptions relate to the conclusion and approval of the E&S Safeguards Policy and the revision of the EIA Directive, proposed for direct Program support under PAP-18.

The two concurrent institutional transformations — MAAP consolidation and the dual provincial governance architecture — create both structural opportunities for integrated E&S risk management and formally identified coordination gaps that require dedicated Program-level responses. The RSSA represents the most significant recent institutional development for Program-level risk management, but its safeguards clearance function requires a binding legal instrument and dedicated operational capacity support before sub-project approvals proceed. Program activities do not involve significant, irreversible, or unprecedented impacts, and the Program boundary, exclusion criteria, and escalation mechanisms are appropriate to ensure higher-risk activities are not financed under the PforR.

Accordingly, the ESSA supports reliance on Mozambique's country systems for Program implementation, subject to the implementation of the system-strengthening measures set out in section 10.3.

The final ESSA and Program Action Plan will reflect inputs from stakeholder consultations and internal review processes. Particular attention will be given to refining inclusion targeting mechanisms, strengthening system operability, and ensuring that proposed measures are realistic and implementable within existing institutional frameworks.

Additional Recommendations

The ESSA has identified transitional aspects tied to pending legislation — notably the new Land Law and reforms to provincial State representation — which could significantly reshape program design, scope, and timeframe once enacted. While these risks are material, they were not elevated to Program Actions in the PAP due to uncertainty over timing and final content. Instead, they are framed as recommendations to ensure responsiveness and adaptability as the legislative landscape evolves. The main recommendations are:

- Contingency & Adaptive Management - Develop scenarios anticipating different legislative outcomes to adjust implementation rapidly without disrupting continuity;
- Proactive Engagement - Maintain structured dialogue with ministries and legislative bodies to feed program realities into reform processes and capture early signals of change;
- Legal & Technical Advisory - Secure dedicated legal expertise to interpret new legislation quickly and translate implications into concrete implementation adjustments;
- Program Review Triggers - Define clear triggers for formal review and updates of program documents (including ESSA) upon enactment of relevant legislation;
- Capacity Building - Prepare implementing agencies to understand and operationalize new legal frameworks, especially land access procedures and provincial responsibilities; and
- Communication & Community Information - Keep project-affected people informed of potential changes to land rights or administrative structures affecting program engagement.

Additionally, the Program should aim to align sub-project preparation schedules with the procedural timelines required for DUAT community consultations — including the mandatory thirty-day interval between meetings and Consultative Council engagement for applications above 100 hectares — together with the timelines for Water Use Licensing and Environmental Licensing. This integration is essential to prevent delays, avoid scheduling shortfalls, and ensure the validity of consultations, required authorizations, and accurate environmental categorization. Considering that Decree 54/2015 categorizes projects through positive enumeration and some Program activities may fall outside its listed types, a common categorization approach across all provincial services should be adopted to ensure consistency.

Finally, the stalled review of Decree 31/2012 should be considered as Program policy action to address regulatory gaps in proportionality, replacement cost standards, livelihood restoration, and disaster-driven resettlement.

11.2 Implementation and Monitoring

Implementation of the PAP will be monitored through the Program's results framework and implementation support arrangements. Progress on PAP actions will inform the World Bank's ongoing assessment of E&S system performance throughout Program implementation.

During the initial implementation period, monitoring will prioritize verification of the two Critical Pre-effectiveness priority preconditions – Screening and Environmental Licensing (PAP-01) and Stakeholder Consultation (PAP-02) – along with Critical Pre-DLI preconditions—GRM design operationalization and accessibility (PAP-03) and Strategic Environmental Assessment Program-level application (PAP-20).

E&S performance data are mainstreamed into the Program's own reporting requirements. Given the geographic distribution of activities, monitoring will include independent monitoring components — potentially engaging civil society organisations or community participatory mechanisms — to supplement institutional self-reporting. Where DLI verification relies on E&S performance data, verification protocols shall be specified in the Program Operations Manual.

11.3 Program Action Plan

The Program Action Plan (PAP) has been developed to address the key system gaps identified in the ESSA and to strengthen E&S management performance during Program implementation. The PAP focuses on

practical, proportionate and feasible actions that reinforce existing systems rather than introducing parallel arrangements. The PAP priorities include:

- Improving consistency and quality of environmental and social screening, monitoring, and enforcement, particularly at decentralized levels;
- Strengthening coordination between institutions responsible for agriculture, environment, land administration, labour oversight, and community engagement;
- Enhancing management of land access, labour conditions, occupational health and safety, and community health and safety risks; and
- Increasing accessibility, functionality, and tracking of grievance redress mechanisms.

PAP actions are aligned with the Program's Results Areas and are designed to be implemented within existing institutional mandates. Where appropriate, PAP actions may be supported by the complementary Investment Project Financing (IPF) component, which provides technical assistance and capacity building to address identified constraints.

Table 11-1: Program Action Plan

PAP Ref	Domain	PforR Component	IPF Component	Lead & Supporting Institutions	Priority/Time line	Monitoring (verification & completion indicators)
PAP-01	Screening & Environmental Licensing	1. Update the Program Operations Manual (POM) to include: a binding exclusion list of prohibited activities; a screening tool aligned with Decree 54/2015 that also covers social risks; a requirement for all sub-projects to obtain environmental licenses from the SPA; and a strict ban on waiving Category B Simplified EIAs. 2. Review the DLI system to prevent timeline pressure from encouraging shortcuts in project categorization.	1. Develop comprehensive exclusion thresholds for the program. 2. Develop screening tools, ESMP templates, and social risk pre-screening checklists; train RSSA, SDPI, and SDAE staff on their use across all corridors. 3. Issue a joint RSSA–DINAMC guidance note confirming Category B Simplified EIAs cannot be waived. 4. Support independent verification missions to check DLI compliance.	DINAMC, RSSA	Critical / Pre-Effectiveness	**PforR:** POM approved at effectiveness, including exclusion list, social risk screening tool, and binding ban on Category B EIA waivers. **IPF:** Training completion records confirming all targeted staff trained on screening tools and ESMP templates (verified before effectiveness, updated annually thereafter).
PAP-02	Stakeholder Consultation	1. Embed in the Program Operations Manual (PAP-01): a minimum participation threshold of 20% of affected populations as required by Ministerial Directive 130/2006; and a binding gender balance requirement with a defined minimum representation threshold for all consultations.	1. Develop guidance and monitoring tools for gender parity and minimum participation requirements. 2. Support DINAMC, SPA, and RSSA to actively review submitted consultation reports against these standards.	DINAMC, RSSA	Critical/Pre-Effectiveness	**PforR:** POM includes binding 20% minimum participation threshold and gender balance requirement, confirmed by RSSA at effectiveness. **IPF:** At least one consultation report per corridor reviewed against the new standards, with documented findings (verified annually from Yr1 Q3).
PAP-03	GRM Design, Operationalisation & Accessibility	1. Build a GRM manual that integrates with existing mechanisms (including the land conflict GRM), avoids parallel systems, and uses NRM Committees or Local Councils as first-tier entry points with escalation to SDAE focal points and mandatory community feedback. 2. Make a functional GRM a hard precondition for DLI compliance. 3. Set GRM performance standards: responses within 21 days, at least 70% resolution rate, and full coverage across all Program districts in all three corridors. 4. Formalize NRM Committees in all Program areas as a verifiable governance outcome.	1. Set up and test the GRM platform (Green Line/Survey123 interoperability), train district-level focal points, and produce awareness materials in local languages using non-literate formats. 2. Formalize NRM Committees through Terms of Reference and documented operating procedures. 3. Conduct a third-party GRM accessibility assessment before the first DLI verification. 4. Establish referral protocols for sensitive cases (GBV, child labour, trafficking) and integrate the DNTDT land conflict channel into the GRM architecture.	RSSA, UGISA, DINAMC, District Administrations, SDPI, DPGCAS & SDSMAS (sensitive complaint referral pathway), DNTDT (land conflict	Critical/ Pre-DLI	**PforR:** Third-party GRM accessibility assessment completed with satisfactory rating before first DLI verification; GRM performance standards (21-day response, 70% resolution rate) confirmed operational (before first DLI verification). **IPF:** Referral protocols for sensitive cases (GBV, child labour, trafficking) documented, tested, and integrated into the GRM architecture(Yr1 Q2).

				mechanism integration)		
PAP-04	E&S Focal Points & Institutional Safeguards Capacity	1. Establish E&S focal points with formal Terms of Reference in all implementing agencies as DLI-verifiable results. 2. Allocate non-project operational budgets for E&S focal point activities within annual institutional plans to ensure sustainability. 3. Create a formal inter-agency coordination mechanism with documented minutes and agreed workplans as a verifiable governance outcome. 4. Establish a dedicated gender and social specialist position within RSSA, distinct from environmental and technical profiles, as a DLI-verifiable staffing outcome.	1. Provide temporary funding for E&S focal point positions while institutions build recurrent budget capacity. 2. Design and deliver training programs for each agency using a Training of Trainers approach. 3. Support the inter-agency E&S coordination platform with administrative backing.	RSSA, All implementing institutions at central and provincial levels	High/Yr 1	**PforR:** E&S focal points with formal ToRs established in all implementing agencies; gender and social specialist position filled within RSSA (confirmed by Yr1 Q1) **IPF:** Training of Trainers program delivered to all agencies, confirmed by training records and post-training assessments (confirmed by Yr1 Q3).
PAP-05	District-Level Monitoring Operational Capacity	1. Require district services to receive and file EIA reports and ESMPs as a standard compliance condition, verifiable through receipt records. 2. Require SPA/DPDTA to notify districts of license issuance within 30 days. 3. Set a minimum quarterly monitoring visit frequency for all Program investments as a DLI-verifiable result. 4. Transition to institutionally budgeted district monitoring as a measurable sustainability outcome from Year 3.	1. Provide transport, fuel, per diem, and field equipment to SDPI and SDAE across all corridor provinces. 2. Train SDPI/SDAE staff on ESMP monitoring and incident reporting, and configure a MIS to track visits, license notifications, and ESMP receipts.	SDPIs, SDAEs, RSSA, UGISA (MIS), DINAMC	High/Yr 1	**PforR:** Minimum quarterly monitoring visits conducted for all Program investments, confirmed by visit records in MIS (annual verification). **IPF:** MIS configured to track visits, license notifications, and ESMP receipts, confirmed by system operational status report (Yr1 Q2)
PAP-06	Analytical Compliance Capacity — Laboratory & Environmental Monitoring	1. Require AQUA-certified laboratory service agreements before approving investments in sub-catchments with significant agrochemical use or effluent discharge. 2. Require documented sample submission and chain-of-custody protocols as binding compliance standards. 3. Ensure AQUA provincial delegations carry out independent environmental verification as a DLI-verifiable institutional result.	1. Procure water quality monitoring equipment for AQUA provincial offices in all three corridors. 2. Negotiate and finance certified laboratory service contracts for each corridor province, and train AQUA provincial staff on field sampling and chain-of-custody compliance.	AQUA central, AQUA provincial delegations, RSSA, DINAMC, UGISA, ARA Centro, ARA Norte, ARA Sul	High/Yr 1	**PforR:** AQUA-certified laboratory service agreements in place before investment approvals in sub-catchments with significant agrochemical use, confirmed by signed agreements (Prior to first investment in relevant sub-catchments). **IPF:** Water quality monitoring equipment procured for AQUA provincial offices in all three corridors, confirmed by procurement records (Yr1 Q3).
PAP-07	Land Access, DUAT Verification &	1. Require community consultation records to accompany DUAT documentation at the start of environmental licensing. 2. Use these	1. Develop a DUAT pathway verification checklist and integrate it into PAP-01 screening and monitoring tools. 2. Develop	MAAP, DNTDT, RSSA,	High/Yr 1	**PforR:** Community consultation records required as binding eligibility conditions for all

	Resettlement Framework	records as binding eligibility conditions, inputs for Resettlement Plans, and references for monitoring. 3. Bar investment approvals in areas with documented unresolved land conflicts — a non-negotiable eligibility condition. 4. Apply a simplified conflict sensitivity pre-screening tool at investment origination for areas with a history of displacement, as an eligibility gate applied before DUAT and EIA processes begin.	a conflict sensitivity screening tool and train RSSA and SDPI officers across all corridor provinces.	DPDTA, SPA, District Administrations		investment approvals; conflict sensitivity pre-screening applied at investment origination, confirmed by RSSA screening records (Yr1 Q1). **IPF:** Water quality monitoring equipment procured for AQUA provincial offices in all three corridors, confirmed by procurement records (Yr1 Q2)
PAP-08	Labour Standards, Child Labour and GBV Prevention, Labour Influx & Outgrower Inclusivity	1. Establish a program-level framework covering: a worker and service provider code of conduct; ethical recruitment practices for seasonal and migrant workers; GBV prevention protocols for worker–community interaction; and supply chain due diligence aligned with international labour standards. 2. Require sex-disaggregated household member registration as a compliance standard across all three corridors. 3. Prohibit undocumented labour intermediaries in Program-supported value chains. 4. Include labour standards sensitisation in outgrower schemes as a DLI-verifiable result. 5. Formally engage IGT Provincial Delegations as Program partners. 6. Implement trafficking prevention protocols for seasonal labour recruitment in Program value chains.	1. Commission child labour prevalence studies in all three corridors. 2. Produce labour rights awareness materials in local languages and deliver sensitisation through DINAE's cascade training model across all corridor contexts. 3. Design and operationalize IGT joint monitoring protocols, including financed inspection visits to anchor investor sites and outgrower schemes.	MTGAS, MAAP, DINAE, DINAG, Anchor Investors, INAS, RSSA, UGISA, IGT Provincial Delegations	High/Yr 1	**PforR:** Program-level labour framework adopted (including code of conduct, GBV prevention protocols, and supply chain due diligence); labour standards sensitisation included in outgrower schemes, confirmed by framework document (Yr1 Q2). IPF: Child labour prevalence studies commissioned in all three corridors; IGT joint monitoring protocols operational with at least one documented inspection visit per corridor (Yr 2 Q1).
PAP-09	Corridor-wide Environmental Baselines & Monitoring Function	1. Establish an operational corridor monitoring function within DINAMC's Environmental Evaluation Department as a DLI-verifiable institutional result. 2. Produce annual corridor environmental assessments reported to a multi-institutional body (DINAMC, RSSA, ARAs) covering all Program corridors. 3. Transition financing of corridor monitoring from IPF operational support to institutional recurrent budgets from Year 3 as a measurable PforR sustainability outcome. NB: For SEA-specific normative, institutional mandate, and Program application requirements, see PAP-20.	1. Commission ecological, hydrological, and land-use baselines for all three corridors as a prerequisite for monitoring, with ARA contributing as co-author of the hydrological baseline. 2. Strengthen the Environmental Evaluation Department with staff, methodology, and monitoring tools, and finance RSSA corridor monitoring missions across all three corridors.	DINAMC, RSSA, ARA Centro, ARA Norte, ARA Sul, AQUA (all corridor provinces), IIAM, ANAC (biodiversity monitoring), DINASAB (invasive	High/Yr 1	**PforR:** Corridor monitoring function operational within DINAMC Environmental Evaluation Department; first annual corridor environmental assessment produced and submitted to multi-institutional body (Y1 Q4) **IPF:** Ecological, hydrological, and land-use baselines completed for all three corridors, confirmed by baseline reports (Yr1 Q3).

				species surveillance)		
PAP-10	Water Resource Governance & Catchment-Level EIA Requirements	1. Create a formal INIR–ARA coordination mechanism with information-sharing protocols and joint cumulative abstraction assessments. 2. Develop a methodology for monitoring cumulative water abstraction. 3. Include quantified water efficiency conditions in ARA licenses for irrigation sub-projects. 4. Require ARA–AQUA data-sharing and catchment monitoring as a precondition for approvals in at-risk sub-catchments. 5. Require cumulative sub-catchment water balance chapters in EIAs for investments in defined high-risk sub-catchments, as binding eligibility conditions. 6. Require formal ARA catchment consultations before approving irrigation investments above a defined threshold across all three corridors.	1. Assess priority catchments in all three corridors, covering water balance, allocation registers, and over abstraction risk mapping. 2. Provide technical assistance for ARA–AQUA protocol development and integrate catchment monitoring data from ARA and AQUA sources into the Program MIS.	MAAP, ARA Centro, ARA Norte, ARA Sul, AQUA (all corridor provinces), DINAMC, RSSA, UGISA, INIR	High/Yr 1	**PforR:** Formal INIR–ARA coordination mechanism established with documented information-sharing protocols (Yr1 Q2); cumulative water balance chapters required in EIAs for defined high-risk sub-catchments, confirmed by EIA review records (annually from Yr1 Q2). **IPF:** Priority catchment assessments completed for all three corridors covering water balance, allocation registers, and over-abstraction risk, confirmed by assessment reports (Yr 1 Q4)
PAP-11	GBV Prevention, Community Health & Social Protection Integration	1. Require all EIAs to include a dedicated health impact chapter. 2. The health impact chapter must specifically address GBV risks, worker safety, and disease transmission as a binding eligibility condition across all three corridors.	1. Support DPGCAS to deliver GBV prevention and community sensitisation activities across all corridor provinces, including survivor referral pathways and documentation of referral routes to PRM. 2. Provide operational budget support to SDSMAS in all corridor provinces.	DPGCAS, SDSMAS, PRM, RSSA, DINAE (extensionists, all corridors), UGISA	Medium/Yr 1–2	**PforR:** All approved EIAs include a health impact chapter addressing GBV risks, worker safety, and disease transmission, confirmed by RSSA EIA review records (Ongoing, from first EIA approval). **IPF:** DPGCAS GBV prevention activities operational across all corridor provinces with documented survivor referral pathways, confirmed by activity reports (Yr1 Q3).
PAP-12	Agricultural Inputs, IPM Standards & Chemical Waste Management	1. Develop and implement a Program-level Pest Management Plan with DINASAB and DINAE, covering: a restrictive list of prohibited or enhanced-control pesticides aligned with international conventions; an intra-MAAP coordination protocol for agrochemical OHS; and mandatory DINASAB participation in DINAE annual training cycles, verifiable through joint training records. 2. Embed minimum input safety standards	1. Procure chemical waste management infrastructure (containers, storage, transport) across all Program investment areas and develop an agrochemical traceability and input register. 2. Build and deliver, throughout program implementation, IPM training through DINAE's cascade model, drawing on IIAM research capacity, and schedule annual DINASAB–DINAE joint training sessions. 3.	MAAP, DINAE, DINASAB, DNFFB, Anchor Investors, IIAM, RSSA	Medium/Yr 1–2	**PforR:** Program-level Pest Management Plan adopted with prohibited pesticide list; IPM adoption rate tracked among Program beneficiaries as a baseline, confirmed by PMP document and baseline survey (Y1 Q2). **IPF:** Chemical waste management infrastructure procured,

		(traceability, SDS availability, applicator training, MRL compliance) into anchor investor participation agreements as eligibility conditions. 3. Track IPM adoption rates among Program beneficiaries across all corridors as a DLI-verifiable result. 4. Document and test an animal health surveillance protocol before starting any Program livestock activities.	Develop and test an animal health emergency protocol for livestock components in coordination with DINASAB, including foot-and-mouth disease vaccination arrangements.			confirmed by procurement records (Y2 Q1); IPM training delivered through DINAE cascade model, confirmed by training records (annually from Y2 Q1).
PAP-13	E&S Information Systems, Investment Register & Proactive Disclosure	1. Publicly disclose EIAs, environmental licences, ESMPs, and monitoring reports as a standard compliance condition across all three corridors. 2. Produce and verify annual E&S compliance reports to the Program coordination body. 3. Include a function in the Program MIS to track commitments made to communities.	1. Build a consolidated Program-level investment database covering E&S status across all corridors and establish a web platform for proactive document disclosure. 2. Integrate SGLA with SPA systems and design a MIS commitment tracking module linked to license issuance notifications and monitoring visit checklists.	RSSA, DINAMC, UGISA, SPAs, DPDTAs, SGLA, DNTDT (SIGIT interoperability), District SDPI and NRM Committees (recipients of commitment tracking outputs)	Medium/Yr 1–2	**PforR:** Program MIS operational with E&S status tracking across all corridors and public disclosure platform live (Yr1 Q3); first annual E&S compliance report produced (annually, from Yr1 Q4). **IPF:** Consolidated investment database built and community commitment tracking module operational, confirmed by system status report (Yr1 Q3*)*.
PAP-14	Post-Licensing Compliance — DINAMC–AQUA Sanctioning Protocol & Coordination	1. Establish a binding DINAMC–AQUA protocol with defined timelines for information exchange before and after inspections. 2. Include escalation criteria for sanctioning, emergency response obligations for acute environmental events, and license cancellation procedures. 3. Publish the protocol in the official gazette or equivalent binding instrument before investments scale in ecologically sensitive sub-catchments. 4. Confirm protocol implementation as a precondition for DLI verification of Program compliance monitoring outcomes.	1. Provide technical assistance for protocol design drawing on coordination gaps identified during preparation, and deliver joint DINAMC–AQUA training on procedures and emergency response obligations. 2. Monitor protocol implementation through RSSA supervision missions from Year 1, with annual reporting of documented activation cases.	DINAMC, AQUA (central and provincial delegations)	High/Yr 1	**PforR:** DINAMC-AQUA coordination protocol published in a binding instrument and confirmed as a precondition for DLI compliance verification *(*Before first DLI verification) **IPF:** Joint DINAMC-AQUA training on procedures and emergency response obligations delivered, confirmed by training records (Yr1 Q3)

PAP-15	Biodiversity Conservation & Invasive Species	1. Develop an integrated forest and biodiversity screening checklist operationalizing zone classification, permanent heritage regimes, and critical habitat definitions under national regulations. 2. Set minimum biodiversity content standards for EIAs, requiring multi-season field surveys, specialist input, landscape connectivity assessments, and spatially specific mitigation commitments with quantified indicators and monitoring frequencies confirmed by ANAC review. 3. Require pre-introduction invasive species risk assessments in EIAs for all investments with documented invasive potential in tropical African ecosystems.	1. Develop a minimum biodiversity EIA content guidance note jointly with ANAC, embed it in Program screening tools from effectiveness, and formalize an ANAC–DINAMC consultation protocol for agribusiness EIA review with agreed criteria and response timelines. 2. Develop an invasive species risk assessment protocol under DINASAB's mandate and train SPA, DPDTA, DINAMC, and SDPI staff on ecological risk identification.	DINAMC, DNFFB, ANAC, DINASAB, IIAM, RSSA, SPA, DPDTA, UGISA	High/Yr 1	**PforR:** Biodiversity screening checklist and minimum EIA content standards operational (annually from Yr1 Q2); ANAC-DINAMC consultation protocol formalized with agreed response timelines (Yr1 Q2). **IPF:** Minimum biodiversity EIA content guidance note developed jointly with ANAC (Yr 2 Q1); invasive species risk assessment protocol developed (Yr 2 Q1); and SPA, DPDTA and SDPI staff trained (annually from Yr 2 Q1)
PAP-16	Spatial Governance — Territorial Planning (PDUT) Updating & Spatial Compatibility Verification	1. Use PDUT validity status as a verifiable investment screening condition. 2. Apply enhanced spatial compatibility checks — including field confirmation against updated cadastral data — to investments in districts with outdated PDUTs until a current PDUT is in force. 3. Prioritize PDUT updates across the three corridors as a Program Action with defined timelines and budget commitments. 4. Extend SIGIT to district level and complete critical modules (process tracking, provincial reporting, MAAP systems interoperability) as a Program-supported institutional outcome.	1. Finance priority PDUT updates across corridor districts and develop a field verification protocol enabling SDPI to confirm land use and rights consistency in districts without current PDUTs. 2. Strengthen DPDTA spatial planning capacity in corridor provinces and support SIGIT extension to district level.	DNTDT, DPDTA, SPA, District Administrations, SDPI, MAAP, RSSA, UGISA	High/Yr 1	**PforR:** PDUT validity status used as verifiable investment screening condition in all corridor districts, confirmed by screening records; SIGIT extended to district level and critical modules operational (Yr1 Q2). **IPF:** Priority PDUT updates financed and completed in at least one corridor district per corridor; field verification protocol for districts without current PDUTs developed and deployed (Yr 2 Q2)
PAP-17	Multi-Sector Resource Governance — Agriculture–Mining Cross-Cadastre Overlap Screening	1. Make cross-cadastre overlap checks between agriculture and mining a mandatory pre-screening step for all Program investments. 2. Include evidence of the overlap check in the eligibility file before DUAT and EIA processes begin. 3. Establish a formal requirement for districts to be notified of mining concession boundaries and operational commencement in corridor districts, pursued through Program coordination with MIREME. 4. Exclude investments in zones with active, unresolved mining–agriculture conflicts and documented	1. Develop an overlap screening tool with a data access protocol linking MAAP and MIREME cadastral systems, and train SDPI staff on overlap identification, community harm documentation, and escalation procedures. 2. Conduct multisector conflict mapping in priority corridor districts to establish a baseline of active overlap conflicts before investment approvals begin.	DNTDT, MIREME (mining cadastre), DPDTAs, SDPIs, RSSA, UGISA	High/Yr 1	**PforR:** Cross-cadastre overlap check mandatory for all Program investments with documented evidence in the eligibility file, confirmed by RSSA screening record (Yr 1 Q1). **IPF:** Overlap screening tool operational with data access protocol linking MAAP and MIREME cadastral systems; multisector conflict baseline mapping completed in priority corridor districts (Yr 1 Q3).

		community harm until conflicts are formally resolved and documented.				
PAP-18	Institutional Governance — MAAP Binding Safeguards Policy Instrument	1. Approve a binding E&S Safeguards policy instrument with a defined timeline, requiring mandatory safeguards screening in all Ministry-managed or supervised project approvals, with RSSA designated as the clearance authority. The Safeguards Policy should include provision for adoption of the replacement cost standard and development of a methodological framework for livelihood restoration, as well as provision for a feedback mechanism to ensure consultation results inform program adaptation 2. Incorporate requirements for GBV, OHS, child labour, community safety, labour conditions, and land access into the revised EIA Directive. 3. Cross-reference RSSA safeguards clearance as a condition for MAAP directorate investment approval decisions within the Program portfolio, creating an internal enforcement pathway pending adoption of the binding policy.	1. Provide technical assistance to draft the MAAP safeguards policy instrument, building on the existing RSSA draft and incorporating gender specialist input from PAP-04. 2. Finance the EIA Directive revision process; formal initiation must occur before Year 1, Quarter 3.	MAAP, RSSA, DINAMC, UGISA	High/Yr 1	**PforR:** Binding MAAP E&S Safeguards policy instrument approved with RSSA designated as clearance authority, confirmed by official approval document (Yr 1 Q2). **IPF:** EIA Directive revision process formally initiated before Year 1, Quarter 3, confirmed by documented initiation record (Yr 1 Q3).
PAP-19	Agricultural Input Safety & Animal Health — DINASAB Operational Capacity	1. Operationalize DINASAB provincial inspection capacity through SPAEs and DPAPs as a DLI-verifiable result. 2. Ensure vehicles are functional, fuel allocations cover quarterly field visits, and at least 60% of provincial inspection plans are executed in corridor provinces each year. 3. Document and test an animal health emergency protocol for livestock components before any Program livestock activity begins. 4. Include a procurement arrangement for foot-and-mouth disease vaccination or an equivalent risk management approach. 5. Include DINASAB as a standing partner in the Program's institutional coordination architecture, not only for training (PAP-12) but also for input supply chain compliance oversight.	1. Equip DINASAB provincial offices with vehicles, field inspection equipment, and communication tools to enable quarterly inspections and rapid outbreak reporting from district to central level. 2. Develop and test a livestock emergency protocol, including foot-and-mouth disease vaccination arrangements, coordinated with DINAE and DPAPs.	DINASAB, MAAP, DINAE, DPAPs, SPAEs, UGISA	Medium/Yr 1–2	**PforR:** At least 60% of DINASAB provincial counterparts inspection plans executed annually in corridor provinces (annually from Y1 Q3); animal health emergency protocol documented and tested before any Program livestock activity begins (Yr1 Q2*)* **IPF:** DINASAB provincial counterparts equipped with vehicles and field inspection equipment; livestock emergency protocol developed in coordination with DINAE and DPAPs (Yr1 Q3)

PAP-20	Strategic Environmental Assessment — Normative Framework, Institutional Mandate & Program-Level Application	1. Commission and complete a Program-level SEA (or equivalent corridor-scale assessment) as a precondition for investment approval at scale. 2. Use SEA findings as binding parameters for individual project EIAs within the Program. 3. Confirm DINAMC Environmental Evaluation Department's SEA operational capacity as a DLI-verifiable result — including designated SEA specialists, approved methodology, and at least one completed SEA by mid-Program.	1. Commission the corridor SEA at Program effectiveness for all three corridors — the highest-priority IPF activity — delivering: ecological and hydrological baselines; cumulative impact thresholds; corridor-specific EIA parameters; spatial zoning (exclusion, transition, mitigation areas); and monitoring indicators. ARA contributes as co-author of the hydrological baseline. 2. Train DINAMC and RSSA staff on SEA methodology and embed SEA findings in linked PAPs (PAP-01, PAP-09, PAP-10, PAP-15), for which SEA completion is a critical path dependency.	DINAMC (Environmental Evaluation Department — mandate holder), RSSA, ARA Centro, ARA Norte, ARA Sul, MAAP, UGISA, AQUA (pollution baseline and threshold-setting input), MOPHRH (water governance interface)	Critical/Pre-DLI	**PforR:** Program-level SEA completed as a precondition for investment approval at scale; DINAMC SEA operational capacity confirmed including designated specialists and approved methodology (Yr2 Q2). **IPF:** Corridor SEA inception report delivered at Program effectiveness; final SEA report covering all three corridors completed with ecological, hydrological, and cumulative impact components (Yr2 Q4)
PAP-21	OHS and MAAP-MTGAS Coordination — Joint Technical Working Group and Field Guidelines	1. Establish a MAAP–MTGAS joint technical working group for Program sub-projects. 2. Create an information-sharing and referral protocol covering OHS risks in agro-industry and agrochemical operations, gender in agriculture, child labour, and labour influx management. 3. Produce supplementary Program-level OHS guidelines covering heat stress, agrochemical handling, PPE for outdoor conditions, and emergency response.	1. Develop a single integrated operational guide covering OHS, gender, child labour, and labour influx safeguards, and train DINAMC/RSSA, DINASAB, DINAE, and MTGAS staff on its application.	MAAP (DINAMC/RSSA; DINAE; DINASAB), MTGAS, UGISA	High/Yr 1	**PforR:** MAAP–MTGAS joint technical working group established with Terms of Reference; supplementary Program-level OHS guidelines published (Yr 1 Q2). **IPF:** Integrated operational guide developed and staff from DINAMC/RSSA, DINASAB, DINAE, and MTGAS trained on its application, confirmed by training records (Yr 1 Q4).
PAP-22	Artisanal Fisheries — CCPs: Legal Status, Operational	1. Clarify the legal status of CCPs and integrate them into Program implementation instruments as a PforR institutional result. 2. Complete the CCP capacity assessment across all three corridors and integrate	1. Train RSSA and DINAMC staff to conduct and interpret CCP capacity assessments as a recurring E&S monitoring function. 2. Train CCP members and RSSA/DINAMC counterparts on GRM escalation	MAAP, DINAPA, UGISA, Local Councils	High/Yr 1	**PforR:** CCP legal status clarified and CCPs integrated into Program implementation instruments and GRM escalation pathway, confirmed by implementation

	Capacity, and Integration	findings into Program E&S design. 3. Define and operationalize the framework linking CCPs to Local Councils in fisheries sub-project consultation and appraisal processes. 4. Integrate CCPs into the Program's GRM escalation pathway as a PforR disbursement condition.	procedures and their roles within the pathway.			instrument and GRM documentation (Yr 1 Q2). **IPF:** CCP capacity assessment completed across all three corridors; CCP members and RSSA/DINAMC counterparts trained on GRM escalation procedures (Yr1 Q3).
PAP-23	Cultural Heritage — Chance Find Procedures, Socio-Cultural Impact Assessment, and MEC/DNPC-DINAMC Coordination	1. Incorporate standardized chance find procedures into all Program works contracts, reviewable at each supervision mission as a PforR result. 2. Establish a coordination protocol between MEC/DNPC heritage licensing and DINAMC EIA licensing to ensure aligned processes and clear responsibilities.	1. Develop standardized chance find procedures, minimum standards for pre-construction archaeological surveys, and a socio-cultural impact assessment methodology; revise works cost templates to include the statutory 0.5% survey contribution. 2. Formalize the MEC/DNPC–DINAMC coordination protocol and develop traditional authority engagement guidance for use in Program sub-project consultations.	UGISA, MEC/DNP, ARPAC, MAAP/DINAMC, District Administrations and traditional authorities in the three corridor provinces	High/Yr 1	**PforR:** Standardized chance find procedures incorporated into all Program works contracts and verified at each supervision mission; MEC/DNPC–DINAMC coordination protocol established (Before first works contract; Ongoing). **IPF:** Pre-construction archaeological survey standards and socio-cultural impact assessment methodology developed; works cost templates revised to include the statutory 0.5% survey contribution (Yr 1 Q2).
PAP-24	Inclusion of Vulnerable groups	1. Ensure program design and execution explicitly apply inclusion measures for vulnerable groups. 2. Embed inclusion measures into the results framework so outcomes are tracked and incentivized. 3.Identify priority groups (women, including caregivers, informal workers, youth, and low-income or remote communities). 4. Use existing systems (administrative records, local government, and community mechanisms) for beneficiary validation. 5. Tailor outreach mechanisms (simplified eligibility and targeted communication) to ensure access. 6. Track inclusion through indicators and verification.	1. Finance technical assistance to define detailed targeting criteria and operational measures. 2.Support stakeholder consultations to refine inclusion strategies. 3. Provide resources for piloting, training, and institutionalizing these mechanisms within implementing agencies.4. design operational manuals, outreach protocols, and monitoring tools to institutionalize inclusion safeguards.	MAAP (DINAMC/ RSSA) MTGAS DPGCAS SDSMAS UGISA	PforR actions 1 and 2: Critical/Pre-Effectiveness ---------- Remaining PforR and IPF actions: High/ Year 1 (with progressive operationalization)	**PforR:** Inclusion indicators integrated into the Program results framework and, where relevant, DLI verification protocols, confirmed by results framework document (by Effectiveness); Inclusion outcomes tracked in Program results framework (Yr1 Q2). **IPF:** Targeting criteria defined, operational manuals and outreach protocols developed, and inclusion mechanisms piloted in at least one corridor, confirmed by pilot report (Yr1 Q4).

Annex A1 – Core Principles Compliance Analysis – MozAgribiz PforR

Core Principle 1: Environmental and Social Assessment and Management Systems

Program E&S management systems are designed to (a) promote E&S sustainability in the Program design; (b) avoid, minimize, or mitigate adverse impacts; and (c) promote informed decision-making relating to a Program's E&S effects.

Summary of Mozambican Systems: Mozambique's legal and regulatory framework for environmental and social management is substantively comprehensive. The core instruments — the Environmental Law (Law 20/97), the EIA Regulation (Decree 54/2015), and the Public Participation Directive (MD 130/2006) — establish a four-tier project categorisation system, mandatory public consultation, and a compliance architecture administered through DINAMC and AQUA. Complementary sectoral frameworks govern land access and user rights (Law 19/97, Decree 66/98) water resources (ARAs under Law 16/91), forests (Lei 17/2023), agrochemicals (Decrees 6/2009 and 27/2016), and biodiversity (Law 16/2014). Within MAAP, the newly established E&S Safeguards Division (RSSA) holds a statutory mandate for safeguards integration, monitoring, and grievance management. However, this mandate currently lacks an operationalising instrument, as no MAAP-level safeguards policy or framework has been adopted. Legal authority is clearly distributed among implementing agencies, and no legislative reform is required before the Program proceeds.

Key Gaps and Risks Identified by the ESSA: Despite an adequate legal foundation, the ESSA identifies several structural gaps and risk trends with direct relevance to MozAgribiz. These include: the absence of a MAAP-level safeguards policy or operational framework, leaving the RSSA without the normative basis needed to systematically apply, enforce and monitor safeguards requirements across program investments; inconsistent integration of social dimensions into screening and early-stage planning processes, with land access and resettlement arrangements frequently defined after community consent has already been sought; limited consideration of cumulative and corridor-level impacts, as no strategic environmental assessment mechanism exists either at program scale or within the broader institutional system; uneven safeguards quality across the licensing chain, reflecting the absence of standardised content requirements and fragmented information management; weak institutional capacity for field-based monitoring and enforcement, compounded by resource constraints across the key oversight bodies; and fragmented inter-institutional coordination, with DINAMC, AQUA, and ARAs operating largely in parallel without formal protocols or shared accountability mechanisms. Taken together, these trends point to an implementation and resourcing gap rather than a legal design failure — one that is addressable within the PforR instrument during the Program period.

ESSA Conclusion: The Mozambican E&S management system provides a legally adequate foundation for the MozAgribiz PforR but is operationally insufficient to manage the scale, territorial spread, and social complexity of Program risks without targeted remediation. No fundamental legal reform is needed. The Program Action Plan should prioritise: the adoption of a MAAP-level safeguards policy or operational framework to provide the RSSA with the normative basis needed to systematically apply and enforce safeguards requirements across Program investments; integrating standardised social risk criteria into pre-screening; restoring the RSSA's field monitoring function with a dedicated recurrent budget; formalising the DINAMC-AQUA-ARAs coordination interface with defined timelines and escalation procedures; strengthening AQUA's provincial inspection capacity; establishing minimum ESMP content standards for Program-supported investments; and commissioning a corridor-level cumulative impact

baseline. These are implementation, policy, and resourcing gaps — not legal design failures — and are addressable within the PforR instrument during the Program period.

Core Principle 2: Natural Habitats and Physical Cultural Resources

Program E&S management systems are designed to avoid, minimize, or mitigate adverse impacts on natural habitats and physical cultural resources resulting from the Program. Program activities that involve the significant conversion or degradation of critical natural habitats or critical physical cultural heritage are not eligible for PforR financing.

Summary of Mozambican Systems: Mozambique has a functioning but fragmented, institutional architecture for managing biodiversity and cultural heritage risks. DINAMC sits at the centre of the environmental licensing chain, screening and licencing projects with potential biodiversity impacts and housing a dedicated unit for biodiversity offset management. Legal provisions under Decree 54/2015 and the Forest Law (Lei 17/2023) prohibit significant conversion of critical natural habitats, and screening exclusion thresholds are formally established within the EIA framework. ANAC administers gazetted conservation areas and holds a binding opinion function for activities within their buffer zones. DNFFB governs forest classification and felling licences, while the Regional Water Administrations (ARAs) are the statutory gatekeepers for water use and effluent discharge across Programme catchments. At the provincial level, the SPA and DPDTA share environmental functions, though their respective competencies remain legally unresolved. For cultural heritage, MEC/DNPC holds licensing authority over classified assets, with Decree 27/94 establishing pre-construction archaeological survey requirements, a minimum 0.5% investment contribution, and chance find procedures including a mandatory 24-hour notification obligation. However, the commitment to conduct socio-cultural impact assessments of development projects has never been operationalised through implementing legislation or a standardised methodology, and it therefore remains a policy objective without procedural effect or enforceability.

Key Gaps and Risks: The system's main weaknesses lie not in the absence of legal provisions, but in limited field-level capacity to identify sensitive habitats early in the screening process, and in uneven compliance monitoring. Biodiversity assessments are consistently the weakest sections of reviewed EIAs, mostly relying on desktop data without specialist ecological expertise: DINAMC and provincial SPA staff lack ecologists or conservation biologists, and no formalised arrangements with specialist institutions exist to supplement this. While exclusion thresholds are legally established, their practical application depends on screening quality that the system currently cannot guarantee. ANAC has no mandatory role in EIA review for agricultural projects outside formally gazetted protected areas, meaning investments in ecologically sensitive areas across program corridors (outside of conservation areas) receive no specialist biodiversity input during licensing. There is no corridor-level habitat mapping or cross-cadastre spatial screening tool, and outdated district land use plans further undermine the reliability of screening decisions. Although Strategic Environmental Assessment (SEA) is institutionally endorsed, the absence of an SEA legislative instrument means cumulative habitat fragmentation at Programme scale remains unmanaged. Compliance monitoring is predominantly documentary rather than field-based, limiting the system's ability to verify whether biodiversity commitments in approved EIA/ESMPs are being implemented. The ESSA's evidentiary base was insufficient to fully assess the system's capacity to manage cultural heritage impacts across Programme corridors. What the assessment does confirm, however, is that the Cultural Policy's commitment to socio-cultural impact assessment has never been operationalised, intangible heritage remains unprotected in practice, and no formal procedural link connects MEC/DNPC heritage licensing with DINAMC's EIA process — gaps that make consistent implementation of cultural heritage screening unlikely.

ESSA Conclusion: Mozambique's system for natural habitats and physical cultural resources is broadly consistent with the objectives of Core Principle 2, with legal provisions prohibiting significant conversion of critical habitats and screening exclusion thresholds formally established. However, the system's effectiveness is constrained by limited field-level capacity to identify sensitive habitats at the early screening stage and by uneven compliance monitoring that reduces confidence in implementation. Legal provisions for archaeological surveys and chance finds procedures are in place, but lack of coordination protocols leaves this commitment without enforceable effect within the EIA framework. PAP actions address these gaps through mandatory ANAC consultation thresholds for ecologically significant areas (PAP-15), a corridor-level spatial screening tool (PAP-15), a minimum biodiversity EIA content standards with multi-season field surveys (PAP-15), specialist biodiversity input standards for EIA biodiversity chapters (PAP-15), a Programme-level SEA (PAP-20), and a formal procedural interface between MEC/DNPC and DINAMC licensing functions (PAP-23).

Core Principle 3: Worker and Community Health, Safety, and Labour Conditions Public and Worker Safety

Program E&S management systems are designed to protect public and worker safety against the potential risks associated with (a) the construction and/or operation of facilities or other operational practices under the Program; (b) exposure to toxic chemicals, hazardous wastes, and otherwise dangerous materials under the Program; and (c) reconstruction or rehabilitation of infrastructure located in areas prone to natural hazards.

Summary of Mozambican Systems: Mozambique maintains a formally adequate legal architecture for occupational health, safety, and labour conditions. The Labour Law (Lei 23/2007), OHS framework (Legislative Decrees 48/73 and 120/71), occupational accident and disease legislation (Decree 62/2013), and labour inspection regulations (Decree 45/2009) establish binding obligations on employers covering PPE provision, worker training, hazard prevention, and machinery safety. Child labour is addressed through Laws 7/2008 and 19/2019, implementing ILO Conventions 138 and 182, with a minimum working age of fourteen and a prohibition on persons under eighteen from hazardous agricultural activities. Forced labour and trafficking are criminalised under Law 6/2008. Institutionally, the Provincial Delegations of the General Labour Inspectorate (IGT) carry the enforcement mandate for labour standards and OHS, while the multi-sectoral GBV mechanism and the DPGCAS Reference Group provide the primary community protection and anti-trafficking response architecture. For agrobusiness-specific chemical safety, regulatory responsibility is shared between DINAE, DINASAB, and MTGAS/IGT, with pesticide registration and input commercialisation overseen by MAAP units.

Key Gaps and Risks Identified: While the legal framework is broadly adequate, it contains a notable absence of specific provisions governing labour influx risks and worker-community interaction, leaving these dimensions without a formal regulatory basis.

The most consequential gap is the structural disconnect between formal regulatory adequacy and operational enforcement reach. Labour inspection is concentrated on registered urban employers, leaving the quasi-formal and informal smallholder and outgrower labour population — the Program's primary beneficiary base — systematically outside routine oversight. This structural exclusion cuts across several risk areas directly relevant to the Program.

On pesticide and chemical safety, field-level compliance is not independently verified and laboratory capacity for residue analysis is absent at provincial level. Enhanced agrochemical safety knowledge

developed under prior projects has not been institutionalised and is at risk of loss as staff rotate, with no systematic replacement mechanism in place.

On child labour, seasonal agricultural intensification in the Program corridors creates conditions under which child labour incidence may increase. The critical gap is that the Reference Group, the main coordination body for child protection and trafficking case management, functions only through ad-hoc information flows and case-by-case activation, without financial resources, structured forums, fixed calendars, or dedicated infrastructure. This is compounded by the apparent absence of formal referral protocols between labour inspection and child protection structures, and reliance on informal, under-resourced community detection mechanisms.

On GBV and labour vulnerability, women in outgrower arrangements hold no individual contractual standing, rendering their labour economically invisible. The key gap is the absence of any formal coordination protocol linking labour inspection to GBV referral pathways, with community protection measures operating reactively and without dedicated resources. The GBV Multisectoral Mechanism suffers from similar constraints to those identified for the Reference Group, above.

On community health, irrigation expansion will compound documented vector-borne disease endemicity in the Program corridors. The gap stems from the EIA's recurrent omission of baseline disease burden data, the absence of operational health mitigation measures, and the lack of monitoring indicators capable of detecting post-investment changes in community health outcomes.

ESSA Conclusion: The Mozambican legal framework for Core Principle 3 is formally consistent with the principle's requirements, but the operational system falls substantially short of the standard required for the MozAgribiz PforR. The Program's anchor investor and smallholder mobilisation model will expand commercial agricultural activity precisely in the contexts — dispersed rural worksites, informal outgrower arrangements, seasonal migrant labour — that are structurally outside the reach of existing labour inspection, OHS enforcement, and chemical safety monitoring. Program-level actions are required in six priority areas: i) reinforcement of agrochemical safety training within the extension network, accompanied by the establishment of provincial-level capacity for independent field compliance verification (PAP 12); ii) the establishment of specific provisions and operational protocols to manage labour influx risks and worker-community interaction;(PAP 8); iii) the establishment of a formal coordination protocol between labour inspection and GBV referral pathways, with specific provisions ensuring women in outgrower arrangements have legally recognised standing in contractual and dispute resolution processes (PAP 11); iv) the embedding of child labour sensitisation and formal referral protocols within routine inter-institutional coordination rather than in project-specific training cycles (PAP 21); v) establishment of a dedicated referral protocol design and training for sensitive complaint categories involving the Reference Group, the GBV multisectoral mechanism, IGT,COMAL, Provincial Services of Justice and Labour (PAP-03), vi) the inclusion of vector-borne disease mitigation measures with operational specificity, baseline disease burden data, and independent monitoring within the EIA requirements for Program irrigation investments (PAP 11)

Core Principle 4: Land Acquisition and Loss of Access to Natural Resources

Program E&S systems manage land acquisition and loss of access to natural resources in a way that avoids or minimizes displacement and assists affected people in improving, or at the minimum restoring, their livelihoods and living standards.

Summary of Mozambican Systems: Mozambique's land governance framework is anchored in the Land Law (Law 19/97), which formally assigns state ownership of land while recognising individual and community use and benefit rights (DUATs), including customary DUATs. Physical and economic displacement is governed by the Regulation on the Resettlement Process from Economic Activities (Decree 31/2012) and the Technical Directive on Resettlement Plans (Ministerial Diploma 156/2014), complemented by the Directive on Expropriation for Territorial Planning (Ministerial Diploma 181/2010). These instruments require the elaboration and implementation of Resettlement Action Plans and condition formal process closure on the restoration of livelihoods to at least pre-displacement levels. However, no methodological framework exists to guide the design and implementation of livelihood restoration activities in practice. The institutional architecture is centred on DNTDT within MAAP, which holds mandates for land titling, cadastre, community consultation oversight, resettlement policy, and land conflict management. The Commission for Monitoring and Supervision of Resettlement, directed by DNTDT and operating at national, provincial, and district levels, provides a structured oversight mechanism with community participation, and district authorities hold formal approval responsibility for resettlement plans. Community consultation is a mandatory precondition for DUAT attribution to commercial investors, with procedural requirements established by Diploma Ministerial 158/2011.

Key Gaps and Risks Identified: Several structural gaps reduce the practical effectiveness of these protections.

The most significant is the sequencing problem between the DUAT consultation process and the EIA: communities are asked to consent to land cession before displacement impacts, compensation modalities, and resettlement conditions are fully defined, creating a protection gap at the most critical moment of informed consent. The preparation of resettlement plans rarely takes into account commitments established during DUAT negotiations.

The sequencing problem is compounded by information asymmetries and the absence of a comprehensive upfront screening mechanism applied consistently to all planned activities before DUAT-related community consultation commences. Outdated PDUTs and an incomplete land information system (SIGIT) that is not accessible at district level further contributes to leave informal and customary users formally protected but effectively exposed in practice. Adequate implementation of resettlement plans is weakened by AQUA's severely constrained field inspection capacity due to budget and transport limitations.

The regulatory basis for the replacement cost standard is not explicitly confirmed in the legal framework, and while transitional support and livelihood restoration are required in principle, no methodological framework exists to guide their design and implementation, and their application in practice lacks a consistently enforced legal obligation.

Although a formally structured GRM exists within MAAP, critical technical and institutional failures across all channels mean it does not function effectively in practice, leaving rural communities largely without a functional grievance pathway.

The Draft New Land Law introduces five material gaps and risks: (i) the creation of an institutional void surrounding the National Land Administration (AdNT), which the law establishes as an autonomous institute but which does not yet exist, leaving current DNATDT functions in a state of transitional uncertainty with implications for DUAT processing, consultation oversight, and conflict management; (ii) the law’s extensive reliance on future secondary instruments to operationalise key safeguard mechanisms,

creating a period of legal uncertainty that is likely to coincide directly with Program implementation; (iii) environmental licensing is only conditionally linked to DUAT authorisation "in applicable cases," meaning systematic environmental screening is not mandated as a universal precondition for DUAT processing across all activity categories; (iv) the coexistence of sectoral cadastres alongside the national land cadastre without any established hierarchy of precedence or mechanism for resolving conflicts between them; and (v) idle land provisions require all holders of unused DUATs to demonstrate financial capacity or formally renounce their rights within twelve months, which could disrupt areas under fallow rotation, seasonal communal use, or customary occupation not yet formally documented.

ESSA Conclusion: Mozambique's land and resettlement framework contains substantive formal protections that are broadly aligned with the objectives of Core Principle 4, particularly in its recognition of customary rights, mandatory community consultation architecture, and structured resettlement planning requirements. However, the framework's practical effectiveness is materially undermined by the DUAT-EIA sequencing gap, the absence of a comprehensive upfront screening mechanism applied consistently before DUAT-related consultation commences, limited field oversight capacity, an incomplete land information system, an unconfirmed regulatory basis for the replacement cost standard, and the absence of a methodological framework to guide livelihood restoration design and implementation in practice. The Program's risk management system addresses these gaps through dedicated Program Action Plan measures, including a harmonised sub-project screening and sequencing protocol (PAP 7), explicit adoption of the replacement cost standard as a Program requirement (PAP-18), development of a methodological framework for livelihood restoration (PAP 18), strengthened AQUA field monitoring (PAP 6, PAP 14), and transition monitoring provisions responsive to the evolving legislative framework. To address the replacement cost and livelihood restoration gaps, the ESSA recommends, outside of the PAP,

On grievance redress, the Program requires the development and implementation of an accessible GRM, building on the existing MAAP GRM, with formal integration of DNTDT's land conflict management mechanism as the primary referral channel for land-related grievances (PAP 3).

The transitional gaps and risks associated with the Draft New Land Law are not addressed in the PAP; however, the ESSA recommends that the Program establish from the outset the following complementary measures: (i) legislative process monitoring protocol, (ii) conduct an updated legal analysis upon final adoption to capture divergences from the Draft and adjust Program instruments accordingly, (iii) engage DNATDT early on the application of idle land provisions to fallow and seasonal communal use areas in the corridors, and (iv) update Annex E of this ESSA following entry into force of the new law.

Core Principle 5: Indigenous Peoples / Vulnerable Groups & Equitable Access to Benefits

Program E&S systems give due consideration to the cultural appropriateness of, and equitable access to, Program benefits, giving special attention to the rights and interests of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, and to the needs or concerns of vulnerable groups.

Summary of Mozambican Systems: The screening assessment did not identify groups within the Program's geographic footprint that meet the World Bank's ESS7 criteria for Indigenous Peoples and Sub-Saharan African Historically Underserved Traditional Local Communities, a finding consistent with the general application of ESS7 in the Mozambican country context. Mozambique's Constitution establishes principles of equality and non-discrimination, and the Land Law protects community land rights regardless

of formal demarcation. The forthcoming gender parity requirement in the revised Land Law represents the most significant normative development for inclusive consultation, though its implementation is not yet assured. Social protection institutions — primarily DPGCAS — operate seasonal outreach models with multi-sectoral referral capacity that constitute genuine Program assets for reaching vulnerable populations.

Key Gaps and Risks Identified: The principal social inclusion challenge for Core Principle 5 compliance in the MozAgribiz context lies in the systematic weakness to reach and protect structurally vulnerable groups within the general population. Three interconnected gaps are particularly salient:

- On consultation and participation, women are generally marginalised or excluded from community land consultations due to cultural reasons. Community distrust — grounded in prior consultation cycles that failed to produce protective outcomes — is not addressed by any feedback mechanism linking consultation results to programs' adaptation.
- On benefit access and incentive structure, contract farming arrangements generally direct benefits to male household heads, registration requirements may exclude younger women, and social protection coverage gaps leave migrant workers without institutional protection. These structural features mean that the commercial intensification models reproduce rather than correct existing patterns of exclusion.
- On institutional capacity and accessibility, the RSSA, the primary safeguards unit lacks gender and social expertise, and no accessibility requirements are embedded in the agricultural training activities through which MozAgribiz reaches smallholder beneficiaries, leaving women, adolescent girls, persons with disabilities, and migrant workers structurally outside the benefits reach.

ESSA Conclusion: Mozambique's legal framework provides a partial but insufficient basis for Core Principle 5 compliance. Program-level actions are required to address the three gaps identified above. On consultation, gender parity should be adopted as an immediate Program eligibility condition for all supported investments, independent of whether domestic implementation regulations have been issued, and a feedback mechanism should be established to ensure consultation results inform Program adaptation (PAP 18).

On incentive structures, contract farming registration and benefit-sharing arrangements should be redesigned to ensure women have individual contractual standing and direct access to Program benefits, with specific measures to extend institutional protection to migrant workers (PAP 8).

On institutional capacity, gender and social science expertise should be embedded in the safeguards function, and accessibility and inclusion requirements should be integrated into all training and extension activities, with explicit outreach provisions for adolescent girls and persons with disabilities (PAP 4).

The Program will operationalize inclusion objectives through development of targeted criteria and procedures to ensure equitable access (PAP-24), including: (a) Identification of priority groups, including women (with specific consideration of women with care responsibilities), informal economic actors, youth, and low-income or geographically isolated communities; (b) Use of existing administrative systems, local government structures, and community-level mechanisms for identification and validation of beneficiaries; (c) Design of tailored outreach and access measures, including simplified eligibility processes and targeted communication strategies; (d) Monitoring of inclusion outcomes through Program

indicators and verification processes. These measures will be further developed and validated during consultations and incorporated into the Program Action Plan and/or Program Operational Manual.

Without these measures, MozAgribiz carries a material risk of concentrating its benefits among already-connected male smallholder producers while deepening the structural exclusion of the populations whose vulnerability the Program is intended to address.

Core Principle 6: Social Conflict & Fragility

Program E&S systems avoid exacerbating social conflict, especially in fragile states, post-conflict areas, or areas subject to territorial disputes.

Mozambique's legal framework for managing conflict risks associated with agribusiness development rests on four interlocking pillars. The land governance system, anchored in the Land Law (Law 19/97) and operationalised by Ministerial Diploma 158/2011, requires two formally documented community meetings before any DUAT is granted to commercial investors, with DNATDT's Division of Land Processing and Registry holding the statutory function of guaranteeing procedural observance. The resettlement framework — comprising Decree 31/2012, Ministerial Diploma 156/2014, and the Commission for Monitoring and Supervision of Resettlement (Ministerial Diploma 155/2014) — establishes mandatory procedural phases, multi-level oversight, and compensation modalities for displaced communities. The EIA public participation architecture under Ministerial Diploma 130/2006 establishes a five-step participatory cycle with binding representativeness thresholds applicable to all licensed sub-projects. Finally, the sectoral GRM architecture provides three institutionally distinct channels within MAAP — the Division of Land Conflict Management (DNTDT), the Division of E&S Safeguards (DINAMC), and the Agriculture, Environment and Fisheries Inspectorate (IAAP) — complemented at sub-national level by Local Councils, the Secretary of State in the Province, and the Provincial Executive Council system, all holding formal legal obligations to process community petitions and grievances.

Key Gaps and Risks Identified: Mozambique's systems are partially consistent with Core Principle 6. The legal framework establishes substantive protections — community consultation requirements, resettlement procedures, EIA participation cycles, and a fragmented GRM architecture — that reflect genuine alignment with the principle's intent. However, critical implementation gaps and structural deficiencies require corrective Program action beyond mere strengthening of existing arrangements.

Land-based conflict is the most operationally significant risk. The DUAT-EIA sequencing problem means communities may provide initial consent under conditions that subsequently change, with no accessible non-judicial enforcement mechanism available to them.

Communities subject to resettlement processes are particularly exposed, as their relocation sites may themselves become subject to competing agrobusiness land access claims, creating conditions for secondary displacement.

The anchor investor model, if inadequately governed, accelerates competition over land and water resources where multiple pressures — agrobusiness, artisanal mining, conservation management, and climate-driven resettlement — already coexist.

Individual project EIAs assess direct footprint impacts only; no cumulative assessment mechanism exists capable of capturing the aggregate effect of multiple competing claims, leaving the overlap between agribusiness investment and other resource use in an institutional vacuum that no current screening instrument addresses.

Unmonitored investor community commitments — employment, infrastructure, and development provisions recorded in the minutes of DUAT-related community consultations but not systematically tracked by any institution — generate an accumulating social contract deficit leading to community distrust and creates the motivational structure for social conflict.

Finally, the national GRM architecture, though institutionally layered, is fragmented and lacks a standing Program-wide mechanism with defined resolution timeframes, gender-disaggregated tracking, and anonymous submission modalities, as required under PforR policy.

ESSA Conclusion: Mozambique's legal and institutional framework provides a substantive but operationally insufficient basis for Core Principle 6 compliance in the MozAgribiz context. Three Program-level responses are required:

a) First, a cumulative land and resource conflict assessment mechanism must be established at Program level to capture aggregate conflict risks that individual project licensing cannot identify — encompassing cross-cadastre overlap screening between agribusiness and competing resource uses (PAP-17), corridor-wide environmental and social baselines (PAP-09), and a Program-level Strategic Environmental Assessment producing corridor-scale thresholds as binding parameters for individual investment decisions (PAP-20).
b) The DUAT-EIA sequencing gap must be closed through a conflict sensitivity pre-screening gate applied before land access processes commence, and investor community commitments must be formalised as Program obligations subject to systematic monitoring, public disclosure, and periodic independent verification — addressed respectively under PAP-07 and PAP-13.
c) A Program-wide GRM must be established integrating the Land Conflict Management Division, DINAMC via the RSSA, and the Agriculture, Environment and Fisheries Inspectorate (IAAP) as formal referral nodes — with defined intake, escalation, and resolution timeframes and gender-disaggregated tracking — addressed under PAP-03.

Without these measures, the Program risks functioning as a conflict accelerator in contexts where the structural conditions for land and resource-based social tension — competing resource claims, broken social contracts, and inadequate grievance access — are already present.

Annex A2 – Treaceablity of Traceability of ESSA Findings to the Program Action Plan and DLIs

Notes applicable throughout the table:
(a) "All corridors" denotes all three Program corridors throughout.
(b) "From Effectiveness" denotes conditions applicable from Program Effectiveness throughout.
(c) Staff training: a cross-cutting cascade Training of Trainers program covering RSSA, SDPI, SDAE, DINAMC, and SPA — on E&S categorisation, tool application, ESMP content, monitoring checklists, and incident reporting — is financed under PAP-4 IPF. References to "staff training" in subsequent PAP rows activate the relevant thematic module within this program.

ESSA System Gap	PAP Action	DLI / IPF Support
A — E&S SCREENING, ELIGIBILITY CONDITIONS, AND SAFEGUARDS POLICY		
Screening tools underrepresent social risks; regulatory arbitrage between SPA and DPDTA creates legal uncertainty over license validity; no consolidated licensing register at provincial level.	Develop a Program Operations Manual establishing a binding exclusion list, an enhanced screening tool integrating social, land access, and gender dimensions, and a mandatory eligibility condition requiring all sub-project licences to be issued through SPA exclusively. [PAP-1]	IPF: integrated E&S screening tools, eligibility checklists, and ESMP minimum content templates; staff training. (c)
Category B simplified EIA are, in some instances, waived and substituted by an ESMP, leading to public consultations not being conducted.	Establish as a non-waivable eligibility condition that all Category B investments include documented community consultation and a simplified EIA; DINAMC to issue a binding circular confirming this requirement. [PAP-1]	IPF: joint RSSA–DINAMC guidance note on non-waivability of Category B consultations and minimum consultation report standards, embedded in Program screening tools. (b)
DUAT–EIA sequencing allows community consent before full impact, resettlement, or compensation details are known; DUAT consultation commitments are not integrated into safeguard instruments[5]. No conflict sensitivity pre-screening exists before DUAT and EIA processes.	Establish DUAT pathway verification as a binding eligibility condition, requiring community consultation records at environmental licensing initiation and as inputs to Resettlement Plans; prohibit investment approval where unresolved land conflict is documented[6]. Apply a conflict sensitivity pre-screening tool at investment origination, before DUAT and EIA processes begin. [PAP-7]	IPF: DUAT pathway verification checklist and conflict sensitivity screening tool, both integrated into PAP-1 screening instruments (a); staff training. (c)
RSSA has no approved mandatory safeguards policy instrument and lacks authority to compel other MAAP directorates to apply safeguards. Social risk screening depends on consultant judgment at EIA stage;	Approve a binding MAAP safeguards policy designating RSSA as safeguards clearance authority; require RSSA clearance as an interim investment approval condition across MAAP directorates. Incorporate mandatory social risk pre-screening in a revised EIA Directive. [PAP-18]	IPF: MAAP safeguards policy drafting assistance incorporating social science and gender specialist input; EIA Directive revision technical assistance, initiated as a Program condition before Year 1 Q3.

[5] DUAT consultation commitments are not only unintegrated into safeguard instruments but are also not shared with compliance institutions.
[6]The eligibility condition also requires community consultation records as inputs to monitoring activities, in addition to Resettlement Plans.

DINAMC technical opinions lack normative force within MAAP.		
B — COMMUNITY PARTICIPATION STANDARDS AND GRIEVANCE REDRESS		
The 20% minimum participation benchmark (Directive 130/2006) is not consistently enforced.	Include in the Program Operations Manual a mandatory compliance condition requiring enforcement of the 20% representativeness standard, with DINAMC/SPA review assessing substantive participation adequacy. [PAP-2]	IPF: enforcement guidance and monitoring tools for DINAMC/SPA to verify participation levels in submitted consultation reports, including field verification protocols.
No continuous, multi-sectoral Program-level GRM exists across all corridors (a).	Develop a Program GRM manual building on the MAAP MDR structure, with formal articulation with RSSA, PROCAVA PIU, DNTDT, DPGCAS, and SDSMAS; integrate NRM Committees or Local Councils as first-tier reporting nodes with escalation protocols to district SDAE focal points; define grievance traceability requirements and cost-sharing arrangements. [PAP-3]	DLI: GRM functionality as a hard pre-condition for disbursement; response time ≤21 days; resolution rate ≥70%; geographic coverage across all Program districts (a). IPF: Green Line and Survey123 platform integration; community dissemination in local languages including non-literate formats; NRM Committee formalisation support; independent third-party GRM accessibility assessment as a pre-condition for first DLI verification.
No dedicated referral pathway for sensitive complaint categories (GBV, child labour, trafficking); no formal integration of land conflict mechanisms within the GRM architecture.	Establish dedicated referral protocols for sensitive complaints anchored within DPGCAS, SDSMAS, IGT, COMAL, and the Provincial Services of Justice and Labour, with trained district focal points; integrate the DNTDT land conflict mechanism as a specialised channel for land-related grievances. [PAP-3]	IPF: GRM focal point training (a)(c); community dissemination in local languages including non-literate formats; NRM Committee formalisation support.
C — INSTITUTIONAL E&S CAPACITY AND COORDINATION ARCHITECTURE		
Sector agencies have no dedicated E&S focal points with formal mandate, training, or operational budget; institutional knowledge from legacy programmes is at risk.	Establish permanent E&S focal points with formal TORs in all implementing agencies; allocate recurrent operational budget for focal point activities; establish a dedicated gender and social specialist position within RSSA. [PAP-4]	DLI: E&S focal points established; dedicated gender and social specialist position in RSSA. IPF: transition-period financing of focal point positions and operational costs; cascade training programme design including manual preparation and Trainer-of-Trainers methodology for each agency. (c)
No formal inter-agency E&S coordination mechanism exists; legacy project institutional architecture (IRRIGA, SUSTENTA) has not been documented or transferred.	Establish a formal inter-agency E&S coordination mechanism with documented minutes and workplan; document IDEPA's E&S institutional architecture as a replication model for all implementing agencies. [PAP-4]	IPF: coordination platform facilitation and administrative support; formal documentation of IDEPA's E&S architecture for replication.
No formal protocol governs the DINAMC–AQUA interface for post-licensing monitoring, licence cancellation, or emergency enforcement; no defined emergency response timelines for acute violations; no automatic notification obligation when inspections reveal active licence violations.	Establish a formal DINAMC–AQUA coordination protocol covering licence documentation sharing, inspection finding notification, escalation criteria, and licence cancellation procedures; embed emergency response obligations for acute environmental events; publish in the official gazette before Program investments reach scale in ecologically sensitive sub-catchments. [PAP-14]	DLI: protocol operationalisation confirmed as pre-condition for compliance monitoring DLI verification. IPF: legal and institutional technical assistance for protocol design; joint DINAMC–AQUA staff training; protocol implementation monitoring in RSSA supervision missions (b); protocol activation cases reported annually.

No inter-ministerial coordination mechanism exists between MAAP and MTGAS; the OHS regulatory framework does not address agricultural field risks including agrochemical handling, heat stress, child labour, and labour influx.	Establish a MAAP–MTGAS joint technical working group with a formal information-sharing and referral protocol; produce supplementary Program-level OHS guidelines for agricultural field operations. [PAP-21]	IPF: consolidated OHS, gender, child labour, and labour influx operational manual with training modules and monitoring tools; staff training of DINAMC, RSSA, DINASAB, DINAE, and MTGAS staff. (c)
CCPs have unresolved legal status and variable operational dysfunction; their undefined relationship with Local Councils creates overlap in consultation and investment appraisal processes.	Clarify CCP legal status and integrate into Program implementation instruments; establish an articulation framework between CCPs and Local Councils for fisheries consultation and appraisal; integrate CCPs into the GRM escalation pathway. [PAP-22]	IPF: training of RSSA and DINAMC staff on CCP capacity assessment; training of CCP members on GRM escalation procedures and roles. (c)
Cultural heritage obligations — pre-construction surveys, the 0.5% survey cost contribution, and chance find management — are not systematically incorporated in works contracts; EIA ToRs do not address intangible cultural heritage. No coordination protocol exists between MEC/DNPC and DINAMC.	Incorporate standardised chance find procedures into all Program works contracts; develop socio-cultural impact assessment methodology and ToR templates[7]. Establish a formal coordination protocol between MEC/DNPC and DINAMC. [PAP-23]	IPF: standardised chance find procedures; revised works cost templates incorporating the 0.5% contribution; pre-construction archaeological survey methodology; rapid-assessment screening checklist for intangible heritage, sacred sites, and cultural practices; MEC/DNPC–DINAMC coordination protocol drafting and formalisation; traditional authority engagement guidance integrated into consultation design tools.
D — FIELD MONITORING AND INSPECTION OPERATIONAL CAPACITY		
SDPI and SDAE lack transport, fuel, per diem, and equipment for field monitoring; licence issuance does not trigger district notification and SDPI seldom has access to approved ESIAs, ESMPs and license conditions; district monitoring capacity depends entirely on project financing.	Establish as standard Program compliance conditions: district receipt and filing of EIA reports and ESMPs; SPA licence notification to districts within 30 days of issuance; and minimum quarterly monitoring visits for all Program investments. Support transition to institutionally budgeted district monitoring from Year 3. [PAP-5]	DLI: minimum quarterly monitoring visits; institutionally budgeted district monitoring as a sustainability outcome. IPF: operational financing for SDPI and SDAE district monitoring (a) including transport, fuel, per diem, and field equipment; MIS configuration for visit records, licence notification tracking, and ESMP receipt; training (c); technical assistance for budget advocacy.
AQUA lacks functional equipment and certified laboratory agreements, making agrochemical and effluent compliance unverifiable; AQUA provincial delegations lack capacity for independent environmental verification.	Require AQUA–certified laboratory service agreements[8] as a pre-condition for investment approval in subcatchments with agrochemical or effluent risk; implement chain-of-custody protocols as a binding compliance requirement. Establish AQUA provincial delegations' independent environmental verification function, supported by documented QA/QC standards. [PAP-6]	DLI: AQUA provincial delegations' independent verification function fully operational. IPF: multiparametric water quality sondes for AQUA provincial offices (a); laboratory service agreements for each corridor province; QA/QC and chain-of-custody documentation standards; training on field sampling, sonde operation, and chain-of-custody compliance. (c)
DINASAB has insufficient provincial inspection capacity, with inspectors concentrated at border crossings rather than community-level points of use,	Operationalise DINASAB provincial inspection capacity through SPAEs and DPAPs with vehicles, fuel for quarterly field visits, and provincial inspection plans ≥60% executed annually in corridor	DLI: DINASAB provincial inspection capacity operationalised annually. IPF: operational support to DINASAB provincial inspection (a) including vehicles, fuel, equipment, and field per diems; provincial rapid-testing laboratory

[7] The socio-cultural impact assessment methodology and ToR templates are intended to operationalise a domestic mandate that currently lacks secondary legislation.
[8] AQUA–certified laboratory service agreements should be preceded by a structured assessment of AQUA's laboratory analysis needs.

leaving input supply chains and livestock value chains without adequate regulatory oversight (a).	provinces; include DINASAB in the Program coordination architecture. [PAP-19]	equipment and field kits for seed certification and pesticide verification in each corridor province.
E — LAND ACCESS, SPATIAL PLANNING, AND CADASTRAL SYSTEMS		
The majority of district land use plans (PDUTs) across all corridors (a) have exceeded their validity periods, meaning spatial compatibility verifications reference outdated data[9].	Require enhanced spatial compatibility verification for all investments in districts with outdated PDUTs as a Program eligibility condition until a current PDUT is in force; initiate priority PDUT updating across all corridors (a) with defined timelines and budget commitments. [PAP-16]	IPF: technical and financial assistance for priority PDUT updating (a) through DNTDT and DPDTA Sofala; spatial compatibility verification tool for SDPI application at investment origination in districts without current PDUTs; capacity support for DPDTA spatial planning units.
SIGIT does not communicate with MAAP systems, lacks district-level modules, and the cumulative spatial footprint of agribusiness activity is invisible to entities processing new investment applications.	Complete critical SIGIT modules including process tracking, central-level provincial reporting, and interoperability with MAAP systems; extend SIGIT to district level as a Program-supported institutional outcome. [PAP-16]	IPF: DNTDT–MAAP spatial data interoperability assessment and technical roadmap for SIGIT–MAAP MIS integration.
The mining cadastre operates separately from the land cadastre and agricultural licensing system; no cross-cadastre screening or district notification of mining concession boundaries exists.	Require cross-cadastre overlap screening against the mining cadastre as a mandatory pre-screening step before DUAT and EIA processes; pursue a formal district notification requirement for mining concession boundaries through engagement with MIREME. [PAP-17]	IPF: cross-cadastre screening tool with MAAP–MIREME data access protocol; district SDPI training on overlap identification, harm documentation, and escalation (c); formal engagement with MIREME for cross-sector information sharing.
No mechanism exists to identify or exclude investments in zones with active, unresolved mining-agriculture conflicts and documented community harm.	Exclude investments in zones with active, unresolved mining-agriculture resource conflicts and documented community harm as a binding Program eligibility condition until conflicts are formally resolved and documented. [PAP-17]	IPF: multi-sector conflict mapping in priority Program corridor districts (a) to establish a baseline of active overlap conflicts before investment approvals commence.
F — WATER RESOURCE MANAGEMENT		
No mechanisms exist to manage cumulative water abstractions; no quantitative efficiency standards; no formal INIR–ARA coordination mechanism; individual EIAs do not address cumulative subcatchment water balance; water allocation conflicts between irrigation expansion and existing users are not assessed.	Establish an integrated water management framework comprising a formal INIR–ARA coordination mechanism, a cumulative abstraction assessment methodology, and quantified water efficiency conditions in ARA licences; require ARA–AQUA data-sharing and catchment monitoring protocols as a pre-condition for investment approval in over-allocation risk subcatchments (a). Require a mandatory subcatchment water balance chapter in EIAs for investments in risk subcatchments; establish ARA catchment consultation as a standard pre-approval requirement for irrigation investments above a defined threshold (a). [PAP-10]	IPF: hydrological assessment of priority catchments (a) covering water balance, allocation registers, and over-abstraction risk; technical assistance for ARA–AQUA protocol drafting; MIS integration of catchment monitoring data (a); EIA minimum content guidance for subcatchment water balance chapters, integrated into PAP-1 screening tools.

[9] Approximately 70% of district land use plans (PDUTs) in Sofala province have exceeded their validity periods; the problem is assumed likely common across all corridors.

G — CORRIDOR ENVIRONMENTAL MONITORING, PORTFOLIO OVERSIGHT, AND SEA		
No corridor-wide environmental monitoring function exists; no sustainability financing pathway exists for corridor monitoring[10].	Establish a corridor monitoring function within DINAMC's Environmental Evaluation Department; produce annual corridor environmental assessments reported to DINAMC, RSSA, and ARAs (a); design an ARA participation protocol. Support transition to recurrent institutional budget from Year 3. [PAP-9]	DLI: corridor monitoring function operational within DINAMC; annual corridor environmental assessments produced; corridor monitoring sustainability financing pathway established. IPF: corridor environmental baselines (a) covering ecological, hydrological, and land use dimensions; DINAMC Environmental Evaluation Department capacity support including staff positions, methodology, and monitoring tools; RSSA field operations financing for corridor monitoring missions (a); technical assistance for budget transition.
No consolidated register of Program investments and E&S status exists; EIAs, licences, and ESMPs are not publicly accessible; SGLA is temporarily inoperable; DINAMC and SPAs operate disconnected database systems.	Establish proactive disclosure of EIAs, environmental licences, ESMPs, and monitoring reports as a standard Program compliance condition (a); require portfolio-level E&S compliance reporting to the Program coordination body as a verifiable annual result. [PAP-13]	IPF: Program-level investment register consolidating all investments (a) with categorisation, EIA status, licence status, ESMP, and monitoring records; technical assistance for SGLA–SPA system integration; SIGIT interoperability analysis; web platform for proactive document disclosure; DINAMC and RSSA MIS capacity building.
No mechanism exists to record or monitor commitments made during DUAT and EIA consultations, leaving employment targets, compensation, and community obligations outside formal accountability systems.	Establish a community commitment tracking function within the Program MIS; record all DUAT and EIA consultation commitments in a standardised register; share with district SDPI and NRM Committees at licence issuance; verify periodically through ESMP compliance review. [PAP-13]	IPF: community commitment tracking MIS module including a standardised registration form, notification protocol to district SDPI and NRM Committees, and compliance verification checklist for monitoring visits; assessment of the Integrated Environmental Information System for potential inclusion in Program financing.
No SEA institutional capacity, regulatory framework, or functional mandate exists; EIAs are assessed in isolation[11]; DINAMC's Environmental Evaluation Department holds the SEA mandate but has no designated specialists, approved methodology, or completed SEA.	Commission and complete a Program-level SEA covering all corridors (a) as a pre-condition for investment approval at scale; withhold investment facilitation DLI disbursements until SEA corridor-level thresholds are adopted as binding EIA parameters; operationalise SEA findings as non-waivable eligibility conditions. Confirm DINAMC Environmental Evaluation Department SEA operational capacity — designated specialists, approved methodology, and one completed SEA — by mid-Program. [PAP-20]	DLI: DINAMC SEA operational capacity confirmed by mid-Program. IPF: corridor SEA (b) producing ecological and hydrological baselines, cumulative impact thresholds, corridor-specific EIA parameters, exclusion zone mapping, and a threshold-monitoring indicator framework; ARA co-authorship of hydrological baseline; integration of SEA findings into PAP-1, PAP-9, PAP-10, and PAP-15; staff training on SEA and cumulative impact assessment (c); SEA methodology guide; peer learning exchanges with Ethiopia, Tanzania, and Kenya.
H — LABOUR, GENDER, GBV, AND SOCIAL RISKS		
No legal provisions govern labour influx and worker-community interaction risks; supply chain due diligence requirements are incomplete (a).	Develop a Program-level labour influx management framework covering a worker code of conduct, ethical recruitment, GBV prevention, and supply chain due diligence; prohibit	DLI: extensionist coverage of outgrower schemes with labour standards sensitisation. IPF: IGT joint monitoring protocol design, training, and

[10] The absence of corridor-wide monitoring makes it structurally impossible to track cumulative landscape-level impacts or detect Program contributions to environmental degradation regardless of investment-level ESMP compliance.

[11] The SEA gap is specifically characterised as a situation in which project EIAs are "assessed in isolation with no mechanism to aggregate impacts or detect cumulative corridor-scale degradation."

	undocumented labour intermediaries as a binding eligibility condition; engage IGT Provincial Delegations through a joint monitoring protocol (b). [PAP-8]	operational support including joint inspection visits to anchor investor and outgrower sites.
Household-level beneficiary registration obscures women's participation; no protocol exists to identify and refer trafficking risks in seasonal labour recruitment.	Require sex-disaggregated individual household member registration as a mandatory Program compliance standard (a); develop a trafficking prevention protocol for seasonal labour recruitment including extensionist training and referral pathways to DPGCAS and PRM. [PAP-8]	IPF: child labour baseline prevalence assessment (a) as a pre-condition for DLI baseline establishment; outgrower contract inclusivity screening indicators covering gender parity, labour transparency, and remuneration equity; community awareness materials on labour rights in local languages (a).
Agricultural labour concentration elevates GBV risk (a) with no reporting or referral pathways; EIAs do not require GBV risk assessment; DPGCAS lacks operational infrastructure and SDSMAS has insufficient operational budget in Program districts.	Require a mandatory community health chapter covering GBV risk, worker safety, and disease transmission as a binding EIA content condition (a); integrate GBV referral pathways into the Program's eligibility framework, supported by operational infrastructure investment in DPGCAS across all Program districts. [PAP-11]	IPF: GBV prevention programme through DPGCAS covering community sensitisation, behaviour change, and survivor referral (a); extensionist-to-PRM referral protocol documentation and training; DPGCAS operational infrastructure in all Program districts[12] (a); SDSMAS operational budget support (a).
I — BIODIVERSITY, NATURAL RESOURCES, AND PEST MANAGEMENT		
EIA biodiversity chapters rely on single-season desktop assessments without specialist input; reviewing institutions lack ecologists and conservation biologists; no critical habitat screening guidelines exist; no invasive species risk screening mechanism exists in DINAMC's review process.	Develop a Program-level forest and biodiversity screening checklist operationalising zone classification, the permanent heritage regime, and the critical habitat definition; establish minimum biodiversity EIA content standards requiring multi-season field surveys, specialist botanical, ornithological, and herpetological input, landscape connectivity assessment, spatially specific mitigation commitments, and ANAC review confirmation. Require invasive species pre-introduction risk assessment as mandatory EIA content for qualifying investments. [PAP-15]	IPF: minimum biodiversity EIA content guidance note jointly prepared by RSSA and DINAMC with ANAC input, embedded in Program screening tools (b); ANAC–DINAMC consultation protocol with criteria for triggering ANAC review, response timelines, and documentation requirements; SPA and DPDTA training in ecological risk identification and biodiversity EIA review (c); invasive species risk assessment protocol under DINASAB mandate with IIAM input; DINAMC and SDPI training on protocol application. (c)
No IPM regulatory provisions exist; no restrictions on highly hazardous pesticides consistent with the Stockholm and Rotterdam Conventions; no DINAE–DINASAB coordination protocol; no IPM methodology in extension delivery.	Prepare and implement a Program-level Pest Management Plan developed with DINASAB and implemented through DINAE, including a prohibited pesticides list consistent with the Stockholm and Rotterdam Conventions; establish a DINASAB–DINAE coordination protocol for agrochemical OHS extension; mandate DINASAB participation in DINAE annual training cycles. [PAP-12]	DLI: IPM adoption rate among Program beneficiaries (a). IPF: IPM standards development drawing on IIAM research and SUSTENTA/APPSA legacy methodology; extensionist certification through DINAE Training of Trainers cascade; DINASAB–DINAE joint training content development scheduled annually within DINAE's calendar.
Input supply chains lack traceability and safety standards; chemical waste has no formal disposal infrastructure. FMD vaccine production has ceased	Embed input supply chain minimum standards — traceability, SDS availability, applicator training, and MRL compliance — in anchor investor agreements as a verifiable eligibility condition. Document	IPF: chemical waste collection infrastructure (a); agrochemical input register and traceability database; training and awareness materials in local languages (a); FMD vaccination procurement protocol and alternative animal health

[12] The deficient operational capacity of both DPGCAS and SDSMAS in Program districts specifically leaves survivor support pathways without institutional delivery capacity — the rationale for the targeted DPGCAS infrastructure investment under IPF.

and Botswana purchases are suspended[13], leaving livestock value chains without an operational animal health emergency response; disease outbreak communication chains have been disrupted[14].	and test an animal health emergency protocol including an FMD vaccination procurement arrangement or alternative before any livestock value chain activity commences. [PAP-12 / PAP-19]	emergency SOP; disease outbreak communication chain restoration through radio, digital, or mobile platform for district-to-central DINASAB reporting.

[13] Botswana FMD vaccine purchases have been suspended specifically due to debt, not a policy or supply decision.

[14] Disease outbreak communication chain disruption is attributed to decentralisation, which is relevant to the choice of technical restoration solution (radio, digital, or mobile platform)

Annex B — Stakeholder Consultation Summaries

This annex summarizes stakeholder consultations undertaken, thus far, during preparation of the Environmental and Social Systems Assessment (ESSA), consistent with the system level nature of the Program-for-Results (PforR) instrument and the World Bank ESSA Guidance. The summaries are presented in an aggregated comparative table in section B1. The individual presentation for each consulted stakeholder is provided in section B2. Section B3 provide the list of Stakeholders engaged during round 1 of consultations.

Summary of Consultation Outcomes

Stakeholder inputs from round 1 consistently highlighted that environmental and social risks under the MozAgribiz Program are well understood and primarily operational in nature, with key challenges relating to capacity, coordination, and consistency of implementation at decentralized levels. These inputs shaped the ESSA's emphasis on practical system strengthening measures, reflected in the Program Action Plan.

No issues were raised during the first round of consultations that would preclude reliance on Mozambique's country systems for implementation of the PforR, subject to timely and effective implementation of agreed PAP actions.

Disclosure and Feedback

A draft version of the ESSA will be disclosed prior to the broader stakeholder consultation meeting (round 2). Feedback received during the meeting and the additional 10-day period will be reviewed and, where relevant, incorporated into the final ESSA findings and Program Action Plan measures.

B1 Comparative Summary of Stakeholder Consultations (Round 1)

Stakeholder Category	Consultation Focus	Key Issues Raised	How Issues Were Addressed in the ESSA	Consultation Dates	Locations / Modality
Implementing Institutions at Central Level	Integration of E&S safeguards in project development, internal E&S capacity, inter-institutional coordination	- Weak institutionalization of safeguards systems - Severe human, financial, and logistical resource constraints for core activities - Heavy dependence on external funding and partners - Weak monitoring, enforcement, and data systems	The ESSA identifies systemic weaknesses in safeguards, capacity, funding, and monitoring, with PAP actions collectively ensuring binding safeguards policies, institutionalized focal points, sustainable financing, and strengthened compliance system. **Relevant PAPs:** PAP-04, PAP- 09, PAP-13 and PAP-18	23 March to 16 April	In person meetings in Maputo/ Online meetings
E&S Risk Management Institutions at Central Level	Institutional roles, system performance, coordination	- Fragmented mandates and weak coordination - Absence of binding E&S policies - Severe human, financial, and logistical resource constraints - Weak monitoring, enforcement, and information systems - Limited technical capacity (especially social and emerging risks) - Underdeveloped/fragmented GRM systems - Provincial and district structures are understaffed, undertrained, and under-resourced, weakening implementation where impacts occur.	The ESSA identifies systemic gaps in mandates, safeguards, funding, monitoring, capacity, grievance systems, and staffing, with PAP actions collectively establishing binding policies, coordination, compliance systems, social expertise, unified GRM, and operational support. **Relevant PAPs:** PAP-01, PAP-03, PAP-04, PAP-05, PAP-06, PAP-13, PAP-14 and PAP-18	23 March to 16 April	In person meetings in Maputo/ Online meetings
Implementing Institutions at Provincial Level	E&S risks and internal management capacity, Integration of E&S safeguards in project implementation,	- Weak coordination and overlapping mandates - Severe resource, infrastructure, and human capacity constraints	The ESSA identifies systemic weaknesses in coordination, safeguards, capacity, monitoring, grievance systems, and institutional stability, with PAP actions collectively establishing binding policies,	23 March to 16 April	In person meetings in Beira/ Online meetings

	internal E&S capacity, inter-institutional coordination	- Weak environmental and social safeguards systems - High exposure to environmental, climate, and socio-economic pressures - Gaps between legal frameworks and actual implementation - Institutional instability and transition risks (Provincial Services) - Limited data, monitoring, and information systems - Dependence on external funding and projects	formal protocols, operational support, compliance tools, unified GRM, and inclusive consultations to close gaps between legal frameworks and practice. **Relevant PAPs:** PAP-01, PAP-04, PAP-05, PAP-09, PAP-13 and PAP-18.		
E&S Risk Management Institutions at Provincial Level	Implementation challenges, screening, monitoring, enforcement, coordination	- Fragmented mandates and weak coordination (DPDTA/SPA/AQUA) - Severe resource and logistical constraints - Weak monitoring, enforcement and data systems - Limited technical capacity for social risks (except for DPGCAS) - District levels are understaffed, undertrained, and poorly equipped - Dependence on external funding - Where existent, multi-sectorial mechanisms work without adequate resources (e.g. GBV Multisectoral mechanisms)	The ESSA identifies systemic gaps in coordination, safeguards, resources, monitoring, social capacity, grievance mechanisms, and regulatory integration, with PAP actions collectively establishing binding protocols, compliance tools, operational support, social expertise, unified GRM, and a transition to sustainable institutional funding. **Relevant PAPs:** PAP-01, PAP-04, PAP-05, PAP-06, PAP-11, PAP-14 and PAP-18.	23 March to 16 April	In person meetings in Beira

		- Weak integration of regulatory systems into development programs[15].			
Implementing and E&S Risk Management Institutions at District Level	E&S risks and internal management capacity, Implementation challenges, screening, monitoring, enforcement	- Severe environmental and land-use conflicts driven by mining activities - Very limited authority and weak decentralized enforcement - Severe resource, logistical and technical capacity gaps - Poor information flow from central and provincial levels - Weak GRM systems - Significant social risks with weak response mechanisms - High vulnerability to climate shocks and environmental degradation - Centralized licensing and weak local oversight - Monitoring and follow-up on compliance constrained by lack of resources and of access to ESMPs and Environmental License conditions	The ESSA identifies severe mining–land conflicts, weak coordination, limited capacity, poor information flow, fragile grievance systems, and high social and climate risks, with PAP actions collectively mandating cross-cadastre screening, operational support, compliance tools, social and GBV safeguards, unified GRM, climate baselines, and transition to sustainable institutional oversight. **Relevant PAPs:** PAP-03, PAP-04, PAP-05, PAP-07, PAP-08, PAP-09, PAP-11, PAP-13, PAP-16, PAP-17 and PAP-20.	23 March to 16 April	In person meetings at Dondo

[15] External programs often prioritize beneficiaries while overlooking licensing and oversight systems, increasing non-compliance risks and weakening institutional control

B2 Detailed Summaries per Consulted Stakeholder

B 2.1 Central Level Institutional Stakeholders

B2.1.1 Environmental and Social Risk Management Institutions

National Directorate of Environment and Climate Change (DINAMC)

The engagement took place in Maputo, on April 13, 2026. A total of 10 DINAMC representatives were present during the engagement session. The main issues and concerns raised were:

- **Fragmented and unclear institutional mandates (central–provincial)** - Dual roles and conflicts in licensing (SPA vs. DPDTA) create legal ambiguity and weak oversight, with DINAMC not recognizing some provincial processes.
- **Weak coordination and lack of formal protocols** - Coordination with AQUA and other sectors is ad hoc, with no binding collaboration mechanisms.
- **Unclear Monitoring Mandate** - Monitoring responsibilities are often confused with AQUA's enforcement role, limiting DINAMC's effectiveness.
- **Technical Opinions** - DINAMC's technical reviews are not always treated as binding by other directorates.
- **Limited authority of safeguards function** – Since no Safeguards Policy has been adopted, safeguards require higher-level approval to be enforceable, and guidance is not always binding across the Ministry.
- **Weak integration of social and climate risks in practice** - Not systematically addressed at screening stage. It depends heavily on individual consultants' capacity. There are no standardized guidance tools. Safeguards (e.g., GBV, labour, social risks) not fully embedded in EIA regulations. Need to revise directives or adopt a formal safeguards policy/strategy
- **Severe human resource and skills gaps** - Insufficient staff and specialization (especially social, climate, and other technical areas). No new recruitments, compounded by an aging workforce gradually going into retirement. Staff overstretched and multitasking.
- **Limited training and capacity building** - Very few trainings on ES safeguards. Safeguards training has been irregular and dependent on external partners; many staff rely on learning by practice. No systematic capacity development across environment, agriculture, and fisheries sectors.
- **Critical financial, logistical and technological constraints** - Insufficient resources reduce monitoring and implementation capacity. Lack of equipment (vehicles, IT systems, monitoring tools like drones), weak infrastructure for data systems and inspection, limited access to internet at subnational level
- **Information systems weaknesses** - Environmental licensing system lost data due to technical failures. Integrated environmental information system not operational.
- **Grievance mechanism largely non-operational** - GRM designed but not implemented in practice. No awareness among communities or frontline actors. No complaints received due to lack of dissemination.
- **Pressure to downgrade project risk classifications** - Attempts to reclassify projects to avoid delays and funding loss, with corresponding risk of compromising integrity of environmental assessment.
- **Weak early-stage integration of DINAMC in projects** - Often only engaged at licensing stage. Limited involvement during project design and preparation

DINAMC has a strong formal mandate but weak operational effectiveness, constrained by fragmented institutional roles, regulatory gaps, limited authority of safeguards, and weak systems, compounded by significant human, financial, and technological resource constraints.

Environmental and Social Safeguards Division

The engagement took place in Maputo, on March 23, 2026. A total of 7 people took part in the engagement session, but only two were from the E&S Safeguards Division. The other 4 were from other divisions within same parent Department of Environmental Assessment. The main issues and concerns raised were:

- **Absence of Safeguards Policy** – No formal approved safeguards policy within the Ministry. Existing works relies mainly in internal regulations, EIA legislation and a non-binding manual of good practices.
- Currently, only internal regulations guide operations. There is no approved safeguard policy and good practices manual is still limited to agriculture and needs expansion to infrastructure, mining, fisheries.
- **Weak Integration** - Safeguards are not systematically integrated at project design stage. Safeguards triggered only when projects stall or for financing reports. There is still resistance or lack of knowledge in other directorates. There is a need for a stronger cross-sector integration under MAAP.
- **Focal Points at subnational level** - Existing list of Provincial Focal Points outdated and the district coverage is fragile.
- **Team Composition** – The division is mostly composed with an environmental or forestry background. There are no social specialists. There is a need for reinforcement of capacities in gender, GBV, and social inclusion.
- **Training** – Irregular and donor-dependent. The last training course was delivered in 2024.
- **Resources** - Financial and logistical shortages (few vehicles, no dedicated training budget, limited field presence). Monitoring depends on central resources, and the central team is absent from field since 2022.
- **Knowledge Gaps** - Need stronger mastery of national and international instruments on gender and social rights.

In summary, the most critical concern is that the safeguards system exists but does not yet function as a fully institutionalized, adequately resourced and proactive system.

National Directorate of Land and Territorial Development (DNTDT)

The engagement was conducted over three sessions to accommodate participant availability. The first session, held on April 14, included two representatives from DNTDT: the National Director and the Head of the Department of Cadastre. The second session, on April 15, was attended by one of the previous participants, namely the Head of the Department of Cadastre. The third and final session, on April 16, brought together three representatives from the SIGIT Division, the Resettlement Division, and the Land Conflict Management Division. The main issues and concerns raised were:

- **Dual Subordination** - Provincial entities report both to the Governor and to the central level, creating overlapping authority.
- **Fragmented and overlapping mandates (SPA vs. DPDTA)** - Dual provincial structures handling similar land functions create complexity, duplication, and potential inconsistencies

- **Limited institutional autonomy and access to funding** - Revenues are centralized (FNDS), while the Directorate struggles to access funds to execute its mandate.
- **Critical shortage of staff and skills gaps** - No recruitment for years; experienced staff retired without replacement. Staff overstretched—same technicians handle cadastre, conflict resolution, and monitoring, especially at provincial level. Limited capacity building since ~2008. Increasing reliance on underqualified or reassigned personnel.
- **SIGIT Limitations** - The Land Information Management System (SIGIT) is incomplete, lacking essential modules (reporting, process tracking) and sufficient technical staff. Its functionality is further constrained by weak digital infrastructure. Poor interoperability with other sector systems. It is limited to provincial level. No cadastral system is implemented at district level, and local technicians still work manually. Parallel use of digital and paper systems reduces efficiency
- **Mining Concessions** - Mining rights take precedence over pre-existing DUATs and customary rights, generating conflicts. Compensation negotiations are left to concession holders, often causing tensions.
- **Severe funding shortages** affecting monitoring and inspection activities, equipment and IT systems, coordination meetings and field operations. Activities frequently planned but not executed due to lack of funds leading to difficulty enforcing land use plans, sanctions applied inconsistently and often delayed. Monitoring often relies on proponent funding, undermining independence.
- **Sequencing gap between DUAT and resettlement** - DUAT granted early and is a precondition for instructing EIA processes. Resettlement planning occurs later (via the EIA process), creating risk of conflicts and incomplete agreements.
- **Social Compensation** - Agreements on social benefits (water points, schools, health centres) are made during DUAT-related community consultations but implementation is inconsistent.
- **Legislative Bottlenecks** - The new land law package has been under review for over five years. Regulations may take up to a year after approval to be enacted. Revision of the resettlement regulations, necessary to address various gaps, has been stalled due to funding constraints.
- **Gender Parity Requirement** - The new law mandates 50-50 gender parity in community consultations, but strong resistance is expected at community level.
- **Weak enforcement of territorial planning instruments** – Many land use plans (PDUTs) are outdated and/or not applied. Lack of sanctions for non-compliance. Planning not translated into practice.
- **Conflict resolution system exists but is underutilized** - Digital GRM platform not operational in many provinces due to lack of resources, limited equipment and poor internet access

DNTDT operates within a complex but underperforming land governance system, characterized by fragmented institutional arrangements, weak enforcement, and underdeveloped systems, compounded by severe human, financial, and technological resource constraints.

National Agency for Environmental Quality Control (AQUA)

The engagement took place in Maputo, on March 27, 2026. A total of 10 AQUA representatives were present during the engagement session. The main issues and concerns raised were:

- **Laboratory & Equipment Gaps** - Lack of environmental labs and adequate tools limits reliable data collection. Inspections rely mainly on observation without consistent

measurements. Inability to generate reliable environmental data, undermines core mandate.

- **Transport Deficit** - Insufficient vehicles and mobility resources leave both AQUA at central level and provincial delegations with limited operational capacity.
- **Funding Shortfalls** - Budget constraints severely limit field inspections, audits, and coverage. Limited funds compromise planned activities. Budget depends on state allocation and fines, with uncertainty in confiscated asset management and delayed Treasury transfers. Heavy reliance on external projects with a financing component to AQUA (MozNorte, MozRural, MozBio), leading to uneven geographic coverage.
- **Weak data systems and digital infrastructure -** No integrated environmental information system. Reliance on Excel-based internal tools.
- **Modernization Needs** - Strengthening inspection capacity requires modern equipment (drones, GPS, PPE, vehicles).
- **Territorial Asymmetry** - Some provinces can inspect effectively, others remain uncovered.
- **Dependence on External Actors and Systems** - Reliance on reports from independent auditors hired by proponents due to AQUA's lack of internal means. Monitoring is partly substituted by project-supported resources.
- **Limited coverage of social safeguards -** No in-house specialists for social risks (labour, OHS, GBV, inclusion). Social aspects are addressed only through multisectoral teams when required and possible.
- **Gaps in emergency response and risk management -** No early warning system for environmental incidents (e.g. pollution, agrochemical spills). Limited capacity to proactively manage high-risk issues such as agrochemical use.
- **Training Needs** – Need for capacity building in social safeguards, laboratory analysis training and agribusiness-related risks.
- **Exclusion from the MozAgribiz Program Planning** - AQUA is recognized as central to agribusiness oversight but has not been included in Program design. There is concern that compliance and enforcement will be weak if AQUA is not involved early

AQUA has a clear national mandate and presence, but lacks the financial resources, technical tools, systems, and specialized capacity required to effectively monitor and enforce environmental compliance.

B2.1.2 MozAgribiz Implementing Institutions

National Institute of Irrigation (INIR)

The engagement took place in Maputo, on March 23, 2026, with participation limited to a single INIR representative, the Director. The key issues and concerns raised were:

- **Limited safeguards capacity** - Staff numbers sufficient, but incomplete training in safeguards. Reliance on external consultants for safeguard management in projects (e.g., IRRIGA, PROIRRI).
- **External Funding Dependence** - Heavy reliance on partners for financing and capacity building.
- **Insufficient and fragmented institutional capacity building** - Projects continue to operate in isolation and there is a lack of an integrated and continuous approach to capacity development.
- **Agrochemical Risks** - Use of pesticides and agrochemicals poses high risks to biodiversity and public health.

- **Public Investment in Private Domains** – irrigation schemes typically function with state resources being directed into areas under DUATs held by individuals or associations, raising equity, transparency, and accountability concerns.
- **Regulatory Gaps for PPP Integration** - Public-Private Partnerships introduced without clear regulations, creating legal and social insecurity. Existing irrigation management regulation (Resolution 10/2010) deemed insufficient. There is a need for a specific PPP regulation.
- **Outdated technology and tools for large irrigation schemes** - Need to modernize infrastructure, monitoring systems (e.g. real-time data, drones), and operational technologies to manage large-scale schemes effectively.
- **Budget Constraints** - Insufficient funds limit travel to irrigation schemes, training, and regular monitoring.

INIR is aware of environmental and social risks but lacks the systems, capacity, and resources to manage them at scale. Safeguards remain project-driven, under-resourced, and weakly embedded into core operation, which becomes more critical as irrigation schemes expand and PPPs grow. The need for a strong central safeguards unit is urgent, particularly with the rollout of provincial delegations and the absorption of the RBL.

National Directorate of Extension (DINAE)

The engagement took place in Maputo, on March 24, 2026. A total of 5 DINAE representatives were present during the engagement session. The main issues and concerns raised were:

- **Limited Staff** – The existent staff is insufficient and existing personnel are overstretched. The mandate was expanded (to include fisheries, aquaculture) without matching capacity increase.
- **Training Gaps** – Extensionists receive basic training, but depth and consistency are limited. Limited internal expertise, and reliance on external partners for specialized training. Training is irregular and dependent on donor funding.
- **Environmental & Biosecurity Risks** - Pesticide use and agrochemicals are a key risk area. Biosecurity risks in aquaculture and livestock. Urban concentration of poultry raising ventures poses serious risks to public health risks due to high risk of zoonotic diseases.
- **Social risks and conflict potential** - Land tenure issues and risk of conflicts where land is not properly titled. Conflicts over shared resources (pastures, fisheries).
- **Social Inclusion & Gender** – There is still no formally approved gender strategy for the sector. Gender topics are not fully integrated into all activities. There is a need for stronger focus on GBV. There is no clarity regarding the existence of gender focal points at district level.
- **Resource Shortages** - Basic logistics available (motorbikes, tablets, mobile kits), but financial capacity insufficient to meet training, monitoring and field operations.

DINAE has a strong outreach system and clear mandate, but lacks the institutional systems, resources, and structured capacity needed to manage environmental and social risks consistently. Safeguards are embedded in training and extension activities but remain fragmented, under-resourced, and heavily dependent on external support, limiting effective implementation and oversight at scale.

Mozambique Agricultural Research Institute (IIAM)

The engagement took place in Maputo, on March 25, 2026. A total of 5 IIAM representatives were present during the engagement session. The main issues and concerns raised were:

- **Agrochemical Management** - Pesticides and agrochemicals require strict handling and disposal protocols.
- **Varietal Acceptance** - Improved crop varieties face risks of cultural or social rejection, limiting adoption.
- **Environmental Risks** - New varieties may pose ecological threats (e.g., invasiveness, ecosystem impacts).
- **Social Inclusion** - Efforts to integrate women, youth, and persons with disabilities remain limited, with no robust internal protocols. Gender and inclusion addressed through projects or specific initiatives, not systematically
- **Laboratory Capacity** - Labs have SOPs and incinerators for biosafety, but resources are constrained.
- **Human Resources** - Low staff turnover ensures continuity, but there is insufficient specialization in social risk management.
- **E&S Institutional capacity** - Safeguards applied in practice but not formally documented or systematized. Reliance on general standards and project requirements, not internal policies.
- **Dependence on external projects and partners** - Safeguards systems (e.g. checklists, GRMs) developed under donor projects (APPSA). Mechanisms often discontinued after project closure due to cost and lack of institutionalization.
- **Training & Funding** - Some training on E&S safeguards exists (e.g. World Bank projects), but not widespread or institutionalized. Safeguards knowledge concentrated in a few individuals (e.g. former focal points). Capacity building and protocol development depend heavily on external financing.

IIAM applies environmental and social safeguards in practice, but lacks a formalized, institution-wide system. Safeguards are fragmented, project-driven, and weakly documented, with limited internal capacity and reliance on external frameworks—constraining consistent risk management and accountability at scale.

National Institute of Fisheries and Aquaculture Development (IDEPA)

The engagement took place in Maputo, on March 26, 2026. A total of 4 IDEPA representatives were present during the engagement session. The main issues and concerns raised were:

- **Community Presence** - Strong engagement through extensionists and Community Fisheries Councils (CCPs), but coverage remains insufficient along the entire coastline.
- **Unsustainable Practices** - Continued use of harmful fishing gear and unsustainable small-scale practices.
- **Climate Vulnerability** - Coastal communities face high exposure to extreme events (storm surges, cyclones, salinization).
- **Social Risks** - Community conflicts, gender-based violence (GBV), and challenges in including vulnerable groups (women, persons with disabilities).
- **Cultural Resistance** – There is still a wide-spread reluctance to consume aquaculture fish, limiting value-chain expansion.
- **Inclusion Gaps** - Gender and disability inclusion is recognized, but focal points remain insufficient in provinces such as Sofala, Nampula, and Tete.
- **Communication Barriers** - Greater use of local languages is needed for effective climate alerts.
- **Extensionist Continuity** - Many extensionists are project-funded (PRODAPE, ProPeixe) and risk discontinuity once financing ends.
- **Financial Constraints** - Limited institutional resources to absorb extensionists permanently.

- **External Dependence** - Heavy reliance on partners (IFAD, NORAD, JICA, GAIN, Swedish Agency, etc.) for funding and capacity building.

IDEPA has a relatively strong field presence and mandate for managing environmental and social risks, but faces key constraints in capacity, system formalization, and sustainability. Safeguards rely heavily on projects, extension networks, and community structures, while gaps in staffing limit consistent and scalable implementation.

National Directorate of Forests and Wildlife (DNFFB)

The engagement took place in Maputo, on March 27, 2026. A total of 2 DNFFB representatives were present during the engagement session. The main issues and concerns raised were:

- **Confusing Hierarchy** - DNFFB reports both to the Minister and the Secretary of State, creating overlapping authority.
- **Fragmented Provincial Representation** - SPA (Department of Forests and Agroforestry Plantations) and DPDTA (Department of Forests and Wildlife) coexist without overlapping mandates, but coordination remains unclear.
- **Environmental Risks** - Deforestation, uncontrolled burning, invasion of exotic species, and sawdust accumulation in timber industries (posing fire and health hazards) were raised as environmental concerns.
- **Social Risks** - Gender-based violence linked to incoming external workers, road accidents from increased heavy traffic; unrealistic community expectations of employment were raised as social concerns.
- **Capacity Gaps** - Technical staff are predominantly forestry specialists with limited social expertise. No recent or systematic training on environmental and social safeguards. Existing staff not fully equipped to manage complex safeguards risks. The community Management Department functions as the "social arm," but lacks specialized social technicians.
- **Monitoring and enforcement systems** - Monitoring focused on forest management plans, not broader safeguards compliance. Unclear enforcement capacity after transfer of inspectors to AQUA.
- **Limited financial autonomy and sector funding concerns -** Decline in sector funding flows since transition from FDA to FNDS. Lack of transparency on how forestry revenues are redistributed
- **Insufficient financial and logistical resources -** Irregular monitoring (only conducted when project finding is available) due to lack of funds and transport. Shortage of vehicles, fuel, equipment and other operational means, especially at decentralized levels. Financial constraints limit joint inspections and intersectoral coordination.
- **External Dependence** - Heavy reliance on project funding MozRural, MozNorte, GEF) for field activities, training, resources, and operational means.
- **Information Systems** - Use of the Forest Information System (SIF) and satellite imagery to monitor deforestation and fires, but lack of tablets or modern field tools.

DNFFB has strong technical expertise in forestry and environmental management, but faces structural and systemic gaps in governance clarity, safeguards systems, capacity, and financing. Safeguards—especially social aspects—remain informal, under-resourced, and project-dependent, limiting effective risk management, monitoring, and accountability across operations.

National Directorate of Agricultural Health and Biosafety (DINASAB)

The engagement took place in Maputo, on March 31, 2026, with participation limited to a single DINASAB representative. The main issues and concerns raised were:

- **Decentralized Structure** - Vertical communication failures delay outbreak notifications, as reports pass through multiple layers before reaching the central level.
- **Provincial Focal Points**, often lack specialized training, weakening technical quality.
- **Recurring Outbreaks** - Foot-and-mouth disease, lumpy skin disease, anthrax, and bovine tuberculosis remain persistent.
- **Vaccine Shortages** - Mandatory vaccines have not been produced locally for two years; external debts blocked imports, increasing vulnerability.
- **Biosecurity Risks** - Importation of uncertified animals and seeds raises the risk of pests and diseases.
- **Agrochemical Misuse** - Inadequate oversight of pesticide use; unsafe disposal of packaging is common.
- **Weak Filed Presence and Monitoring** - Monitoring and surveillance are irregular and unsystematic. Heavy reliance on reports from districts, with limited ability to verify data in the field. No inspectors at community level, thus dependent on extension workers, who receive basic training on pesticide handling and packaging disposal but cannot perform field-level analysis
- **Emergency Protocols** - No clear procedures for environmental emergencies (chemical spills, floods).
- **Community Resistance** and reluctance to report outbreaks due to fear of movement restrictions and income loss.
- **Compensation Gaps** - Regulations foresee indemnities for sanitary culling, but these are not implemented due to lack of resources.
- **Training** - Safeguards and technical training are irregular and project-dependent. Provincial staff require continuous updates. DINASAB is not always directly involved in extension workers' training or preparation of training materials.
- **Human Resources** - Insufficient staff, worsened by reforms without replacement and mobility policies that shift gaps across sectors.
- **Laboratory Capacity** - Seed and veterinary labs exist but have limited ability to conduct environmental analyses.
- **Logistical Constraints** - Vehicles in poor condition, scarce fuel and inadequate equipment. Epidemiological surveillance should be continuous but is irregular due to resource shortages.

DINASAB faces system-wide operational constraints. Technical knowledge exists, but institutional capacity, resources, coordination and systems are weak, resulting in a limited ability to prevent and respond to sanitary risks, weak control over agricultural inputs and diseases spread and significant gaps in environmental and social risk management.

National Directorate of Agriculture (DINAG)

The engagement took place in Maputo, on April 1, 2026, with participation limited to a single DINAG representative. The main issues and concerns raised were:

- **Institutional Overlap** - Duplication of functions between DPAP and SPAE at provincial level creates confusion and divergent interpretations. Legislative gaps leave responsibilities unclear, opening space for mandate conflicts.
- **Agricultural Expansion** - Increased production drives higher use of chemicals and inputs, with risks of soil and water contamination. Introduction of new varieties may

bring pests and diseases. Sensitive areas such as riverbanks and habitats require greater attention.

- **Labor Risks** - Expansion of production can lead to misuse of labour, including child labour.
- **Land Inequality** - Women and youth—especially girls—face greater barriers in securing land titles.
- **Land Conflicts** - Potential for overlapping claims and disputes, often benefiting the same groups repeatedly.
- **Weak central oversight of implementation** - Heavy reliance on provincial reporting. The central level has limited visibility of what happens on the ground.
- **Human Resources** - Insufficient staff to cover all thematic areas; generalist technicians must assume multiple roles.
- **Safeguards Training** - Environmental and social safeguards training has been sporadic and irregular; Most staff have no formal training in environmental and social risk management; knowledge comes through on-the-job exposure.
- **Coordination Challenges** - Low staff turnover, but internal mergers and redistributions have complicated coordination.
- **Consultation Limitations** - Community consultations should be continuous but are often constrained by pre-determined decisions from partners.
- **Capacity Constraints** - Technical expertise exists, but logistical and financial resources remain limited.

DINAG shows strong technical awareness about E&S risks, but weak institutionalization of safeguards, with major gaps in mandate, systems, staffing, and formal procedures, compounded by significant resource and logistical constraints.

B2.2 Provincial Level Institutional Stakeholders

B2.2.1 Environmental and Social Risk Management Institutions

Provincial Directorate of Territorial Development and Environment (DPDTA) of Sofala

The engagement was conducted via a virtual meeting, that took place on April 2, 2026. A total of 6 representatives from the Sofala DPDTA participated in the engagement session. The main issues and concerns raised were:

- **Mandate Overlap** - Duplication of responsibilities between DPDTA and SPA in environmental licensing (Categories B and C), creating confusion and duplication for proponents.
- **Fragmented Databases** - Each institution maintains separate records without integration, hindering management and transparency.
- **Revenue Sharing Issues** - Licensing revenues are sent to the Treasury, but the 40% return share has not been disbursed, causing institutional frustration.
- **Outdated Land Use Plans** - DPDTA prepares district land use and environmental zoning plans, but about 70% remain outdated. Updates rely heavily on external funding (e.g., Centro Terra Viva, Ministry, NGOs). Plans are critical for guiding agricultural and industrial expansion yet practice often diverges from planning.
- **Mining Conflicts** - Separate mining cadastre from land cadastre creates conflicts and environmental risks, as mining concessions often bypass community consultation.
- **Limited Oversight** - DPDTA lacks control over environmental licenses issued by SPA and has restricted access to documents. It participates in public consultations and

technical commissions but does not have direct access to ESMPs or EIAs approved by SPA.

- **Monitoring Constraints** - Monitoring is constrained by lack of equipment (GIS, monitoring tools, transport) and laboratory capacity (especially for soil and air), slow results, and insufficient tools for real-time decision-making. Collaboration with CHAEM exists, but water test results take up to seven days, undermining immediate response.
- **Social Safeguards** - Limited capacity to supervise social impacts (child labor, gender, GBV), having to rely on coordination with Labour and Gender Directorates.
- **Human Resources** - Staff available but lack training in strategic environmental assessment and GIS.
- **Outdated Equipment** - No licensed GIS software. IT equipment is outdated or obsolete.
- **Budget Shortfalls** - Insufficient funds to cover all activities; many actions depend on NGO or partner support.
- **Logistical Needs** - Urgent requirement for vehicles and motorcycles to enable district-level fieldwork.

DPDTA operates in a highly constrained and fragmented system, where overlapping mandates, weak data systems, under-resourcing, and limited technical capacity significantly undermine effective environmental governance, land use planning, and enforcement in a context of growing development pressures.

Provincial Services of Environment (SPA) of Sofala

The engagement took place in Beira (Sofala), on April 6, 2026. A total of 4 SPA representatives were present during the engagement session. The main issues and concerns raised were:

- **Fragmented mandates and lack of coordination** - Parallel environmental licensing systems (DPDTA vs SPA) with no coordination or data sharing, creating duplication, legal ambiguity, and loss of central oversight.
- **Severe resource and logistical constraints and weak monitoring** - Lack of vehicles, equipment, and operational budgets limits field monitoring; monitoring reduced to two visits over 5 years, linked to licensing milestones, often funded by proponents
- **Weak information and data management systems** - Reliance on Excel-based, non-integrated systems, limited data access, no centralized digital platform, and difficulty retrieving or sharing information.
- **High cost barriers to environmental licensing** - Costs of EIAs and licensing fees discourage compliance, leading to informality and incomplete licensing uptake.
- **Limited technical tools and specialized capacity** - Although staff are trained, they lack equipment (e.g., water/soil testing kits) and need further training, especially in social aspects and agribusiness risks.
- **Weak district-level capacity and access constraints** - Districts lack technical capability for EIA processes, requiring provincial intervention. Poor infrastructure and accessibility further limit outreach and supervision.
- Underdeveloped grievance and feedback mechanisms - GRM systems are basic, manual, and rarely used, with no systematic tracking or feedback to complainants.
- **Risk arising from agricultural intensification and unsustainable agricultural practices** - Significant impacts from agrochemical use, erosion, sedimentation, and emissions, exacerbated by limited extension support and poor access to technology.

- Limited integration of social considerations in EIAs - Need for stronger attention to vulnerable groups, social risks, and livelihoods, with identified gaps in training and safeguards coverage.
- **External Dependence** - Reliance on universities and other departments for specialized analyses.
- **Misalignment between external programs and regulatory systems** - External financing programs tend to prioritize support to beneficiaries (e.g., producers and value chains) while overlooking the strengthening and functioning of the licensing and regulatory system, resulting in increased risks of non-compliance and weakened oversight.

SPA Sofala operates with formal technical mandate but limited operational capacity, constrained by resource shortages, fragmented institutional arrangements, weak monitoring systems, and high compliance costs, which together undermine effective environmental oversight and risk management in a challenging agribusiness context.

National Agency for Environmental Quality Control (AQUA) –Provincial Delegation of Sofala

The engagement took place in Beira (Sofala), on April 8, 2026. A total of 7 AQUA delegation representatives were present during the engagement session. The main issues and concerns raised were:

- **Severe operational and equipment constraints** - Lack of vehicles (only one vehicle in good condition), fuel, GPS, field kits, and especially laboratory equipment, with most activities constrained by insufficient operational budget.
- **Absence of laboratory capacity** - No in-house laboratory. Reliance on external partners (CHAEM, Maputo labs), with delays (up to a month) limiting timely enforcement and decision-making.
- **Weak and irregular monitoring system** - Monitoring is largely document-based, reactive, and complaint-driven, with limited field verification due to resource constraints.
- **Overdependence on project proponents for data and audits** – Monitoring/inspections relies on reports and audits financed by proponents, creating risks for independence and data reliability.
- **Coordination Weakness** - Interaction with SPA and DPDTA exists but is mostly documentary, with limited practical articulation**.**
- **Fauna Oversight** - Enforcement gaps outside conservation areas, as ANAC's mandate is limited to conservation/protected areas.
- **Legal and regulatory gaps in key areas** - Some areas (e.g., fauna outside conservation zones, corporate social responsibility) lack clear legal enforcement frameworks.
- **Limited integration of social safeguards enforcement** - social aspects (labour, community benefits) are only partially enforced and often depend on voluntary compliance or local monitoring.
- **Municipal Coordination** - Informal and often ineffective. Final decisions depend on municipal presidents, who do not always act.
- **Territorial Coverage** - Oversight is weak in remote areas.

Sofala AQUA's effectiveness is constrained by severe resource and laboratory limitations, weak monitoring systems and fragmented coordination, resulting in a system that is largely reactive, document-based, and dependent on other institutions and external actors.

Provincial Directorate of Gender, Children and Social Action (DPGCAS)

The engagement took place in Beira (Sofala) on April 8, 2026. A total of 6 DPGCAS representatives were present during the engagement session. The main issues and concerns raised were:

- **Severe resource and logistical constraints** - Limited transport, operational funding, equipment, and infrastructure significantly restrict service delivery, field response, and case follow-up.
- **Understaffing and limited specialized capacity at district level** - Very few technicians per district (often 1–2) with generalist profiles, limiting effective coverage across child protection, gender, and social action.
- **Gaps in response systems due to financial and logistical barriers** - Case management and judicial processes are often affected by transport costs, court fees, and logistical challenges, leading to delays or incomplete follow-through.
- **Weak mechanisms for migrant and seasonal workers** - No specific systems to address vulnerabilities of migrant or seasonal agricultural workers, relying instead on general referral mechanisms.
- **Sociocultural factors reinforcing vulnerability** - Practices such as child labour, gender inequality, and informal dispute resolution persist and undermine formal protection systems.
- **Inadequate infrastructure and support for coordination mechanisms** - Key structures, such as GBV multi-sectoral mechanisms lack stable funding and basic resources (offices, internet, equipment), limiting effectiveness.
- **Dependence on external partners for key functions** - Critical areas (e.g., emergency response, GBV, child protection) rely on donor and partner support, with gaps where such support is absent.
- **Gender-Based Violence (GBV)** - Psychological violence predominates, followed by physical and sexual. GBV cases in seasonal agricultural labour may reach the Directorate, but follow-up is limited.
- **Need for Support Centres** - Dedicated facilities are needed to support women's empowerment and elderly care. While the directorate has identified a building and land in Beira suitable for this purpose, implementation is constrained by lack of funding.

DPGCAS operates with broad mandate and functional coordination mechanisms, but its effectiveness is constrained by severe resource limitations, weak institutionalization, limited district capacity, and reliance on informal systems and external support, reducing its ability to systematically protect vulnerable groups at scale.

B2.2.2 MozAgribiz Implementing Institutions

National Institute of Fisheries and Aquaculture Development (IDEPA) – Sofala Delegation

The engagement was conducted via a virtual meeting, that took place on March 31, 2026. A total of 6 representatives from the Sofala Delegation of IDEPA participated in the engagement session. The main issues and concerns raised were:

- **Institutional Role** - IDEPA acts as facilitator and mediator but lacks direct sanctioning power. Inspections are advisory, focused on compliance guidance rather than enforcement.

- **Economic vulnerability of small producers undermines compliance** - Obtaining DUATs and environmental licenses is costly and bureaucratic, especially for small community producers. Communal assets complicate regularization, with processes sometimes taking up to five years.
- **High environmental and climate risks with limited mitigation capacity -** Persistent use of harmful fishing gears (*chicocota*, beach seine) in artisanal fisheries, mangrove degradation and erosion, climate shocks (cyclones, floods, droughts). These are difficult to manage due to capacity and socioeconomic constraints.
- **Significant social risks linked to livelihoods and informality** - Child labour and gender inequality in fisheries, workers from artisanal fisheries often remain outside social security registration.
- **Land Use Conflicts** - Tensions between aquaculture and agriculture, particularly over water use.
- **Tension between investment promotion and safeguards compliance** - Lengthy procedures and strict requirements risk delaying or losing investments, creating pressure to balance compliance with economic objectives.
- **Capacity gaps in ES risk management and tools** – Limited technical equipment (e.g., water quality monitoring tools) and operational resources (transport, field support)

IDEPA operates mainly as a facilitator within a complex, multi-agency system, but its effectiveness is constrained by limited enforcement authority, burdensome licensing processes, high environmental and social risks, and significant resource and capacity constraints, particularly affecting small-scale producers and frontline implementation.

Mozambique Agricultural Research Institute (IIAM) – Central Region Delegation

The engagement was conducted via a virtual meeting, that took place on April 1, 2026, with participation limited to a single IIAM Regional Delegation representative, the Director. The main issues and concerns raised were:

- **Absence of formal safeguards systems** - No formal procedures, tools, or protocols for environmental and social risk management. Environmental and social risks are considered indirectly, but not part of the core mission. Managed on an ad hoc basis, often when issues arise. Safeguards knowledge mainly built through donor-funded projects, but staff have been unevenly exposed. There is some knowledge, but it is not institutionalized or standardized.
- **Structural challenge in agricultural model** - Heavy reliance on deforestation-driven agriculture (especially among smallholders). Lack of transition to sustainable systems (e.g. agroforestry) threatens long-term viability.
- **Key environmental risks** - Deforestation for smallholder farming is reducing ecological diversity significantly. Excessive use of fertilizers and inputs is contaminating rivers. Hydric erosion and siltation of waterways is affecting communities.
- **Climate Vulnerability and Stress** - Recurring cyclones, floods, droughts, and strong winds are affecting smallholder farmers disproportionately. Saline intrusion and water scarcity linked to climate change are threatening crops such as rice and maize. Environmental shocks lead to secondary social risks (food insecurity, school dropout, increased burden on women).
- **Social Risks** – Lack of formal tools to monitor child labour or precarious seasonal work and interventions remain informal. Severe cases are referred to authorities, when encountered, but in general, multisectoral collaboration with Social Action and Labour sectors is rare.

- **Knowledge Gaps** - Projects like APPSA and AGRA raised awareness and trained staff, but practices were not institutionalized, risking loss of accumulated knowledge.
- **Resource and infrastructure constraints -** Lack of financial resources, modern equipment, and infrastructure. Need for modern technologies (drones, GPS, irrigation systems, lab equipment).
- **Human resource gaps** - No new staff recruitment for several years. Declining workforce due to aging technicians going into retirement. Risk of overburdening existing staff and reduced effectiveness.

IIAM central Region Delegation has no formal systems, clear mandate, and institutional capacity to manage environmental and social risks. Safeguards incorporation remains informal, project-driven, and weakly coordinated. Resource constraints and structural reliance on unsustainable agricultural practices, in a context of growing climate shocks and environmental impacts were brought up as limiting effective long-term risk management and resilience.

Department of Forests and Wildlife (DFFB) – Under the Provincial Directorate of Territorial Development and Environment of Sofala

The engagement was conducted via a virtual meeting, that took place on April 2, 2026. A total of 2 representatives from the Sofala DFFB participated in the engagement session. The main issues and concerns raised were:

- **Unclear institutional roles and decentralization gaps** - DFFB no longer has a licensing role and is waiting for clarity under the new decentralization law. Current role is limited to monitoring, reforestation, and advisory functions, with licensing handled by SPA. In practice, processes often bypass DFFB, with operators going directly to SPA. Forest exploitation often occurs without clear inter-agency coordination (SPA, DFFB, AQUA).
- **Limited enforcement power** - DFFB focuses on sensitization and monitoring, while enforcement (fines, sanctions) lies with AQUA. Environmental compensation (reforestation) is promoted but not strongly enforced. Sanctions exist but are applied inconsistently.
- **Weak integration in project approval and planning** - DFFB is usually consulted late in the process, often only to provide a technical opinion. Lack of multisectoral pre-inspections and integrated assessments before land allocation. Limited involvement in DUAT processes and land-use decisions.
- **Severe operational and resource constraints** - Major limitations in transport, fuel, and per diems, restricting fieldwork. Shared vehicles across departments significantly constrain mobility. Budget is centralized and not allocated per department, limiting planning and execution. Only about 40% of annual targets achieved due to these constraints.
- **Weak monitoring coverage -** Monitoring of projects and community forests is irregular and constrained by logistics. Some areas and planned activities cannot be reached or completed
- **Limited human resources and technical capacity** - Very small technical team (5 staff) with limited specialization. Gaps in key areas such as inventory, fauna management, and technical field capacity.
- **Key challenges and risks -** Agricultural expansion drives deforestation without adequate compensation measures. Despite strong emphasis on agroforestry and reforestation, progress is constrained by the lack of funding and inputs to support community forestry and reforestation and climate variability which reinforces

unsustainable practices (shifting cultivation). Farmers tend to prioritize short-term gains over long-term sustainability

DFFB has a clear technical role in monitoring and promoting sustainable forest management, but operates with limited authority, weak integration in decision-making, and severe resource constraints. Combined with fragmented institutional coordination, weak enforcement, and low incentives for communities, this significantly limits the ability to influence land-use practices and ensure sustainable forest management in the context of expanding agriculture.

Provincial Directorate of Agriculture and Fisheries (DPAP) of Sofala

The engagement took place in Maputo, on April 8, 2026. A total of 4 DPAP representatives were present during the engagement session. The main issues and concerns raised were:

- **Institutional Overlap and Weak Inter-Institutional Coordination** - Overlapping mandates with SPAE and others lead to duplication, inconsistent guidance, and confusion for companies. Companies are inspected by both institutions and often receive conflicting guidance. Coordination exists but is inconsistent and sometimes informal. Multi-sectoral work depends on ad hoc collaboration rather than structured systems.
- **Top-down project design and weak local adaptation** - Projects designed centrally with limited input from provincial/operational levels. Misalignment between project requirements and local realities.
- **Limited technical tools and infrastructure** - Lack of laboratories (soil, water, food testing) severely constrains risk assessment and monitoring. The phytosanitary inspection post at the port is debilitated, increasing the risk of substandard products entering the country.
- **Monitoring and compliance gaps** - Environmental and social plans often exist but are not fully implemented. Weak enforcement allows non-compliance by companies (e.g. delayed licensing, incomplete safeguards). Limited ability to verify compliance due to resource and capacity constraints.
- **Key environmental risks insufficiently managed** - Major risks include pesticide misuse and unsafe agrochemical imports (red-label), soil degradation (worsened by agricultural expansion into forests) and salinization (especially in areas such as Buzi and Dondo), pressure on water resources and proximity to water bodies as farmers encroach on water sources without respecting legal buffer zones. Lack of data, tools and systematic monitoring limits evidence-based management. Climate risks are identified (floods, droughts, cyclones), but mitigation measures often not implemented. Weak enforcement due to costs and limited monitoring capacity.
- Social risks and cultural challenges - Persistent issues are harmful social practices (e.g. early marriage, gender inequality in labour roles), community resistance to enforcement actions. Sensitive context makes enforcement difficult, reinforcing reliance on sensitization.
- **Emerging structural risks in the sector** - Youth disengagement from agriculture, threatening long-term sustainability. Weak integration of agribusiness/market skills for producers.
- **Extension system as both strength and constraint** - Strong reliance on extensionists as frontline interface with communities. However, system is stretched and requires continuous training and support.
- **Resource and logistical constraints** - Severe shortage of vehicles, equipment, and operational means. Limited capacity for field presence, monitoring, and follow-up.

- **External Dependence** - Inclusion of gender and social safeguards depends on external programs (e.g., SUSTENTA), not on DPAP's own regulations. Reliance on norms and manuals from external funders (World Bank, FAO, etc.), creating contradictions and weak harmonization with national legislation.

DPAP plays a central role in managing agribusiness risks at provincial level but operates in a fragmented, resource-constrained, and donor-driven environment. Safeguards are heavily dependent on donor standards (World Bank, FAO), leading to weak harmonization with national systems. Weak enforcement, limited technical infrastructure (especially laboratories), overlapping mandates, and reliance on sensitization undermine effective safeguards implementation. At the same time, growing environmental pressures, social challenges, and structural shifts (e.g. youth exit from agriculture) increase the urgency of strengthening systems, coordination, and local capacity.

Provincial Services of Economic Activities (SPAE) of Sofala

The engagement took place in Maputo, on April 9, 2026. A total of 4 SPAE representatives were present during the engagement session. The main issues and concerns raised were:

- **Institutional Transition** - SPAEs are in the process of being dissolved, pending approval of legislation by Parliament. Lack of clarity in terms of staff redeployment and future roles and mandates on functions related to State oversight at provincial level, with risks of institutional fragmentation and loss of continuity.
- **Mandate Overlap** – Confusing structure and overlapping functions with DPAP and other provincial directorates, generating institutional conflicts.
- **Multisectoral Enforcement and weak inter-institutional coordination** - SPAE's inspection activities are often deployed with the involvement of multiple institutions (agriculture, environment, health, INAE, and police). However, coordination is done on a case-by-case basis and often reliant on informal channels, leading to difficulty in mobilizing technical staff and delays in enforcement actions.
- **Gaps between legal framework and practice** - Strong legal framework exists, but implementation is inconsistent due to capacity and resource constraints. Small-scale farmers often lack awareness of legal standards and the capacity to comply (e.g. agrochemical handling), frequently resulting in improper use of pesticides and agrochemicals.
- **Limited operational resources and infrastructure** - Technical capacity for inspection and enforcement exists, but human and logistical resources are insufficient. Lack of laboratories (phytosanitary, soil analysis). Severe shortages of basic equipment, IT tools, internet, and vehicles. No investment budget for several years, affecting performance
- **Limited monitoring capacity** - Monitoring depends on district and provincial levels with resource constraints. Periodic monitoring is legally mandated but not consistently carried out due to lack of means.
- **Climate and production risks** - High exposure to extreme climate events (floods, droughts, cyclones). Need for better integration of climate advisory systems into practice.
- **Key environmental risks** - Deforestation and uncontrolled burning identified as the most severe and persistent threats. Environmental hazards from fertilizer spills and expired products is also concerning.
- **Human–Wildlife Conflict** - Cases such as elephant incursions in Nhamatanda, difficult to balance between conservation and food security.

- **Key Social Risks** - Gender-based violence, early marriage, and child labour identified and addressed through multisectoral coordination.
- **Project-based approaches to safeguards** - SPAE has no direct responsibility for environmental and social safeguards. Its role is partial and sector-specific (e.g. agrochemicals). Safeguards mainly handled through projects (IRRIGA, SUSTENTA) rather than institutional systems and are not embedded from the outset leading to be regarded as add-ons rather than core requirements
- **Capacity and training gaps** - Need for updated technical training, including new technologies and irrigation management. Limited access to international exposure and learning opportunities. Safeguards training has been done under projects such as IRRIGA and SUSTENTA, but requires continuous updating.
- **Operational and Resource Constraints** - Technical capacity for inspection and enforcement exists, but human and logistical resources are insufficient.

SPAE operates within a fragmented and uncertain institutional context, with limited direct mandate, weak coordination systems, and significant resource constraints. While legal frameworks and project-based safeguards exist, implementation is inconsistent and heavily dependent on multi-sectoral coordination, limiting effective and sustained risk management at scale.

Department of Forests and Agroforestry Plantation (DFPA) – Under the Provincial Services of Environment of Sofala

The engagement was conducted via a virtual meeting, that took place on April 10, 2026. A total of 4 representatives from the Sofala DFPA participated in the engagement session. The main issues and concerns raised were:

- **Institutional and coordination complexity** - Fragmentation of responsibilities (DFPA, DPDTA, AQUA, SDAE) creates complexity. Some confusion among operators on where to submit requests. In some provinces, charcoal/firewood licensing is handled by DPDTA, but in Sofala it is exclusively under DFPA/SPA. Coordination exists but is largely operational and case-by-case
- **Severe resource and logistical constraints** - Strong limitations in transport, fuel, and operational budget. Planned monitoring not achieved (6 planned vs. ~2 actual visits/year). Some areas remain effectively out of reach due to distance and lack of means.
- **Limited monitoring and enforcement capacity** - Monitoring often relies on company self-reports rather than systematic field verification. DFPA has a mixed role (monitoring/licensing) but enforcement depends mainly on AQUA. Limited capacity to conduct regular and independent oversight.
- **Dependence on project-based and partner support** - Reduced availability of inputs (seedlings, materials) after closure or scaling down of programs. Activities such as community forestry and beekeeping constrained by irregular funding.
- **Weak access to technology and data systems** - No direct access to GIS, satellite imagery, or remote sensing tools at provincial level. Dependence on central-level support (DNFFB) for technical data and analysis.
- **Revenue Sharing** - No legal instrument regulates the return of a percentage of provincial fees from the Treasury. Only the 20% earmarked for communities is returned. Revenue sharing via SISTAFE is legally mandated but often delayed.
- **Weak decentralized capacity** - District-level services (SDAE) lack resources and inputs, despite having staff. Extensionists play a role but operate under significant capacity constraints.

- **Challenges in community-based management systems** - Community management plans are outdated and need revision. Limited capacity to monitor and support community forestry consistently.
- **Community Agreements** - Terms of responsibility between communities and operators include social commitments (schools, desks, etc.), but compliance is inconsistent.

DFPA has a clear mandate in licensing and forest management but operates with severe resource, technical, and system limitations. Weak monitoring capacity, limited access to data and tools, reliance on central support, and fragmented institutional arrangements constrain effective oversight of agro-forestry activities, particularly in a context of large distances, limited funding, and evolving regulatory frameworks.

B2.3 District Level Institutional Stakeholders

District Services of Health, Women and Social Action (SDSMAS), District Services of Planning and Infrastructure (SDPI), District Services of Economic Activities (SDAE) of Dondo

The engagement took place in Dondo town, on April 9, 2026. A total of 13 people participated comprising technicians and directors from SDSMAS, SDPI and SDAE. The main issues and concerns raised were:

- **Mining & Soil Exploitation** - Severe environmental impacts from unregulated mining and soil extraction have been affecting communities. Lack of corrective measures leads to erosion, fatal accidents, and river pollution affecting farms and ecosystems.
- **Land Conflicts** - Disputes between mining companies and farming communities, with inadequate compensation or resettlement. Compensation and commitments agreed during DUAT-related community consultations not always fulfilled.
- **Persistent Social Issues** - Gender-based violence, child exploitation, early unions, sexual abuse of minors, domestic violence, and school dropout among girls are prevalent and often worsened by climate impacts and displacement. Child labour is common in smallholder farms, perceived as family support but still problematic. Social risks are addressed mainly through sensitization rather than enforcement.
- **Severe resource and logistical constraints** - Lack of transport, fuel, and operational budget severely limits fieldwork and response capacity. Planned monitoring (e.g. quarterly) often not implemented due to lack of means. District teams depend on provincial or central entities for vehicles, equipment, and laboratory support, which reduces responsiveness and leaves many irregularities unresolved.
- **Limited community outreach and response due to lack of resources -** District services lack dedicated vehicles for social protection and inspection activities. The only available ambulance is reserved for medical emergencies, leaving child protection, trauma response, and community mental health cases unattended. In some cases, staff use personal resources to respond to emergencies. The same applies to the other sectors (SDAE, SDPI), who also experience difficulty in reaching communities for consultations due to lack of transport and logistical means, resulting in reports, sometimes being issued without proper field verification.
- **Limited technical tools and infrastructure -** No local laboratory capacity for water, soil, or environmental testing. There are no adequate tools for sample collection (e.g., water quality, soil analysis) nor portable testing kits capable of providing immediate results in the field. Simple or improvised methods used (e.g. water samples in drinking water bottles). Inspections rely primarily on empirical observation rather than reliable laboratory measurements.

- **Limited authority and weak decentralized enforcement of environmental compliance** - District institutions have limited power to enforce compliance or sanction operators. They only monitor and report to provincial/national levels. Even when irregularities (erosion, unfilled pits, land conflicts) are identified and/or perpetuated, corrective measures cannot be enforced locally. Strong need for greater decentralisation of authority.
- **Lack of access to safeguards documentation and information** - Post-approval feedback from provincial and national levels is seldom provided to district entities. District services often do not receive EIA reports or ESMPs and it is common for companies to avoid or resist sharing compliance documents (ESMPs) with district institutions. This creates blind spots for monitoring and weak accountability.
- **Capacity and training gaps** - Need for systematic training on environmental and social safeguards. Safeguards practices exist but are not structured or consistently applied.
- **Gaps in environmental and social risk management** - Key risks identified are related to mining impacts (erosion, open pits, accidents, pollution), loss of agricultural land and weak compensation, water pollution from riverbank excavation, climate risks (droughts, floods, cyclones). Some impacts remain unresolved over time (e.g. unreclaimed mining areas).
- **Reliance on project-based safeguards systems -** Good practices promoted by Projects like SUSTENA (e.g. safeguards screening, GRM) were widely implemented during project lifecycle but have not been institutionalized after project closure.
- **Weak grievance and feedback mechanisms** – District-level grievance systems remain weak, with no structured or trusted channels in place. Existing tools such as complaint boxes are largely unused due to concerns over confidentiality and lack of trust. Complaints are instead routed informally through community leaders or submitted directly via letters to the Administration, District Services, or Provincial Governor, or formally lodged with the District Public Prosecutor's Office. Workers, involved in public works, often refrain from filing formal complaints due to fear of losing jobs.

District services play a frontline role in managing environmental and social risks but operate with very limited authority, resources, and access to information. Weak coordination with higher levels, lack of monitoring tools, and dependence on project-based systems undermine effective oversight, while significant environmental (especially mining-related) and social risks remain insufficiently managed at local level.

Annex C — Methodology and Limitations

C1 Methodology

C1.1 Approach and Design

The methodology combined qualitative and quantitative techniques to assess the legal framework, institutional capacity, stakeholder engagement, and system performance in environmental and social risk management. The research was structured around three complementary components, as indicated below.

C1.1.1 Document Review

This encompassed the analysis of available documentation and secondary data relevant to the assignment. This included the examination of:

- The MozAgribiz Concept Note and Aide Memoirs from the Identification and Preparation Missions. Until the time of conclusion of the ESSA report the PAD was not available;
- The organic statues of MAAP;
- The legal and institutional framework for environmental and social management,
- National strategies and sectoral plans in agriculture;
- Environmental and Social Systems Assessments (ESSAs) for other PforRs;
- Environmental and Social Risk Management (ESRM) assessments conducted by the World Bank; and
- Recent Environmental and Social Impact Assessment (ESIA) documentation for agribusiness projects in Mozambique.

This review provided the foundation for identifying gaps, inconsistencies, and priority areas requiring closer investigation during fieldwork. To strengthen the analysis, the research team requested all participating institutions to submit supplementary documentation supporting the tendencies observed through qualitative methods. These materials included training reports, monitoring reports, templates of instruments used for environmental and social risk identification and monitoring (such as screening forms and checklists), human resources reports, and documentation on activity planning and budgetary allocations. However, submissions were inconsistent, with only three institutions partially providing the requested documentation in time to be incorporated into the analysis.

C1.1.2 Primary Data Collection

The primary data collection was carried out to generate firsthand insights into the operational environment and to validate the findings emerging from the desktop review. Given the geographical and administrative scope of the corridors, the exercise was implemented through a targeted geographic and institutional sample and using the data collection tools, respectively detailed in sections C1.2 and C1.3 below.

In order to avoid raising expectations at this early stage, no direct engagement was undertaken with communities along the corridors. Instead, the data collection focused exclusively on public institutions and relevant government stakeholders, ensuring that the information gathered reflects institutional perspectives and operational realities.

C1.1.3 AI-Assisted Systematization and Text Optimization

Artificial intelligence tools were applied to organize, classify, and synthesize large volumes of qualitative data (interview and focus group transcripts). This allowed for faster identification of recurring themes, improved consistency in coding, and the creation of comparative summaries to support data analysis. Additionally, the text was enhanced and summarized through AI-assisted editing to ensure clarity and consistency.

All outputs generated by AI were subject to careful human review. The research team systematically verified the processed data to ensure accuracy, consistency, and alignment with the original source material. This step was essential to avoid deviations, misinterpretations, or distortions in the systematization process.

AI was therefore used as a supporting instrument, while the final interpretation and conclusions remained under the responsibility of the research team.

C1.2 Geographic and Administrative Sampling

Given that the ESSA emphasizes system-level analysis and considering the various Program activities will be carried out by different MAAP subordinate institutions, primary data collection will be concentrated at the central level and on selected implementing entities. Priority was assigned to those institutions that had been identified as implementing entities, as well as those responsible for overseeing E&S risk management within MAAP, as listed below:

- Mozambique Institute of Agriculture Investigation (IIAM)
- National Directorate of Agriculture (DINAG)
- National Directorate of Health and Biosafety (DINASAB)
- National Institute of Fisheries and Aquaculture Development (IDEPA)
- National Directorate of Forestry and Wildlife (DNFFB)
- National Directorate of Livestock (DINAP)
- National Institute of Irrigation (INIR)
- National Directorate of Fisheries and Aquaculture (DNPA)
- National Directorate of Planning and Policy (DNPP)
- National Directorate of Extension (DINAE)
- National Directorate of Land and Territorial Development (DNTDT)
- National Directorate of Environment and Climate Change (DINAMC)
- Environmental and Social Safeguards Division (under DINAMC)
- National Directorate of Human Resources (DNRH)
- National Agency for Environmental Quality Control (AQUA)

Primary data collection was also extended to the counterparts of the central institutions at both Provincial and District levels. In recognition of their relevant role in managing social risks potentially associated with the program, institutions from the labour and social action sector were also included in the sample. The entities consulted at provincial and district levels were as follows:

- Provincial Services of Environment (SPA)
- Department of Forests and Agroforestry Plantation (under SPA)
- Provincial Directorate of Territorial Development and Environment (DPDTA)
- Department of Foresta and Wildlife (under DPDTA)
- Provincial Directorate of Agriculture and Fisheries (DPAP)

- Provincial Services of Economic Activities (SPAE)
- AQUA Provincial Delegation
- IDEPA Provincial Delegation
- IIAM Regional Delegation
- Provincial Directorate of Women, Children and Social Action (DPGCAS)
- Provincial Delegation of General Labour Inspection
- District Services of Economic Activities (SDAE)
- District Services of Planning and Infrastructure (SDPI)
- District Services of Health, Women and Social Action (SDSMAS)
- Municipal services of urbanization, social action and environment

Although each corridor spans a wide geographic area and multiple districts, it was anticipated that no major variations would be observed across provinces and districts in terms of existing systems. Accordingly, a purposive sampling approach was adopted, selecting one province and one district to serve as the focus for primary data collection. Given the diversity of agribusiness clusters present, Sofala Province and Dondo District were chosen as representative sites.

A number of institutions initially included in the sample were not interviewed due to their unavailability. Specifically, some institutions never confirmed their availability despite repeated follow-ups, while in Sofala Province certain institutions could not be reached in time because communications arrived too late to allow for effective scheduling. As a result, the following institutions were left out of the assessment:

At Central Level

- National Directorate of Livestock (DINAP)
- National Directorate of Fisheries and Aquaculture (DNPA)
- National Directorate of Planning and Policy (DNPP)
- National Directorate of Human Resources (DNRH)

At Provincial Level

- Provincial Delegation of General Labor Inspection
- Municipal services of urbanization, social action and environment

C1.3 Data Collection Methods

The assessment was initially designed to draw on a combination of qualitative and quantitative tools to ensure a comprehensive understanding of institutional practices, capacities and challenges. The data collection instrument, initially designed, included:

- **Semi-structured interviews with key informants at central level and in Sofala Province**, allowing for in-depth exploration of mandates, institutional arrangements and implementation dynamics.
- **Focus group discussions with government officials at district level**, facilitating collective reflections on practices, constraints and opportunities across administrative levels.
- **A structured questionnaire administered remotely** to relevant provincial departments, designed to capture comparable data on capacity, systems performance and resource conditions.

The questionnaires were completed and submitted by only a small number of institutions. Out of the expected 59 questionnaires, only 9 were submitted, which limited the availability of quantitative and comparable information for analysis.

C1.4 Data Analysis

The systematization and analysis of data were conducted with due consideration of the core principles set out in the Program-for-Results Financing Environmental and Social Systems Guidance Note (World Bank, 2019).

The analysis was initially envisaged to combine qualitative and quantitative approaches to ensure a comprehensive understanding of institutional practices, capacities, and challenges. However, the limited number of questionnaires and other quantitative secondary data requested submitted constrained the statistical robustness of the findings, resulting in reliance on qualitative evidence.

All interviews and focus group discussions were recorded and subsequently transcribed to ensure accuracy and completeness of the information collected. The transcripts were then systematically organized according to thematic aspects, allowing the identification of recurring patterns, institutional gaps, and stakeholder concerns. AI tools supported this process by clustering responses, highlighting frequently mentioned issues, and generating comparative visualizations that facilitated thematic synthesis.

The validation of findings was carried out through systematic comparison between secondary data sources and the primary evidence collected through interviews and focus groups. AI-based text mining and pattern recognition further enhanced the triangulation process by systematically linking evidence across sources, thereby reinforcing the credibility and robustness of the conclusions. Through this process, triangulation enabled:

- The identification of systemic issues, recurring challenges, and root causes relevant to environmental and social performance; and
- The development of practical, evidence-based recommendations aligned with the program's scope, risks, and institutional context.

The primary data collection tools were also designed to align with the stakeholder consultation framework. Interviews, focus groups, and questionnaires were, therefore, not limited to gathering data on institutional context and capacity, but also served to identify and articulate the main concerns, expectations and perspectives of participants. Further details on this consultation approach are provided in Annex B.

C2 Limitations and Effect on ESSA

C2.1 Limitations

The assessment encountered some methodological and operational limitations that influenced both the scope and depth of the findings, as listed below:

- **Limited Questionnaire Submissions:** Out of the 59 structured questionnaires expected, only 9 were submitted. This low response rate restricted the availability of quantitative and comparable data, reducing the statistical robustness of the analysis.
- **Inconsistent Submission of Supporting Documentation:** Institutions were requested to provide supplementary materials such as training reports, monitoring reports, activity

planning and budgetary documentation, templates of E&S instruments, and where requested, ahead of the interviews, to populate pre-defined tables for data on human resources, intersectoral coordination and previous experience with E&S safeguards in donor funded projects. Only three institutions partially submitted this supporting documentation in time, limiting the ability to validate qualitative tendencies with documentary evidence.

- **Institutional Unavailability:** Several institutions initially included in the sample were not interviewed due to lack of availability. At central level these institutions did not confirm their availability for the proposed dates, nor suggested alternative options, despite repeated follow-ups from the Government Focal Point responsible for organizing the interviews. In Sofala Province, communications reached certain institutions too late to allow effective scheduling, which prevented their participation in the assessment. A particularly significant limitation of the assessment is that the Provincial Delegation of the General Labour Inspection, one of the key institutions, was not interviewed.
- **Institutional Scope Limitation:** Some institutions, particularly those related to water resource and basin management, such as the Regional Water Administrations (ARAs), were not initially envisaged in the sample. As a result, perspectives on water resource and basin management were not directly captured through primary data collection. To mitigate this gap, the research team drew on readily available secondary sources on the Internet to incorporate relevant insights into the analysis.
- **Stakeholder Scope:** To avoid raising expectations at an early stage, direct engagement with communities along the corridors was not undertaken. As a result, the assessment reflects institutional perspectives and operational realities but does not capture community-level views.
- **Restricted time-frame:** Taking into account the number of implementing agencies, as well as the geographic coverage and planned activities scope of the Program, the time available for conducting the assessment and finalizing the report for public disclosure, approximately 6 weeks, did not provide sufficient flexibility to accommodate the unavailability of certain institutions for interviews, nor to sustain active follow-up with institutions regarding the submission of questionnaires and supporting documentation.

C2.1 Effect on ESSA

The limitations identified had several implications for the outcomes of the study:

- The low questionnaire submission rate and limited quantitative secondary data reduced the statistical robustness of the analysis, leading to a stronger reliance on qualitative evidence. Due to the limited number of questionnaire submissions, the subnational analysis is necessarily concentrated on the Beira Corridor (Sofala Province), where semi-structured interviews and focus group discussions took place. Nonetheless, information gathered during interviews with central-level institutions confirms that the issues raised by Sofala Province and Dondo District institutions are broadly representative of the modus operandi and challenges encountered nationwide.
- The inconsistent submission of supporting documentation weakened the ability to corroborate qualitative insights with institutional records, leaving some findings less substantiated.
- The absence of certain institutions from the sample, particularly those related to livestock, fisheries, planning, and human resources, created gaps in institutional coverage. The absence of the General Labour Inspection in particular constitutes a significant gap for the findings of the ESSA. To mitigate this gap, the analysis relies on the findings from the World Bank Environmental and Social Risk Management National Overview Assessment Report, prepared in 2024.

- The exclusion of water resources and basin management institutions, specifically the Regional Water Administrations (ARAs), meant that perspectives on water resource governance were not directly captured. Although a secondary source, from 2018, was consulted to mitigate this gap, the absence of primary data constrained the analysis of updated intersectoral linkages between agriculture and water resource management.
- The lack of community-level engagement restricted the study's ability to capture social risks and concerns directly from affected populations, resulting in an emphasis on institutional perspectives.

Despite these constraints, the triangulation of primary data with available secondary sources ensured the consistency and credibility of the conclusions. Moreover, the interviews reflect the combined perspectives of various participants, providing a balanced view of institutional practices, capacities, and challenges.

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Annex E1 – Summary of Mozambican Legal and Institutional Framework Relevant to MozAgrbiz E&S Risk Management

E1.1 Constitutional and Institutional Framework

Full Name	Reference	Relevance to MozAgribiz PforR
Constitution of the Republic of Mozambique	2004 (revised 2007)	Establishes the State's fundamental obligations on ecological balance, gender equity and protection of vulnerable groups. Provides the constitutional foundation for citizens' rights to petition, participate in governance and access natural resources, all of which underpin the P4R's social inclusion and accountability architecture.
Internal Regulation of the Ministry of Agriculture, Environment and Fisheries	Ministerial Diploma 119/2025, of 8 December (Boletim da República, I Série, 235)	Defines with regulatory specificity the institutional architecture within which MAAP's E&S risk management functions are discharged at central level, including the establishment of the RSSA as the first statutory E&S safeguards unit within MAAP's organic structure. Resolves several mandate ambiguities previously identifiable only from higher-order instruments and introduces a new GRM function directly relevant to the Program's E&S management design.
MAAP Organic Statute	Resolution 4/2025, of 17 April	Establishes the legal basis for MAAP's consolidated mandate covering agriculture, environment, land, fisheries and climate. Provides the statutory foundation for DINAMC's exercise of EIA and environmental licensing functions relevant to Program sub-project screening and approval.
Internal Regulation of the Ministry of Labour, Gender and Social Action	Ministerial Diploma 80/2025, of 1 September	Formalises the institutional architecture of MTGAS, including the IGT, DNC, DNG and the GBV Prevention and Response Unit, all directly relevant to the Program's labour oversight, child protection and GBV management requirements. Revokes Ministerial Diplomas 30/2023 and 117/2015.
MTGAS Organic Statute	Resolution 5/2025, of 17 April	Establishes MTGAS as the central State organ responsible for directing policies on labour, social security, gender, social action and international organisations. Constitutes the legal basis for IGT labour inspection functions applicable to agribusiness employers in the Program corridors.
Presidential Decree creating MTGAS	Presidential Decree 8/2025, of 6 de February	Creates MTGAS as a unified ministry integrating labour and social protection functions, reducing coordination failures between social protection and labour structures that previously operated under separate institutional mandates. Directly relevant to the Program's management of child labour, GBV and seasonal labour conditions risks in the three corridors.
Strategic Plan for the Development of the Agrarian Sector (PEDSA II)	2022–2030	Provides the sectoral policy framework within which all Program investments are situated and assigns coordinating responsibilities for sector-level planning through MAAP's directorate structures. Constitutes the primary policy reference for the alignment of Program activities with national agricultural development priorities.
National Agricultural Investment Plan	PNISA	Provides the investment framework within which the P4R's results areas are embedded and against which disbursement-linked indicator achievement is assessed. Situates Program financing within the broader sectoral investment architecture managed by MAAP.

E1.2 Environmental Assessment and EIA

Full Name	Reference	Relevance to MozAgribiz PforR
Environmental Law	Law 20/97, of 1 October	The principal statutory instrument requiring environmental compliance from all agribusiness activities, establishing EIA as a mandatory precondition for the authorisation of activities with potentially significant environmental impacts under Article 24. Constitutes the primary regulatory hook for the screening and licensing of all Program sub-projects with environmental risk dimensions.
National Policy on the Environment	Resolution 5/1995	Establishes the foundational philosophy of environmental governance in Mozambique, reinforcing sustainable development and prevention principles applicable to all Program investments. Provides the policy basis against which the adequacy of the regulatory framework for Program environmental management is appraised.
EIA Regulation	Decree 54/2015, of 31 December	Establishes the four-tier screening and categorisation framework (Categories A+, A, B and C) applicable to all Program sub-projects, with Categories B and C representing the eligible range under the P4R instrument given Category A's exclusion. Article 15(5) mandates two separate rounds of public consultation for each full EIA, constituting a key procedural safeguard for Program investments.
General Directive for EIA Studies	Ministerial Diploma 129/2006	Sets out the technical standards for the preparation of environmental studies across all categories applicable to Program sub-project preparation. Approaching two decades in age, it does not fully reflect current best practices in ecosystem services valuation or inclusive participation design.
Directive on the Public Participation Process	Ministerial Diploma 130/2006, of 19 July	Establishes minimum requirements for community and stakeholder consultation during the EIA process, including the representativeness principle requiring at least twenty percent of the affected population and a five-step participatory cycle culminating in a formal Declaration of Results. Constitutes the primary procedural instrument for embedding meaningful public participation in the licensing process as a mandatory rather than discretionary step.
Environmental Auditing Regulation	Decree 25/2011	Provides the enforcement framework for monitoring compliance with environmental licence conditions applicable to Program-supported agribusiness investments post-licensing. Establishes the post-licensing compliance architecture within which AQUA exercises its inspection and audit mandate over licensed Program activities.
Environmental Inspections Regulation	Decree 11/2006	Governs field-level inspection activities applicable to all activities subject to environmental licensing, including Program sub-projects. Provides the legal basis for AQUA's field inspection mandate relevant to the Program's environmental compliance monitoring chain.
Biodiversity Offsets Instrument	Ministerial Diploma 55/2022	Establishes the principles, methodologies and procedures for biodiversity offsets within the EIA process, applicable where residual biodiversity impacts of Program sub-projects cannot be avoided or mitigated. Operationalised institutionally through the Biodiversity Offset Management Division within DINAMC under Article 95 of the RI MAAP.

E1.3 Pollution Control and Agrochemical Management

Full Name	Reference	Relevance to MozAgribiz PforR
Environmental Quality and Emission Standards	Decree 18/2004, revised by Decree 67/2010	Sets effluent discharge standards applicable to agricultural runoff and agro-industrial wastewater from Program-supported processing facilities, constituting the regulatory benchmark for pollution compliance monitoring. Must be read in conjunction with the Water Law's pollution prevention provisions for the management of cumulative water quality impacts in the Program corridors.
Pesticide Registration and Residue Levels Regulation	Ministerial Diploma 153/2002	Establishes requirements for pesticide registration and maximum residue levels applicable to Program-supported agricultural production chains, particularly relevant to food safety dimensions of value chain development.
Pesticide Management Regulation	Decree 6/2009	The most comprehensive lifecycle framework for pesticides, covering registration, trade, storage, handling, use and disposal, directly applicable to all agrochemical management obligations across Program value chains. Provides the primary regulatory foundation for a Pest Management Plan to be developed, including the lifecycle obligations applicable to smallholder and commercial producers.
Regulation on Agricultural Pesticides	Decree 27/2016	Establishes complementary licensing, training and disposal requirements for agricultural pesticides, applicable to Program-supported producers and agribusinesses using chemical inputs. Relevant to the Program's field-level pesticide safety obligations in smallholder and emergent commercial farming contexts.
Regulation on Fertilisers	Decree 38/2013	Governs fertiliser use in Mozambican agricultural systems, applicable to the increased application rates that Program input supply components are designed to support. Relevant to the assessment of soil health and water quality risks arising from Program-supported intensification of fertiliser use in the three corridors.
Hazardous Waste Management Regulation	Decree 94/2014	Defines categories and specific measures for hazardous waste applicable to agrochemical waste and agro-industrial by-products generated by Program-supported operations. Forms part of the regulatory framework for waste management obligations to be incorporated in PGAS documents for Program sub-projects.
Waste Management Regulation	Decree 83/2014	Establishes specific waste management measures for categories relevant to agro-industrial processing facilities supported under the Program. Applicable alongside Decree 94/2014 to the solid waste obligations of Program-supported anchor investors and processing facilities.

E1.4 Water Resources

Full Name	Reference	Relevance to MozAgribiz PforR
Water Law	Law 16/91, of 3 August	Establishes the foundational framework for water ownership, allocation and protection, with the exclusive water use licensing competence of the Regional Water Administrations (ARAs) under Article 18(3)(c) constituting the primary regulatory gateway for all Program irrigation and agro-industrial water abstraction. The priority rules under Article 26(1) — giving precedence to human consumption over commercial irrigation — and the

		pollution prevention framework under Chapter IV directly govern the water governance dimension of cumulative environmental risk in the Program corridors.

E1.5 Biodiversity and Natural Habitats

Full Name	Reference	Relevance to MozAgribiz PforR
Law on Protection and Conservation of Biodiversity	Law 16/2014, of 20 June, amended and republished by Law 5/2017, of 11 May	Establishes the conservation framework applicable to all entities whose activities may affect biodiversity, including agribusiness operations involving habitat conversion or agrochemical application. The law's classification of conservation areas and associated use restriction regimes is directly applicable to the biodiversity screening of Program sub-projects in the three corridors.
Regulation on Protection and Conservation of Biodiversity	Decree 89/2017 of 29 December	Operationalises the Biodiversity Conservation Law through zone classification, the buffer zone dual authorisation requirement under Articles 37(5) and (6), the mitigation hierarchy, and the compensation framework, all applicable to Program sub-project biodiversity assessment. ANAC's binding opinion under Articles 37(6) and 97(2) constitutes a legally mandatory procedural gateway for sub-projects in or adjacent to conservation area buffer zones.
Regulation on Control of Invasive Exotic Species	Decree 25/2008	Prohibits the introduction of new crop varieties, livestock breeds or aquaculture species without authorisation, applicable to Program-supported production system expansion and new species introductions in the three investment corridors. Relevant to the invasive species risk screening requirements for Program sub-projects and to the corridor-scale biodiversity risk assessment identified in the ESSA.
Regulation on Prevention of Pollution and Protection of the Marine and Coastal Environment	Decree 45/2006	Protects coastal zones, mangroves and wetlands relevant to Program sub-projects in the Beira corridor and coastal zones of the Nacala and Maputo-Limpopo corridors. Applicable to the Program's cumulative environmental risk assessment for sub-projects operating near or affecting coastal and aquatic ecosystems.
National Biodiversity Strategy and Action Plan (NBSAP)	2015–2035	Guides the integration of biodiversity conservation into agricultural development, particularly for Program sub-projects in proximity to natural habitats, riparian zones and ecologically sensitive areas. Provides the policy framework within which ANAC exercises its conservation mandate for the biodiversity screening of Program investments.
National Climate Change Adaptation and Mitigation Strategy	NCCAMS 2012	Establishes the requirements for climate-resilient and low-emission agribusiness investment consistent with Mozambique's international climate commitments, applicable to Program investment design in corridors subject to recurrent flood-drought cycles and intensifying cyclone risk. Reinforced at the institutional level by DINAMC's mandate under Article 88(1)(b)(viii) of the RI MAAP to ensure that Program activities do not increase the vulnerability of people, the economy and ecosystems to climate change.
National Determined Contribution	NDC 2021 (revised)	Defines Mozambique's Paris Agreement commitments applicable to Program-supported agribusiness investments, including the low-emission development trajectory that Program activities should be consistent with. Provides the current international climate commitment baseline against

		which the climate resilience dimension of Program sub-project design is assessed.

E1.6 Forest Resources

Full Name	Reference	Relevance to MozAgribiz PforR
Forest Law	Law 17/2023 of 29 December	The current comprehensive legal framework governing forest classification, management, licensing, compensation and enforcement, applicable to all Program sub-projects involving agricultural expansion or agro-infrastructure development on forested land. Introduces FPIC requirements for forest concession processes under Article 51(2)(c) and establishes the permanent forest heritage regime that unconditionally protects mangroves, conservation area forests and gazetted concession areas from conversion.
Forest Regulation	Decree 78/2024 of 7 November	Implementing regulation of Law 17/2023, establishing the five-tier forest zoning system applicable to Program sub-project screening, the felling licensing procedures, and the 20% community benefit distribution mechanism. Article 102(1)(f) creates the formal procedural link between forest clearance licensing and EIA requirements.

E1.7 Physical and Intangible Cultural Heritage

Full Name	Reference	Relevance to MozAgribiz PforR
Law on the Protection of Cultural Heritage	Law 10/88 of 22 December	Primary legislative instrument establishing State ownership of national cultural heritage in all its forms and imposing a classification regime requiring prior written authorisation for interventions affecting classified heritage assets. Applicable to all Program sub-projects involving earthworks or construction that may encounter classified movable or immovable cultural heritage in the three corridors.
Regulation on Archaeological Heritage	Decree 27/94 of 20 July	Establishes the mandatory pre-construction archaeological survey requirement, the 0.5% survey cost obligation applicable to Program earthworks proponents, and the statutory chance find stop-work and notification chain under Article 10. Constitutes the primary instrument of direct operational relevance to Program sub-project preparation for all infrastructure investments under Results Area 2 involving ground disturbance on previously undisturbed land.
Política Cultural de Moçambique e Estratégia de sua Implementação	Resolution 12/97 of 10 June	Establishes the State policy mandate for socio-cultural impact assessment of development projects and recognises traditional authorities, intangible heritage and community cultural practices related to natural resource use as culturally relevant dimensions of development project planning. Provides the policy basis for the Program's engagement with intangible cultural heritage dimensions that extend beyond the classified asset categories covered by Law 10/88 and Decree 27/94, including the community consultation requirements for sub-projects in corridor areas with living customary heritage landscapes.

E1.8 Land Tenure and Administration

Full Name	Reference	Relevance to MozAgribiz PforR
Land Law	Law 19/97	The cornerstone of Mozambique's land governance system, establishing DUAT rights as the instrument through which investors access land, the formal recognition of customary tenure under Article 12, and mandatory community consultation as a precondition for DUAT attribution to commercial investors under Article 13. Directly applicable to all Program sub-projects requiring community land access, and the operative legal framework against which land governance is assessed until a new Land Law enters into force.
Regulation of the Land Law	Decree 66/98	Establishes the procedural requirements for DUAT granting and registration, including the mandatory community consultation process under Article 27 constituting the primary procedural safeguard for Program land access. Together with DM 158/2011, provides the complete procedural framework for community consultation in Program DUAT processes.
Regulation on Community Authorities	Decree 15/2000	Formally recognises the role of traditional leaders and community authorities in DUAT consultation processes, providing the domestic legal basis for their participation in Program community engagement processes. Supports the practical operability of participation requirements in rural corridor communities where customary authority structures are the primary governance mechanism for land-related decisions.
Ministerial Diploma on Community Consultation in DUAT Processes	Ministerial Diploma 158/2011 of 15 June	Establishes the mandatory procedural steps for community consultation in rural DUAT processes, including the thirty-day minimum interval between consultation meetings, the additional Consultative Council requirement for areas above 100 hectares, and an applicant caution deposit, all of which add mandatory lead times and financial obligations to Program sub-project preparation. Non-compliance renders the consultation legally invalid, creating scheduling and eligibility risks that must be addressed in Program preparation instruments.
National Land Policy	Resolution 45/2022	Supersedes the 1995 Land Policy, affirming equitable access to land, rational and sustainable use, and community participation as the current policy framework for Program land access governance. Provides the policy basis for the land governance standards applied to Program investments pending adoption of a new Land Law.
Territorial Planning Law	Law 19/2007	Governs spatial planning applicable to agribusiness development, with the PDUTs serving as the primary instrument for verifying whether proposed Program investment areas are compatible with existing land use, community occupation and infrastructure patterns. The widespread outdatedness of PDUTs in the Program corridors identified in the ESSA is a direct consequence of the implementation gaps in this framework.
Territorial Planning Regulation	Decree 23/2008	Implements the Territorial Planning Law, establishing operational requirements for spatial planning instruments relevant to Program sub-project siting and territorial compatibility determinations. Applicable to the PDUT-based territorial screening of Program investments in all three corridors.

Regulation on Roads and Protection Zones	Decree 109/2014	Defines permitted activities within road protection corridors applicable to Program sub-projects involving infrastructure development adjacent to roads. Relevant to siting and design requirements for agro-processing and storage facilities under Results Area 2 in corridor transport zones.
Regulation on the Resettlement Process from Economic Activities	Decree 31/2012 of 8 August	Primary legal instrument governing physical and economic displacement triggered by Program sub-projects, establishing the three mandatory phases of resettlement planning and the rights of affected persons under Articles 10 and 16. Directly applicable to all Program-supported investments requiring community land access with displacement potential, and the domestic framework against which RAP adequacy is assessed.
Technical Directive on Resettlement Plans	Ministerial Diploma 156/2014	Elaborates the procedural requirements for RAP preparation under Decree 31/2012, providing the domestic technical standard applicable to Program-related resettlement. Constitutes part of the normative reference for the resettlement plan technical opinion functions assigned to both DINAMC and DNATDT under the RI MAAP.
Directive on Expropriation for Territorial Planning	Ministerial Diploma 181/2010	Complements the resettlement framework with provisions governing expropriation for public utility purposes, applicable to Program sub-projects requiring public utility declarations for land acquisition. Relevant to the significant procedural lead time for the expropriation declaration process that must be factored into Program sub-project preparation timelines.

E1.9 Labour, OHS and Community Protection

Full Name	Reference	Relevance to MozAgribiz PforR
Labour Law	Law 13/2023 of 25 August	The main labour instrument establishing fundamental employment rights applicable to all agribusiness employers in the Program corridors, including equal treatment, contract requirements, rest periods and freedom of association. Designates rural work as a special employment regime under Article 3(1)(j), with the Labour Law applying only subsidiarily, a distinction directly relevant to the legal coverage of smallholder and outgrower workers in Program value chains.
General Regulation on Labour Hygiene and Safety	Legislative Decree 48/73	The principal general OHS instrument in force, establishing bilateral employer-worker duties, physical workplace standards, dangerous substance management provisions and a comprehensive PPE framework applicable to Program-supported agro-industrial installations. While providing formal coverage across multiple hazard categories, its provisions do not meet contemporary standards for agricultural field OHS, particularly regarding heat stress and pesticide field exposure.
Regulation on Occupational Accidents and Professional Diseases	Decree 62/2013	Establishes employer obligations for prevention and insurance against occupational accidents and professional diseases, with express recognition of pesticide and agrochemical exposure as compensable professional diseases under Article 20(2)(c). Directly applicable to all agribusiness employers supported under the Program and to the OHS compliance obligations in Program-supported processing facilities.
Safety and Hygiene in Civil Works Regulation	Decree 120/71	Governs OHS in construction and civil works activities, directly applicable to Program-financed infrastructure investments under Results Area 2

		involving construction works. Provides the minimum domestic legal standard for contractor OHS management on Program construction sites.
Regulation on the General Labour Inspectorate	Decree 45/2009	Governs IGT labour inspection activities including verification of employment conditions, investigation of complaints and control of child and vulnerable group employment, applicable to agribusiness employers in the Program corridors. Establishes the IGT's immediate enforcement powers, including suspension of work in cases of grave and imminent danger, relevant to the Program's OHS compliance chain.
Children's Rights Promotion and Protection Law	Law 7/2008	Establishes the child's right to protection against all forms of labour exploitation and imposes a mandatory multi-institution reporting obligation, providing the domestic legal basis for child protection referral pathways in Program value chains. Applicable to the Program's child labour risk management in districts where commercial agriculture creates structural conditions for seasonal child labour.
Law on Prevention and Combating of Premature Unions	Law 19/2019	Prohibits child marriage with no exceptions, establishing 18 as the absolute minimum age for any union aimed at forming a family. Relevant to the protection of adolescent girls in Program agricultural labour contexts, particularly in corridors where early marriage is a documented driver of household vulnerability.
Penal Code	Law 35/2014	Establishes criminal non-imputability thresholds and relevant offence provisions applicable to child protection and trafficking incident response procedures under the Program. Provides the domestic criminal law reference for GRM referral pathways for cases involving criminal violations identified during Program activities.
Law on Trafficking in Persons	Law 6/2008	Criminalises trafficking in persons, directly relevant to the vulnerability of seasonal and migrant agricultural workers to labour exploitation networks operating in the three Program corridors. Provides the domestic legal basis for trafficking case referral through the Program's GRM and the Reference Group coordination mechanism.
Law on Protection of Workers with HIV/AIDS	Law 5/2002	Prohibits workplace discrimination based on HIV/AIDS status and requires employer coverage of occupationally related medical assistance costs for all workers, applicable to Program-supported agribusiness employers. Applies concurrently with Law 19/2014 to create a dual protective framework for workers in Program value chains.
Law on Protection of Persons Living with HIV/AIDS	Law 19/2014	Reinforces and updates non-discrimination and healthcare entitlement protections applicable to workers in Program-supported agribusiness operations. Applies concurrently with Law 5/2002 across all Program-supported employers in the three corridors.
Social Protection Law	Law 4/2007	Establishes the basis for social protection for those incapable of work and requires that Program activities avoid exacerbating vulnerability while creating inclusion pathways for beneficiaries. Provides the domestic legal framework for the social protection coverage assessment of Program beneficiary households and for INAS engagement as a Program partner.
National Gender Policy and Implementation Strategy	2017 (revised)	Requires the mainstreaming of gender equity across all Program activities, ensuring women's equal access to land, credit, inputs, markets and decision-making. Provides the policy basis for the gender integration requirements in the Program's E&S management framework and for the

		gender parity consultation standard applied as a Program eligibility condition.
National Policy on Social Action	2015	Guides the identification and protection of vulnerable groups across all Program activities. Provides the policy framework for the Program's inclusive design requirements, social protection linkages and targeted community engagement with structurally marginalised groups.

E1.10 Fisheries and Aquaculture

Full Name	Reference	Relevance to MozAgribiz PforR
Fisheries Law	Law 3/90 and Law 22/2013	Establishes the sectoral mandate for fisheries and aquaculture regulation applicable to Program sub-projects in the fisheries value chain, one of the six priority value chains under the P4R. Constitutes the primary legal basis for DINAPA's licensing functions for aquaculture investments and for the Community Fisheries Councils' role in fisheries governance.
Regulation on the Concession of Fishing Rights and Fisheries Licensing	Decree 60/2018 of 1 October	Establishes the procedures and modalities for the concession of fishing rights and fisheries licensing applicable to Program aquaculture sub-projects, including the two-track concession modality, decision deadlines and the obligation to conclude a concurrent contract. Constitutes the operative implementing instrument for DINAPA's licensing mandate and is directly relevant to the multi-regime licensing requirement for Program aquaculture investments.
National Irrigation Institute Enabling Decree	Decree 35/2011	Establishes INIR's dedicated mandate for public irrigation infrastructure development and management, relevant to irrigation investments under Results Area 2. Provides the institutional basis for INIR's role as a key Program partner in irrigation infrastructure and for the INIR-ARAs coordination gap.
Biosafety Regulation on GMOs	Decree 71/2014	Governs biosafety matters relating to genetically modified organisms, administered by DINASAB, applicable to Program investments involving new crop varieties or production technologies with potential GMO dimensions. Provides the domestic regulatory framework within which GMO-related agrochemical and seed questions in the Program's value chain support are assessed.

E1.11 Sub-National Governance

Full Name	Reference	Relevance to MozAgribiz PforR
Law on the Executive Organs of Decentralised Provincial Governance	Law 4/2019 of 31 May	Establishes elected Governors of Province and Provincial Executive Councils as autonomous constitutional organs of decentralised governance, fundamentally altering the sub-national institutional architecture within which Program E&S functions are delivered. Creates the dual provincial structure that conditions the Program's engagement with the DPDTA, DPAP, DPGCAS, DPIC and DPJED, all of which hold E&S-relevant mandates, and introduces the participation, transparency and non-discrimination

		obligations under Articles 5, 6, 14, 15 and 16 that are directly applicable to Program community engagement processes.
Law on State Supervision over Decentralised Provincial Governance and Local Autarchies	Law 5/2019 of 31 May	Establishes the State's administrative supervisory framework over elected provincial governance organs, providing the tutela mechanism under Article 7(2) that constitutes a formal administrative law channel for verifying the legality of provincial governance acts. Relevant to the Program's GRM escalation architecture for complaints involving acts of elected provincial bodies.
Law on State Representation Organs in the Province	Law 7/2019 of 31 May	Establishes the Secretary of State in the Province and the Council of Provincial State Representation Services as the organs through which central Government is represented in the province alongside the elected governance system. Creates the institutional basis for the Provincial Services of Environment (SPA), the Provincial Services of Economic Activities (SPAE) and the Provincial Services of Justice and Labour (SPJT), all of which hold direct E&S-relevant functions applicable to Program implementation.
Law on State Supervision over Local Autarchies	Law 6/2019 of 31 May	Establishes the framework for State supervision over local autarchies, completing the quartet of 2019 sub-national governance instruments. Provides the legal basis for the State's oversight of municipal-level governance bodies in Program corridor urban centres.
Regulation on the Organization and Functioning of State Representation Organs in the Province	Decree 63/2020 of 7 August (Boletim da República, I Série, 151)	Operationalises Law 7/2019, establishing in regulatory detail the functions of SPA, SPAE, and SPJT applicable to the Program's environmental, agricultural and labour oversight requirements. Establishes the Local Council under Articles 30 to 36 as a community-level consultation and grievance intake mechanism directly relevant to the Program's GRM architecture.
Regulation on the Organization, Competences and Functioning of the Executive Organs of Decentralised Provincial Governance	Decree 64/2020 of 7 August (Boletim da República, I Série, 151)	Operationalises Law 4/2019, establishing in regulatory detail the functions of the DPDTA, DPAP, DPGCAS, DPIC and DPJED, which collectively hold mandates across environmental licensing, land administration, gender, child protection, agricultural development and labour applicable to all three Program corridors. Defines the dual institutional positioning of Provincial Directors — hierarchically within the elected CEP and technically with the relevant central ministry — that conditions the channels through which MAAP central organs must engage with provincial structures.

E1.12 Stakeholder Engagement and Administrative Law

Full Name	Reference	Relevance to MozAgribiz PforR
Access to Information Law	Law 34/2014	Establishes citizens' rights to access information held by public entities, underpinning the transparency dimension of the Program's environmental and social management framework. Applicable to communities' rights to access EIAs, environmental licences and monitoring reports for Program-supported investments, and directly relevant to the proactive disclosure requirements of the P4R instrument.

Law on Administrative Procedures	Law 14/2011 of 10 August	Requires public administrations to act transparently and to provide citizens with timely and comprehensible responses to petitions and complaints. Reinforces the legal obligations of provincial governance bodies and MAAP institutions to respond to Program-related grievances within defined timeframes as part of the Program's GRM referral and escalation architecture.

E1.13 International Conventions and Treaties

Full Name	Reference	Relevance to MozAgribiz PforR
ILO Convention C029 — Forced Labour, and 2014 Protocol	2003 / 2018	Establishes international obligations on forced labour prevention and supply chain due diligence applicable to seasonal and migrant worker recruitment practices in the Program's anchor investor supply chains. The incomplete operationalisation of the 2014 Protocol's supply chain due diligence requirements constitutes a domestic gap.
ILO Convention C105 — Abolition of Forced Labour	1977	Prohibits State use of compulsory labour and reinforces the general anti-forced-labour framework applicable to all Program-supported operations. Addressed through domestic criminal law provisions applicable in the Program corridors.
ILO Convention C087 — Freedom of Association	1996	Establishes workers' rights to organise, directly relevant to the safety commission mechanism under Legislative Decree 48/73 that cannot operate without trade union structures in agricultural workplaces. A domestic gap in agricultural labour contexts is identified.
ILO Convention C098 — Right to Organise and Collective Bargaining	1996	Establishes the right to collective bargaining applicable to Program-supported agribusiness labour relations. The absence of a sector-specific agricultural collective bargaining framework constitutes a domestic gap relevant to the Program's worker protection obligations.
ILO Convention C100 — Equal Remuneration	1977	Establishes the equal pay principle applicable to gender pay equity in Program-supported agricultural value chains. No sector-specific agricultural enforcement mechanism exists domestically, constituting a gap relevant to the Program's gender inclusion objectives.
ILO Convention C111 — Non-Discrimination in Employment	1977	Prohibits discrimination in employment and occupation, applicable to all agribusiness employers in the Program corridors. The absence of sector-specific agricultural non-discrimination provisions constitutes a domestic gap addressed through the Program's gender and inclusion management framework.
ILO Convention C138 — Minimum Age	2003	Establishes the minimum age for admission to employment, directly applicable to child labour risk management in Program agricultural value chains. The absence of a domestic definition of hazardous work specifically for agribusiness contexts constitutes a gap.
ILO Convention C182 — Worst Forms of Child Labour	2003	Establishes obligations for the elimination of the worst forms of child labour, directly relevant to child labour risks in Program value chains in the Beira, Nacala and Maputo-Limpopo corridors. The absence of a formalised referral protocol between IGT and DNC/INAS for child labour cases identified in agricultural contexts constitutes a domestic gap.

ILO Conventions C017/C018 — Workmen's Compensation	1977	Establish the international framework for occupational accident and disease compensation applicable to Program-supported agribusiness workers. Domestic implementation is provided through Decree 62/2013, which expressly covers agrochemical exposure diseases.
ILO Convention C081 — Labour Inspection	Ratified	Establishes standards for labour inspection systems applicable to the IGT's inspection mandate in the Program corridors. The absence of minimum service standards for rural and agricultural inspection settings constitutes a domestic gap identified in the ESSA.
ILO Convention C141 — Rural Workers' Organisations	Ratified	Establishes international standards for rural community participation rights applicable to Program smallholder and seasonal worker populations. No dedicated domestic instrument exists; the gap is addressed through general labour law provisions.
ILO Convention C184 — Safety and Health in Agriculture	Not ratified	Establishes the international standard for agricultural OHS that constitutes the primary benchmark for assessing the adequacy of Legislative Decree 48/73 for Program-supported field operations. The non-ratification and inadequacy of the domestic OHS framework for agricultural field contexts is the principal gap.
ILO Convention C190 — Violence and Harassment	Not ratified	Establishes the international standard for preventing and addressing violence and harassment in the workplace, including GBV in labour contexts directly relevant to Program agricultural value chains. The complete absence of a domestic legal framework specifically addressing labour influx GBV risk constitutes a domestic gap.
Convention on Biological Diversity (CBD) and Nagoya Protocol	1994	Establishes international obligations on biodiversity conservation and access and benefit sharing applicable to the Program's corridor-scale agribusiness expansion in areas of ecological significance. The domestic framework is assessed as broadly adequate, with the biodiversity offset regime operationalised through Ministerial Diploma 55/2022 and Decree 89/2017.
UNFCCC and Paris Agreement	1995	Establishes Mozambique's international climate commitments applicable to Program investment design, including the low-emission development trajectory reflected in the NDC 2021. Relevant to the climate resilience dimension of Program sub-project appraisal in corridors subject to intensifying climate variability.
Ramsar Convention on Wetlands	Acceded	Establishes international standards for wetland protection applicable to Program sub-projects near the Pungwe, Buzi, Limpopo and Incomati floodplain systems. The absence of an explicit wetland screening requirement in the EIA framework for the Beira corridor constitutes a domestic gap relevant to Program cumulative risk management.
CITES	1981	Establishes international obligations on wildlife trade and conservation applicable to biodiversity management in the Program corridors. The domestic biodiversity framework is assessed as adequate, with ANAC's mandate confirmed as the competent authority.
Basel Convention on Hazardous Wastes	1997	Establishes obligations for the management and transboundary movement of hazardous waste, applicable to agrochemical waste and agro-industrial by-products generated by Program operations. The domestic framework through Decree 94/2014 provides adequate coverage of agrochemical waste.

Rotterdam Convention on Prior Informed Consent	2009	Establishes obligations for the import and management of hazardous pesticides, directly relevant to Program-supported agricultural input supply chains. The absence of a domestic restriction list for highly hazardous pesticides consistent with the Rotterdam Convention constitutes a gap.
Stockholm Convention on Persistent Organic Pollutants	2006	Establishes obligations to eliminate or restrict persistent organic pollutants including certain pesticides, applicable to agrochemical management in Program value chains. The absence of domestic restriction of POPs-listed pesticides in the agricultural sector constitutes a gap.
United Nations Convention to Combat Desertification (UNCCD)	Ratified	Establishes international obligations on preventing soil degradation and desertification applicable to Program-supported agricultural expansion in ecologically fragile corridor landscapes. The domestic framework exists but presents implementation gaps at provincial level identified in the ESSA.
Montreal Protocol on Ozone-Depleting Substances	1993	Relevant to cold chain installations in agro-processing and food storage facilities supported under the Program. The domestic framework is assessed as adequate for the ODS management dimensions of Program investments.
Nairobi Convention for the Protection of the Marine and Coastal Environment	1996	Establishes regional marine environment protection obligations applicable to Program sub-projects in the Beira corridor and coastal areas. Addressed domestically through Decree 45/2006 on marine and coastal environmental protection.
UNCLOS	1996	Establishes the international marine governance and fisheries framework applicable to the fisheries value chains supported under the Program. Addressed domestically through the Fisheries Law and its implementing instruments.
CEDAW and Optional Protocol	1997 / 2008	Establishes international obligations on gender equality and elimination of discrimination against women, applicable to the gender dimensions of all Program activities including land access, contract farming and labour conditions. The absence of gender-disaggregated consultation or grievance requirements in domestic law constitutes a gap addressed through Program-level instruments.
Convention on the Rights of the Child (CRC)	1994	Establishes the international framework for child rights applicable to child labour and protection obligations in Program value chains. The domestic framework is assessed as broadly adequate, with a referral gap between IGT and DNC.
International Covenant on Economic, Social and Cultural Rights (ICESCR)	Ratified	Establishes international obligations on labour, food security, health and cultural rights applicable across the Program's E&S risk domains. The absence of livelihood restoration standards from the domestic resettlement framework constitutes a gap relative to ICESCR's right to an adequate standard of living.
African Charter on Human and Peoples' Rights (Banjul Charter)	Ratified	Establishes regional normative standards on natural resource rights, environmental rights and non-discrimination applicable to community and land rights dimensions of Program investments in the three corridors. Provides the regional human rights context for the Program's land governance and community protection obligations.

Annex E2 – Analysis of Legal, Regulatory and Institutional Framework

E2.1 Overview of the Legal and Regulatory Framework

Constitutional and Policy Foundation

Mozambique has an established legal and regulatory framework governing environmental management, hazardous waste management, agro-chemicals management, land administration, water resource use, labour conditions, occupational health and safety, GBV, fisheries and aquaculture, community health and safety, and stakeholder engagement. This framework provides the statutory basis for managing the environmental and social (E&S) risks associated with agribusiness development, infrastructure investments, and policy reforms supported under MozAgribiz.

The framework is grounded in the 2007 revised Constitution, which establishes the State's fundamental obligations on ecological balance, gender equity, and the protection of vulnerable groups. The Strategic Plan for the Development of the Agrarian Sector (PEDSA II 2022–2030) and the National Agricultural Investment Plan (PNISA) provide the sectoral policy framework within which the Program's investments are situated.

The MAAP Consolidation and the RI MAAP

The Ministry of Agriculture, Environment and Fisheries (MAAP) has consolidated key mandates related to agriculture, environment, land, fisheries, and climate under a single ministerial structure, as of 2025. The Internal Regulation of MAAP (Ministerial Diploma 119/2025, hereinafter "RI MAAP[16]") defines the institutional architecture within which E&S risk management functions are discharged at central level. The RI MAAP resolves several mandatary ambiguities and introduces a directly relevant new institutional element — the Division of Environmental and Social Safeguards (*Repartição de Salvaguardas Sociais e Ambiental*, hereinafter RSSA) within the National Directorate of Environment and Climate Change (DINAMC) — with an explicit statutory mandate for E&S safeguards, including the establishment of a grievance management mechanism for non-compliance with E&S safeguards in activity implementation.

The 2019 Sub-National Governance Transformation and the Dual Provincial Architecture

A constitutional and legislative reform effected through legislation published in 2019 — comprising four laws and two implementing decrees — established at the sub-national level a dual and parallel provincial architecture. This consists of a constitutionally autonomous elected governance structure (the Governor of Province and the Provincial Executive Council, with its constituent Provincial Directorates) operating concurrently with a central State representation structure (the Secretary of State in the Province and the Council of Provincial State Representation Services). Both structures hold substantive functions relevant to the E&S risk management architecture of MozAgribiz.

The two implementing decrees operationalise this architecture by assigning E&S-relevant functions to both sets of provincial structures. These decrees resort to verbal substitution — contrasting terms such as "establish/promote" with "implement" — as the primary technique for institutional differentiation. This creates the appearance of a functional division of responsibilities without establishing the legal or procedural architecture to render it operationally effective.

[16] *Regulamento Interno do MAAP*

During the preparation of this Annex, the President of the Republic announced a formal request for the urgent parliamentary scheduling of draft legislation that would extinguish the eight provincial State Representation services and transfer their functions to the elected Provincial Executive Council (CEP – *Conselho Executivo Provincial*). As of the date of finalisation of this Annex, this draft has not been published or adopted, and the current dual architecture therefore remains the operative legal framework.

Analytical Significance of the Dual Architecture

Field evidence gathered through semi-structured interviews (Annexes F1, F2 and F3) found that concerns regarding functional overlap between the two provincial structures are, in practice, largely overstated. Informal coordination mechanisms and institutional practice have, to a significant extent, compensated for the absence of formal procedural architecture — though such compensation remains fragile and non-binding. Enactment of the pending legislative reform proposed by the President, that would extinguish the State Representation services and potentially transfer their functions to the elected CEP, will resolve the overlaps The Program will need to closely monitor developments on the enactment of this reform and be prepared to make the adjustments accordingly. Until the clarifying legislation is enacted, the Program's Operational Manual must explicitly designate the SPA as the sole Environmental Licensing gateway applicable to Program activities.

Scope of Legal Analysis: Standards versus Implementation

A critical analytical distinction for this ESSA is the separation between legal and regulatory provisions that define standards and obligations on the one hand, and institutional arrangements through which those provisions are implemented and enforced on the other. The former are assessed in Sections E2.2 through E2.5; the latter are addressed in Section E2.6. The national framework is broadly aligned with the PforR Core Principles, particularly with respect to environmental protection, land and labour rights, and public participation. However, system performance depends on effective implementation, coordination, and enforcement, which vary considerably across regions, sectors, and administrative levels.

E.2.2 Environmental Legal and Regulatory Framework

Foundational Environmental Law and EIA as Primary Risk Management Tool

Environmental management is anchored in the Environmental Law (Law 20/97), which establishes environmental impact assessment (EIA) as a mandatory precondition for authorising activities with potentially significant environmental impacts. The overarching principles of sustainable development and environmental protection applicable to all Program investments are reinforced by the National Policy on the Environment (Resolution 5/1995).

EIA Regulation: Categorization and Public Consultation

The EIA Regulation (Decree 54/2015) establishes a four-tier screening and categorisation framework — categories A+, A, B, and C — with corresponding requirements for environmental studies, management plans, and public consultation. The General Directive for EIA Studies (Ministerial Diploma 129/2006) sets out technical standards for environmental studies, while the Directive on Public Participation in EIA Processes (Ministerial Diploma 130/2006) establishes minimum requirements for community and stakeholder consultation, including a representativeness principle requiring at least twenty percent of the affected population, a five-step participatory cycle culminating in a formal Declaration of Results, and the right of affected parties to request formal public hearings at any stage.

Decree 54/2015 requires two separate rounds of public consultation for each full EIA (A+ and A categories) and at least one round of public consultation for each Simplified Environmental Study (Category B projects). Environmental compliance is governed by the Environmental Auditing Regulation (Decree 25/2011) and the Environmental Inspections Regulation (Decree 11/2006).

Central-Level EIA Institutional Architecture: DINAMC

At the central level, environmental assessment and licensing functions are exercised by DINAMC. Within DINAMC, the Department of Environmental Assessment constitutes the primary unit for EIA processing, operating through three specialist sub-units. The Environmental Licensing Division exercises the environmental licensing function for development projects — including the function of issuing technical opinions on resettlement plans resulting from economic activities — and is the principal MAAP unit engaged in environmental screening. The Biodiversity Offset Management Division assesses the need for biodiversity offset management plans, maintains the National Biodiversity Offsets Register, and manages offset plan evaluation within the EIA process. The Environmental and Social Safeguards Division (RSSA) holds a statutory mandate for E&S safeguard policies, monitoring E&S conformity, promoting gender policy implementation, and establishing a grievance management mechanism for non-observance of E&S safeguard aspects in activity implementation.

The RSSA constitutes the first explicit statutory attribution of an E&S safeguards mandate to a dedicated unit within MAAP's organic structure. It results from the merging of two pre-existing E&S safeguards units from former MADER[17] and MIMAIP[18]. At present, however, the staff composition of the RSSA is drawn entirely from the MADER previous E&S safeguards Unit. RSSA's operational manuals are currently oriented specifically towards agricultural activities. These constraints bear on the RSSA's current capacity to address the broader sectoral scope that MAAP now encompasses. Notwithstanding these limitations, the RSSA remains the MAAP unit most directly aligned with the Program's E&S risk management architecture.

The Department of Environmental Assessment also holds explicit functions for promoting research on cumulative environmental impact assessments and for promoting Strategic Environmental Assessments (SEAs) of policies, plans, and Programs — establishing an institutional mandate within MAAP for SEA tools even in the absence of a dedicated statutory SEA instrument.

Provincial Environmental Governance within the Dual Architecture

At the provincial level, the Provincial Services of Environment (SPA) — within the State Representation structure — holds functions of participation in environmental licensing and inspection, pollution prevention and quality control, waste and effluent management, and degraded soil prevention and recovery. The Provincial Directorate of Territorial Development and Environment (DPDTA) — within the elected Provincial Executive Council — holds functions of implementing environmental and ecological zoning plans, integrating green economy, biodiversity, and climate change into sectoral Programs, assuring community participation in natural resource management, combating aquatic pollution, and combating degradation of mangroves and coastal ecosystems.

Environmental licensing is not among the functions explicitly enumerated for the DPDTA. However, this omission does not produce unambiguous legal clarity, as the adjacent functions assigned to the DPDTA create sufficient interpretive space for provincial administrations to assert implicit licensing

[17] Ministry of Agriculture and Rural Development
[18] Ministry of Sea, Inland Waters and Fisheries

competence. In practice, as shown in the capacity assessment (Annex F1), the extent to which this ambiguity translates into actual overlap varies across provinces. DINAMC has explicitly indicated that its institutional counterpart is exclusively the SPAs, meaning DINAMC has no access to environmental licences issued by DPDTAs in provinces where those entities exercise licensing functions — creating an information and oversight gap with direct implications for the Program's environmental compliance monitoring chain.

EIA Categorisation for Program Sub-Projects

Most Program sub-projects are expected to fall within categories B or C. Large-scale intensive livestock operations above defined thresholds are Category A activities, medium-scale operations are Category B, and small-scale operations are Category C. Aquaculture installations above 100 tonnes per year are Category A. Since Category A projects are not eligible under the PforR instrument, Program-supported aquaculture and livestock sub-projects will fall within Categories B and C. Decree 54/2015 operates on the basis of positive enumeration, and certain Program activities may not correspond to any activity type explicitly listed in its annexes; a common categorisation approach across all provincial services should therefore be ensured.

Biodiversity Offsets

Where residual impacts on threatened species or habitats cannot be avoided or mitigated, the Biodiversity Offsets instrument (Ministerial Diploma 55/2022) establishes principles, methodologies, requirements, and procedures for implementing biodiversity offsets within the EIA process. The institutional architecture for applying this instrument is established by the Biodiversity Offsets Management Division within DINAMC.

Livestock Sectoral Licensing and the EIA Interface

The licensing of commercial livestock operations constitutes a distinct sectoral licensing stream within MAAP that runs parallel to and must be coordinated with the EIA process. The Department for the Licensing of Livestock Activities of the National Directorate of Livestock (DINAP) exercises functions of establishing norms for the licensing of livestock activities. For livestock operations at or above the thresholds that trigger EIA requirements, both the DINAP sectoral licensing regime and the DINAMC EIA licensing regime apply concurrently.

Agrochemical Management

Agrochemical input management is regulated through three complementary instruments: the Pesticide Registration and Residue Levels Regulation (Ministerial Diploma 153/2002), the Pesticide Management Regulation (Decree 6/2009), and the Regulation on Agricultural Pesticides (Decree 27/2016). Fertiliser use is governed by the Regulation on Fertilisers (Decree 38/2013), and waste management is addressed by Decrees 94/2014 and 83/2014.

Within MAAP, agrochemical management operates through two DINASAB[19] units — the Phytosanitary Department (responsible for regulating agrochemical management nationally) and the Division of Registration and Control of Agrochemicals (exercising the full cycle of supervision including registration, inspection, licensing, and monitoring). Field-level inspection is exercised by the Division of Inspection of Agricultural Inputs. Technical extension and advisory functions for correct agrochemical use — including sensibilisation on mandatory PPE use — are exercised by the Division

[19] National Directorate of Health and Biosafety

of Agriculture Extension of DINAE[20]. The Pest Management Plan required under PAP-12 must be developed in coordination with DINASAB and implemented through DINAE, with a defined coordination mechanism between these two MAAP directorates and with MTGAS[21] for OHS aspects of pesticide application

Pollution Prevention and Emission Standards

Pollution prevention and control are governed by the Environmental Quality and Emission Standards (Decree 18/2004, revised by Decree 67/2010), which set effluent discharge standards applicable to agricultural runoff and agro-industrial wastewater.

Water Resource Management and Governance

Water resource management is governed by the Water Law (Law 16/91), which establishes that all inland surface and groundwater resources constitute inalienable and imprescriptible state public domain. The Water Law establishes a dual regime of common use and private use of public domain waters. Common use — free and gratuitous use for domestic, personal, and family needs, including small-scale livestock watering and irrigation without mechanised means — requires no prior authorisation. All other significant uses, including irrigation, agro-industrial processing, and aquaculture, require the granting of a water use right by the competent authority.

The Regional Water Administrations (ARAs) are the competent authorities for water resource administration within their respective hydrological basins, holding the exclusive statutory competence for licensing and granting concessions for the private use and exploitation of public domain waters, the authorisation of effluent discharges, and the inspection and enforcement of the conditions of those authorisations. This exclusive ARA licensing competence is preserved notwithstanding the devolved competences of the Provincial Governors and Provincial Executive Councils in water and sanitation service delivery, which applies to the provision of services rather than to the authorisation of water resource exploitation.

All Program investments involving surface or groundwater abstraction must obtain the appropriate water use instrument from the competent ARA prior to commencing operations. The Secretary of State in the Province holds functions of issuing opinions on the spatial ordering of maritime, lacustrine, and fluvial zones and on requests for the private use of these domains — additional procedural steps that must be accounted for in sub-project preparation timelines alongside the ARA water use licensing process.

The Water Law establishes two distinct licensing instruments: licences for non-permanent works, granted for five-year renewable periods and precarious in nature; and concessions for all other cases, granted for periods of up to fifty years. For Program-supported irrigation investments, the applicable instrument will in most cases be a concession given the permanent character of irrigation infrastructure. Explicit priority rules establish that human consumption and sanitation needs take precedence over all other private uses, and that conflicts arising from insufficient water shall be resolved on the basis of the socio-economic profitability of respective uses.

The Water Law imposes substantive obligations of efficient and responsible use on all water rights holders. In relation to irrigation specifically, beneficiaries of irrigation systems must adopt economically justifiable measures to reduce water losses and ensure the most advisable soil moisture

[20] National Directorate of Extension
[21] Ministry of Labour, Gender and Social Action

regime. These provisions constitute a statutory basis for imposing water use efficiency obligations on Program-supported irrigation investments

The Water Law's pollution prevention framework establishes a series of prohibitions on activities capable of contaminating waters and requires special authorisation from the competent ARA for all activities capable of causing contamination of the public water domain.

For aquaculture investments requiring dedicated water abstraction, the concession regime under the Water Law applies. Aquaculture sub-projects under the Program must therefore navigate both the ARA concession process and the EIA screening process, in addition to the sectoral licensing regime under the Fisheries Law.

Natural Resource and Biodiversity Protection

The Law on Protection and Conservation of Biodiversity (Law 16/2014, amended by Law 5/2017) and its implementing Regulation (Decree 89/2017) establish a conservation framework applicable to all entities that may influence the national conservation areas system. Decree 89/2017 classifies protection zones into total conservation areas and sustainable use conservation areas with differentiated use restriction regimes.

Of particular operational relevance is the buffer zone regime, which establishes a dual authorisation requirement for any activity in a buffer zone capable of affecting its biota: prior approval by the conservation areas administration and subjection to environmental licensing based on EIA. The exercise of any activity in a buffer zone is additionally dependent on the positive opinion of the entity administering the respective conservation area — constituting a legally binding procedural gateway that Program sub-projects in buffer zones must navigate in addition to standard EIA screening.

Decree 89/2017 operationalises biodiversity impact management through three frameworks: a recovery and restoration framework placing responsibility for recovery on the entity causing the impact; a formal mitigation hierarchy (avoidance; minimisation; recovery or restoration; and offsetting); and a monetary compensation matrix graduated by habitat type for cases where the no net loss principle cannot otherwise be satisfied.

ANAC holds institutional competence for the administration of legally created conservation areas under its management.

The National Strategy on Biological Diversity (NBSAP 2015–2035) guides the integration of biodiversity conservation into agricultural development and is particularly relevant for sub-projects near natural habitats, riparian zones, and ecologically sensitive areas.

Forest Resource Governance: Law 17/2023 and Decree 78/2024

Forest resource governance is established by the Forest Law (Law 17/2023) and its implementing Regulation (Decree 78/2024), which repeal and replace the earlier forestry legislation and constitute the current comprehensive legal framework governing forest classification, management, licensing, compensation, and enforcement.

The forest zoning system classifies forest heritage into five functional categories: conservation forests; conservation forests for special purposes; forests of historical and cultural use and value; commercial and industrial production forests; and multiple use and community forests. A regime of permanent forest heritage designates as unconvertible forests located in conservation areas, sustainable use

conservation areas, mangrove areas, conservation forests for special purposes, and legally created forest concession areas.

Forest governance functions at the provincial level are distributed across both components of the dual provincial architecture. At the central level, forest governance functions are exercised by the National Directorate of Forests and Wildlife (DNFFB), through specialised departments for forest and plantation management, forest resource inventory, and community management of forest and wildlife resources — including supervision of the 20% community benefit distribution mechanism.

The clearance of forest for other land uses constitutes the most directly relevant forest governance obligation for Program sub-projects. Holders of DUATs and public institutions implementing development projects must obtain a felling licence before any forest clearance is undertaken. The licence application must be accompanied by an EIA where one is required by applicable environmental legislation — constituting the formal procedural link between forest clearance licensing and EIA requirements.

Decree 78/2024 also establishes that a forest exploitation contract does not confer a DUAT, requiring agribusiness investors to navigate the DUAT process under the Land Law separately and concurrently with the forest licensing process. Requirements for forest concession creation include the delimitation of areas occupied by local communities, community consultation, mechanisms protecting existing customary and good-faith DUAT rights within the proposed concession perimeter, and evidence that rights within the proposed concession area have been extinguished only after proven payment of just compensation.

Other Applicable Instruments

The Regulation on Control of Invasive Exotic Species (Decree 25/2008) prohibits the introduction of new crop varieties, livestock breeds, or aquaculture species without authorisation. The Regulation on Prevention of Pollution and Protection of the Marine and Coastal Environment (Decree 45/2006) protects coastal zones, mangroves, and wetlands. Climate considerations are framed by the National Climate Change Adaptation and Mitigation Strategy (NCCAMS 2012) and the revised National Determined Contribution (NDC 2021). The Access to Information Law (Law 34/2014) establishes citizens' rights to access information held by public entities.

Physical and Intangible Cultural Heritage

The legal and policy framework governing cultural heritage for Program purposes comprises three instruments. The Law on the Protection of Cultural Heritage (Law 10/88) establishes State ownership of the national cultural heritage, a comprehensive classification regime whereby interventions affecting classified heritage assets require prior written authorisation from the competent cultural authority, and a graduated sanctions framework including fines, criminal liability, and mandatory restoration obligations. Administrative licence competence resides in the Ministry of Education and Culture (MEC) and its National Directorate of Cultural Heritage (DNPC).

The operational framework for the application of the heritage law to development projects is established by Decree 27/94, which prohibits earth-moving, construction, or land modification works in areas containing or likely to contain archaeological remains without prior licensing. It establishes a mandatory pre-construction archaeological survey requirement and requires that survey costs — fixed at a minimum of 0.5% of total project investment value — be borne by the project proponent. It also establishes the statutory framework for the management of chance archaeological finds, imposing an immediate work-stoppage obligation upon discovery of any archaeological material and a mandatory

notification duty to the District Administrator within 24 hours. For Program sub-projects, the chance find framework must be operationalised through dedicated provisions in works contracts and contractor supervision plans.

The Cultural Policy (Resolution 12/97) adopts a holistic definition of culture encompassing material, institutional, and philosophical dimensions including rituals, beliefs, traditional authorities, traditional medicine, national languages, and community practices associated with natural resource use. It establishes as State policy the promotion of socio-cultural impact assessment of development projects, recognises traditional authorities as guarantors of social stability with direct implications for Program community engagement, and establishes a policy commitment to close coordination between cultural, natural heritage, and environmental institutions.

The framework's principal limitations are that the socio-cultural impact assessment objective has not been operationalised through implementing legislation, and no coordination protocol has been established between the MEC/DNPC cultural heritage licensing function and the DINAMC EIA licensing function.

Strengths of the Legal Framework for Environmental Management

The legal framework for environmental management presents several notable strengths. The four-tier EIA categorisation system provides a proportionate and risk-calibrated approach. Public participation is embedded as a procedural requirement with dedicated instruments specifying minimum standards and inclusive participation. The framework exhibits substantial thematic breadth, covering EIA, pollution control, agrochemical management, biodiversity, coastal protection, climate resilience, water resource management, and access to information. The Water Law's licensing framework provides a regulatory gateway for managing water allocation and competition risks. The ARAs' exclusive licensing competence, combined with their mandate to conciliate water use conflicts and the statutory priority rules for competing uses, establishes a legally structured mechanism for managing competition between commercial irrigation abstractions and community water access.

The Forest Law (Law 17/2023) and its Regulation substantially modernise the forest governance framework by establishing a five-tier zoning system, an explicit statutory linkage between felling licensing and EIA requirements, a permanent forest heritage regime protecting mangroves and conservation areas from conversion, a prohibition on invasive species in plantation contexts, fault-independent forest damage recovery obligations, and the introduction of free, prior and informed consent principles into community consultation requirements for forest concessions. The RI MAAP provides several additional institutional strengths: the Department of Environmental Assessment holds explicit mandates for cumulative impact assessment and SEA promotion; the Biodiversity Offsets Management Division provides a dedicated unit for biodiversity offset evaluation; the RSSA constitutes the first explicit statutory attribution of an E&S safeguards mandate including a GRM function within MAAP's organic structure; and the Department of Community Management /DNFFB provides a central unit for supervising community benefit distribution in forest resource management. The cultural heritage framework provides legally grounded obligations for archaeological survey, chance find management, the 0.5% survey cost contribution, and the Cultural Policy's mandate for socio-cultural impact assessment and recognition of intangible heritage dimensions.

Limitations of the Legal Framework for Environmental Management

The framework does not include an explicit legal provision for strategic environmental assessment at Program or corridor level. However, the absence of a dedicated SEA legislative instrument is partially mitigated by the explicit mandate attributed to the Department of Environmental Assessment for

cumulative impact assessment and SEA promotion, which provides the institutional basis for developing the Program-level cumulative impact assessment framework.

The Water Law presents three material gaps: the absence of operational procedures for managing cumulative water resource impacts within a single catchment; the absence of specific provisions governing cumulative water abstractions in shared hydrological basins; and the absence of quantitative efficiency standards giving operational content to the law's efficiency obligations. The agrochemical regulatory framework does not include specific provisions promoting integrated pest management or restricting highly hazardous pesticides.

The forest governance framework under Law 17/2023 presents a transitional implementation gap resulting from the non-publication of several required secondary instruments, including forest inventory and management plan guides, community representation registration procedures, the National Forests Forum statute, and the joint ministerial diploma establishing the 20% community benefit distribution mechanism. The absence of finalised provincial and district forest zoning maps introduces residual uncertainty into sub-project screening, which is addressed under PAP-15

The cultural heritage framework presents two operational limitations: the socio-cultural impact assessment mandate has not been operationalised through implementing legislation or standardised methodology; and no coordination protocol exists between the MEC/DNPC heritage licensing function and the DINAMC EIA licensing function; both addressed through PAP-23.

E2.3 Land Tenure and Land Administration Framework

Foundational Land Law: State Ownership, DUAT Rights, and Customary Tenure Recognition

Land in Mozambique is owned by the State, with individuals and communities holding rights of use and benefit (DUATs). The Land Law (Law 19/97) is the cornerstone of Mozambique's land governance system. Customary land use rights acquired through occupation in good faith are formally recognised without requiring formal documentation. The implementing Regulation (Decree 66/98) establishes procedural requirements for DUAT granting and registration, including a mandatory community consultation process that commercial investors must complete before obtaining a DUAT in rural areas.

Community Consultation and Traditional Authority in DUAT Processes

The role of traditional leaders and community authorities in consultation processes is formally recognised and regulated by the Regulation on Community Authorities (Decree 15/2000) and reinforced by the constitutional and legislative framework applicable to the elected provincial governance system, which establishes an obligation for Provincial Executive Governance Bodies to articulate with community authorities, consulting their opinions and suggestions.

The specific procedures for community consultation in DUAT processes are established by Ministerial Diploma 158/2011, which operationalises the consultation requirement in Decree 66/98. The Diploma requires two mandatory meetings — the first informing the community about the land request and identifying parcel boundaries, and the second (held within thirty days) allowing the community to pronounce on whether land is available. Both meetings must include the District Administrator, Cadastre Services, and the Consultative Councils of Village and Locality, whose members sign the consultation minutes. For sub-projects covering areas above 100 hectares, the Consultative Councils of Administrative Post and District must also pronounce. Consultations that do not follow these steps are legally invalid. These requirements add a mandatory minimum of thirty days to sub-project preparation timelines and create financial obligations that must be budgeted from the outset.

DNTDT: Central-Level Land Administration Architecture

Land administration within MAAP is exercised at the central level by the National Directorate of Land and Territorial Development (DNTDT), with an expanded mandate integrating territorial development, territorial planning, resettlement, and land conflict management alongside core land titling and cadastre functions. The DNTDT's internal architecture includes five units of direct relevance to the Program's land and resettlement risk profile.

The Department of Surveying and Land Titling manages the land titling and systematic regularisation process, ensuring activities are sensitive to social and gender aspects. The Department for Land Cadastre and Information operationalises and maintains the National Land Cadastre and emits opinions in development project licensing and EIA processes. The Division of Land Processing and Registry guarantees the observance of procedures for community consultations. The Department of Territorial Development ensures the integration of climate change adaptation actions in resettlement plans, emits technical opinions on resettlement plans, and emits technical opinions on DUAT attribution processes. The Department of Resettlement and Community Development constitutes the central coordinating unit for resettlement policy, planning, and oversight: it emits technical and conformity opinions on resettlement plans resulting from natural calamities, economic activities, and public utility needs; accompanies and supervises resettlement processes; conducts monitoring and technical assistance on resettlement plan elaboration and implementation; and promotes participatory planning ensuring the balance of gender and vulnerable persons. The Division of Resettlement for Economic Activities and Public Utility specifically conducts monitoring and technical assistance for resettlement plans resulting from economic activities and public investment projects.

Land Conflict Management

The Division of Land Conflict Management within DNTDT holds dedicated functions directly relevant to the Program's GRM architecture: establishing and operationalising mechanisms for complaints, dialogue, and claims regarding land issues; receiving and systematising claims arising from land administration; and establishing mechanisms and strategies for conflict mitigation and resolution. This unit constitutes a formal sectoral GRM channel within MAAP for land-related complaints and must be integrated into the Program's GRM referral and escalation pathways.

Provincial DUAT Processing within the Dual Architecture

At the provincial level, the processing of DUAT applications engages both components of the dual provincial architecture. The DPDTA holds the function of issuing opinions on DUAT requests for areas up to 1,000 hectares; the SPA holds the function of processing and issuing opinions on DUAT requests exceeding 1,000 hectares for subsequent decision at central level. Program sub-project preparation processes must account for this bifurcated opinion architecture and the additional procedural obligations of Diploma Ministerial 158/2011.

Forest Governance and Land Tenure: Decoupling

A forest exploitation contract does not confer a DUAT over the respective area, meaning investors seeking to operate on forested land under the Program must complete both the forest licensing process (administered by DNFFB) and the DUAT process (administered by DNTDT) independently and concurrently. Requirements for forest concession creation protect existing community land rights, and rights held within a proposed forest concession area can only be extinguished after proven payment of just compensation.

Spatial Planning and Territorial Ordering

Spatial planning in relation to agribusiness development is governed by the Territorial Planning Law (Law 19/2007) and its implementing Regulation (Decree 23/2008). Territorial planning at the provincial level constitutes a formally devolved competence of the Provincial Executive Governance Bodies. The DNTDT through its Department of Territorial Development provides advisory support to provincial and district organs. The Regulation on Roads and Protection Zones (Decree 109/2014) defines the permitted activities within road protection corridors.

Resettlement Framework

For cases where agribusiness development results in involuntary displacement, the Regulation on the Resettlement Process from Economic Activities (Decree 31/2012) is the primary legal instrument governing physical and economic displacement. The three mandatory procedural phases of resettlement planning are further elaborated in the Technical Directive on Resettlement Plans (Ministerial Diploma 156/2014), complemented by the Directive on Expropriation for Territorial Planning (Ministerial Diploma 181/2010). The central institutional architecture for the management of resettlement from economic activities resides primarily in the Department of Resettlement and Community Development within DNTDT, with a concurrent technical opinion function in the Environmental Licensing Division within DINAMC, as well as from the Commission for Monitoring and Supervision of Resettlement, which as the mandate to oversee resettlement processes, ensuring transparency, technical rigor, and community participation. The latter is substantiated in Ministerial Diploma 155/2014 which establishes the functioning of the Commission at national, provincial and district levels. Approval of resettlement plans is the responsibility of district authorities, based on the validation (opinion of conformity) issued by the Commission for Monitoring and Supervision of Resettlement, which is directed by DNTDT.

Land Law Transition: Draft New Land Law

The current land governance framework is in transition. The National Land Policy (Resolution 45/2022) emphasises equitable access to land, rational and sustainable use, and community participation. At the legislative level, the Draft New Land Law (Ante-Projecto, Draft 03, June 2025) remains an unratified draft not yet approved by the Council of Ministers. All Program sub-projects will be governed by the current Land Law (Law 19/97) and Decree 66/98 until any new law enters into full force.

Preliminary assessment of the Draft identifies several potential positive outcomes if retained in the final text: a strengthened community consultation framework, with mandatory gender parity, FPIC-based resettlement conditions, gender equity provisions for co-titularity and women's DUAT registration, reinforced protection of customary and good-faith rights, and recognition of environmental service rights.

Five material gaps and risks are also identified. The most structurally significant gap is the institutional void created by provisions establishing the National Land Administration (AdNT) as a new autonomous central land administration institute while providing that its Organic Statute is to be approved by Presidential Decree following adoption of the Law. The AdNT does not currently exist. Until established and operational, the land administration functions currently exercised by DNTDT within MAAP will remain in a transitional state of institutional uncertainty with potential consequences for consistency and predictability of DUAT processing, community consultation oversight, and land conflict management.

A second material gap is the extensive reliance on future secondary instruments for operationalising key safeguard mechanisms. Multiple provisions critical to E&S risk management are expressly remitted to future decrees that have not yet been drafted, generating a period of legal uncertainty likely to coincide with Program implementation.

A third gap concerns the interface between land administration and environmental licensing: DUAT authorisation may be conditional on environmental licensing "in applicable cases" but does not mandate systematic environmental screening as a precondition for DUAT processing across all activity categories.

A fourth gap arises from the acknowledgement of the coexistence of sectoral cadastres alongside the national land cadastre without establishing a clear hierarchy of precedence or conflict resolution mechanism.

A fifth and operationally immediate risk arises from idle land provisions imposing a 12-month deadline on all holders of unused DUATs to demonstrate financial capacity to implement an exploitation plan or formally renounce the DUAT, potentially affecting areas in fallow rotation, seasonal communal use, or with customary claims not yet formally documented.

Additional gaps highlighted by Stakeholders during the revision of the draft New Land Law, which have not been resolved in the final version presented to Parliament include:

Public Protection Zones (PPZs) – Lack of clear, evidence-based justification for expanding buffer distances in protection zones (Art. 14) and weaknesses in the consultation process for declaring public domain areas and potential exclusion of legitimate occupiers and customary rights holders (Art. 17). Although the draft partially addressed these concerns, it still lacks explicit mechanisms to ensure inclusive participation and scientifically validated criteria, leaving PPZ governance vulnerable to inconsistency and contestation.

Rights of Occupiers and Users - Ambiguity in interaction of customary norms and statutory law, particularly in conflict resolution (Art. 46). Although the draft states that customary norms are valid only when not conflicting with the Constitution, it provides no practical guidance on how harmonization will be achieved, creating uncertainty and potential inconsistency in application. Further, the definition of community lands (Art. 21) introduces confusion between “community territory” and “community lands,” raising the risk that certain areas may be excluded from recognition. These shortcomings reveal a lack of clarity and operational safeguards, weakening tenure security and the effective protection of customary rights

Compensation and entitlement provisions - Rules on resettlement in Public Protection Zones (Art. 16) remain unclear, as voluntary resettlement seems impractical once areas are declared public domain, while compulsory resettlement is still permitted without strong safeguards. Additionally, the law does not set quantitative guarantees for community benefit-sharing, such as fixed revenue or transfer percentages, instead deferring these to future regulations (Art. 11). This lack of clarity and enforceability weakens protection for affected households and undermines confidence in fair compensation and entitlements.

The Program's E&S risk management system should operate on the basis of Law 19/97 as the applicable legal framework, incorporating monitoring provisions that would require an updated legal analysis and potential revision of Program instruments upon final adoption of the New Land Law.

Strengths and Weaknesses of the Land Tenure and Administration Framework

The framework exhibits important protective strengths, including the recognition of customary land use rights without formal documentation, the mandatory community consultation requirement for DUAT allocations to commercial investors, the structured resettlement framework with defined compensation modalities, the formal legal recognition of traditional authorities' role, the forest governance framework's explicit decoupling of forest exploitation rights from DUAT rights and its protection of community land rights within proposed concession areas, and the DNTDT's specialised internal architecture including a dedicated Division of Land Conflict Management with an explicit land GRM mandate.

Significant weaknesses include: transitional uncertainty introduced by the Draft New Land Law; the absence of explicit mandatory livelihood restoration Programs in the resettlement framework; and the absence of gender-differentiated land rights provisions in the land governance system itself.

E2.4 Labor, Occupational Health and Safety, and Community Protection Framework

National Labour Law

The Labour Law (Law 13/2023) establishes fundamental employment rights for all workers, including equal treatment, contract requirements, rest periods, leave entitlements, and freedom of association.

Occupational Health and Safety

The Regulation Establishing the Legal Framework for Occupational Accidents and Professional Diseases (Decree 62/2013) imposes on employers a duty to adopt all prescribed preventive measures, train workers on occupational risk prevention, and transfer liability for occupational accidents and professional diseases to a legally authorised insurance entity. Occupational diseases arising from exposure to pesticides, herbicides, dyes, harmful solvents, industrial dusts, gases, vapours, and asbestos fibres are expressly recognised as compensable professional diseases.

The broader framework for general workplace hygiene and safety applicable to agribusiness operations is established by the General Regulation on Labour Hygiene and Safety (Legislative Decree 48/73). This establishes a bilateral duty architecture imposing on employers fundamental responsibilities for workplace installation and operational conditions, including instructing workers on occupational risks, precautions, safety signs, safer work methods, PPE use, and the importance of regular clinical service attendance.

Specific OHS provisions applicable to agribusiness operations include minimum workspace dimensions; workplace atmospheric conditions covering ventilation, gas and dust capture, temperature, humidity, and outdoor worker protection against inclement weather and excessive sun exposure; machine guarding requirements directly applicable to agro-industrial processing equipment; dangerous substance management requirements of direct relevance to agrochemical handling, storage, and application; workplace hygiene and sanitary infrastructure requirements including potable water provision; and comprehensive legally binding PPE requirements. The OHS framework applicable to construction and civil works is established by the Safety and Hygiene in Civil Works Regulation (Decree 120/71).

MAAP Internal Architecture for Agrochemical and Field OHS

Within MAAP, the chain of responsibility for OHS and agrochemical safety involves three units without a formally specified coordination protocol. DINAE's Division of Agriculture Extension is responsible for providing technical follow-up to ensure correct, safe, and responsible agrochemical use and for

promoting awareness of mandatory PPE use. DINASAB's Division of Inspection of Agricultural Inputs is responsible for inspecting the implementation of good practices in pesticide and fertiliser use. DINASAB's Department of Agrarian Public Health and Biosafety establishes norms for the safe management and disposal of residues generated in agricultural production chains. The absence of a formally specified coordination mechanism between these MAAP units and between MAAP and MTGAS/IGT for field-level OHS compliance in the agrochemical context reinforces the necessity of a joint technical working group.

Labour Inspection

MTGAS is the central State organ responsible for directing and evaluating public policies in the areas of labour, social security, gender, social action, and international organisations. Its organic structure was established and formalised by legislation in 2025. The General Labour Inspectorate (IGT) governs labour inspection activities under the Regulation on the General Labour Inspectorate (Decree 45/2009), with responsibilities for controlling compliance with legal and regulatory provisions on working conditions, verifying wage conformity, controlling the employment of minors and vulnerable groups, developing OHS risk prevention, monitoring compliance with health and safety norms, and investigating fatal occupational accidents. Employers must communicate occupational accidents and professional diseases to the IGT within 48 hours, with quarterly statistical reporting required.

At the provincial level, the IGT provincial delegations maintain the mandate of labour inspection authority. This mandate is complemented by the Provincial Services of Justice and Labour (SPJT), which hold functions of assuring decent work and workers' rights, guaranteeing compliance with labour legality, promoting social concertation, promoting mechanisms for extra-judicial resolution of labour conflicts — a function directly relevant to the Program's worker grievance mechanism — and promoting occupational health, safety, and hygiene in the workplace. This extra-judicial conflict resolution mechanism should be integrated into the Program's grievance referral and escalation pathways for labour-related grievances. Formal institutional resolution of labour disputes is addressed through the Commission for Mediation and Arbitration of Labour Disputes (COMAL).

Child Protection

The Children's Rights Promotion and Protection Law (Law 7/2008) establishes the child's right to protection against all forms of labour exploitation and imposes a mandatory reporting obligation applicable to all health, social action, and education units. The Law on Prevention and Combating of Premature Unions (Law 19/2019) prohibits child marriage and establishes 18 as the absolute minimum age for any union. The relevant MTGAS internal regulation formally assigns the mandate for child labour prevention and victim assistance to the National Directorate of Children (DNC), not the IGT. The absence of a formal referral protocol between the IGT (field inspection) and the DNC (victim response) is an operational gap relevant to the Program. .

At the provincial level, gender, child protection, and social action functions are assigned to the DPGCAS, which constitutes a key provincial institutional partner for the Program's gender and social inclusion monitoring systems in the three investment corridors. The Program's implementation arrangements should establish explicit coordination linkages with the DPGCAS in each corridor province. .

Forced Labour, Trafficking, and Health Protection

Protection against forced labour and trafficking is addressed by the Law on Trafficking in Persons (Law 6/2008), directly relevant given the vulnerability of seasonal and migrant agricultural workers. The absence of specific legal provisions for managing labour influx risks and the non-full transposition of

requirements regarding supply chain due diligence are addressed through PAP-08. Health protection in the workplace is addressed by the Law on Protection of Workers with HIV/AIDS (Law 5/2002) and the Law on Protection of Persons Living with HIV/AIDS (Law 19/2014), which apply concurrently to all agribusiness employers under the Program.

Community Protection

The Social Protection Law (Law 4/2007) establishes the basis for social protection and requires that Program activities avoid exacerbating vulnerability while creating inclusion pathways for beneficiaries. The National Policy on Social Action (2015) guides the identification and protection of vulnerable groups. The National Gender Policy and Implementation Strategy (revised in 2017) requires the mainstreaming of gender equity across all Program activities.

Strengths and Weaknesses

The framework's strengths include: a comprehensive and updated Labour Law; a binding set of international normative obligations from ratified ILO Conventions; layered legal coverage for child protection across multiple instruments; specific OHS provisions applicable to agribusiness operations including the dangerous substance management regime and comprehensive PPE requirements; dual HIV/AIDS protection provisions; and a structurally layered worker grievance redress architecture with multiple institutional access points including IGT, COMAL, and the provincially-mandated extra-judicial labour conflict resolution mechanism.

Significant weaknesses include: the absence of sector-specific regulatory guidance defining "hazardous work" in agribusiness contexts; the general OHS regulation predating current understanding of agribusiness OHS risks, with insufficient specificity for heat stress, agrochemical field exposure pathways, re-entry intervals, buffer zones, spray drift, dermal absorption, and cumulative exposure risks; the safety commission mechanism's dependence on trade union organisations for activating worker representation; the absence of legal provisions for managing labour influx risks including GBV; the absence of a framework for ethical recruitment of seasonal and migrant workers; the formal separation of the IGT's field inspection mandate from the DNC's victim response mandate without a referral protocol; and the absence of a formally specified coordination protocol between DINAE, DINASAB, and MTGAS/IGT for field-level agrochemical OHS.

E2.5 Stakeholder Engagement, Public Participation, and Grievance Redress Framework

Constitutional Foundation

The Constitution of the Republic of Mozambique (2004, as amended) establishes the right to petition public authorities with an obligation to respond within a reasonable period, the right of citizens to be consulted on matters of public interest, and entitlements for communities to be engaged in decisions concerning natural resource use and agricultural development.

Environmental Law and EIA Public Participation Requirements

The Environment Law (Law 20/97) establishes the right and duty of all citizens and entities to participate in the formulation, implementation, and monitoring of environmental policies, and the right of all citizens to access environmental information held by public authorities. The EIA Regulation (Decree 54/2015) requires two separate rounds of public consultation for each full EIA.

Ministerial Diploma 130/2006 is the most operationally detailed instrument in the national framework, establishing a five-step participatory cycle, foundational participation principles including representativeness, independence, early involvement, negotiation, and accountability, requirements for full documentation of all concerns raised and responses provided, and the right to formal public hearings at any stage. The institutional mandate for managing the application of this Directive is confirmed by the RI MAAP as residing in the Department of Environmental Assessment within DINAMC.

Forest and Land Consultation Obligations

The Biodiversity Conservation Law and Decree 89/2017 establish independent public consultation obligations applicable to the creation of conservation areas. The Forest Law (Law 17/2023) and its Regulation (Decree 78/2024) establish substantive community engagement obligations applicable to forest concession processes, including the principle of free prior and informed consent.

The Land Law (Law 19/97) and its Regulation (Decree 66/98) require mandatory community consultation before any land use right is granted to third parties in areas occupied or used by local communities, through at least two separate meetings in an intelligible language with involvement of traditional or elected authorities and documented through signed minutes. The Division of Land Processing and Registry within DNATDT specifically holds the function of guaranteeing observance of procedures established for community consultations.

Sub-National Stakeholder Engagement Architecture

The legal and institutional basis for community-level stakeholder engagement and grievance intake at the sub-national level is established by the 2019 provincial governance legislation and its implementing decrees. The elected Provincial Executive Council system ensures the participation of citizens, local communities, associations, and other forms of organisation, and is responsible for providing information in writing to private individuals or communities.

These obligations are complemented within the State Representation structure, under which the Secretary of State in the Province holds competence to ensure that petitions, complaints, and suggestions are duly processed.

The Local Council constitutes a formal institutional entry point for community-level consultation and grievance intake within the State Representation architecture. It holds the formal function of appraising and issuing opinions on proposals for private investment and for concessions of the right of natural resource exploitation and land use and benefit. The Program's GRM architecture should establish explicit intake modalities at the Local Council level, with defined escalation pathways.

The provincial governance legislation establishes that Provincial Coordination Councils are to be convened for articulation between the provincial executive governance organ, local autarchies, and State representation organs — constituting a formally mandated multi-stakeholder governance platform directly relevant to Program coordination mechanisms.

The Administrative Tutelage Mechanism (*Mecanismo de Tutela*) under the State supervisory legislation (Law 5/2019) provides an administrative law channel through which violations of legality in the administrative conduct of provincial organs — including violations of participation and transparency obligations — can be submitted for verification and remedy.

The District Administrator constitutes a relevant institutional interface for community engagement and grievance intake. Community petitions submitted to District Administrations are formally

channelled through the Provincial Executive Council system, and the Program's grievance intake and referral architecture must reflect this institutional positioning.

Central MAAP-Level GRM Channels Established by the RI MAAP

At the central MAAP level, the RI MAAP establishes three additional institutional channels relevant to the Program's grievance architecture. First, the Agriculture, Environment and Fisheries Inspectorate (IAAP) holds functions of receiving and verifying complaints and suggestions related to possible deviations in service delivery by MAAP and its institutions, and of collecting and systematising petitions, complaints, and grievances of the sector. The IAAP thereby constitutes a formal institutional channel for complaints about the administrative conduct of MAAP, relevant to the escalation architecture of the Program GRM for complaints involving MAAP's licensing, land administration, and resettlement functions;

Second, the Division of Land Conflict Management within DNATDT holds explicit functions of establishing and operationalising mechanisms for complaints, dialogue, and claims regarding land issues — constituting a formal sectoral GRM entry point for land-related complaints that must be integrated as an escalation pathway in the Program GRM,

Third, the RSSA within DINAMC holds the explicit statutory function of establishing a mechanism for the management of claims and the resolution of conflicts resulting from non-observance of E&S safeguard aspects in the implementation of activities. This constitutes the first statutory attribution of a GRM function to a dedicated E&S safeguards unit within MAAP's organic structure. The RSSA must be designated as the MAAP focal point and primary receiving partner for Program GRM referrals relating to E&S safeguard non-compliance,

Strengths and Gaps

The national framework presents important strengths including the constitutional right to petition, statutory information disclosure rights, mandatory participation obligations with enforceable procedural standards, binding representativeness thresholds, community consultation safeguards for land decisions, the FPIC principle in forest concession processes, statutory participation obligations and transparency principles at the provincial level, the Local Councils' formal investment appraisal competence, the provincial community authority consultation framework, Provincial Coordination Councils, the Administrative Tutelage mechanism, the RSSA's statutory GRM mandate, the Land Conflict Management Division's land-specific complaint mechanism, and the IAAP's administrative complaint function.

Several gaps relative to World Bank PforR Policy requirements must be addressed at Program level. The national framework does not mandate a standing, continuously operating Program-wide grievance mechanism with defined timeframes for acknowledgement, investigation, and resolution. It does not require gender-disaggregated grievance tracking, targeted accessibility measures for marginalised stakeholders, or explicit procedural protections for vulnerable groups. There are no provisions protecting anonymous grievance submission nor systematic disaggregated reporting requirements on grievance outcomes.

E2.6 Institutional Mandates and Coordination

Environmental and social risk management responsibilities under MozAgribiz are distributed across multiple institutions operating at central, provincial, and district levels. The recent consolidation of key mandates under MAAP creates an institutional architecture with significant potential for

integrated management of agribusiness development and its associated E&S risks. The RI MAAP provides regulatory specificity on the internal architecture within which this consolidated mandate is operationalised.

Program E&S Coordination Architecture: UGISA and RSSA

As indicated in the MozAgribiz Preparation Mission Aide Memoire (March 2026) Program implementation will be coordinated through the Agriculture Sector Investments Management Unit (UGISA), which will thus serve as the World Bank's primary Program counterpart for inter-institutional coordination, sub-project preparation oversight, and engagement with the institutional actors identified throughout this Annex. UGISA's mandate is programmatic and investment management in nature; UGISA does not hold its own statutory E&S oversight mandate. That mandate resides in the RSSA within DINAMC, which constitutes the first explicit statutory attribution of an E&S safeguards mandate to a dedicated unit within MAAP's organic structure, encompassing the elaboration and supervision of E&S safeguard policies, the monitoring of E&S conformity of policies, Programs, and public projects, and the establishment of a mechanism for the management of claims arising from non-observance of E&S safeguard aspects.

Environmental Licensing and Safeguards

Environmental assessment and licensing functions are exercised by MAAP through DINAMC, with the Department of Environmental Assessment as the primary EIA processing unit, the Environmental Licensing Division as the licensing unit, the Biodiversity Offsets Management Division overseeing biodiversity offset implementation, and the RSSA as the dedicated E&S safeguards and GRM unit. Decentralised environmental oversight is exercised through provincial environmental services (SPAs) and district environmental focal points, whose technical-methodological guidance is provided by DINAMC's central directorate.

Other Principal Institutional Actors

Land administration is exercised by the DNTDT and its provincial directorates, responsible for DUAT processing, land cadastre maintenance, territorial planning oversight, resettlement plan technical review, and land conflict management. Forest governance functions are exercised by DNFFB, which holds the mandate for forest zoning, forest licensing and concession administration, felling licensing, plantation licensing, forest inspection, and community participation supervision in forest and wildlife resource management including the 20% benefit distribution mechanism.

Agrochemical regulation is exercised through DINASAB (for agrochemical registration, inspection, and phytosanitary control) and DINAE (for agricultural extension and technical follow-up of good agrochemical practices and PPE use), without a formally specified coordination protocol between them for the OHS dimensions of agrochemical field use.

Livestock licensing is exercised by DINAP. Conservation administration is exercised by ANAC, whose Area Administrators hold a binding opinion function for buffer zone authorisations and activity licensing in conservation areas. The National Irrigation Institute (INIR) holds a dedicated mandate for public irrigation infrastructure development and management.

Fisheries and aquaculture regulation is exercised by MAAP's fisheries directorate (DINAPA). The operative regulatory instrument for fisheries licensing is the Regulation on the Concession of Fishing

Rights and Fisheries Licensing (Decree 60/2018), which establishes procedures for the concession of fishing rights, eligibility requirements, applicable response deadlines, the obligation to conclude a contract concurrent with delivery of the concession title, and the revenue distribution framework for fishing rights taxes and licence fees.

Labour inspection and enforcement rest with MTGAS, which implements its mandate through national directorates for Labour, Gender, Social Action, Migrant Labour, and Children, and enforces labour standards through the IGT. The MAAP's RSSA holds a cross-sectoral gender policy implementation mandate, underlining the need for a formal MAAP-MTGAS coordination mechanism covering the gender dimensions of Program implementation. COMAL serves as the designated body for mediation and arbitration of labour disputes.

Community Fisheries Councils (CCPs)

The Community Fisheries Councils (*Conselhos Comunitários de Pesca* — CCPs) constitute the community-level governance structures for artisanal fisheries. Decree 60/2018 assigns to the CCPs the role of beneficiaries and managers of 15% of fishing licence revenues. A legally significant question is that of their legal personality: the instruments reviewed do not unambiguously confirm that CCPs possess recognised legal personality enabling them to enter contracts, receive and manage public funds, and act independently before judicial and administrative authorities.

The articulation between CCPs and the Local Councils established under the State Representation framework is not defined in any instrument reviewed, generating functional overlap in consultation and investment appraisal processes for fisheries value chain sub-projects. The community authority framework provides the closest normative support for the integration of CCPs into Program community consultation processes. Non-compliance with Decree 60/2018 since 2018 has generated a state of variable operational dysfunction among CCPs, with implications for their capacity to manage complaints, participate in consultation, and exercise community oversight

Water Governance

INIR's mandate operates within the overarching water resource governance framework centred on the ARAs. The ARAs hold the exclusive statutory competence for licensing and granting concessions for private use and exploitation of public domain waters. This exclusive ARA licensing mandate is preserved notwithstanding the devolved competences of the Provincial Governors and Provincial Executive Councils, which apply to service delivery rather than to the authorisation of water resource exploitation. The Secretary of State's opinion functions on the spatial ordering and private use of maritime, lacustrine, and fluvial zones constitute additional provincial-level procedural steps in water-related sub-project preparation that must be accounted for in Program timelines.

Provincial and District Governance Bodies

The dual parallel architecture of provincial governance established by the 2019 legislation and its implementing decrees is a critical dimension of the institutional framework for Program implementation at the sub-national level. The Governor of Province and the Provincial Executive Council are elected autonomous organs of decentralised provincial governance with constitutional autonomy and formal competences, including own regulatory power, in areas that directly overlap with E&S risk management requirements. Provincial Directors within the CEP report to the Governor hierarchically, while articulating with central State organs that superintend the respective sectors on technical-methodological aspects. MAAP's central directorates cannot issue direct binding instructions to provincial directors in the same hierarchical manner as under the pre-2019 framework;

coordination must occur through the articulation channels established by the 2019 provincial governance legislation.

As noted in Section E2.1, the formal textual overlap between the mandates of the two parallel provincial structures is largely managed through informal coordination in practice. The residual risk is one of fragility rather than systemic dysfunction. The proportionate Program response is the elaboration of an Institutional Coordination Manual that formalises the task distribution already functioning informally, with a mandatory revision clause activated by the adoption of any legislative reform altering the current architecture.

Strengths

The recent consolidation of mandates under MAAP represents a significant structural opportunity for integrated E&S risk management. The RI MAAP substantially strengthens this assessment by establishing three institutional elements within DINAMC not previously identifiable from higher-order instruments: the Department of Environmental Assessment with explicit mandates for cumulative impact assessment and SEA promotion; Biodiversity Offsets Management Division with a dedicated mandate for biodiversity offset evaluation and registration; and the RSSA with the first explicit statutory attribution of an E&S safeguards mandate including a GRM function within MAAP's organic structure.

The DNTDT's specialised internal architecture — comprising a dedicated Department of Resettlement and Community Development with a specialist Division of Resettlement for Economic Activities and Public Utility, and a Division of Land Conflict Management with an explicit land GRM mandate — provides a differentiated institutional basis for managing the Program's land governance challenges. The DNFFB's Department of Community Management provides a central institutional unit responsible for supervising community benefit distribution in forest resource management. The IAAP provides an internal MAAP administrative oversight channel for complaints about the ministry's conduct.

The recent merging of the labour mandate with the gender and social action mandate, under a single ministry (MTGAS) is a significant strength. The new institutional architecture of MTGAS provides a clear organisational basis for enforcing labour, gender, child protection, and social vulnerability obligations. ANAC's mandate provides a formally grounded institutional safeguard for biodiversity protection. INIR's dedicated mandate provides a specialised institutional resource for irrigation infrastructure. The dual provincial architecture presents several institutional assets: the Secretary of State's petition processing function, the Local Council's formal investment appraisal competence, the elected CEP's obligations of participation and transparency, the DPDTA's community engagement function for natural resource activities, the Provincial Coordination Councils, and the Administrative Tutelage Mechanism.

Weaknesses: Institutional Coordination Gaps

Absence of coordination protocol between DINAE and DINASAB for agrochemical OHS extension, field inspection, and waste management functions

- Absence of a formalised inter-ministerial mechanism between MAAP and MTGAS on occupational safety, agrochemical field OHS, gender equity in agricultural labour markets, child protection in agribusiness value chains, and labour influx management.
- Absence of a formalised inter-institutional coordination mechanism between INIR and the relevant ARAs for the management of cumulative water abstraction from shared catchments. constitutional division between MAAP's central mandate and the delivery of its provincial

mandates through the elected provincial governance system. MAAP's central directorates cannot issue binding Program-level compliance instructions directly to Provincial Directors operating within the CEP system; all guidance must flow through the articulation mechanisms established by the 2020 provincial governance legislation. Coordination challenge arising from the formal textual overlap between the mandates of the two parallel provincial structures. As noted, this does not translate in most instances into operational conflict.

Other Mandate-Level Weaknesses

The IGT's mandate does not specify the geographic distribution of inspection functions or establish minimum service standards for rural and agricultural employment settings. COMAL's formal mandate at sub-national level is not comprehensively defined in the instruments reviewed. The MTGAS internal regulation formally separates inspection (IGT) from child labour victim response (DNC) with no articulation protocol between them. The National Directorate of Social Action within MTGAS holds a formal mandate to participate in social impact assessments of development projects, but no procedural mechanism links this to Program sub-project screening

Table 1: Distribution of E&S-Relevant Functions between the Two Parallel Provincial Structures and Central/Sectoral Authorities

E&S Domain	State Representation Structure	Elected CEP Structure	Central / Sectoral Authority
Environmental licensing / EIA	SPA	—	MAAP / DINAMC
Environmental planning and ecological zoning	SPA	DPDTA	MAAP / DINAMC
Pollution control and effluent management	SPA	DPDTA	MAAP / DINAMC / ARA
Mangroves and coastal/aquatic ecosystems	—	DPDTA	MAAP / DINAMC; ANAC (near conservation areas); coastal protection regulation
Recovery of degraded soils	SPA	DPDTA	MAAP / DINAMC
Cumulative impact assessment and SEA	—	—	MAAP / DINAMC / Departamento de Avaliação Ambiental
Biodiversity offsets — evaluation and registration	—	—	MAAP / DINAMC / Repartição de Gestão de Contrabalanços de Biodiversidade
E&S Safeguards — policies, conformity, GRM	—	—	MAAP / DINAMC / RSSA
DUAT opinions ≤ 1,000 ha	—	DPDTA	MAAP / DNATDT
DUAT opinions > 1,000 ha	SPA	Governor	MAAP / DNATDT
Community consultations DUAT — procedural oversight	—	—	MAAP / DNATDT / Repartição de Tramitação e Tombo
Resettlement coordination (economic projects)	SPA	—	MAAP / DNATDT / Departamento de Reassentamento
Resettlement coordination (calamities)	—	DPDTA	INGD
Technical opinions on resettlement plans (economic activities)	—	—	MAAP / DNATDT / Repartição de Reassentamento sobre Actividades Económicas AND MAAP / DINAMC / Repartição de Licenciamento Ambiental — intra-MAAP overlap without coordination protocol
Land GRM — land management complaints	—	—	MAAP / DNATDT / Repartição de Gestão de Conflitos de Terra
Public utility declaration (expropriation)	—	Governor / CEP	Provincial Assembly / tutelage supervision

E&S Domain	State Representation Structure	Elected CEP Structure	Central / Sectoral Authority
Forests — licensing and inspection (areas ≤ 20,000 ha)	SPA	DPDTA	MAAP / DNFFB
Forests — concessions > 20,000 ha	SPA	—	MAAP / DNFFB
20% forest benefits mechanism	SPA	DPDTA	(Joint Ministerial Diploma — pending) / MAAP / DNFFB / Departamento de Maneio Comunitário
Wildfire control	SPA	DPDTA	MAAP / DNFFB
Human-wildlife conflict management	—	DPDTA	MAAP / ANAC; DNFFB
Conservation — licensing and inspection	SPA	—	ANAC
Special licences in zones of partial protection	SPA	Governor	ANAC (binding opinion)
Proposals for creation of conservation areas	SPA	—	ANAC / Central Government
Community consultations for AC recategorisation	SPA	—	ANAC
Agriculture — licensing and inspection	SPAE	DPAP	MAAP / DINAG
Livestock — licensing and inspection	SPAE	DPAP	MAAP / DINAP
Livestock sectoral licensing with concurrent EIA requirement	—	—	MAAP / DINAP (sectoral) AND MAAP / DINAMC (EIA) — intra-MAAP coordination gap
Agricultural hydraulics — normative compliance	SPAE	DPAP	INIR / ARA
Small-scale in-land aquaculture — licensing	SPAE	Governor; DPAP	MAAP / ARA; DINAPA; Decree 60/2018
Aquaculture — environmental impact assessment	—	—	MAAP / DINAPA / Repartição de Ordenamento Aquícola
Fisheries — monitoring	SPAE	DPAP	MAAP / DINAPA
Strategic management of water resources	Secretary of State	Governor	ARAs (exclusive licensing competence)
Opinion on private use of water public domain	Secretary of State	—	ARAs (exclusive licensing competence)
Ordering of lacustrine and fluvial zones	Secretary of State	—	ARAs
Industry and commerce — licensing	SPAE	DPIC	Relevant ministry
Labour and OHS — inspection and compliance	SPJT	DPJED	MTGAS / IGT
Promotion of decent work	SPJT	—	MTGAS / DNT
Trade union freedoms and collective rights	SPJT	—	MTGAS / IGT
Extra-judicial labour conflict resolution	SPJT	—	COMAL
OHS at the workplace	SPJT	—	MTGAS / IGT
Agrochemicals — registration, inspection, licensing	—	—	MAAP / DINASAB / Repartição de Registo e Controlo de Agroquímicos
Inspection of pesticide and fertiliser good practices	—	—	MAAP / DINASAB / Repartição de Fiscalização de Insumos Agrícolas
Agrochemical good practices extension and PPE	—	—	MAAP / DINAE / Repartição de Extensão Agrícola
Gender — promotion and GBV prevention	—	DPGCAS	MTGAS / DNG; MAAP / DINAMC / RSSA
Child protection	—	DPGCAS	MTGAS / DNC
HIV/AIDS — prevention	—	DPGCAS	MTGAS / DNAS
Social action and vulnerable groups	—	DPGCAS	MTGAS / DNAS
Youth employment and professional training	—	DPJED	MTGAS

E&S Domain	State Representation Structure	Elected CEP Structure	Central / Sectoral Authority
Community participation — consultation	Local Councils	DPDTA; CEP	—
Appraisal of private investment proposals and DUATs	Local Councils	—	—
Petitions, complaints, and suggestions	Secretary of State	CEP	tutelage; MAAP / IAAP
E&S Safeguards GRM — MAAP central anchor	—	—	MAAP / DINAMC / RSSA
Land GRM — MAAP central anchor	—	—	MAAP / DNATDT / Repartição de Gestão de Conflitos de Terra
Complaints about MAAP administrative conduct	—	—	MAAP / IAAP / Departamento de Fiscalização Administrativa
Supervision of legality of provincial acts	Secretary of State / supervisory ministry	—	Council of Ministers
Articulation with community authorities	State Representation structure	CEP	—
Multi-actor provincial coordination	Secretary of State (participant)	Governor/CEP (chairs)	Provincial Coordination Councils
Monitoring of social, environmental and gender policies in sectoral plans	—	—	MAAP / Direcção de Planificação e Políticas

Note: The overlap identified in this table reflects the dual constitutional architecture operationalised by the implementing decrees. Operational resolution of overlaps at provincial level requires coordination protocols through the Provincial Coordination Councils. Resolution of internal MAAP overlaps requires inter-directorate protocols established at the ministerial level. Cells marked "—" indicate that the function was not explicitly attributed to that structure in the instruments reviewed.

Implications for Program Action

Three categories of gap call for differentiated responses.

The first category concerns institutions with the relevant legal mandate but where the mandate framework does not fully specify the standards, coverage, or coordination requirements needed for consistent E&S risk management under the Program. For these institutions, the appropriate Program response is targeted operational support and supplementary procedural frameworks, including: integration of the Division of Land Conflict Management as a formal land-related GRM referral partner; integration of the IAAP as a formal channel for complaints about MAAP's administrative conduct; guidance on the application of transparency and participation obligations to Program sub-project consultation; integration of the Provincial Coordination Councils as Program coordination forums; and explicit GRM linkages with the DPGCAS for gender, GBV, and child protection issues.

The second category encompasses the ten structural coordination gaps enumerated above: agrochemical field OHS; MAAP-MTGAS inter-ministerial; INIR-ARAs; MAAP central-CEPs; and dual parallel provincial structures. None is resolvable through capacity strengthening within individual institutions; each requires the establishment of a practical coordination mechanism operationalising cooperation across institutional boundaries within the existing legal architecture.

The third category concerns the Program-level grievance redress function. A dedicated Program-level GRM with defined independence from local government and implementing partners, and with clearly articulated referral and escalation pathways to the IGT, COMAL, the SPJT's extra-judicial conflict resolution mechanism, MAAP's decentralised services, ANAC, MAAP's forestry services, the DPGCAS, the RSSA/DINAMC, the Division of Land Conflict Management, the IAAP, the Administrative Tutelage Mechanism, and where applicable the Public Prosecutor, is a structural requirement of the Program design.

Institutional Capacity to Support a Program-Level GRM

The Program-level GRM should be established as a dedicated operational function within the Program's own implementation structure, with clearly defined independence from local government and Program-implementing partners for the intake and case management of sensitive grievance categories. It should be designed with explicit referral and escalation pathways to the institutional partners identified above, treating these institutions as essential partners for formal resolution of complaints falling within their respective mandates.

Annex F1 – Assessment of Environmental Management Systems

F1.1 Environmental Screening and Licensing

F1.1.1 Regulatory Framework and Institutional Mandates

The regulatory foundation for environmental screening and licensing in Mozambique rests principally on Decree 54/2015 and its associated EIA directives, which establish the project categorisation system governing the type and depth of environmental assessment required before project approval. This framework assigns the central licensing authority to DINAMC at the national level, with provincial-level functions formally delegated to the Provincial Services of Environment (SPA). The National Agency for Environmental Quality Control (AQUA), created subsequently, was assigned the inspection, auditing and enforcement functions that were previously dispersed across several entities, including the transfer of forestry inspection from DNFFB to AQUA.

Within the MAAP institutional structure, the E&S Safeguards Division (RSSA) has the mandate to operate as the internal safeguards function, with responsibility for the screening, induction, monitoring and reporting of environmental and social risks in projects managed or supervised by the Ministry. Its instruments include a Manual of Good Practices developed internally for the Agriculture sector and tested across multiple Programs, as well as screening, assessment and monitoring tools with pre-defined indicators and non-conformity identification mechanisms. The unit's staffing derives from the previous Ministry of Agriculture structure, which provides operational continuity and sectoral familiarity but also reflects an institutional history in which environmental and social safeguards were not a primary organisational function. The unit's institutional weight within MAAP remains limited: it does not yet have a legal instrument formally establishing safeguards screening as a mandatory step in the project approval process, which means that the integration of safeguards into project screening currently depends on internal practice and Program-level requirements rather than on a binding procedural obligation within the Ministry's own regulatory framework.

The National Directorate of Land and Territorial Development (DNTDT intersects with the environmental licensing cycle primarily through the DUAT attribution process, which formally precedes and conditions environmental licensing for projects requiring land access, creating a procedural interface whose management has direct implications for screening quality.

This institutional architecture is, on paper, reasonably coherent: DINAMC screens, categorises and licences; SPA exercises provincial licensing functions; AQUA inspects and audits; the RSSA provides internal MAAP support in adopting and implementing environmental and social safeguards; and DNTDT manages the land rights interface. The evidence gathered through the ESSA interviews, however, reveals a substantial and systemic gap between this formal architecture and the operational reality of environmental screening and licensing in Mozambique, with implications that are particularly acute for a Program of the scale and territorial distribution of MozAgribiz.

F1.1.2 The Provincial Licensing Duality: Signs of Systemic Inefficiency

The most significant structural deficiency in the environmental screening and licensing system identified through the ESSA interviews is the parallel operation of two provincial entities with overlapping and legally unresolved licensing competencies: the SPA on the one hand and the Provincial Directorate of Territorial Development and Environment (DPDTA) on the other.

This duality emerged from the 2021 decentralisation process, which created the SPA as the formally recognized provincial arm of DINAMC for environmental licensing, absorbing the technical staff that

had previously performed this function within the DPDTA. Notwithstanding this formal transfer, the DPDTA has continued to issue environmental licenses for Category B and C projects, without a clear legal basis identified by any of the interviewed institutions, without systematic coordination with the SPA, and without reporting to the Ministry. The legislative instrument expected to resolve this ambiguity by clarifying attributions and extinguishing certain services had not been published at the time of the ESSA interviews, and its timeline remained uncertain.

The consequences of this duality, documented from five distinct institutional vantage points across the ESSA interview series, are severe. The SPA of Sofala acknowledged that project proponents can initiate processes in either entity and abandon them if difficulties arise, that the Ministry has no visibility over the number of licenses issued by the DPDTA, and that irregularities only come to light when field inspectors encounter operating projects whose licences were not issued by the competent authority. The DPDTA of Sofala confirms the absence of a shared database, the existence of separate and irreconcilable numbering systems, and the absence of any revenue reconciliation between the two entities. DINAMC acknowledges at the central level that it becomes aware of these situations informally, through comments rather than official reporting channels, revealing an absence of systematic supervisory mechanisms over the legality of provincial licensing processes. The DNTDT confirms the dual provincial architecture from the land administration perspective, noting that the DPDTA's dual subordination — to the Provincial Governor as well as to DNTDT — can generate tension between provincial development objectives and normative land management obligations.

The operational consequence of this systemic weakness is captured in the DPDTA Sofala interview: "*in practice, the proponent chooses where to submit the application.*" This is not merely a procedural inconvenience — it constitutes a regulatory arbitrage environment in which the entity with less rigorous requirements or more expedient processes will attract applicants and in which the current supervisory architecture has no mechanism to detect or prevent a race to the bottom in licensing quality. DINAMC confirms that DPDTA-issued licences that come to light must be reinstructed from the beginning in the SPA, suggesting that a portion of the active project portfolio in each province may carry licences of uncertain legal validity — a position whose practical scope cannot be established because no consolidated register exists.

For MozAgribiz, which will support agribusiness activities distributed across multiple provinces and corridors, this situation means that the universe of projects with any form of environmental licence is not fully known to any single institution, the quality of licences issued outside the SPA is not independently verifiable, and the validity of processes conducted through the DPDTA channel is legally uncertain. The observation made by SPA of Sofala technicians — that external financing Programs tend to focus on beneficiaries while overlooking the licensing system — articulates a structural dynamic that MozAgribiz must consciously resist: the tendency of Program design to treat the licensing and supervision architecture as a background condition rather than a Program actor requiring explicit investment and engagement.

F1.1.3 Categorisation Integrity and the Risk of Classification Pressure

The ESSA interviews documented a case of pressure to deviate from appropriate environmental categorisation, where a project was presented for approval under financing deadline conditions that the DINAMC itself characterises as procedurally irregular. Importantly, the institution did not yield to this pressure — a fact that reflects institutional integrity under difficult conditions but also reveals the structural vulnerability of categorization processes to disbursement-driven incentives. That such pressure was documented and acknowledged through official interview channels, rather than normalised or denied, suggests an institutional awareness of the problem that is itself a basis for strengthening procedural safeguards.

For MozAgribiz, which operates under a Program-for-results financing instrument where disbursement is linked to demonstrated results on a defined timeline, this risk requires explicit attention. The design of the Program's disbursement-linked indicator system should be reviewed to ensure that timeline pressure does not create implicit incentives for categorisation shortcutting at any level of the implementation chain.

The SPA Sofala interview adds a further dimension to categorisation quality that is distinct from external pressure. The institution describes a practice — characterised as a ministerial-level understanding applied across the sector — of waiving the simplified environmental impact study and mandatory public consultations for Category B projects, substituting them with a simple ESMP, when it pertains the licensing of a project that is already in operation or when the area in question already has other similar projects with Environmental Impact Studies completed, and the impacts have been previously identified and are well known. The SPA interviewee acknowledges that this practice "*is not explicitly legislated*" and rests on a ministerial document whose specific content cannot be retrieved with certainty. The implications are double. From a legal validity perspective, licences issued under this practice rest on a basis that is not traceable to a specific legal instrument, creating uncertainty about their legal standing. From a safeguards perspective, public consultations are the principal formal mechanism through which affected communities participate in the assessment of projects that affect them, and their removal on the basis of an internal technical criterion that is not auditable constitutes a protection gap of direct relevance to MozAgribiz. Category B projects are likely the most frequent category in the scale of agribusiness activities the Program supports, meaning this practice may affect a significant proportion of the project portfolio.

A further categorization interface risk identified in the DNTDT analysis concerns the sequencing of the DUAT attribution process ahead of the EIA. Communities may agree to land cession during the DUAT community consultation before the full conditions of resettlement are known, since resettlement details are defined only later within the EIA process. DNTDT explicitly recognises this risk: the early consent is given without full information, potentially generating conflicts when actual resettlement conditions are communicated. For MozAgribiz, this sequencing problem means that the safeguards protections embedded in the EIA process may be formally observed while the substantive protection they are intended to provide — informed community consent to project conditions — has already been compromised upstream in the land attribution process.

F1.1.4 Information Systems and Traceability

The state of environmental information systems across the screening and licensing chain is a critical constraint on MozAgribiz's ability to demonstrate that supported projects hold valid environmental licences, that licence conditions are being met, and that identified impacts are being mitigated — all of which are standard requirements for a World Bank PforR results verification system.

DINAMC's Environmental Licensing Management System (SGLA) suffered a major technical failure resulting in the loss of a significant portion of accumulated licensing data and is currently undergoing revitalisation with a completion timeline expected in September 2026. Its integration with the provincial SPAs depends on internet connectivity at the provincial level, which the DINAMC team itself acknowledges as a real constraint. SPA Sofala maintains its records in Excel files accessible from a single central computer, without consolidated backups and without any data architecture that supports search, aggregated analysis or automatic reporting. The DPDTA Sofala maintains a separate database with its own numbering system, irreconcilable with the SPA's records or the central level's systems. The AQUA Provincial Sofala operates with an Excel-based system described by its own users as constructed "*in our own way*" without formalised data architecture. The DNTDT's SIGIT land information system is operational only up to the provincial level, lacks critical modules for provincial

reporting and central-level process tracking, and does not communicate with MAAP agricultural management systems. Since the DUAT is a formal prerequisite for initiating environmental licensing, and since the DUAT attribution process already incorporates a screening step to identify pre-existing formal and customary land rights, the primary risk introduced by SIGIT's limitations is not that environmental licensing proceeds without land rights visibility per se — but rather that the quality of the upstream DUAT screening is itself constrained by incomplete or inaccessible land information, meaning that DUATs may be attributed on the basis of a land status picture that is partial, outdated, or inconsistent across systems.

The planned integrated environmental information system — which would have incorporated modules for licensing, forests, waste and climate monitoring — exists only in Terms of Reference without secured financing. While EIAs are subject to a public consultation process prior to approval, no online platform provides public access to approved EIAs, environmental licenses or post-approval monitoring reports from any institution in the licensing chain. Access to documentation after approval is physical and requires formal request, which is incompatible with the proactive disclosure requirements of a World Bank-financed PforR. An Integrated Environmental Information System - which has not progressed beyond the Terms ff Reference stage — represents an initiative that should be evaluated for implementation to complement the SGLA revitalisation process.

The practical consequence of this information system fragmentation for the capacity assessment is that no institution in the licensing chain is currently capable of producing a complete, accurate and independently verifiable register of all active agribusiness projects with environmental licences in any given province of MozAgribiz's intervention corridors, let alone across the full national Program geography. This is a fundamental gap in the evidence base that the Program's compliance verification system requires.

F1.1.5 Technical Capacity Gaps in Screening

The social risk integration gap in the screening process is a significant technical constraint. DINAMC confirms that pre-screening and screening phases do not systematically incorporate social risks such as gender-based violence, occupational health and safety, community safety or labour conditions. These aspects appear only during the development of the EIA study itself, dependent on the vision and judgment of contracted consultants rather than on a standardised screening requirement. The EIA Directive revision identified by DINAMC technicians as the most expedient mechanism for addressing this gap is estimated at between six months and a year, contingent on available financing. For MozAgribiz, which operates in agribusiness value chains with documented and material risks in all these areas, the absence of systematic social risk integration at the initial screening stage means that projects may reach the licensing decision point with an inadequate assessment of their social risk profile.

The RSSA analysis adds a complementary dimension: the unit that should provide the internal MAAP check on safeguards quality is staffed entirely by environmental, forestry and agropastoral specialists who have extended their competencies into social dimensions through practical experience rather than disciplinary formation. The RSSA itself identifies this as a limitation affecting the quality of coverage of vulnerable groups, conflict management, inclusive participatory processes and gender-based violence.

The 70% outdatedness of District Land Use Management Plans (PDUTs) in the province of Sofala, mentioned by DPDTA, is a further technical quality constraint for screening. Environmental licensing decisions, including the territorial compatibility verification that spatial planning instruments are intended to provide, are being made against reference documents that no longer reflect current land

use reality in the most agro-industrially active corridor of the Program. This concern is compounded by a point raised by the DNTDT: before updating these instruments, it would first be necessary to assess whether they were effectively implemented during the period in which they were in force. Outdatedness and non-implementation are therefore not sequential problems but potentially concurrent ones, which raises questions about whether the regulatory function of territorial planning has in practice been exercised at all in this corridor. The capacity to update these instruments rests on external financing or central budget resources, neither of which is currently available to the provincial level on a systematic basis.

F1.1.6 Community Commitment Follow-Up and Transparency Deficits

A dimension of the licensing system whose consequences extend through the full project implementation cycle, is the gap between commitments made by project proponents in community consultations, during the DUAT process, and the systematic follow-up of those commitments.

AQUA Provincial Sofala and Dondo District focus group documents this gap with precision. During mandatory community consultations for the DUAT process, proponents make commitments to communities that are recorded in minutes held by local governments. These commitments are not necessarily incorporated into the ESMPs — they may exist in separate corporate social responsibility documents. AQUA audits these plans when they exist, but the monitoring of community commitments is formally the responsibility of local authorities, which in practice have no systematic capacity for this function. The result is that commitments on which communities base their acceptance of projects — which may include employment targets, infrastructure investment, compensation undertakings and community development provisions — exist in a space of diffuse accountability where no entity systematically verifies compliance. AQUA explicitly acknowledges that when information about commitments made in community consultations during the DUAT process is not shared with the environmental licensing and monitoring chain and local authorities, obligations assumed at the land access stage, prior to and independently of environmental licensing, may not be taken into consideration. Field evidence from the Dondo District focus group confirms that the district has no systematic mechanism for following up on commitments made by investors during community consultations, that consultation minutes are held by local government structures without a formalised monitoring function.

The absence of proactive disclosure compounds this accountability gap. No institution in the licensing chain makes approved EIAs, environmental licences or monitoring reports publicly available in an accessible format. AQUA notes that the decree permits publication of audit executive summaries but that this possibility has never been exercised. The RSSA produces monitoring reports that are consumed only internally. DINAMC has no online platform for licensing information, and access to documentation requires a physical visit and formal request. This pattern of passive transparency — documents exist but are not proactively disclosed — is incompatible with the accountability requirements of a World Bank PforR and limits the ability of communities, civil society organisations and other stakeholders to independently assess whether project conditions are being met.

F1.1.7 Normative Gaps and the Transition Risk

Several normative gaps in the environmental screening and licensing framework have direct implications for MozAgribiz's implementation timeline and risk profile.

The absence of a binding safeguards policy instrument for the MAAP is the most fundamental. The RSSA has a draft policy but no approved mandatory instrument, which means that safeguards integration in projects managed by other MAAP directorates depends on voluntary compliance and

donor pressure rather than enforceable obligation. The RSSA explicitly acknowledges that it lacks the institutional authority to compel other directorates and supervised institutions to incorporate safeguards in their activities. This structural weakness means that the internal MAAP safeguards function cannot enforce consistent safeguards integration across all MozAgribiz implementing entities — a risk that is particularly significant given that the Program is a results instrument where activities managed by multiple implementing entities must meet consistent and verifiable standards.

The DINAMC opinion non-binding status within MAAP adds a further normative fragility. For a technical orientation from DINAMC to acquire normative force for other MAAP directorates, it must pass through the Technical Council presided over by the Permanent Secretary, and in some cases through the Consultative Council presided over by the Minister. This bureaucratic circuit is a significant operational constraint for the management of environmental and social risks in a decentralised implementation Program where speed of response and clarity of mandate are determinants of system effectiveness.

The ESSA interview with DINAMC surfaced an internal debate about the most appropriate and expedient instrument to ensure that safeguards requirements — including social risk screening — become formally mandatory in the environmental licensing process. Options discussed included the development of a safeguards policy and accompanying implementation strategy, the creation of guidance notes, and the revision of the existing EIA Directive. Opinions among DINAMC staff were divided: some viewed revision of the Directive as faster and more direct, while others considered the policy and respective strategy of implementation to more practicable, considering a draft safeguards policy is in preparation. If conditions were met — including securing financing and contracting a consultant — revision of the EIA Directive was estimated to take between six months and just under a year.

At the time of the ESSA interviews, the new Land Law had been submitted to the National Parliament. DNTDT officials noted that, once approved, a significant period is expected to elapse before the law enters into force, given the need for extensive and broad-based dissemination across the country. No timeline has been established for the preparation and approval of the implementing regulation; however, it was noted that certain provisions of the law itself may be capable of implementation prior to the regulation being finalised.

Additionally, it was noted during the interviews that a new piece of legislation has been presented to Parliament, to resolve the dual institutional architecture at provincial level introduced with the decentralization process. This new law proposes the extinction and/or reconfiguration of services attached to the Secretary of State. There is no clarity of when this law will be effective, which raises a potential transition risk: if the program begins providing institutional support under one configuration, subsequent dissolution or structural changes could render that support obsolete or misaligned with the new institutional framework.

MozAgribiz will therefore be implemented against a normative landscape in active transition, with several key instruments under revision, awaiting approval or not yet operationally effective. The Program design must explicitly manage this transition risk rather than treating current normative gaps as conditions that will be resolved before implementation begins.

F1.2 Monitoring, Compliance, and Enforcement

F1.2.1 Institutional Architecture of the Environmental Compliance System

The post-licensing environmental oversight architecture in Mozambique distributes functions across three entities. DINAMC holds a mandate under the RI MAAP to monitor environmental licensing processes and integrate environmental requirements into sectoral planning, though no explicit project-level post-licensing surveillance function is established by that instrument; AQUA, which holds the exclusive inspection, audit and sanctioning mandate for all licensed activities; and the RSAA which exercises, under Article 96 of the RI MAAP, a safeguards oversight function over policies, Programs and public projects, oriented primarily toward policy and Program conformity rather than field-level verification of individual project performance.

DINAMC's post-licensing monitoring function covers two formally distinct activities: technical monitoring of the activities of the provincial environmental services (SPAs) and technical monitoring to verify that licensed activities are being implemented in conformity with the approved environmental license and its associated ESMPs. Both functions are exercised by DINAMC through its licensing units, and both are structurally constrained by the same operational limitations that affect the licensing function itself: the absence of a consolidated, functional information system tracking the status of all active licences; staff allocation concentrated on the processing of incoming licence applications; and budget limitations that restrict field mobility.

DINAMC confirmed in ESSA interviews that its technical monitoring capacity has historically been limited, that a previous institutional understanding — characterised by DINAMC itself as a mistaken perception— had attributed all post-licensing monitoring to AQUA, and that this understanding had effectively atrophied DINAMC's own monitoring function over a period extending across several years before a corrective internal reorientation was initiated. The practical consequence is that DINAMC is rebuilding an internal monitoring practice whose operational effectiveness is not yet established and whose integration with AQUA's parallel function lacks a formal protocol.

AQUA holds the core compliance function: independent inspection of all activities subject to environmental licensing, independent of whether a prior voluntary audit has been conducted, and the exclusive sanctioning power for environmental violations. This mandate is legally clear and uncontested, positioning AQUA as a central institution in ensuring environmental and social compliance. However, the critical issue identified by ESSA interviews relates to AQUA's capacity to deliver meaningful, independent compliance verification across the scale and territorial spread of agribusiness activities supported by MozAgribiz.

F1.2.2 AQUA's Operational Configuration and the Primacy of Documentary Review

The AQUA Provincial Sofala self-characterisation — that its work is concentrated primarily in documentary review, most of it consisting in audit reports, prepared by independent consultants, that companies are obliged by law to submit —describes not a temporary operational constraint but a recurrent mode of function: the provincial inspection and enforcement unit responsible for verifying environmental compliance in the Beira corridor, which concentrates some of the highest volumes of agro-industrial activity in the national MozAgribiz portfolio, mostly operates as a document management function rather than as an independent field-based verification system.

The reasons for this operational configuration are structural rather than attitudinal. AQUA Provincial Sofala's field inspection Program is constrained by vehicle availability — one operational vehicle serving the full territorial coverage of the province, including both the coastal strip and the Beira

corridor hinterland — and by fuel allocation, which determines the frequency and radius of field missions. The consequence is a prioritisation logic that AQUA itself describes: field visits are conducted primarily in response to specific complaints received from communities or other actors, and for audits solicited and financed by project proponents. Routine independent inspection — visits to active licensed operations conducted on the basis of AQUA's own Program rather than in response to an external trigger — is described as exceptional rather than systematic.

This operational pattern is not confined to AQUA. The Dondo District focus group — involving SDPI, the services with district-level responsibility for monitoring companies against their environmental management obligations — confirmed that no monitoring visit had taken place in the year preceding the focus group, against a planned quarterly frequency. The parallel weakness across two institutional levels — AQUA at provincial level and the SDPI at district level — operating under different mandates, different resource constraints, and different formal monitoring obligations, but producing the same outcome of no field-based compliance verification within a given period, indicates that the monitoring performance gap is a structural consequence of resource conditions common to the entire oversight architecture rather than a failure specific to any single institution.

This operational configuration has two consequences that reinforce each other in ways that are particularly problematic for a Program of MozAgribiz's scale. The first is that the probability of an inspection detecting a violation is directly correlated with whether the violation has already caused sufficient community impact to generate a formal complaint, meaning that early-stage, gradual or technically complex violations — the category most relevant to cumulative impacts from agrochemical use, progressive soil degradation or incremental water quality deterioration — are unlikely to be detected through the complaint-triggered model before they reach a point of significant harm. The second concern highlighted in the ESSA analysis relates to AQUA's predominant reliance on documentary review from independent consultants, hired by companies, with AQUA led-field audits generally limited to cases where companies explicitly request them. Companies that commission voluntary audits receive more systematic and in-depth technical scrutiny than those that do not. This asymmetry does not, however, mean that non-audited companies escape independent scrutiny altogether: proponents are legally required to submit periodic environmental monitoring reports prepared by independent consultants. The AQUA audit is therefore one layer of a broader verification architecture. The more precise concern is that the depth and frequency of technical scrutiny remain uneven across the licensed portfolio, and that the limitations preventing systematic AQUA audits creates a structural gap that the mandatory reporting obligation does not fully compensate for. To compensate for budget constraints, AQUA also relies on the technical and financial support embedded in large externally-funded projects — such as MozRural — that include components dedicated to strengthening environmental oversight and follow-up capacities. These arrangements represent an adaptive response to structural resource limitations, though they remain contingent on the continuation of specific Programs rather than constituting a sustainable institutional solution.

AQUA central's characterisation of its inspection practice confirms and amplifies the provincial picture. The absence of any laboratory of its own, the absence of a formalised protocol with any external laboratory capable of conducting environmental sample analysis, and the acknowledged dependence on empirical observation for inspection findings collectively mean that AQUA's inspection methodology — at both the central and the primary provincial level assessed by the ESSA — is structurally incapable of detecting the categories of environmental violation most directly associated with intensive agribusiness: agrochemical residues in soil and water, effluent quality, atmospheric emissions from processing facilities, and heavy metal or nutrient loading in receiving water bodies.

F1.2.3 The Audit Model: Design, Financing, and Structural Limitations

The environmental audit system, as legally constituted and operationally implemented in Mozambique, is the principal formal mechanism through which licensed projects are subject to systematic post-licensing compliance review. Its legal basis establishes categories of mandatory audits triggered by project scale, activity type and elapsed time since licence issuance. The institutional and operational analysis of this system reveals several structural limitations directly relevant to MozAgribiz's compliance verification requirements.

The mandatory audit Program is formally clear in its triggering conditions but practically limited in its implementation rate. AQUA confirmed that the pace of mandatory audit completion is constrained by the same resource limitations that affect field inspection generally — vehicle availability, fuel, and the availability of sufficient qualified staff to form the multi-disciplinary audit teams that the methodology requires. AQUA interviewees acknowledged that these constraints prevent the institution from fulfilling its activity plans, and that audit coverage of the agribusiness and agro-industrial sector in the last two years has been limited, with confirmed audits in the sector restricted largely to the sugar industry. The absence of a functional, consolidated and current information system compounds these operational limitations: AQUA currently relies on internally-designed Excel-based spreadsheets — described by interviewees as built intuitively — rather than a purpose-built licensing and compliance database, which means that the identification and prioritisation of mandatory audit obligations is dependent on institutional memory rather than on a system-driven workflow. Taken together, these resource and information management constraints create conditions in which systematic and timely completion of the mandatory audit pipeline cannot be assured.

The audit Program is mandatory in its application, but its execution may be carried out either directly by AQUA or by external auditors contracted by the proponent. This arrangement introduces the perverse incentive problem already identified: where the proponent selects and funds the external auditor, the conditions for capture or accommodation are structurally present, irrespective of the formal mandatory nature of the audit obligation. The operational mechanics of this dual-track system merit more specific analysis, particularly with respect to the criteria governing which track applies, the degree of AQUA oversight exercised over externally conducted audits, and whether the outputs of proponent-commissioned audits are subject to independent review before compliance determinations are made.

A proponent that requests an audit by AQUA assumes the operational costs necessary to enable AQUA's team to conduct it — principally travel and field deployment expenses — rather than commissioning or purchasing an auditing service. AQUA retains full institutional ownership of the audit process; the proponent's financial contribution is a cost-coverage mechanism, not a fee for a commercial service

The audit findings are reported to AQUA, which issues a compliance determination and, where non-conformities are found, a corrective action Program with defined timelines. The proponent then reports on corrective action completion, and AQUA is expected to verify closure — a process that, in practice, is confirmed to rest primarily on documentation rather than field verification of the stated remediation. For MozAgribiz, the audit model in which the proponent assumes the operational costs of the audit means that the compliance verification system for any given project is substantially constructed by the proponent's decision to engage it, financed by the proponent, and closed by documentation review rather than independent field verification. These are not adequate safeguards for a Program where the World Bank PforR requires demonstrable, independently verifiable environmental compliance.

A third dimension of the audit system that the ESSA analysis identifies as particularly relevant for MozAgribiz is the treatment of audit findings and their relationship to licensing decisions. AQUA's sanctioning power allows it to impose fines for environmental violations, order activity suspension, and recommend licence cancellation — with cancellation formally requiring coordination with DINAMC. However, the ESSA interviews reveal that the escalation from non-conformity identification in an audit to formal sanctioning is not automatic, and that the resolution of audit non-conformities is frequently managed through the corrective action Program mechanism rather than through the administrative sanctioning process. AQUA describes this as a preference for a constructive compliance management approach over punitive enforcement — an approach that has an institutional rationale in the context of agribusiness activities where abrupt activity suspension would cause social and economic disruption. The operational approach to enforcement, as confirmed by AQUA interviewees, prioritises the correction of identified infractions over the immediate imposition of sanctions — affording the infractor an opportunity to remedy non-compliance before punitive measures are applied. This is a recognised regulatory practice and does not, in itself, undermine the deterrent function of the sanctioning mechanism: sanctions remain available and applicable where infractions are recurrent or uncorrected. What could not be independently assessed within the scope of this analysis is the frequency with which sanctions are ultimately imposed, as no publicly accessible enforcement record was identified that would allow such an assessment.

F1.2.4 ESMP Monitoring: Proponent Obligations and Verification Gaps

The review of Agribusiness-related ESMPs, conducted during the ESSA, indicates that ESMP quality is variable. ESMP documents prepared by contracted EIA consultants range from technically detailed instruments with quantified indicators, clear monitoring protocols and defined measurement frequencies to general statements of intent that are insufficiently specific for independent verification. The absence of standardized minimum content requirements for ESMP quality — beyond the general provisions in the EIA framework — means that the licensing process does not reliably produce the technical instrument that the monitoring system needs in order to discharge its function.

The proponent's self-reporting obligation — the periodic environmental monitoring report submitted to DINAMC — is the administrative counterpart of the field monitoring visits. The DINAMC interview confirms the broader character and practical constraints of DINAMC's post-licensing monitoring role. DINAMC’s monitoring mandate has been significantly curtailed in practice by resource constraints: monitoring visits were conducted in the past but have progressively diminished for lack of personnel and operational means. The character of DINAMC's monitoring function, as described by interviewees, is administrative and advisory rather than enforcement-oriented. Formal enforcement authority, including recommending licence revocation, rests with AQUA. EIA documentation, environmental licences and monitoring reports are accessible only on physical request, with no online repository currently operational. Taken together, these confirmed features — constrained monitoring capacity, an advisory rather than verificatory monitoring orientation, and the absence of accessible compliance records — indicate that DINAMC's post-licensing oversight does not currently provide systematic independent surveillance of ESMPs implementation between licensing milestones.

SPA Sofala's description of its monitoring role confirms a parallel pattern at the provincial level. The reduction from annual field visits to two monitoring visits per five-year licence cycle — driven by AQUA's assumption of the inspection mandate and by budget constraints — means that for a project licenced for five years, the total number of field-based compliance verifications conducted by the licensing authority is two: one associated with the operation phase and one associated with licence renewal. The timing of these two visits is triggered by proponent licensing events rather than by an independent technical monitoring calendar, meaning that the monitoring system does not provide systematic independent surveillance of environmental conditions between licensing milestones. In the

context of agribusiness activities where seasonal variations in chemical use, irrigation intensity and crop processing operations mean that environmental impacts fluctuate significantly within and across annual cycles, a two-visit five-year monitoring cadence is structurally inadequate for the detection of developing impacts.

F1.2.5 The RSSA: Monitoring Architecture and Operational Suspension

The RSSA represents the most institutionally developed internal monitoring architecture in the MAAP institutional system for the management of environmental and social risks in Program activities. Its staff and methodological frameworks were carried over from the Office for E&S Safeguards of the predecessor MADER, and the unit is new to the current MAAP structure following the merger of the agriculture, environment and fisheries portfolios. Its monitoring framework incorporates pre-defined impact indicators, a monitoring methodology with field verification protocols, a non-conformity identification mechanism, and a corrective measure follow-up system — elements that reflect a level of methodological development comparable to the indicator-based monitoring and audit approaches applied by external licensing and compliance institutions such as AQUA and SPA/DINAMC, which similarly structure their oversight functions around the indicators established in ESMPs. This architecture is, however, operating in a state of effective suspension at the field level: no field visits have been conducted since 2022, meaning that the monitoring function has been discharged exclusively through remote communication with provincial extensionists for a continuous four-year period at the time of the ESSA assessment. The consequences of this operational suspension extend beyond the immediate loss of field-based environmental monitoring data. The remote monitoring model — relying on extensionists who are primarily agronomic and not environmental specialists, operating under their own institutional workloads, and reporting to safeguards unit technicians whose training base is primarily agro-environmental and forestry — adequate for agricultural sector monitoring but not covering the social dimension that the unit itself identifies as a gap in its own composition — cannot be considered a functionally equivalent substitute for direct field-based verification. The absence of specialized competence is not confined to the provincial level; it characterizes the unit responsible for receiving, interpreting and acting on the information that extensionists provide. The result is a monitoring chain in which neither the source of field data nor the institutional recipient of that data has the technical formation to identify, record or escalate the categories of environmental and social risk that the ESMP is designed to manage.

Beyond the operational constraint of absent field visits, there is a further and more fundamental dimension to the capacity gap. The unit's technicians are not, in their own assessment, equipped to conduct certain categories of environmental analysis — a limitation the unit itself implicitly acknowledges through its practice of integrating external environmental technicians on a project-by-project basis when the technical demands of a given intervention require it. This ad hoc arrangement may be adequate for individual investment projects where the need for specialist analysis is identifiable in advance. However, in the context of a program-level monitoring obligation covering multiple sub-projects across dispersed geographic areas, it does not constitute a systemic solution. The consequence is that the monitoring architecture lacks not only the field presence required to observe environmental conditions directly, but also the in-house technical capacity to interpret and act on environmental data of the kind that the PGAS is designed to track.

The unit does not have a recurrent operational budget that would support independent monitoring activities, nor has any program directly financed the RSSA since it assumed its current institutional form. External Program support has been partial and indirect: PROCAVA, for instance, has contributed to specific items such as the financing of the MDR's green line, but this does not constitute direct operational financing of the unit's monitoring functions. Capacity-building activities were more active

in the earlier period of the unit's existence — when it benefited from FNDS and World Bank-supported training — but these have not been regular and depend entirely on external funders. No such support has materialised in the current year.

When project financing cycles are interrupted or delayed, the monitoring function is suspended entirely. This financing model makes the operational continuity of the most institutionally developed monitoring function in the MAAP system contingent on the grant management cycles of external financing, rather than on a sustainable institutional budget allocation. The instability this creates is directly relevant to MozAgribiz, which as a results-based instrument requires continuous and verifiable monitoring performance rather than episodic activity tied to disbursement cycles.

F1.2.6 Sanctioning Capacity and Enforcement Deterrence

The effectiveness of an environmental compliance system depends not only on the technical quality of its monitoring and audit functions but on the credibility and consistent application of its sanctioning powers. A monitoring system that reliably detects violations but does not consistently apply sanctions creates a deterrence gap that can undermine compliance incentives for project proponents. Sub-projects approved under MozAgribiz will, depending on their category and scale, be subject to AQUA's enforcement jurisdiction — making the deterrence characteristics of that system directly relevant to the Program's environmental risk management performance.

AQUA's formal sanctioning toolkit includes administrative fines calibrated to violation severity, activity suspension orders, and licence cancellation recommendations. The legal architecture for these instruments is established, and AQUA confirms that fines have been issued in specific cases. However, AQUA also confirms that the predominant approach to non-conformity resolution — both in audit findings and in inspection contexts — is the corrective action Program, with formal sanctioning reserved for cases of severe, persistent or deliberately obstructive non-compliance. The preference for corrective action over immediate sanction is presented by AQUA as a deliberate and operationally rational choice, reflecting the constructive compliance management model preferred for agribusiness investments with significant employment and economic development dimensions.

The institutional logic of this preference is defensible in principle. Applying immediate fines for minor first-instance non-conformities in active agribusiness operations, particularly those that are attempting to engage constructively with the regulatory system, would risk creating adversarial relationships that reduce voluntary compliance quality and information sharing between proponents and regulators. However, the ESSA analysis identifies two conditions under which the corrective action preference transitions from a constructive management tool to a deterrence weakness. The first is when corrective action Program completion is not independently verified by field inspection — which, given AQUA's operational configuration, it frequently is not. The second is when the pattern of preferring corrective action becomes so consistent that it is perceived by proponents as a de facto guarantee that non-conformities will not result in meaningful sanctions. There is insufficient evidence in the ESSA dataset to conclusively characterise the deterrence effect of AQUA's current enforcement practice across the agribusiness sector as a whole. However, the combination of infrequent independent field inspection, the dominance of proponent-financed audits as the primary source of compliance information, remote corrective action verification, and absence of publicly accessible enforcement records does not constitute a configuration from which a strong deterrence signal can be expected to emerge. The absence of publicly accessible enforcement records is itself relevant in this context: without transparency over the pattern and frequency of sanctions applied, it is not possible for proponents, civil society or Program oversight bodies to assess whether the corrective action preference has in practice functioned as a compliance management tool or as a substitution for meaningful enforcement.

The human consequences of this deterrence weakness are documented in concrete and severe terms from the Dondo District focus group. The Focus Group participants described a set of unresolved mining sector cases that had been identified, documented, and formally communicated to the provincial level without producing corrective action. These include excavations abandoned by mining operators and left open for extended periods, causing accidents that resulted in the deaths of children; riverbank excavations that have modified water courses and directed flows onto agricultural fields, causing crop losses; and the displacement of smallholder farmers from their *machambas* without compensation. The focus group characterised the district's role explicitly as a command post whose observations are aggregated and acted upon at a higher level; however, the documented mining cases illustrates a situation where the non-compliances were documented and reported to higher levels, with no apparent resolution. It is unclear if the situations remain unresolved due to the logistics difficulties experienced at provincial level to perform inspection, or if the inspection was conducted, but no action was effectively taken by the proponents following the inspection. Nonetheless the described situation evidences that the corrective action preference, combined with infrequent independent inspection and the authority asymmetry between district monitoring and provincial enforcement, has in at least these specific instances produced an outcome functionally equivalent to impunity for documented environmental and social harm. For MozAgribiz, these cases are directly relevant: they occur in a district within the Program's primary corridor geography, in an extractive industry whose spatial overlap with agrobusiness activity is documented in F1.5.3, and they involve the same escalation pathway that Program-related environmental violations would traverse. The Program must not design its monitoring and compliance architecture on the assumption that the escalation pathway functions reliably when it is triggered.

The mandate interface between AQUA and DINAMC in the licence cancellation process adds a further procedural uncertainty to enforcement. AQUA's sanctioning power does not include unilateral licence cancellation — the most severe sanction available — because licence issuance and cancellation formally remain within DINAMC's competency. A case requiring licence cancellation must therefore traverse the DINAMC-AQUA coordination channel, which operates on the basis of case-by-case correspondence in the absence of a formal protocol governing timelines, escalation criteria, or decision thresholds. The absence of such a protocol means that the pace and reliability of resolution in any given case depend on informal administrative practice rather than defined procedural obligations. In cases requiring urgent action — where an active violation causing ongoing environmental harm may require immediate licence suspension rather than a corrective action cycle — the absence of a protocol with defined response timelines introduces a structural uncertainty about whether the coordination channel can operate at a pace commensurate with the urgency of the harm. This is not merely an administrative gap: it is a structural limitation on the system's capacity for swift protective intervention in acute environmental events, with direct implications for MozAgribiz sub-projects operating in environmentally sensitive areas where delayed enforcement response could result in irreversible harm.

F1.2.7 Inter-institutional Coordination and Information Flows

Effective environmental monitoring and enforcement requires not only that individual institutions discharge their assigned functions but that information flows between them in a timely, complete and structured manner. The ESSA assessment identifies significant coordination gaps at all three primary institutional interfaces in the compliance system.

The DINAMC-AQUA interface, described in F1.1.3 is the most operationally significant. Monitoring reports received by DINAMC/SPA that raise compliance concerns are not automatically shared with AQUA under a standardised protocol triggering an inspection response. AQUA inspection findings that identify licence condition violations are not automatically notified to DINAMC under a standardised

protocol triggering licence review. The consequence is that information exchange between the licensing function and the enforcement function is reactive and request-driven rather than automatic and systemic. The implications for the integrity of the compliance cycle are material: an entity that is inspecting for compliance with licence conditions without systematic access to the full licensing documentation, and a licensing entity that is monitoring compliance without systematic access to the independent field findings of the inspection authority, are both operating with incomplete information.

The SPA-AQUA interface at the provincial level presents a structurally similar coordination gap. SPA Sofala and AQUA Provincial Sofala do not have a formalised information sharing arrangement, and the provincial monitoring data — including the results of the two monitoring visits conducted per five-year licence cycle — are not systematically communicated to the provincial inspection authority. AQUA Provincial Sofala confirms that it formally requests from SPA the database of licensed projects and associated management measures as a reference for inspection planning, as well as data from DPDTA. While this constitutes a structured step in inspection preparation, it reflects a request-driven dynamic in which the inspection authority bears the initiative for accessing licensing information, rather than receiving it automatically as part of a systematic information sharing arrangement.

The monitoring-enforcement separation documented at the DINAMC-AQUA and SPA-AQUA interfaces is reproduced with full structural consistency at the district level. The Dondo focus group confirmed explicitly that the SDAE — the district service with the most direct and sustained community-level presence across all administrative posts, and the entity operationally closest to smallholder producers and extension beneficiaries — cannot act in economic activity inspection. Its formal role is limited to accompanying inspection teams and sensitizing producers and operators; the formal intervention authority rests with the INAE at provincial level. The result is identical in functional terms to the DINAMC-AQUA split at central level: the institution with field presence and community relationships has no sanctioning authority, and the institution with sanctioning authority has no routine field presence. This structural pattern — monitoring and field presence separated from enforcement authority at every level from central to district — is therefore not a feature of a particular institutional interface but a design characteristic of the entire oversight architecture as it operates from central level to the administrative post level. For MozAgribiz, this means that the Program cannot rely on any single institutional tier to deliver integrated field monitoring and enforcement; it must build escalation protocols that bridge these structural separations explicitly, with defined response obligations at each tier rather than assuming that field observations by district services will reliably translate into enforcement responses from provincial authorities. The multi-sectoral monitoring model operating across the SDPI, SDAE, and SDSMAS in Dondo — characterised by focus group participants as primarily horizontal in authority and dependent on inter-personal coordination — is the district-level expression of this same structural condition: genuine field knowledge held without the authority to act upon it directly.

The interface between DNTDT and other MAAP directorates presents a coordination gap of a different but structurally important character. DNTDT confirms that SIGIT — the national land information system — does not currently support interoperability with the agricultural management systems of other institutions, including from MAAP. As a result, information on land rights status, DUAT processes, community delimitation and cadastral records that is relevant to the implementation of agricultural sub-projects is not systematically accessible to MAAP's technical and management entities. Coordination between DNTDT and other MAAP institutions operates through formal correspondence and case-by-case requests for opinions, a reactive and request-driven dynamic rather than a system-enabled information flow. The practical consequence for MozAgribiz sub-projects is that entities responsible for project oversight — including compliance monitoring and inspection — cannot systematically cross-reference project status against the land rights picture held by DNTDT, including

the status of DUAT processes, community consultation outcomes or resettlement commitments recorded at the time of land allocation. This information gap is particularly material in cases where sub-projects have triggered resettlement, given that the social conditions established at the DUAT stage have direct implications for the environmental and social compliance assessment conducted during implementation.

F1.2.8 Monitoring in Corridor Contexts and Cumulative Compliance

The agribusiness development model that MozAgribiz supports in its principal corridors — the Beira corridor, the Nacala corridor and the Maputo-Limpopo Corridor — involves the progressive expansion and intensification of agricultural activity across geographic areas where individual projects are not isolated events but components of a cumulative agro-industrial landscape. The environmental monitoring and compliance system described in the preceding subsections was designed and has evolved in the context of individual project compliance rather than corridor-level or cumulative impact management. The gap between these two operational modes is a structural limitation of the current system that has direct consequences for MozAgribiz's environmental risk profile.

Individual project monitoring, as implemented by DINAMC, AQUA and SPA, focuses on whether a given licensed installation is meeting its ESMP commitments: whether effluent discharge from a specific processing unit meets defined standards, whether agrochemical storage at a specific farm meets safety requirements, whether soil preparation at a specific plot meets erosion control conditions. These are necessary but not sufficient questions for environmental management in a corridor context, because the cumulative effects of multiple agro-industrial operations — on shared water bodies, on regional groundwater levels, on soil health across a connected agricultural landscape, on biodiversity corridors between project areas — cannot be detected through the individual project monitoring framework.

DINAMC confirms that it does not have a systematic mechanism for aggregating individual project monitoring data to produce corridor-level or catchment-level environmental trend assessments. There is no shared environmental monitoring data platform across the licensing, inspection and internal oversight entities that would enable the periodic synthesis of compliance data into a picture of environmental conditions in the Program corridors. The absence of laboratory analytical capacity means that baseline data on water quality, soil contamination levels and biodiversity indicators in the Program corridors does not exist in a form that would allow monitoring findings to be assessed against a known starting condition. This combination — no baseline data, no aggregated monitoring platform, and no corridor-level synthesis function — means that MozAgribiz's implementation in the Beira, Nacala and Maputo-Limpopo corridors will proceed without an institutional mechanism capable of detecting the development of cumulative environmental impacts in the first years of Program operation.

This is not a problem that can be resolved through improvements in individual project compliance monitoring alone. It requires a specific investment in corridor-level environmental surveillance that is distinct from, and complementary to, the individual project licensing and inspection system. The design of MozAgribiz's environmental management framework should explicitly address this gap by establishing a corridor monitoring function — whether within the Program's own implementation architecture or through a designated institutional partnership — that aggregates individual project data, conducts periodic corridor-level environmental assessments against defined indicators, and reports to a multi-institutional coordination body with the mandate to respond to cumulative trend findings.

F1.3 Management of Pollution, Agricultural Inputs, and Biodiversity Risks

F1.3.1 Regulatory Framework for Pollution Control and Agricultural Inputs

The regulatory architecture governing pollution control and the management of agricultural inputs in Mozambique is distributed across several legal instruments and institutional mandates that intersect in ways that are relevant to the agribusiness activities MozAgribiz supports. The Environment Law and its subsidiary regulations establish the foundational pollution control framework, setting discharge standards for liquid effluents, atmospheric emissions and solid waste and assigning compliance monitoring to the environmental licensing and inspection system. The Agricultural Inputs Law and its associated regulations establish a specific regime for the registration, import, commercialisation and use of pesticides, fertilisers and other agrochemicals within MAAP. IIAM is responsible for the technical and scientific evaluation underpinning product registration, while DINASAB exercises regulatory and inspection functions, overseeing compliance with certification, commercialisation and biosafety requirements at borders, transit points and in the market. The ESMP framework translates these regulatory requirements into project-specific obligations for licensed agribusinesses, constituting the operational interface between the regulatory system and the management practices of individual operators.

The regulatory architecture is formally adequate in its coverage of the principal risk categories associated with intensive agribusiness: chemical contamination of soil and water, improper pesticide and fertiliser use, waste management from processing facilities, and the atmospheric emissions associated with agro-industrial installations. However, the ESSA assessment reveals a significant gap between the formal adequacy of the regulatory framework and the operational capacity to implement, monitor and enforce it at the intensity and geographic scale of the agribusiness expansion MozAgribiz will support. This gap operates at three levels: the institutional capacity to manage the agricultural inputs registration and inspection system; the technical capacity of the environmental compliance system to independently verify pollution control performance; and the capacity of individual project proponents and smallholder producers operating in Program value chains to implement the required management standards.

F1.3.2 Pesticide and Fertiliser Registration and Inspection

The National Directorate of Agricultural Health and Biosafety (DINASAB) holds the primary regulatory mandate for the registration and commercialisation oversight of agricultural inputs, including pesticides and fertilisers. IIAM provides the technical research functions that may inform input selection and agronomic protocols and has historically been involved in the production of veterinary vaccines, though this role has been constrained by funding shortfalls. The operational relationship between DINASAB and IIAM in the specific domain of pesticide registration and agro-chemical oversight is not systematic, and both institutions confirmed capacity constraints that limit the rigour with which the regulatory framework is applied in practice.

The pesticide registration system requires that all products commercialised in Mozambique have undergone a registration process confirming their safety profile, establishing permitted application rates and target crops, and setting residue standards. DINASAB interview confirms that the informal commercialisation of unregistered, uncertified or improperly labelled agricultural inputs — including products sold as certified seed that are in fact unimproved grain — represents a persistent and documented challenge to regulatory control. Producers in the family sector, DINASAB notes, are frequently deceived in this way, purchasing inputs from informal traders without the means to verify certification status. For MozAgribiz, which will support the intensification of production systems in corridors with significant cross-border agricultural trade and informal input supply chains, the risk that

smallholder and emergent commercial producers in Program value chains are sourcing inputs from unregulated channels is operationally significant. DINASAB explicitly identifies this as one of the central risks associated with value chain development programs.

The inspection of input commercialisation is a DINASAB responsibility – delivered at provincial level by SPAE – covering agro-chemicals, veterinary services, seeds and border control. However, the modality of inspection is important to understand correctly. Inspectors are deployed at border crossings and at internal transit control points. They are not systematically present at community level, within agro-dealer networks, or at the point of sale in rural and peri-urban markets. It is the extensionist from SDAE who is present at community level and who provides the primary channel for information on pesticide use, dilution and container disposal. The DINASAB interview confirms that extensionists receive some training on safe pesticide handling but also confirms a structural coordination gap: extensionists are trained by DINAE, and DINASAB's participation in those training processes is irregular and dependent on invitation rather than mandated. The result is that the quality and completeness of pesticide-related guidance reaching producers at field level is variable and not systematically assured by DINASAB.

The Dondo District focus group provides the most operationally detailed field evidence in this assessment for what that extensionist channel can deliver when trained and adequately resourced, and for the risks that arise when training is not institutionalised. Under the SUSTENTA Program, SDAE extensionists and supervisors in Dondo were trained in environmental and social screening methodology and applied it as a mandatory pre-condition for PACE approvals — meaning that screening for pesticide and input use risks was operationally tested before inputs were released to producers, rather than simply taught in classroom sessions. The Dondo District focus group confirmed, however, that the environmental and social screening methodology developed under SUSTENTA was not institutionalised after project closure and is no longer systematically applied. The knowledge is retained informally by a cohort of trained individuals but has not been documented in protocols, manuals, or internal training resources available for transfer to newer staff. MozRural and PROCAVA currently embed some safeguards content but have not generated equivalent depth of institutional training. The practical consequence for pesticide guidance at field level is direct: the extensionists who currently interact with smallholder producers in the Program's target communities are the same channel through which DINASAB's regulatory framework nominally reaches the point of use, but their capacity to provide technically grounded guidance on safe pesticide handling, application rates, pre-harvest intervals, and container disposal is dependent on training that has not been systematically refreshed or institutionalised since SUSTENTA's closure. For MozAgribiz, this confirms both the design rationale and the implementation gap: the extensionist channel is the correct delivery mechanism for field-level input safety guidance, but it requires structured E&S training investment before it can function as a reliable safeguards delivery asset across the Program's beneficiary base.

The geographic coverage of inspection is therefore concentrated at points of circulation and entry rather than at points of use, and the rural agri-input networks through which smallholder producers in the Program target areas primarily source their inputs receive limited regulatory scrutiny. DINASAB acknowledges that field visits and surveillance activities are not conducted on a regular basis due to severe resource constraints: at the time of interview, vehicles at headquarters were non-operational, fuel availability was described as critically limited and the local level had effectively no operational capacity. Annual activity plans that include supervision, monitoring and inspection are routinely not executed.

The fertiliser management dimension presents a distinct but related challenge. The use of inorganic fertilisers in Mozambican smallholder systems has historically been low, but the input subsidy and access programs supported under various agricultural development initiatives — including those

within the PNISA framework to which MozAgribiz contributes — are designed explicitly to increase fertiliser application rates. The agronomic rationale is sound, and the yield response potential is well evidenced. The environmental risk, however, is that increased fertiliser application in systems without adequate soil testing, agronomic advisory coverage and water management infrastructure creates conditions for nutrient runoff into watercourses, groundwater nitrogen loading, and soil chemistry degradation from inappropriate product selection or over-application.

The ESSA assessment finds no evidence of a systematic soil or water quality monitoring program in the three target corridors that would establish baseline nutrient loading levels, against which the impact of increased fertiliser application could be assessed. This finding is consistently supported across multiple institutional interviews. AQUA confirmed that it has no laboratory capacity, either at central or provincial level, that it relies on the Centre for Environmental Hygiene and Medical Examinations (CHAEM) for water analysis and on the Mozambique Engineering Laboratory (LEM) for soil analysis[22], that results from samples may take up to one month to obtain, and that its monitoring activities are predominantly documentary rather than field-based, or based on observation when field visits are conducted, due to resource constraints. INIR confirmed that water quality monitoring in and around irrigation schemes depends entirely on AQUA. The DPDTA and SPA in Sofala confirmed that soil analysis is not possible locally and that field monitoring instruments for soil and water quality are absent. No institution interviewed is currently conducting systematic, georeferenced environmental quality monitoring in the Program corridors.

F1.3.3 Integrated Pest Management: Policy, Implementation, and Program Value Chain Coverage

Mozambique's agricultural policy framework formally endorses Integrated Pest Management as the preferred approach to crop protection, emphasising the reduction of chemical pesticide dependency through the combination of biological controls, agronomic practices, resistant varieties and targeted chemical intervention as a last resort. IIAM's advisory mandate includes the promotion of IPM practices through its extension networks, and several donor-supported agricultural programs operating in the MozAgribiz corridors have incorporated IPM training components into their smallholder support activities.

The ESSA assessment finds, however, that the implementation of IPM principles in the production systems that MozAgribiz will support remains highly variable and that the extension infrastructure required for consistent IPM advisory coverage is structurally insufficient for the scale of the Program's beneficiary base. IIAM's extension presence in the Program corridors involves agronomic staff whose workloads preclude the frequency of field contact required for effective IPM coaching, particularly in the transitional period when producers are shifting from primarily subsistence to more market-oriented production with higher input use intensity. The ratio of extension agents to active producers in the Program's target districts is, by IIAM's own assessment, inadequate for individualised advisory support and concentrated primarily on seasonal demonstration activity rather than on continuous crop management guidance.

The consequence of this advisory gap in the IPM context is that producers who are increasing their input use intensity under MozAgribiz Program support will make pesticide application decisions based primarily on commercial agro-dealer advice — which is commercially incentivised toward higher application rates and more frequent treatments — and on informal peer-to-peer knowledge exchange rather than on technically grounded IPM advisory guidance. The risk of pesticide over-application, inappropriate product selection, incorrect timing relative to pest pressure cycles, and inadequate pre-

[22] It should be noted that LEM's soil analysis capacity is confined to assessing the structural properties of the soil and does not necessarily extend to evaluating its quality characteristics.

harvest intervals is materially elevated in this advisory environment. These risks extend beyond the direct environmental effects of pesticide residues in soil and water to the food safety and human health dimensions addressed under F2.3.

F1.3.4 Pollution from Agro-industrial Processing: Effluent, Waste, and Atmospheric Emissions

The agro-industrial processing facilities that anchor MozAgribiz's corridor investment model — sugar mills, oilseed processing plants, grain storage and drying installations, fruit and vegetable packing facilities, and poultry and livestock processing units — generate pollution loads across three principal pathways: liquid effluent discharge, solid and semi-solid waste, and atmospheric emissions. Each pathway is subject to regulatory standards established under the environmental licensing framework, translated into ESMP commitments and subject to inspection and audit by AQUA. The ESSA assessment of each pathway in the context of MozAgribiz's risk profile reveals a set of intersecting compliance and monitoring challenges.

Liquid effluent from agro-industrial processing — including high-organic-load effluents from sugar processing, abattoirs and dairy facilities, and chemical-bearing effluents from pesticide rinsing and packaging operations — represents the highest environmental risk pathway in terms of its potential for acute impact on receiving water bodies. The discharge standards established in the regulatory framework are formally defined, but their practical enforcement faces the laboratory analytical gap already documented in F1.2.2: AQUA's inspection methodology cannot independently verify whether effluent meets discharge standards without access to laboratory analysis of effluent samples, and the absence of any laboratory within AQUA's institutional infrastructure or any formalised protocol with an external laboratory means that compliance determinations are made on the basis of empirical observation — colour, odour and visual sedimentation — rather than on chemical analysis. The consequence is that a facility discharging effluent that meets the visual characteristics of compliance while containing elevated levels of biological oxygen demand, heavy metals or pesticide residues cannot be identified as non-compliant through the current inspection methodology.

Solid waste management from agro-industrial facilities covers both organic byproducts — pomace, bagasse, animal processing waste, and grain dust — and chemical waste streams from pesticide and agrochemical handling. The regulatory framework requires ESMPs to address both categories, and the management of organic byproducts is in many cases relatively well-managed by anchor investors with commercial incentives to recover energy or fertiliser value from processing residues. Chemical waste management — including the disposal of empty pesticide containers, expired or surplus pesticide stocks, and contaminated packaging materials — presents a more variable compliance picture. Pesticide container disposal practices in the Program corridors are inconsistent, with inadequate reuse, informal burning and open dumping of empty containers mentioned as common practices. During the interview with DINAG a serious incident in Chitima (Tete Provnce) was mentioned where traditional beer (*pombe*) was stored in drums that had previously contained pesticides with severe consequences to human health. This is not merely a site-specific management failure: empty pesticide containers in Mozambique's humid corridor environments leach residual chemical content into soils and surface water with documented frequency, in addition to posing serious risks to community health due to improper reuse. Their collection, neutralisation and safe disposal require a supply chain for chemical waste management that does not exist at scale outside of a small number of donor-supported and sector-specific programs.

Atmospheric emissions from agro-industrial facilities — primarily from biomass combustion in sugar mills, grain drying operations and processing facility boilers — are regulated under the environmental licensing framework but represent a compliance monitoring area where AQUA's field inspection capacity is particularly limited. Emissions monitoring requires either continuous monitoring

equipment installed at source or periodic stack testing by qualified technicians with appropriate instrumentation — neither of which is within AQUA's current operational capacity. Compliance with atmospheric emission standards for MozAgribiz-supported processing facilities is therefore not independently verifiable under the current compliance system and rests entirely on proponent PGAS commitments, self-reporting and/or external audits conducted by consultants.

F1.3.5 Water Resource Management in an Irrigation-Intensive Corridor Context

It should be noted that the ARAs were not among the institutions covered by ESSA stakeholder interviews, and the analysis in this section therefore draws primarily on documentary sources, principally the 2018 JICA technical assessments of ARA-Centro and ARA-Norte, supplemented by ESSA background research.

Water is a critical input across the Beira, Nacala and Maputo-Limpopo corridors, underpinning irrigation, agro-industrial processing, and livestock and aquaculture operations. The water governance framework, primarily administered through DNA under MOPHRH at national level and at regional level by the regional water administrations (ARAs) — ARA-Centro for the Pungwe and Buzi catchments in the Beira corridor, ARA-Norte for the Lúrio and other Nacala corridor catchments, and ARA-Sul for the Limpopo and Incomati catchments relevant to the Maputo-Limpopo corridor. These bodies are responsible for water use licensing, surface water allocation, groundwater regulation and environmental flow requirements. Neither DNA nor the ARAs were consulted in the institutional consultations conducted for the ESSA; the findings in this section relating to water allocation and hydrological data adequacy therefore draw primarily on the ESSA's review of EIA and ESMP documents and should be read with that evidential limitation in mind.

The intersection between the agricultural input and pollution management system and the water resource management system is a critical governance interface for MozAgribiz's environmental risk profile. The ESSA assessment identifies several dimensions of this intersection that present direct Program risks. The allocation of water use licences for irrigation in the Beira corridor catchments is proceeding against a background of incomplete hydrological data for low-flow conditions, particularly in the secondary tributaries of the Pungwe and Buzi systems where smallholder and emergent commercial irrigation is expanding. The JICA (2018) Final Report documents systemic monitoring and data management deficiencies across ARA-Centro's jurisdiction, including insufficient station coverage relative to basin scale, suspended national hydrological databases, and unreliable rating curves. Significantly, the Pungwe basin is identified in JICA's own technical materials as lacking an operational rainfall-runoff model, with modelling work not completed under the project. Available information nonetheless suggests that combined irrigation demand across licensed and unlicensed users during low-rainfall periods in some of these tributary systems has not been comprehensively assessed, though the ESSA was not in a position to confirm this directly with ARA-Centro during the consultation process.

The implication of this water allocation uncertainty for pollution management is direct: a watercourse under hydrological stress from multiple irrigation abstractions has a materially reduced capacity to assimilate the effluent, nutrient runoff and agrochemical loads from the agro-industrial operations along its catchment. Environmental flow standards in ESMPs require the protection of specified water volume and velocity regimes, but these conditions may not be maintained during peak irrigation abstraction. The absence of coordinated water quantity and water quality management — with the water administration bodies managing abstraction and allocation without systematic information exchange with the environmental oversight institutions on effluent and runoff loads from licensed agribusinesses in the same catchments — represents a governance gap through which cumulative water stress impacts can develop undetected and unmanaged.

This risk of impacts developing undetected is substantially confirmed by the institutional consultations conducted for the ESSA, even though those consultations did not encompass the water administration system directly. AQUA at national level confirmed that the institution possesses only a single multiparametric sonde nationally, operates without laboratory capacity, and that environmental monitoring in practice relies predominantly on empirical observation rather than measurement-based analysis. AQUA Sofala confirmed that systematic water quality monitoring does not occur, that no defined monitoring network exists for areas of agro-industrial concentration, and that the response to a recent water contamination incident in the province required borrowing analytical capacity from the provincial health service (CHAEM) because AQUA lacked the equipment to collect and analyse samples independently. At provincial level, both the SPA and the DPDTA in Sofala confirmed equivalent deficiencies in measurement equipment and analytical capacity. The INIR interview confirmed explicitly that monitoring of water quality downstream of irrigation schemes under INIR's management is delegated entirely to AQUA, thereby closing a circuit in which the institution mandated to detect downstream pollution impacts from irrigated agriculture is precisely the institution that, as confirmed across multiple consultations, cannot perform systematic environmental measurement in the field. The consequence, in practice, is that no institution in the current system is actively monitoring whether irrigation-intensive agricultural expansion is generating cumulative water quality or availability impacts in the Program corridors.

The deeper governance weakness — the absence of a formal coordination mechanism between the MOPHRH water administration system, which manages abstraction and allocation, and the MAAP-anchored environmental oversight system, which nominally governs effluent and pollution management — was not directly examined in the consultations conducted for the ESSA and cannot therefore be fully evidenced from the interview set. The inter-institutional fragmentation documented in detail within the MAAP system, across AQUA, DINAMC, the SPA and the DPDTA, is however strongly consistent with the hypothesis that equivalent or greater coordination deficits exist across the MOPHRH–MAAP interface, where no shared mandate, no formal information exchange protocol and no joint monitoring arrangement has been identified in the available documentation.

F1.3.6 Biodiversity Risks: Habitat Conversion, Fragmentation, and Program Context

The geographic footprint of MozAgribiz's investment facilitation activity in the Beira, Nacala and Maputo Limpopo corridors overlaps with areas of ecological significance that present biodiversity risk dimensions requiring specific assessment. The Beira corridor traverses transition zones between the miombo woodland ecosystem — the dominant savanna-forest mosaic of central Mozambique, recognised as a centre of biodiversity endemism — and the lowland agricultural plains. The Nacala corridor passes through areas of highland miombo, montane forest fragments and riverine gallery forest systems that support significant vertebrate diversity. The Maputo-Limpopo corridor presents a distinct ecological profile: it traverses the dry savanna and mopane woodland systems of the lower Limpopo basin, a landscape characterised by xeric vegetation types adapted to seasonal aridity and encompasses the floodplain and wetland systems associated with the Limpopo River and its principal tributaries, which support important riparian biodiversity and seasonal hydrological dynamics. The corridor's southern extent is spatially proximate to the Greater Limpopo Transfrontier Conservation Area, creating an interface between agricultural expansion zones and a transboundary conservation landscape of international significance. Agricultural development in this corridor — including irrigated schemes in floodplain areas and dryland expansion further inland — involves both direct habitat conversion in ecologically sensitive lowland systems and the potential disruption of hydrological connectivity that underpins floodplain ecosystem function. Agricultural expansion in all three corridors — for large-scale anchor investor operations and for smallholder area development — involves land clearance and land use change that has direct habitat conversion consequences and, at the scale supported by MozAgribiz, cumulative fragmentation effects.

The environmental licensing system addresses biodiversity risks through the EIA process, which requires an assessment of the biodiversity values in the project footprint and establishment of avoidance, mitigation and compensation measures in the ESMP. The ESSA assessment of the quality of biodiversity assessment in EIA documents processed through the DINAMC licensing system — based on a review of a sample of ESMPs documents for agri-business projects in Sofala, Zambezia and Gaza provinces — reveals that biodiversity chapters in the reviewed documents are among the weakest technical sections. Biodiversity assessments are typically based on desktop review of existing datasets and very limited field surveys, often conducted in a single season and without specialist botanical, ornithological or herpetological input. Mitigation hierarchies for biodiversity impacts are described in general terms — avoid sensitive areas, maintain buffer strips, conduct activity during non-breeding seasons — without the specific spatial commitments, monitoring indicators or compliance verification mechanisms that would be required to assess whether the mitigation is actually delivered. Institutional consultations conducted for the ESSA corroborate these document-review findings at the systemic level: staff profiles across the reviewing institutions do not include ecologists, conservation biologists, ornithologists or botanists, and no formalised arrangements exist with specialist institutions to supplement in-house technical capacity in ecological assessment. At DINAMC, the acknowledgement that the quality and depth of biodiversity and other specialist content in EIA documents "*depends on consultants*" — in the absence of standardised guidance on how such risks should be approached — is consistent with the variability and frequent inadequacy of biodiversity treatment identified in the document review.

ANAC, which holds the mandate for biodiversity conservation and protected area management, does not have a systematic involvement in the EIA review process for agricultural projects outside of formally gazetted protected areas and their buffer zones. Projects in ecologically significant areas that are not within a formally protected area — including areas covered by community conservation arrangements, ungazetted forests, and wildlife dispersal zones — do not trigger a mandatory ANAC consultation requirement under the current EIA regulations. This institutional gap was explicitly confirmed in consultations conducted for the ESSA: the AQUA provincial delegation in Sofala stated that ANAC disposes of inspectors only within conservation areas, and that outside those areas there is a regulatory and oversight vacuum in wildlife governance, with AQUA, SPA and DPDTA acting jointly on fauna-related matters in open areas only because no institution has a clear individual mandate to do so. None of the institutional consultations conducted for the ESSA — including interviews at DINAMC, AQUA central, AQUA Sofala, SPA Sofala, and DPDTA Sofala — identified ANAC as a participant in the Technical Evaluation Commission for agricultural or agro-industrial projects. The consequence is that the EIA review process for the majority of MozAgribiz-relevant agricultural investments is conducted without mandatory technical input from the institution with the relevant biodiversity expertise, and the biodiversity chapters of EIA documents are assessed by DINAMC and provincial SPA staff whose available technical profiles, as confirmed through institutional consultations, are concentrated in environmental management, forestry, agronomy and geography rather than ecology or conservation biology.

The invasive species dimension of biodiversity risk is a particularly relevant concern for corridor-scale agricultural expansion. Several agribusiness commodities and production systems relevant to MozAgribiz — including several horticultural species, certain cover crops and green manures, and some biomass energy crops — have documented invasive potential in tropical African ecosystems, and the movement of plant material, machinery and people across corridor agricultural landscapes creates pathways for the introduction and spread of both plant and animal invasives. The ESSA assessment finds no evidence of a systematic invasive species risk screening mechanism in the DINAMC EIA review process for agricultural projects, and no institutional mandate for the monitoring of invasive species spread in the agricultural landscapes of the Program corridors. This finding is corroborated by the comprehensive absence of any reference to invasive species as an agricultural

risk category across all institutional consultations conducted for the ESSA — at national level with DINAMC and the RSSA, and at provincial level with AQUA, SPA and DPDTA in Sofala. In all of these consultations, agrochemical management was consistently identified as the primary environmental risk associated with agribusiness activities, with no respondent raising invasive species introduction or spread as a monitoring, licensing or enforcement concern.

F1.5 Cumulative Environmental Risks in Corridor Contexts

F1.5.1 The Structural Absence of Strategic Environmental Assessment

The most fundamental institutional gap in the environmental management of corridor-scale agribusiness development in Mozambique is the complete absence of Strategic Environmental Assessment (SEA) capacity across the entire institutional landscape covered by the ESSA. SEA is the instrument specifically designed to address the cumulative, synergistic and landscape-level risks that individual project EIAs cannot capture. Mozambique continues to face significant gaps in the effective application of SEA. Interviews confirmed the absence of targeted capacity-building initiatives for SEA elaboration and highlighted the very limited national experience to date. The few SEAs conducted have not generated meaningful actions to advance SEA objectives, particularly with respect to cumulative impact assessment and management. The institutional mandate has shifted repeatedly across different departments within the environmental sector ministries, only recently being reassigned to DINAMC's Environmental Evaluation Department. In addition, the absence of clear regulations specifying responsibility and procedures for conducting SEA undermines both the perceived necessity of SEA, and the consistency and effectiveness of its implementation.

Additionally, the existing framework developed at the individual project monitoring level — is not configured to assess Program-level cumulative effects.

The EIA process is a project-by-project instrument, legally designed to assess the impacts of individual installations against site-specific baseline conditions and to produce project-specific management measures. It has no mechanism for aggregating the environmental effects of multiple projects across a shared landscape, no methodology for assessing the interaction between the impacts of different project types in the same catchment or habitat zone, and no analytical framework for evaluating whether the cumulative trajectory of multiple investment decisions is moving a corridor ecosystem toward or away from a threshold of irreversible degradation.

F1.5.2 Territorial Planning Deficits and the Spatial Governance Gap

The spatial governance framework that should provide the territorial reference system against which corridor-level land use decisions are assessed is in a state of structural deterioration that represents a distinct and compounding cumulative risk factor. The PDUTs – the instruments that define the spatial allocation of land uses, establish protected zones, delineate agricultural expansion areas, and provide the compatibility reference for environmental licensing decisions — are confirmed to be approximately 70% outdated across the province of Sofala, having exceeded their validity periods without revision. In the Beira corridor specifically, which concentrates the highest density of Program-relevant agro-industrial activity in the national portfolio, only Namawanda has a current PDUT at the time of the ESSA assessment. Dondo — a corridor district with significant agro-industrial activity — has no updated instrument and does not expect to have one for at least another year.

The implications of this PDUT deficit for cumulative risk management in the corridor extend considerably beyond the individual project licensing compliance dimension discussed in F1.1. At the corridor scale, the PDUTs are the instruments through which the aggregate spatial pattern of land use

decisions is governed — the tools that should prevent the uncoordinated expansion of agricultural land clearance into ecologically sensitive transition zones, the accumulation of agro-industrial installations in areas with inadequate water or waste management infrastructure, and the progressive encroachment of intensive production systems on community land and resource access areas. When these instruments are outdated, the individual licensing decisions made against them — for which they are a formal precondition — are technically sound only with respect to a spatial reality that may have changed materially since the instruments were drawn up. More critically, the territorial compatibility determination that the PDUT is supposed to provide for each new investment is made against a map of land use that does not reflect the current distribution of previous investments, meaning that the cumulative spatial footprint of existing agribusiness activity in the corridor is not visible to the entity processing the next licensing decision.

This spatial blindness is compounded by the information system fragmentation documented in F1.1.5. Even if the PDUTs were fully current, the absence of an integrated licensing database shared between the DPDTA and the SPA means that the licensing authority processing a new application cannot systematically verify the geographic distribution of previously licensed operations in the same district or catchment, the land uses adjacent to the proposed project footprint, or the cumulative water abstraction commitments already authorised for the water bodies the new project intends to use. The territorial compatibility verification — the function that spatial planning instruments are specifically designed to enable — is therefore incomplete by design across the entire corridor licensing system, not as an occasional weakness but as a structural operational condition.

The DNTDT's SIGIT land information system, which should provide the land rights information layer essential for spatial governance, does not communicate with MAAP agricultural management systems and is operational only to the provincial level without the critical modules required for provincial reporting on land allocation status. The DPDTA's dual subordination — vertically to DNTDT and horizontally to the Provincial Governor — means that the provincial spatial planning function operates under governance pressures that are not always aligned with normative land management obligations, as the DNTDT interview confirms. The combination of outdated spatial instruments, fragmented information systems, unintegrated land cadastres and dual institutional accountability produces a spatial governance deficit whose consequences for cumulative risk management in the corridor are structural and not resolvable through improvements within any single institution. In principle, this issue should be resolved with the enforcement of the New Land Law, as provisions have been introduced to ensure interoperability between the land cadastre and other systems, as confirmed in the DNTDT interview. However, this issue may persist during part of the program’s implementation, as there is currently no defined timeline for the New Land Law to enter into force.

F1.5.3 Overlapping Resource Claims: Agriculture, Mining, Conservation, and the Multi-Pressure Landscape

A dimension of cumulative environmental risk in the Program corridors that the ESSA interviews identify as emergent but not yet institutionally managed is the spatial overlap between agribusiness expansion, artisanal and small-scale mining activity, and conservation land use claims across the same geographic zones. The DPDTA Sofala interview identifies this explicitly as a risk of particular concern: the mining cadastre operates as a system entirely separate from the land cadastre and the agricultural licensing system, frequently proceeds without consultation with communities or local authorities, and in practice generates competing claims over the same land and water resources that agribusiness investments depend on. Field evidence from the Dondo District focus group confirms and extends this institutional analysis with documented cases from within the Program's primary corridor. Dondo District's territory encompasses active mining concessions operating alongside agro-industrial installations including a sugar company, agricultural smallholder communities, and a peri-urban

municipal area — making it a district where multiple categories of environmental and social risk converge simultaneously. The Dondo Focus Group documented specific cases identified through multi-sectoral monitoring visits: excavations abandoned by mining operators and left open for extended periods, causing accidents including the deaths of children; riverbank excavations that have diverted water flows onto agricultural fields; and the displacement of farmers from their *machambas* without compensation. In each case the district documented the harm, communicated it to the provincial level, but various of the described situations remain unresolved — a direct operational demonstration of the authority gap between monitoring at district level and enforcement authority at higher levels that F1.2.6 analyses, applied specifically to the mining-agriculture overlap context. Critically, the district confirmed that it does not receive systematic notification of mining concession boundaries or operational commencement from the mining licensing chain, meaning that the identification of overlap situations depends on field observation and community complaint rather than on any inter-cadastre information exchange. A district technician in the agro-industrial corridor cannot know, on the basis of formal institutional information, whether an area in which agricultural investment is being planned or supported already carries a mining concession that will generate competing resource claims — the condition that produces the documented harms must first materialise before the oversight system becomes aware of the overlap. The ESSA interviews confirm that agribusiness and artisanal and illegal mining activities are coexisting in overlapping zones in several districts of Sofala, creating multi-directional pressure on shared resources and generating community-level conflicts that the environmental licensing system for either sector cannot address because neither is aware of the other's footprint.

The institutional mechanism that should manage this overlap — a cross-cadastre screening requirement at the licence application stage — does not exist yet. The DPDTA's access to the mining cadastre is informal and not systematic. The SPA does not have a mandatory consultation requirement with the licensing authority for mining activities before issuing an environmental licence for an agricultural project, and vice versa. The information cascade weakness documented across central and provincial institutional levels extends downward in its consequences to the district services that hold the closest field proximity to investment sites. The consequence is that an agro-industrial investment licensed by the SPA and a small-scale mining concession authorised through the Instituto Nacional de Minas may be located in the same micro-catchment, drawing from the same groundwater system, with neither licensing process having been informed of the other's existence. The environmental interactions between these two activity types — particularly in terms of water quality, where mining drainage can introduce heavy metals and sediment loads into water bodies used for agricultural irrigation, and where agricultural pesticide and fertiliser runoff can impair water quality for communities that mining activity has already displaced toward degraded water sources — are precisely the kind of synergistic impacts that individual project EIAs cannot detect and that SEA is designed to anticipate.

The conservation land use dimension adds a further layer to this multi-pressure picture. The DPDTA confirms that areas of formal protection — conservation zones, gazetted forests, *coutadas* — are mapped and crosschecked with licensing applications. However, the protection of these areas from the cumulative pressure of activities at their margins is a different and harder problem than blocking individual applications that fall within their formal boundaries. The ecological processes that make formally protected areas viable — connectivity corridors between habitat fragments, buffer zones around sensitive water bodies, migration pathways for wildlife populations — are not defined by formal protection boundaries, and they can be disrupted by the cumulative effect of agricultural and mining expansion at the periphery of protected areas even when individual projects do not technically violate protection zoning. ANAC, which holds the mandate for biodiversity conservation, is not systematically involved in the review of agricultural or mining projects outside of formally gazetted

areas, meaning that the cumulative marginal pressure on protected area viability from corridor investment expansion is not being institutionally assessed.

F1.5.4 Cumulative Water Resource Stress in Program Catchments

Water is the resource through which the cumulative environmental risks of corridor-scale agribusiness development are most directly and acutely experienced. Each of the three Program corridors depends on catchment systems that are already under pressure. The Beira corridor draws on the Pungwe and Buzi catchments for irrigation, industrial process water and community water supply across the catchment extent. The Nacala corridor depends on the Lúrio, Messalo and secondary tributaries, which are characterised by high rainfall variability and low dry-season baseflows, meaning that peak irrigation demand coincides with minimum water availability. The Maputo-Limpopo corridor faces a structurally distinct challenge: the Limpopo and Incomati are transboundary rivers governed by international agreements with South Africa and Zimbabwe, while the Umbeluzi simultaneously supplies Maputo's urban demand and the irrigation and processing needs of the lower corridor, leaving dry-season availability already constrained under existing commitments.

Across all three corridors, cumulative water stress is compounded by a governance gap that could affect the current Program. The 2018 JICA technical assessments of ARA-Centro and ARA-Norte documented that the ARAs operated with incomplete hydrological monitoring networks and no systematic data exchange with the then-competent environmental authority, MICOA. The subsequent reorganisations of environmental governance into the current MAAP and AQUA structure has not resolved this separation. The ARAs continue to manage water abstraction licensing while AQUA manages effluent discharge regulation, and no evidence was found that the two systems share data or conduct joint catchment assessments.

The hydrological knowledge base that underpins ARA licensing decisions remains incomplete. JICA identified in 2018 that ARA monitoring infrastructure was insufficient beyond primary river channels, and low-flow conditions in the secondary tributaries where smallholder and emergent commercial irrigation is expanding have still not been comprehensively modelled. Water use licences issued on this basis may overstate dry-season availability, and the cumulative effect of multiple licences in a single subcatchment can exceed sustainable yield without any individual licence being technically deficient. When this risk of hydrological over-allocation is combined with effluent discharges from agro-industrial facilities that AQUA cannot independently verify — due to the laboratory capacity constraints documented in F1.3.4 — the cumulative effect of multiple pressures operating simultaneously across a catchment can progressively erode water body health in ways that no single licence or discharge point would reveal in isolation. The current monitoring architecture, relying on visual field inspection without systematic laboratory verification and on abstraction licensing that does not track aggregate subcatchment demand, is not designed to detect degradation at this level of granularity; by the time harm becomes visible within the existing system, it is likely to have already reached a threshold beyond easy reversibility.

The climate trajectory of the Program area reinforces rather than moderates this concern. The Beira corridor is already subject to the recurrent flood-drought cycles associated with ENSO variability and intensifying Indian Ocean cyclone systems. A corridor in which multiple operations are abstracting at peak demand during a dry-season low-flow event, while processing facility effluent enters water bodies with reduced dilution capacity, and where the monitoring system relies on visual inspection by under-resourced AQUA field teams, is one where water resources are operating without effective safeguards against the scenario most likely to produce irreversible harm. The JICA findings confirm

that this is a pre-existing structural vulnerability, and the ESSA identifies it as directly material to the Program's expansion of irrigated agriculture and agro-industrial processing in the corridor, and that capacity to mitigate and monitor this risk should be strengthened as a Program implementation condition. Project-level EIAs under the Program should be required to situate water demand and effluent loads within a subcatchment-level water balance that accounts for all existing and planned uses, moving beyond the facility-level assessment that the current EIA practice defaults to. A SEA at Program level is therefore key to establish the catchment-level baseline, define thresholds of acceptable cumulative water stress across the relevant subcatchments, and set the parameters within which individual project EIAs are required to demonstrate consistency.

At the institutional level, a formal data-sharing protocol between the ARAs and AQUA — covering abstraction volumes, licence status and effluent discharge records for all Program-associated facilities — should be established as a Program implementation condition, alongside targeted investment in ARA monitoring infrastructure in Program catchments and the AQUA laboratory capacity strengthening recommended in F1.3.4.

F1.5.5 Land Use Change Trajectories and Biodiversity Fragmentation at Corridor Scale

The landscape ecology of the Beira, Nacala and Maputo-Limpopo corridors is a function not only of the current distribution of land uses but of the trajectory of land use change over time — the rate at which natural vegetation is being converted to agricultural land, the pattern of that conversion in relation to ecological connectivity structures, and the speed at which the corridor's biodiversity support functions are being eroded beneath any individual institution's detection threshold. The cumulative biodiversity risk of corridor-scale agribusiness expansion cannot be assessed through the sum of individual project EIA biodiversity chapters, for the reasons identified in F1.3.6 — those chapters are technically weak, conducted over single seasons, based on desktop data, and reviewed without mandatory ANAC input when projects are located outside protected areas. The corridor-scale picture requires a landscape-level assessment that no institution is currently configured to produce.

Each project is assessed against its own site boundary, with biodiversity mitigation measures focused on the immediate project footprint. The cumulative effect of multiple projects progressively encroaching from different points along the transition zone is to reduce the width, connectivity and ecological integrity of the corridor below the landscape-level threshold at which it can continue to support the biological functions — pollination, pest regulation, watershed protection, soil formation — that the agricultural systems themselves depend on. There is no systematic landscape-scale monitoring of miombo woodland extent and fragmentation status in the Beira corridor, and no institution with a mandate to trigger regulatory or planning responses when fragmentation indicators cross defined thresholds.

The invasive species dimension of corridor-scale agricultural expansion — identified in F1.3.6 but requiring more specific analysis in the cumulative risk context — presents a particularly insidious form of biodiversity degradation because it operates through diffuse dispersal mechanisms that are accelerated by the very corridor infrastructure that makes agricultural investment viable. Roads, irrigation canals, field drainage systems, movement of farm machinery, seed contamination, and the spread of propagule material in transported agricultural commodities create dispersal pathways along which invasive plant and animal species move from introduction points to new establishment sites faster and across larger areas than would be possible in a less connected landscape. Several of the agribusiness commodity systems most relevant to MozAgribiz — including certain horticultural production systems, cover crop regimes and biomass energy crops under evaluation for pilot activities in the corridors — include species with documented invasive potential in tropical African contexts. During the interview with DINASAB, it was not possible to ascertain whether a corridor-level invasive

species monitoring Program is currently effective. It is essential the ESIA processes associated with the program incorporate a systematic pre-introduction risk assessment for these species.

F1.5.6 A Weak Corridor Monitoring Function: Systemic Consequences

The absence of a corridor-level environmental monitoring function — one capable of aggregating individual project data, detecting multi-project trends, and triggering responses to cumulative impact signals before they reach thresholds of irreversibility — is not merely a gap in the institutional architecture: it is a systemic consequence of the entire design logic of the environmental management system, which is constituted around individual project licensing and compliance rather than around the environmental integrity of shared landscapes and resources. Every institution in the licensing and compliance chain — DINAMC, SPA, AQUA, DPDTA, RSSA — discharges its functions in relation to individual licensed projects. None has a defined mandate, a defined methodology, or a defined resourcing model for the surveillance of environmental conditions at the corridor or catchment scale.

The complaint-triggered monitoring model that characterises AQUA's operational practice — described in detail in F1.2.2 — is particularly ill-suited to the detection of cumulative impacts, because cumulative impacts by their nature do not generate the visible, localised, attributable events that trigger community complaints. A watercourse whose water quality is deteriorating gradually through the combined effect of five agro-industrial operations' effluent loads, three irrigation schemes' return flows, and increasing fertiliser runoff from an expanding smallholder production area does not generate a single, definable pollution event that can be attributed to a responsible party and escalated through the complaint pathway. It generates a progressive deterioration that communities experience as a general reduction in water quality, fishing yield or aquatic biodiversity, without a specific causal event, a specific responsible party, or a specific date from which the damage can be calculated. These are precisely the conditions under which the complaint-triggered model fails to generate a regulatory response, and the cumulative agrobusiness impacts most consequential for MozAgribiz's Program corridors — soil health trajectories, water body nutrient loading, agrochemical accumulation in sediments, gradual habitat fragmentation — all fall in this diffuse, multi-causal, threshold-dependent category.

The absence of environmental baseline data for the Program corridors is the condition that makes this monitoring gap impossible to remedy through operational improvements alone, even if the complaint-triggered model were replaced by a more systematic independent inspection Program. Detecting a cumulative trend requires knowing the starting condition. Without a baseline, a monitoring finding cannot be assessed for trend significance, and the difference between normal seasonal variation and the early signal of a developing cumulative impact cannot be distinguished. The monitoring system is therefore not only under-resourced operationally but is informationally blind to the reference conditions that any form of meaningful trend monitoring requires.

The slow devolution of the percentage of licensing and fine revenues that should return to the provincial level, confirmed by various interviews, creates a dysfunction with direct consequences for the financial sustainability of the supervisory system as it removes the resource base that would notionally support more active provincial environmental monitoring. The provincial institutions that are closest to the corridor environments, that have the local institutional knowledge and the geographic accessibility for routine surveillance, and that would be the natural home for a corridor monitoring function are precisely the institutions whose operational budgets are most severely constrained. The combination of structural under-resourcing, the dysfunction of the revenue return mechanism that could support autonomous monitoring, and the dependence on external financing for all but routine administrative functions means that any corridor monitoring function established

through Program financing would need to be designed with an explicit sustainability pathway that does not assume continuation of donor investment beyond the Program period.

Annex F2 - Assessment of Social Management Systems

F2.1 Land Access, Use, and Conflict Management

F2.1.1 Regulatory Framework for Land Rights in Agribusiness Contexts

The normative architecture governing land access in Mozambique is anchored in the 1997 Land Law (Lei 19/97) and its Regulation (Decree 66/98), which establish the DUAT — *Direito de Uso e Aproveitamento da Terra* — as the principal instrument through which individuals, communities and corporate entities acquire formal land use rights. The Land Law's foundational provision — that land is state property and cannot be alienated, sold or hypothecated — shapes the entire framework through which agribusiness investment accesses land: investors do not acquire ownership of land but rights of use and development, conditioned in principle on productive development within defined timescales and on respect for pre-existing community rights. The community land rights provisions of the Land Law are among its most distinctive features, establishing that communities hold DUATs over land that has been occupied and used according to customary practices, that these rights exist regardless of formal demarcation or registration, and that community consultation is a mandatory precondition for any DUAT attribution over land subject to customary occupation.

This framework is, on its face, a substantive legal protection for the land rights of communities in the Program corridors. The ESSA assessment of its operational reality, however, reveals a consistent pattern across multiple institutional interviews of conditions under which the formal protective architecture either does not function as designed or functions in ways that leave communities with legal protection on paper and inadequate protection in practice. The DNTDT interview is the institutional source that most directly characterises this gap from within the land administration system itself: the DUAT attribution process formally precedes and conditions the EIA for projects requiring land access, but the community consultation conducted for DUAT purposes is not the same consultation as that conducted within the EIA process, and communities may give consent to land cession during the DUAT consultation without having received the information about resettlement conditions, compensation arrangements or project impacts that would only be defined later within the EIA stage. This sequencing problem was not identified in the DNTDT interview as a source of conflict. However, the ESSA considers that this could constitute a structural protection gap whose consequences would be distributed across the implementation lifecycle of every agribusiness investment in the Program that requires community land access.

At the time of the ESSA interviews, the new Land Law was before Parliament, with its approval introducing changes to community consultation requirements including a gender parity requirement that directly intersects with the consultation processes conducted for DUAT and environmental licensing purposes. The implementation regulation period of up to one year following approval means that MozAgribiz will be implemented through a normative transition for land governance, with the possibility that consultation processes initiated under the current framework will need to be reassessed against the requirements of the new one.

F2.1.2 The DUAT-EIA Sequencing Problem and Its Consequences for Community Consent

The structural relationship between the DUAT attribution process and the EIA process is the single most significant procedural protection gap in the land access governance framework as it applies to MozAgribiz. The analysis of this problem requires situating it within the sequence of steps through which a large-scale agribusiness investment acquires the legal authorisations it needs: a community consultation under the Land Law leading to a DUAT application; an environmental screening and EIA process under Decree 54/2015 leading to an environmental licence; and, where applicable, a

resettlement process required as a condition of the EIA. The formal sequence positions these steps in a logical progression, with the DUAT preceding the environmental licence and the resettlement process following from the EIA.

The DNTDT's identification of the protection gap in this sequence is precise: the community consultation that the Land Law requires for DUAT attribution is conducted at a point when the full conditions of project impact, resettlement entitlements and compensation arrangements have not been defined — those details being the product of the EIA process that comes later. The community is therefore being asked to consent to land cession before it has the information necessary to make an informed consent decision. This is a potential source of conflict: when the actual resettlement conditions are communicated — potentially months or years after the initial DUAT consultation — communities that consented in a context of incomplete information find that the conditions to which they are being held differ from their understanding of the agreement, and the disputes that follow are difficult to resolve within the existing institutional framework because the formal consent was validly recorded in the DUAT process.

Field evidence from the Dondo District focus group provides the most operationally specific available description of how the community consultation sequence actually functions at district level in the Program's primary corridor, and of the conditions under which it malfunctions. Focus group participants across the SDPI, SDAE, and SDSMAS described a three-stage sequence that is operationally established and relatively well understood within the district: a pre-consultation with community leaders and district technicians to establish whether conditions for the proposed activity exist; a formal community consultation focused on land cession conditions and social obligations; and a subsequent public consultation for broader stakeholder engagement in the EIA process after DUAT issuance. The evidence of at least five community veto outcomes within this sequence — including a recent case involving an association of companies that failed to meet a community-imposed pre-condition, with the result that no DUAT was issued — confirms that when the full sequence is observed with district participation, a functioning protective mechanism exists. The Program should treat the district participation requirement in the full consultation sequence, as well as license issuance notification as a mandatory condition and should require evidence of SDPI, SDAE, and SDSMAS participation in all stages of Program-supported investment as a Program eligibility verification step.

F2.1.3 Resettlement and Displacement: Institutional Mandates and Operational Gaps

The resettlement function in Mozambique is governed by a structured framework led by the DNTDT, which holds a dedicated Resettlement and Community Development Department and chairs a National Resettlement Monitoring and Supervision Commission. This Commission is the single unified supervisory body for resettlement processes at the national level, composed of representatives from all relevant state institutions. It operates across three levels — central, provincial, and district — and at district level affected communities are incorporated into the local composition of the Commission, ensuring direct participation. The DNTDT interview confirms that it is this Commission, under DNTDT leadership, that oversees and accompanies each resettlement process from initiation to conclusion, including the issuance of the final conformity opinion (*parecer de conformidade*) that certifies the completion of the process.

The primary legal instrument governing resettlement associated with economic activities is Decree 31/2012, of 8 August, which applies broadly to resettlement arising from economic activities — a category that encompasses both private sector operators and state-implemented projects. For state-led interventions involving land access and expropriation, the Expropriation Directive is also applied, and DNTDT confirms that the two instruments are typically used in conjunction, since each addresses

distinct dimensions of rights and compensation. The applicable ministerial authority is now the MAAP, following the institutional restructuring that dissolved the former Ministry of Land and Environment.

Responsibility for the preparation of Resettlement Action Plans rests with project proponents — whether private or public — who are required to contract independent consultants registered with the MAAP. DNTDT confirms that this obligation applies equally to state-implemented projects, citing various EDM cases as examples where compliance has improved markedly in recent years following closer institutional engagement. For Category A projects, the EIA and RAP must be developed and approved simultaneously: the SPA interview confirms that the EIA cannot be approved without a concurrent RAP approval. Project installation may only commence once all compensation has been delivered and all physical or economic displacement has been completed and documented — a sequencing requirement confirmed by both DNTDT and the SPA.

AQUA's competency in resettlement is that of inspection — field inspection and enforcement — of RAP implementation. This falls under AQUA's Land inspection and Spatial Planning Department, and the AQUA interview confirms it is a formally assigned institutional function, not an ad hoc operational assignment. The AQUA organic statute, which has been requested as part of the document checklist, should confirm the precise formulation. The distinction between inspection and enforcement, which belongs to AQUA, and monitoring and supervision, which belongs to the Resettlement Commission led by DNTDT, is institutionally significant and was consistently reflected across the AQUA and DNTDT interviews.

AQUA's inspection and enforcement function in resettlement is, however, constrained by the same operational limitations that characterise its broader inspection work. The AQUA headquarters interview and the Sofala provincial delegation interview both confirm that field-based activity is substantially limited by insufficient transport, inadequate operational budgets, and dependence on project-specific funding to finance field deployments. In the absence of adequate resources, activity concentrates on documentary review — the analysis of monitoring reports submitted by proponents and their contracted auditors — rather than independent field-based verification against actual conditions on the ground. This brings the risk that RAP commitments on compensation, livelihood restoration, housing standards, and community infrastructure are being implemented as designed, may not always be independently verified in the field. The SPA interview adds that, to avoid duplication, SPA and AQUA increasingly coordinate their monitoring and audit activities, with AQUA leading on audits and SPA accompanying where its own resources permit.

The Dondo District focus group provides the only operationally detailed account of a completed resettlement process at district level in the ESSA's field evidence base. The resettlement associated with a photovoltaic energy project was managed using a two-track approach: families whose preference was land reallocation received agricultural plots with inputs, while families preferring financial compensation received monetary settlement. All resettled families additionally received training in agricultural good practices, savings and rotating credit, and environmental and social safeguards. This model — combining choice-based compensation pathways with livelihood restoration and social safeguards training — is more substantive than a compensation-only approach and provides a documented implementation reference for Program-supported resettlement in the corridor.

The process of monitoring RAP implementation beyond the point of physical displacement is governed by an annual monitoring cycle: proponents are required to submit regular progress reports, which DNTDT reviews against the approved action plan matrix. Periodic supervision visits are carried out by the Commission at all levels. Final closure of a resettlement process occurs when DNTDT assesses, on the basis of field visits and community interviews, that livelihoods have been restored to a level equal

to or better than the pre-displacement situation. DNTDT acknowledges, however, that the current regulation does not define a fixed timeline for process closure, and that this is among the revisions under consideration in the ongoing regulatory review. The review process for Decree 31/2012 has been ongoing but has stalled following the interruption of World Bank financing approximately one year ago.

One regulatory gap flagged by DNTDT during the interviews concerns the threshold criteria for smaller-scale resettlement processes. The current regulation makes no meaningful distinction between large-scale resettlement affecting entire communities and small-scale processes affecting only a handful of families; in both cases, the full three-tier Commission structure must be mobilised, creating disproportionate procedural and cost burdens. This is identified as a priority revision, with a view to enabling faster local resolution of minor cases without activating the full national apparatus.

A second regulatory gap, confirmed by DNTDT, concerns resettlement arising from natural disasters and climatic calamities. No specific regulatory instrument currently exists to guide institutional action in these contexts. DNTDT identified this as an urgent normative need and noted that institutions are regularly called upon to respond without an adequate legal framework. This gap is primarily relevant to the legal framework analysis rather than to the institutional capacity assessment; however, from a capacity perspective, the absence of regulatory guidance compounds operational challenges for institutions active in areas such as the lower Búzi and Pungwè floodplains, where climate-driven and investment-related displacement processes can coincide geographically and temporally without any integrated institutional mechanism to assess their cumulative effects on affected communities.

F2.1.4 Women's Land Rights and the Gender Dimension of Land Governance

The Land Law formally provides equal land rights for men and women, and the DUAT system is gender-neutral in its formal provisions. The ESSA assessment identifies, however, a set of structural and cultural conditions under which women's land rights are systematically less effectively protected than men's, with direct implications for MozAgribiz's agribusiness support activities.

In the community consultation processes required under the Land Law for DUAT attribution, the DPGCAS Sofala interview documents a known pattern in which male household heads are the primary participants in land negotiation decisions, with women's voices marginalised or absent — a pattern the institution describes as a known cultural reality without a current awareness or prevention Program addressing it specifically. However, this picture is not uniform across all communities. The Dondo focus group indicated the opposite dynamic, with women frequently represented in significant numbers and playing active roles in consultation processes. This contrast suggests that participation patterns vary considerably depending on the community, its leadership structures, and the specific context of the consultation. Nonetheless, because no systematic monitoring of gender participation in consultations exists and because the institutional architecture offers no mechanism to distinguish communities where this risk is real from those where it is not, the structural concern must be considered relevant across the three Program corridors until evidence to the contrary is established community by community. The gender parity requirement that the new Land Law introduces into community consultations is precisely designed to address this structural exclusion; but its implementation depends on a monitoring and enforcement function that the existing institutional architecture does not currently provide.

In contract farming and outgrower arrangements — the primary modalities through which MozAgribiz's anchor investor model connects smallholder producers to commercial value chains — the DPGCAS interview documents a pattern of structural invisibility for women that has direct land rights implications: contracts are signed with male household heads, women and children work within

the contract farming scheme without individual contractual standing, and women who assert payment rights or challenge land use decisions that affect their household risk retaliation from husbands or social sanction from community structures. The contractual architecture of most outgrower arrangements does not formally require individual household member contracting, meaning that the women who contribute labour and knowledge to production systems are legally invisible within the commercial relationship, and that their land use rights — which may have pre-existed the contract farming arrangement as customary rights — can be effectively converted into contract farming obligations without their individual consent or individual entitlement to compensation.

The RSSA has identified gender and social inclusion as dimensions requiring strengthened coverage in its safeguards framework, acknowledging that its staffing is constituted by specialists in environmental, forestry and agropastoral fields who have extended into gender and social analysis through practical experience rather than disciplinary formation. This limitation affects the quality with which gender dimensions of land access and community consultation are assessed in the safeguards review of MAAP Program activities, creating a reinforcing pattern in which neither the external licensing process nor the internal MAAP oversight function reliably captures the gender dimensions of land governance in agribusiness investment contexts.

F2.1.5 Land Conflict Mechanisms and Institutional Capacity

The land conflict resolution architecture in Mozambique operates across multiple tiers, distributing functions between community-based structures governed by customary norms, an intermediate institutional layer at district and provincial level, and formal judicial proceedings as a last resort. At the base of this architecture, conflicts are handled first by community leaders — secretaries of the neighbourhood, locality chiefs, land chiefs and family elders — who apply customary norms and practices that are expressly recognised by the Land Law as valid evidentiary grounds, including testimonial evidence. Above this level, the District Services of Planning and Infrastructure (SDPI) and, in some provinces, the District Services of Economic Activities (SDAE) represent the DNTDT at district level and intervene in conflicts requiring institutional mediation. At provincial level, the Provincial Directorate of Territorial Development and Environment (DPDTA) and the Provincial Services of Environment (SPA) both carry land management competences, and in several provinces there are also Provincial Commissions for Land Conflict Management that integrate multiple sectoral directorates — including agriculture, industry, tourism, conservation areas and energy — as interinstitutional spaces for mediating complex or multi-sectoral land disputes. Unresolved conflicts escalate to DNTDT at the central level and, where necessary, to the Minister's office or Council of Ministers. The formal judicial pathway — Administrative Tribunal and district courts — functions as a residual mechanism at the top of this escalation chain. Both interviews confirm that this pathway remains largely inaccessible to smallholder communities in rural corridor districts, where physical distance to district courts, associated legal costs, language barriers and awareness deficits combine to restrict meaningful access to judicial land dispute resolution.

Community-level mechanisms are more proximate and more commonly used but present significant limitations documented by both interviews. Their quality is variable across districts, and they are not consistently impartial in disputes where one party is a powerful investor or influential local actor. The DNTDT interview further confirms that community leaders and district technicians in many cases lack the technical understanding of the DUAT system required to interpret formal land documentation correctly — a constraint compounded by the fact that the same district technician is responsible simultaneously for cadastre processing, inspection and conflict management, without the functional specialisation that exists in other natural resource sectors. This overload reflects a structural staffing deficit: the State has not recruited new technicians for several years, experienced staff are gradually

reaching retirement without replacement, and technical training Programs were last conducted under the Mozlands project, with the most recent national-level sessions occurring between 2022 and 2023.

A digital complaints and conflict management platform exists under the management of the Public Cadastre Services, accessible to the public, with a formal 15-day response target and a documented escalation mechanism through which unresolved cases rise from district to provincial to central level before referral to the courts. The platform is designed to record all conflicts regardless of where they are resolved, providing a national-level dataset. However, DNTDT confirms that the platform is sub-operational in a significant number of provinces due to the absence of the basic conditions required for its use — internet connectivity, functioning computers and trained staff. In some provincial contexts it is not being used at all. The platform therefore represents an institutional design with meaningful architecture but limited effective reach, and cannot currently be treated as a reliable mechanism for systematic land conflict monitoring or grievance tracking in the Program corridors.

The DNTDT interview confirms that land conflicts involving the DUAT attribution process — including disputes over the delineation of community land boundaries, the validity of community consultation records, and the adequacy of compensation in displacement processes — constitute a significant and growing conflict category in the Program corridors. The DNTDT's conflict mediation role is described as primarily technical and advisory in nature, but the institution retains substantive remedial authority: it can recommend area reduction of a DUAT as a graduated sanction for non-compliance with exploitation plans, and can initiate revocation and extinction procedures in cases of total non-compliance or breach of fiscal obligations. DNTDT also leads the National Resettlement Commission and coordinates its tripartite structure across central, provincial and district levels. The most significant constraint on DNTDT's enforcement capacity is structural rather than legal: land inspection authority was transferred to AQUA in the previous mandate, leaving DNTDT without direct enforcement powers over DUAT compliance. The new Land Law, currently under consideration by Parliament, provides for this authority to return to the land sector, but the transition has not yet occurred, and the timeline for the law's entry into force — which requires a dissemination period of three to six months following approval, followed by the drafting of a regulation estimated to take up to one year — means that this enforcement gap will persist through at least the early implementation phase of MozAgribiz.

The SIGIT land information system, which should provide the documentary basis for land rights verification and formal conflict resolution proceedings, remains technically incomplete in ways directly relevant to the Program's risk profile. DNTDT's confirmation across both the cadastre and SIGIT interviews is unambiguous: the system is operational only to provincial level and has not been extended to districts or communities; central-level processing of DUAT files continues in analogue form because the module for central-level process tracking was never completed; the reporting module remains unfinished; and the system does not communicate with agricultural management systems at MAAP, a limitation explicitly described by the SIGIT manager as critical given that land information and agricultural data must be integrated to support agribusiness investment and conflict prevention. The system has not been substantially updated since its development in 2012 and required financial support for a redesign that was not executed before the Mozlands project closed. These conditions mean that the evidentiary foundation for formal land conflict resolution is itself technically incomplete, and that the information basis for Program-level verification of DUAT status, community boundary delineation and consultation records depends on provincial-level paper processes whose quality and completeness vary significantly across the corridor districts.

On territorial planning, the DPDTA interview reveals that approximately seventy percent of district land use plans (PDUTs) in Sofala province require updating, with most having exceeded their validity periods. In the Beira corridor specifically, only the Nhamatanda PDUT has been updated as of the

interview date; the Dondo plan has not been updated and is scheduled for revision next year; Gorongosa and Marromeu are in process. This is significant because PDUTs serve as the primary instrument for verifying whether proposed agribusiness investment areas are compatible with existing land use, community occupation and infrastructure patterns, and whether zoning conditions for large-scale agricultural or processing projects are satisfied. Where PDUTs are outdated or have not been implemented as designed — the DPDTA notes that municipal authorities frequently deviate from approved plans without notification or consultation — the territorial basis for DUAT attribution and environmental licensing decisions is itself unreliable, increasing the risk of overlap with community land use areas, resettlement triggers and subsequent conflict.

For MozAgribiz, the land conflict risk is not abstract. In the Program corridors — particularly in the Beira corridor districts of Nhamatanda, Buzi, Gorongosa and Chibabava, and in the Nacala corridor districts with the highest concentration of planned investment — agribusiness expansion is occurring in areas where land use systems are already complex, with overlapping customary claims, prior resettlement processes with unresolved compensation disputes, and a documented history of land conflict associated with large-scale commercial farming investments in the Mozambican agricultural development experience. The institutional architecture for preventing and resolving such conflicts faces compounded constraints at every level: the digital complaints platform is sub-operational; PDUT coverage is incomplete and partially outdated; SIGIT cannot verify land rights comprehensively; inspection authority sits with AQUA rather than the land sector during a transition period that will extend well into the Program's implementation window; and the same undertrained and overloaded district technicians are responsible for cadastre, monitoring, inspection and conflict management simultaneously. In this context, the Program's land access eligibility conditions must require not merely a check of DUAT existence but verification of the full attribution pathway for all supported investments, including the community consultation record, the documentation of pre-existing rights, the absence of active land disputes with affected communities, and — for investments above a defined area threshold — confirmation of compliance with applicable PDUT zoning. This verification should function not as a one-time condition at Program entry but as a continuing obligation subject to structured monitoring throughout implementation, with the Program's grievance mechanism explicitly designed to receive and track land-related complaints in the absence of a fully functional national platform.

F2.2 Labour, OHS, and Working Conditions

The Provincial Delegation of the General Labour Inspection (IGT) was not available for interview during the ESSA consultation process. This is a material evidential limitation for this section. In the absence of a direct IGT interview, the ESSA's findings on labour inspection capacity, child labour dynamics, seasonal and migrant worker conditions, and gender dimensions of agricultural labour draw primarily on the DPGCAS interview conducted in Sofala province — which provided substantive and contextually grounded information on child labour, trafficking, and gender-differentiated labour vulnerability — and on secondary documentation, principally the Mozambique ESRM National Overview Assessment Report (World Bank, 2024), hereinafter ESRM Assessment. Findings in this section should be read with that limitation in mind: the assessment reflects the institutional perspective of social protection and gender actors rather than the labour inspection system itself, and the operational picture of labour inspection capacity is therefore constructed from indirect evidence rather than from direct institutional engagement.

F2.2.1 Regulatory Framework and Institutional Mandates for Labour Oversight

The labour regulatory framework applicable to the agribusiness activities MozAgribiz supports is constituted primarily by the Labour Law (Law 23/2007 as amended) and its associated regulations, which establish the minimum wage structure, working hour limits, leave entitlements, occupational health and safety requirements, and the conditions for employment of workers in seasonal and fixed-term agricultural labour contexts. The Ministerial Diploma establishing the agricultural sector minimum wage — which is distinct from and lower than the minimum wages applicable in the industrial and services sectors — defines the wage floor for the formal agribusiness labour market. The Child Labour regulations — implementing Mozambique's obligations under ILO Convention 138 on minimum age and Convention 182 on the worst forms of child labour — establish fourteen as the minimum working age, with exceptions for light and non-hazardous work under specific conditions, and prohibit the employment of persons under eighteen in hazardous agricultural activities.

The institutional mandate for labour inspection resides with the labour inspectorate, which is currently within the ministry that also encompasses gender and social action functions — the organisational integration mentioned in the DPGCAS interview as having reduced coordination failures between social protection and labour structures by approximately 90%. The labour inspectorate exercises its mandate through the Provincial Delegations for General Labour Inspection, which maintain inspection units responsible for visiting workplaces, verifying compliance with employment conditions, investigating complaints, and referring cases to judicial authorities where violations are found. The occupational health and safety function is formally part of the labour inspection mandate, with inspectors expected to assess workplace safety conditions, chemical exposure management, personal protective equipment provision, and emergency response preparedness.

This framework is formally adequate in its coverage of the principal labour risk categories associated with agribusiness: agricultural wage labour conditions, seasonal worker protections, child labour prohibition, chemical safety in pesticide application, and OHS in agro-industrial processing. The ESSA assessment finds, however, a substantial gap between the formal adequacy of the framework and the operational capacity to implement it in the specific conditions of agribusiness labour in the Program corridors.

F2.2.2 Labour Inspection Capacity in the Program Corridors

The labour inspection capacity at provincial level in Sofala is structurally constrained by the same category of resource limitations that affect the environmental compliance system: insufficient staff relative to the scale of the mandate, limited transport and fuel availability for field inspections, and an inspection Program concentrated on formal registered employers in urban and peri-urban areas, with rural agricultural workplaces receiving materially less systematic attention. The ESRM Assessment provides the national quantitative baseline for this structural condition: as of 2021, Mozambique had 129 Labour Inspectors for a country with 14 million workers. The ESRM Assessment explicitly confirms that limited budget and resources, including fuel and vehicles, hamper the Labour Inspectorate's ability to enforce labour laws across the country, and that monitoring and evaluation functions are particularly weak at the provincial level. IGT's characterisation in the ESRM Assessment — that the inspection process is overall good but that it lacks specialists and budget to ensure enforcement throughout the country, especially in areas of difficult access — is consistent with the structural picture constructed through the ESSA consultation process. The ESRM Assessment further notes that IGT has an institutional plan and conducts biannual sectoral campaigns. The formal employer population — registered companies operating sugarcane estates, oilseed processing plants, grain storage facilities and commercial farms — is accessible to the labour inspection system in principle and is subject to periodic inspections.

The informal and quasi-formal agricultural labour population — the seasonal workers recruited through intermediaries for cotton, sugarcane and cashew harvesting; the smallholder outgrowers engaged under contract farming arrangements without formal employment status; the household members including women and children who participate in production activities that are commercially organised but whose own relationship with the commercial system is not documented in any employment record — is largely outside the operational reach of the provincial labour inspectorate. This exclusion is partly formalised: the ESRM Assessment confirms that IGT's mandate, while national in geographic scope, formally excludes public administration and the informal sector from its inspection coverage, meaning that the segment of the agricultural labour force most relevant to MozAgribiz — smallholder and quasi-formal outgrower workers — falls outside the legal perimeter of systematic inspection. The enforcement gap is compounded by a further structural weakness documented in the ESRM Assessment: under the Labour Law, IGT officers have power only to impose the minimum amounts of fines, with employers able either to obtain a discharge by paying voluntarily or to appeal to the Inspector's superior, who may graduate the fine differently. The ESRM Assessment further identifies that the institutional responsibility for enforcing sectoral OHS regulations is unclear and that there is an inherent conflict of interest in involving the sectors in self-enforcement. The DPGCAS interview confirms that child labour data in the agricultural sector is held by the provincial labour directorate, not by DPGCAS. At national level, the ESRM Assessment documents indicate that the IGT interview conducted identified the mining, construction and agriculture sectors as those that most frequently violate the law in employing minors. These are national-level figures, not Sofala-specific measurements.

The DINASAB provincial inspection Program, through SPAE, for agricultural input commercialisation — assessed in F1.3.2 — reveals a geographic coverage pattern that mirrors the labour inspection gap: formal commercial establishments in urban centres receive the majority of inspection attention, while the rural and peri-urban agri-input networks and the agricultural worksites where pesticide application practices most directly affect worker safety receive considerably less oversight. The ESRM Assessment documents that institutional mandates, resourcing, and means to develop, update and enforce pollution management and chemical safety regulations and standards are inadequate nationally, and that inspections are under-resourced in the relevant ministries. The consequence for OHS in the Program's smallholder and emergent commercial beneficiary populations is that compliance with pesticide handling, PPE provision and chemical safety standards at the worksite level is not being independently verified.

F2.2.3 Child Labour in Agricultural Value Chains

Child labour in agricultural value chains is the social risk that is most explicitly documented from an institutional perspective in the ESSA interview series, primarily through the DPGCAS analysis but also implicitly in the labour and extension system assessments. The DPGCAS of Sofala demonstrates a substantive institutional understanding of child labour dynamics in the province: the seasonal correlation between school absenteeism and the harvesting campaigns for cotton, cashew, pineapple and sugarcane is documented; the role of parents in removing children from school for agricultural labour is openly acknowledged; and the geographic concentration of risk in the districts where commercial agricultural activity is most intensive — Buzi, Nhamatanda, Chibabava and Gorongosa — is explicitly mapped.

The detection and response mechanism is multi-channel and documented as functional in at least some cases. The reported case, during the interview with DPGCAS, of children transported by train from Caia to Beira — identified by a CFM focal point, intercepted by police, and referred to DPGCAS for family reintegration — illustrates that the Reference Group mechanism, when its network is alert and communication infrastructure is functional, can activate a coordinated institutional response

consistent with international child protection standards: formal registration, multi-sectoral referral, family reintegration with social accompaniment, and continuous follow-up. The ESSA's assessment is that this capacity exists and is real, while being structurally fragile in ways that require explicit Program attention.

The structural fragility operates at several levels. The district-level coverage that makes early detection possible depends on a network of community committees that are untrained community volunteers without remuneration, without institutional equipment, and without a systematic supervision and support mechanism from the technical teams at the SDSMAS level, which in several districts operate with only one or two staff. The DPGCAS's own assessment indicates that the districts with the most limited technical coverage tend to coincide with those where commercial agriculture concentrates seasonal labour and where child labour risk is highest — a structural correspondence between high-risk geography and minimal institutional presence that is not specific to any single district configuration, but rather reflects a systemic resourcing pattern across the province. This is a structural condition that the Program cannot assume will be resolved through institutional development alone during the implementation period, and it applies broadly across the geographic footprint where Program activities are likely to generate increased commercial agricultural intensity.

The seasonal calibration of prevention activities — timing awareness campaigns and school outreach to the pre-harvest periods for the relevant commodities — is a contextually adapted and positive practice that the ESSA identifies as a replicable element of the DPGCAS's operational model. Its effectiveness, however, is constrained by the same logistical limitations: the transport to conduct home visits for children with poor school attendance patterns, the communication infrastructure to coordinate multi-district outreach activities, and the staff time to simultaneously manage incoming cases while conducting proactive prevention activities.

For MozAgribiz, child labour risk is not peripheral to the Program's results framework, though the nature of the evidential basis requires careful qualification. What the ESSA documents directly is a seasonal correlation between school absenteeism and commercial agricultural harvesting campaigns in Sofala province, with child labour risk geographically concentrated in the districts where commercial agricultural activity is most intensive. However, this tendency is not intrinsic to commercial agriculture itself, but rather arise within the family dynamics, where children often contribute to household labour across multiple tasks – a participation that typically extends into agricultural activities on family plots.

What the ESSA does support, as a structural inference consistent with the broader literature on child labour in smallholder agricultural systems in sub-Saharan Africa, is that any Program intervention that materially increases the commercial intensity of smallholder production — and the economic returns to household agricultural labour — in districts where child labour detection and response systems are already structurally fragile, creates conditions under which child labour incidence may increase.

Field evidence from the Dondo District focus group provides a documented operational example of what targeted prevention through the agricultural extension system can achieve when trained and resourced, and of the institutional conditions required for that achievement to be durable. Under the SUSTENTA Program, SDAE extensionists in Dondo implemented GBV awareness and child labour sensitisation components as part of their regular field presence with producers and outgrower beneficiaries. Documented outcomes in the district include a reduction of child labour in outgrower activities, achieved through sensitisation explicitly linked to school enrolment — connecting the child labour risk directly to the school attendance variable through an extension-delivered message. The Dondo Focus Group Discussion confirmed that this sensitisation was operationally delivered as part of the same field visits through which extensionists supervised agricultural inputs and screening

requirements, embedding child protection messaging within the agricultural support relationship rather than as a separate institutional function. The SDAE extensionist network that produced these outcomes retains SUSTENTA-era awareness, maintains direct community contact across all administrative posts, and has demonstrated the institutional capability to route social risks through appropriate channels — including the referral of domestic violence cases identified during extension visits to the PRM. This is not a latent institutional capacity awaiting activation: it is a demonstrated delivery model whose results were observed in practice. The critical finding from the focus group for the Program's child labour risk management is that this capacity has not been maintained as a routine district procedure since SUSTENTA's closure, that training is held individually by the cohort of trained staff rather than documented in transferable form, and that MozRural and PROCAVA have not reproduced equivalent depth of training. The Program should treat the restoration of E&S training for this extensionist network — specifically including child labour sensitisation and referral protocols — not as a capacity-building objective but as a prerequisite for deploying the extensionist network as the Program's primary community-level social risk monitoring asset.

The ESSA's assessment is therefore that the relationship between the Program's smallholder mobilisation model and child labour risk in the target districts is a knowledge gap that requires explicit attention during Program preparation — including, at minimum, a baseline assessment of child labour dynamics in the PforR value chains and economic corridors prior to the commencement of anchor investor operations at scale.

F2.2.4 Contract Farming, Outgrower Arrangements, and Labour Vulnerability

The contract farming and outgrower arrangement model is the primary commercial linkage mechanism through which MozAgribiz's anchor investor approach connects with smallholder producers. The labour dimensions of these arrangements present a set of risks that the formal labour regulatory framework does not adequately address, and that the current institutional oversight capacity cannot reliably detect.

The contractual structure of outgrower arrangements in Mozambique's agricultural corridors typically involves a formal agreement between an anchor investor or aggregator and a male household head, covering input provision, technical advisory services, purchase commitment and price. This structure does not individually contract other household members — women, adolescents and older children — who participate in the production work covered by the contract. Their labour contribution is legally invisible, their entitlement to compensation for that contribution is not individually established, and their protection under the labour law — including minimum age requirements, safe working conditions and chemical safety provisions — is not directly enforceable because they are not parties to any employment or commercial relationship. The DPGCAS interview documents this structural invisibility precisely: women and children work within contract farming schemes, contributing labour for which the contract payment flows exclusively to the male household head, without recourse if payment is withheld or if working conditions are unacceptable.

The absence of individual registration for household members contributing labour in contract farming operations is a governance gap that operates across the entire anchor investor model that MozAgribiz supports, and it is not currently addressed by any regulatory requirement in the agricultural contracting framework. The MAAP does not have a standard for contract farming agreements that requires individual household member registration, and the RSSA does not have a specific screening indicator for outgrower contract labour inclusivity. The consequence is that a Program designed to increase the participation of smallholder households in commercial value chains can simultaneously increase the economic invisibility and legal vulnerability of the household members — primarily

women and adolescent girls — who contribute disproportionately to the production work while having no individual commercial standing.

Intermediary labour recruitment — the engagement of labour contractors to supply seasonal harvesters for large commercial farms — is a further dimension of the contract farming and agricultural labour landscape that presents elevated risk. DPGCAS confirms the presence of labour recruitment networks operating in the province that in some cases have trafficking dimensions, recruiting young workers from other provinces or districts under conditions that do not always correspond to what was represented to the worker at the point of recruitment.

F2.2.5 Occupational Health and Safety in Agro-industrial and Smallholder Contexts

Occupational health and safety in the agribusiness contexts most relevant to MozAgribiz encompasses two distinct but connected risk domains: the OHS conditions in formal agro-industrial workplaces — processing facilities, sugar mills, grain storage installations — where the labour law and occupational safety regulations apply with formal employer accountability; and the OHS conditions in field-level agricultural production (that is, production activities taking place at dispersed plot and farm worksites, predominantly but not exclusively among smallholder and emergent commercial producers). — particularly pesticide application, machinery operation and crop processing — where the regulatory framework applies in principle but enforcement is structurally limited by the informality of labour relations and the geographic dispersal of worksites.

In formal agro-industrial workplaces, the principal OHS risks — machinery guarding, dust and fume exposure in grain and processing facilities, heat stress in sugar mill environments, and chemical exposure in laboratories and quality control functions — are known and regulated. Labour inspectors conduct periodic visits to the largest facilities, and the major anchor investors operating in the corridors generally maintain OHS management systems commensurate with their operational scale and the requirements of buyers and certifiers. The ESSA assessment does not identify a systematic pattern of severe OHS weaknesses in formal agro-industrial workplaces as a Program risk, but notes that the quality of OHS management in smaller processing facilities — the scale of investment most directly relevant to the emergent commercial farmer and agro-processing SME categories that MozAgribiz supports — is considerably more variable and receives less systematic inspection attention.

In field-level agricultural production, the OHS risk profile is concentrated on pesticide exposure: incorrect mixing, inadequate or absent personal protective equipment, re-entry to treated areas before waiting periods have elapsed, storage of chemicals in domestic environments, and inadequate disposal of empty containers. The DINASAB inspection assessment in F1.3.2 confirms that rural agricultural worksites receive minimal regulatory attention, meaning that compliance with pesticide safety requirements at the field level is not being independently monitored. The extension advisory coverage assessed in F1.3.3 is insufficient for the frequency of contact required to support correct pesticide handling practices in a smallholder population that is increasing its input use intensity under Program support.

The absence of laboratory capacity in the compliance system — documented in full in F1.2.2 — has direct OHS dimensions beyond the environmental pollution assessment. The verification of whether pesticide residues in crop products, soil and water are within acceptable limits for worker and community exposure requires the same analytical infrastructure that AQUA lacks for environmental compliance purposes. Workers on farms where pesticide over-application or incorrect product use is occurring cannot be protected through an inspection system that can only observe visual empirical indicators of chemical use.

F2.2.6 Seasonal and Migrant Labour: Structural Vulnerabilities

The seasonal labour economy of the Beira corridor — which draws workers from the corridor's own rural populations and from migrant workers from Manica, Tete, Zambezia and other provinces during peak harvest periods — creates a transient and socially disconnected labour population whose vulnerability to exploitation, inadequate working conditions and health risks is elevated relative to the permanent rural labour force. The DPGCAS interview documents the presence of Zimbabwean and Malawian migrants in the province who are considered particularly vulnerable to forced labour networks, and notes that the inter-provincial reintegration protocol for trafficking victims operates without dedicated financial resources for transport, accommodation or subsistence — a logistical gap that the institution explicitly acknowledges as having a disproportionate impact on whether victims pursue formal justice.

Seasonal and migrant workers in agricultural corridor contexts are structurally invisible to social protection systems whose coverage mechanisms depend on community residency and household registration: PSSB[23] and PASP[24] beneficiary identification is based on community-level registration that transient seasonal workers do not qualify for. They are also structurally less visible to the labour inspection system, whose visit scheduling and employer engagement model is calibrated to permanent workplaces rather than to the temporary camp and accommodation structures associated with seasonal harvest labour. The concentration of seasonal workers in shared accommodation — either provided by employers or self-organised — creates elevated risks for communicable disease transmission, GBV, and social friction that are not captured in either the environmental health monitoring system or the labour inspection system.

For MozAgribiz, seasonal and migrant labour risk is directly relevant across several of the six PforR value chains, most acutely in rice, horticulture and forestry, all of which employ significant numbers of seasonal harvest workers and where the conditions of seasonal labour — including accommodation, sanitation, access to drinking water, wage payment reliability, and physical security — constitute substantive social risk dimensions of the investment portfolio. It is worth noting that the broader agricultural labour landscape in Sofala includes high seasonal labour demand in sugarcane and cotton operations, which lie outside the PforR scope but shape the household economy dynamics within which MozAgribiz-supported value chain actors operate, including patterns of adult migration and consequent household vulnerability. Within the Program's own value chains, the anchor investor model creates an institutional entry point for labour conditions management that the Program should exploit: anchor investors with direct commercial relationships with MozAgribiz support should be subject to Program-level labour standards that cover their seasonal workforce, including accommodation, water and sanitation, wage payment protocols, and a prohibition on child harvest labour.

F2.3 Community Health and Safety

F2.3.1 Gender-Based Violence in Agricultural Labour Contexts

The intersection of agricultural labour and gender-based violence is one of the most significant social risk dimensions of the agribusiness expansion model MozAgribiz supports, and the DPGCAS interview provides operationally important institutional evidence on how that intersection presents in the provincial protection system. The DPGCAS of Sofala confirms that GBV is a critical intervention area

[23] Basic Social Subsidy Program (*Programa de Subsídio Social Básico*)
[24] Productive Social Action Program (*Programa de Acção Social Produtiva*)

in the province, with psychological violence predominating in the reported case profile, followed by physical and sexual violence.

The multi-sectoral response model articulating health, justice and social action is operational and has demonstrated capacity for sustained engagement with complex protection cases — the case of the woman violated during the Buzi floods who has been under continuous follow-up with facilitated access to health services and whose perpetrators were prosecuted and imprisoned, illustrates this sustained engagement capacity in a geographic corridor directly relevant to the Program.

The finding of greatest analytical significance for MozAgribiz in the DPGCAS statement that at least 90% of GBV cases presenting at the Integrated Care Centre (*Centro de Atendimento Integrado*) in Beira relate to psychological violence in a work context. This is the formulation the interviewee used in direct response to a question about whether GBV, in seasonal agricultural labour contexts, reaches the institution's knowledge. The work context is integral to the 90% characterisation as stated; the interview does not disaggregate this figure by sector or specify which agricultural operations generate these cases. What the figure does confirm is that the Integrated Care Centre is receiving a high volume of GBV cases with a labour dimension, and that psychological violence is the dominant form in which workplace GBV is presenting to the formal protection system in the province.

The relationship between DPGCAS and the Provincial Directorate of Labour is confirmed as functional, although not guided by a formal coordination protocol. The interviewee explicitly said she was not certain whether a formal document exists. In practice, coordination happens through information flows and through the Reference Group and Multi-sectoral GBV Mechanism, which are activated on a case-by-case basis when situations arise. There are no periodic structured joint meetings. This means that the articulation between GBV case management in the social protection system and the labour inspection system is reactive rather than systematic, and depends on the activation of shared coordination mechanisms rather than on a standing institutional interface. This is an analytical inference from the conditions the interview describes; the interviewee did not characterise this gap in those terms.

The structural position of women in contract farming is confirmed by DPGCAS as a known vulnerability, even in the absence of systematic case documentation. The institution acknowledges — as a recognised cultural reality rather than as a formally registered pattern — that contracts in cotton outgrower systems are typically held by male household heads while women work without individual contractual standing, and that women who attempt to assert payment or other rights face social disadvantage within the household. One specific case of a woman not paid for her labour is currently in judicial proceedings. The interviewee also described the polygamous household structure common in Sofala, in which husbands assign a plot to each wife but are typically absent from the fields: in this structure, a woman who raises a grievance is socially exposed because the husband holds formal authority as head of household. The institution does not have a current awareness or prevention campaign addressing this structural vulnerability, though it explicitly identifies one as a need. This gap is confirmed directly by the interviewee's response that they would like to develop such a campaign but have not yet done so.

The operational capacity of the institution to address any of these risks is severely constrained. The Gender Department has no development partner. The Multi-sectoral GBV Mechanism, which is the primary coordination instrument for GBV response including in labour contexts, operates without a computer, without internet access, without operational credit and without a dedicated meeting space — relying on a WhatsApp group as its primary coordination tool. The institution manages a documented high-volume GBV caseload, including cases with direct labour dimensions, under conditions of minimal operational infrastructure.

Evidence from the Dondo District focus group introduces a finding that is analytically significant for the design of GBV detection and referral infrastructure in the Program corridors. During SUSTENTA, SDAE extensionists in Dondo, have served, informally, as first-line detection and referral channel for domestic violence cases identified during regular extension field visits, routing these cases to the Office for Assistance to Families Victims of Violence housed at PRM. This extensionist-to-PRM referral pathway operated as an informal GBV detection mechanism embedded within the routine agricultural support relationship — not as a specialised GBV response function, but as a natural consequence of the extensionist's sustained community presence and the social trust that presence generates. The focus group further noted a structural contrast between two categories of E&S capacity at district level: the SUSTENTA-derived agricultural safeguards knowledge, which is held individually, is not institutionalised, and is at progressive risk of loss as trained staff change posts; and the SDSMAS social action function's child protection and GBV response capacity, which is more robustly embedded precisely because it is anchored in ongoing inter-institutional practice with the PRM and the Public Prosecutor's Office rather than in a single closed project cycle. This contrast identifies the design principle most relevant to MozAgribiz: GBV detection and response capacity is durable when embedded in routine inter-institutional practice rather than when delivered through project-specific training that ends with the project. For the Program, this means that the extensionist-to-PRM referral pathway could be reinstated as a systematic practice, supported by formal referral protocols, provided that such practices do not undermine their acceptability or the trust-building necessary for the performance of their core functions at community level. The durability of that capacity depends on it being anchored in the regular inter-institutional coordination architecture of the SDSMAS, SDAE, and PRM rather than in a Program-funded training module that will not survive Program closure.

For MozAgribiz, this institutional context defines both the limits of what can be expected from the existing protection system in the Program corridors and the areas where targeted Program support to the Gender Department's operational capacity would have direct relevance to Program social risk management.

F2.3.2 Agrochemical and Pollution Health Risks

The community health risks associated with agrochemical use and agro-industrial pollution in the Program corridors are structurally linked to the environmental compliance gaps documented in F1.2 and F1.3, but their manifestation as health risks requires separate assessment because the institutional responsibility for protecting community health from environmental pollution is distributed across the environmental licensing system, the public health system and the pesticide regulatory system in ways that produce significant gaps in effective protection.

The absence of laboratory analytical capacity in the environmental compliance system — confirmed at every level of the licensing and inspection chain — means that communities living adjacent to agribusiness operations whose water sources are receiving irrigation return flows, agro-industrial effluents or agricultural runoff cannot rely on the formal compliance system to independently verify the safety of their water. The one-month analytical response time in the water pollution case described by AQUA Provincial Sofala — where CHAEM samples were still under analysis two weeks after the incident — illustrates the timeline within which community health exposure continues during the investigation of an identified pollution event. Communities that rely on affected water bodies for drinking, irrigation and fishing in the interval between pollution occurrence and regulatory response are exposed to risks that the current system cannot address in a public health-protective timeframe.

The pesticide exposure pathway operates through multiple channels: field worker direct exposure during application; community exposure through drift during aerial or motorised application; exposure through water bodies contaminated by agricultural runoff; and dietary exposure through

residues in food crops produced in the Program value chains. DINASAB confirms that the informal commercialisation of unregistered or improperly labelled pesticide products — particularly in border markets and rural input networks — represents a persistent challenge to regulatory control, and that rural agricultural input networks in the Program corridors receive minimal inspection attention. The food safety dimensions of pesticide residues in produce are addressed in the formal export and premium market certification systems operated by some anchor investors, but not systematically across the smallholder and informal market channels through which the majority of Program-supported production reaches domestic consumers.

The IIAM interview is relevant to this risk through a different channel: not pesticide regulation, but the structure of agronomic knowledge transfer to smallholder producers. IIAM confirms that its research outputs reach farmers exclusively through DINAE extension, and that without functional extension coverage, technology transfer — including guidance on pesticide use, application timing and pre-harvest intervals — does not reach producers. IIAM also confirms that its agrochemical handling training, which was systematised under the APPSA project, has been maintained informally through continuing field training activities led by the former safeguards focal point, but is not embedded in a consolidated institutional framework. Producers operating outside the reach of IIAM-informed extension, and making pesticide application decisions based primarily on commercial agri-dealer advice — which is commercially incentivised toward higher application rates and more frequent treatments — and on informal peer-to-peer knowledge, are therefore the producers most likely to generate the over-application, incorrect timing and inadequate pre-harvest interval patterns that translate into dietary exposure risks for communities consuming their products. This causal chain is an analytical inference from the structural conditions the IIAM interview confirms; the interview does not itself document specific instances of pesticide misuse in Program corridors.

In the absence of a systematic soil or water monitoring Program in the Program corridors establishing baseline nutrient and chemical loading levels, the cumulative health impact trajectory of increasing agrochemical use across the Program's beneficiary base is not being assessed. The IIAM interview confirms that its own field monitoring protocols are designed to track agronomic performance indicators rather than environmental chemical loading, and that no consolidated institutional mechanism, at IIAM level, exists for environmental monitoring beyond the requirements of individual donor-funded research projects.

F2.3.3 Vector-borne Disease, Irrigation Expansion, and Water-related Health

The expansion of irrigated agricultural production in the Beira and Nacala and Maputo -Limpopo corridors — a central objective of the infrastructure and investment facilitation components of MozAgribiz — creates conditions for the proliferation of vector-borne and water-related diseases that require explicit Program management attention. The relationship between irrigation infrastructure and malaria transmission is well-documented in sub-Saharan African agricultural development contexts: standing water in irrigation canals, drainage channels, rice paddies and waterlogged field margins creates breeding habitat for Anopheles mosquitoes, with the intensity of malaria transmission positively correlated with the density and permanence of water surface area. The communities residing adjacent to irrigation schemes and the workers employed on irrigated farms — particularly seasonal and migrant workers without prior exposure to the local malaria parasite strains — face materially elevated malaria exposure risk relative to the dryland agricultural conditions they may have left.

Schistosomiasis risk follows a parallel trajectory: the freshwater snails that intermediate bilharzia transmission thrive in slow-moving or still surface water associated with irrigation infrastructure, and communities that use irrigation canals for bathing, washing and incidental contact — a behavioural

pattern documented across the Program corridor communities — are exposed to infection at rates that increase with the area and permanence of the irrigation water network. The Pungwe and Buzi valley systems, as well as the major systems of the Limpopo river basin (Irrigation schemes of Chokwe and of lower Limpopo), where irrigation expansion under MozAgribiz will be most intensive, already have documented schistosomiasis endemicity that irrigation infrastructure expansion will compound rather than reduce if specific mitigation measures are not designed into irrigation schemes and enforced through their management protocols.

Water-related health risks in the immediate Program corridors extend beyond vector proliferation to the direct health consequences of deteriorating surface water quality — assessed in the cumulative water risk analysis of F1.5.4. Communities that use surface water bodies for drinking and domestic purposes, and where the quality of that water is deteriorating from the combined effects of agro-industrial effluents, agricultural runoff and irrigation return flows, face exposure to enteric pathogens, chemical residues and nutrient-driven algal toxins that the current public health monitoring system — calibrated to routine epidemiological surveillance rather than to the water quality changes associated with agribusiness intensification — is not configured to detect and attribute.

The EIA process is formally required to assess vector-borne disease and water quality risks for irrigation projects. The ESSA review of EIA related-documents for agribusiness and irrigation investments finds that health impact assessments in reviewed documents are typically limited to generic statements about malaria without quantified exposure assessments, without baseline disease burden data, and without monitoring indicators that would allow detection of post-construction changes in disease incidence attributable to the investment. Mitigation measures are correspondingly general without the operational specificity, budget allocation and verification mechanism that would be required for their implementation to be independently confirmed.

F2.3.4 Trafficking and Forced Labour

Trafficking for labour exploitation is documented in the DPGCAS interview as an active risk in Sofala province. The Directorate confirmed specific case documentation of young people trafficked to Laos under false employment promises, and identified Zimbabwean and Malawian migrants present in the province as a population facing heightened vulnerability to forced labour recruitment networks. The Reference Group, led by the Attorney General's Office and co-coordinated by Social Action, functions as the primary coordination mechanism for case identification, response and inter-provincial reintegration. OIM is confirmed as a partner in this function, though the Directorate characterised its support as occasional rather than sustained, and did not identify it as a formal institutional partner.

The Program corridors present structural conditions conducive to labour trafficking. The DPGCAS interview confirms several of these directly: the economic pressure on rural households intensified by the legacy of Cyclone IDAI; the absence of local social networks among migrant workers — including those recruited seasonally for sugarcane harvesting from Niassa, Zambezia and Nampula — which reduces both their ability to recognise exploitative conditions and their access to protection services; and the seasonal concentration of agricultural labour demand. The interview does not specifically document unregistered labour recruitment intermediaries operating in the corridor, though the structural conditions it confirms — informal seasonal recruitment, cross-provincial labour mobility and limited institutional oversight — are consistent with that risk.

The institutional response to trafficking in the Sofala corridor operates functionally when resources, communication and inter-institutional coordination align — the inter-provincial reintegration protocol, the Reference Group communication network, and the OIM partnership create a response architecture that works in documented cases. However, the DPGCAS explicitly acknowledges that this

response system operates without dedicated financial resources for transport, accommodation or subsistence in trafficking cases.

For MozAgribiz, the trafficking risk is most directly connected to the labour recruitment practices of anchor investors and their sub-contracted labour suppliers. This connection is not drawn explicitly in the DPGCAS interview, which focuses on the institutional response architecture rather than on private sector recruitment practices. It is, however, a reasonable analytical conclusion from the structural conditions the interview confirms: concentrated demand for seasonal agricultural labour, cross-provincial worker mobility without local social networks, and an institutional protection system that — by the Directorate's own account — is resource-constrained and reactive rather than preventive. The commercial pressure on anchor investors to fill seasonal labour demand rapidly and at minimum cost creates structural incentives toward informal recruitment channels where the conditions the DPGCAS interview documents are most likely to concentrate. The program will need to define and implement standards prohibiting the use of labour intermediaries with undocumented recruitment practices.

F2.4 Stakeholder Engagement and Grievance Redress Mechanisms

F2.4.1 Community Consultation in the Licensing Process: Quality and Coverage Gaps

The mandatory community consultation requirements in the environmental licensing process — the primary formal mechanism through which affected communities participate in the assessment of projects that affect them — are designed to be the procedural anchor of stakeholder engagement in Mozambican agribusiness investment governance. The ESSA assessment of their operational quality reveals, however, a set of quality and coverage gaps that limit their effectiveness as genuine participatory mechanisms and that have direct implications for the social risk profile of projects entering the MozAgribiz portfolio.

The practice documented in the SPA Sofala interview — of waiving the simplified environmental impact study and mandatory public consultations for Category B projects when impacts are considered already known, substituting them with a simple ESMP[25] — is the most directly significant quality gap in the consultation system from a safeguards perspective. The SPA acknowledges that this practice is not explicitly legislated and rests on a ministerial document whose specific content cannot be retrieved with certainty. Category B projects are likely to be the most frequent category in the agribusiness activities MozAgribiz supports, and the waiver practice — applied on the basis of an internal technical criterion that is not externally auditable — can remove the only formal community participation mechanism from the licensing process for a significant proportion of Program-supported investments.

The quality of consultations that are conducted for Category B projects not subject to the waiver — the ceiling of PforR-eligible project classification, given Category A's exclusion from the instrument — is itself variable in ways that the ESSA assessment identifies as material. Community consultation processes for EIA purposes in the Program corridors are confirmed to be conducted primarily by EIA consultants contracted by project proponents, whose interests do not necessarily align with maximising the quality of community participation. The absence of an independent observer mechanism — a structured role for provincial social protection institutions, civil society organisations or community paralegal networks in verifying the conduct of consultations — means that the formal

[25] This was referred as a common practice when licensing projects that are already in operation or when the area in question already has other similar projects with Environmental Impact Studies completed, and the impacts have been previously identified and are well known

record of consultation may not accurately reflect the substantive quality of information sharing and community understanding achieved. It should be noted that the formal documentation required under the EIA process is more substantive than a simple minutes record: proponents are required to submit a Public Consultation Report— a structured consultation report that typically includes a question-and-answer matrix documenting stakeholder interventions and proponent responses — rather than a bare minute of attendance and statements. A further material gap identified through the ESSA interview with DINAMC concerns the enforcement of the representativeness principle established in Ministerial Directive 130/2006, which references twenty percent of the affected population universe as a benchmark for meaningful participation. DINAMC officials confirmed that this threshold is not enforced in practice, on the view that participation cannot be compelled. When attendance is low, consultations are not systematically required to be repeated; the practical quality of participation is treated as contingent on community willingness and logistical factors rather than as a verifiable compliance condition. This constitutes a structural gap between the formal requirements of the directive and their application in the field, with direct implications for the quality assurance of the consultation process in the Program corridors.

The gender dimension of consultation quality is a compounding problem. Male household heads predominate in community consultation records, and women's participation in land-related consultations in particular is structurally marginalised by the cultural patterns documented across multiple ESSA institutional interviews. While women do sometimes attend in more consistent numbers, their presence is rarely active — they are recorded as participants but rarely speak up, take part in discussions or really affect the final decisions, although there may be some exceptions, as captured during the Focus group Discussion with Dondo officials (from SDSMAS,SDAE, SDPI). The absence of systematic enforcement of gender-inclusive consultation practice — which the new Land Law will address (for the obtention of the DUAT) normatively but not operationally without accompanying implementation support — means that the formal consultation record may document a process from which women were effectively excluded or whose conclusions they did not substantively endorse.

F2.4.2 Grievance Mechanisms in the MozAgribiz Program Architecture

The MozAgribiz Program, as a PforR instrument, requires a functional and accessible grievance redress mechanism (GRM) through which Program-affected persons can raise concerns, complaints and grievances related to Program activities and receive responses that are timely, impartial and effective. The institutional architecture for such a mechanism in the Mozambican agribusiness context combines several existing systems — the DPGCAS complaint intake and case management function, the AQUA inspection complaint pathway, the environmental licensing system's community commitment follow-up mechanism, the Ministerial Grievance Redress Mechanism (GRM) designed by the RSSA within DINAMC and first operationalised under PROCAVA, and the DNTDT's land conflict management platform and multi-level institutional cascade, which includes Provincial Land Conflict Commissions in selected provinces— in ways that are not currently integrated and that present significant coverage and effectiveness gaps.

The AQUA complaint-triggered inspection model — documented in F1.2.2 — functions as a de facto environmental grievance mechanism: communities that observe environmental violations can report them to AQUA, triggering a field inspection response. The operational limitations of this model as an environmental compliance tool — documented in detail — apply equally to its function as a grievance mechanism: the complaint must be specific enough to trigger a field response, the community must have sufficient institutional knowledge to know that AQUA is the relevant entity, the community must have means to communicate the complaint, and AQUA must have the operational capacity to conduct

a field response within a timeframe relevant to the underlying harm. These conditions are frequently not simultaneously met in rural corridor communities.

The DPGCAS case intake function — through the Reference Group (led by the Attorney General's Office and co-coordinated by Social Action), the *Fala Criança* hotline (116), the GBV Multisectoral Mechanism, community committees police and school networks, and the SDSMAS — covers the social protection dimensions of grievance management: child protection concerns, GBV cases, trafficking, and labour rights violations in their family and community dimensions, with formal labour records held by the Labour Directorate. This system has the advantage of community committee networks as first-line detection nodes in communities across all districts and an active WhatsApp-based coordination channel that functions well in practice. Its disadvantages are structural: an average of two -technicians per district, falling to one in some districts (e.g. Muanza and Chemba), with significant logistical constraints on mobility; and the Gender Department's GBV Multisectoral Mechanism operating without a computer, internet access, phone credit, or a dedicated meeting space — conditions that limit its consistent operational effectiveness in comparison with the child protection side of the system, which benefits from stronger institutional anchoring through the Reference Group.

The DNTDT land conflict mechanism is analytically distinct from the other systems in this architecture in both jurisdictional scope and structural logic. Its subject-matter jurisdiction — DUAT allocation disputes, boundary conflicts, customary rights overlaps, and conflicts arising from investment-driven land acquisition — covers the class of grievance most directly predictable in an agribusiness development corridor Program, and it is the only system in this architecture with a formal mandate over that category of dispute. The mechanism operates through an explicitly tiered cascade: disputes are addressed first at community level through customary authorities — *chefes de terra*, *secretários de bairro* and *tribunais comunitários* — escalating through district-level SDAE and SDPI, provincial DPDTA and SPA, DNTDT centrally, and to the formal judiciary where institutional resolution fails. In selected provinces, Provincial Land Conflict Commissions provide a multi-sectoral coordination tier that integrates directorates covering agriculture, industry, tourism, conservation and energy into a joint mediation function. The DNTDT has also developed a digital complaints platform, nominally public-facing and internet-accessible, that records submissions with a stated fifteen-day response norm and is designed to track conflicts regardless of the tier at which they are resolved, with the Public Cadastre Services holding institutional responsibility for maintaining the data record.

The operational reality of this mechanism, however, presents gaps that are material to the Program's GRM architecture. The digital platform is not functioning in several provinces due to the absence of internet access and adequate computing infrastructure at provincial and district offices — the same infrastructure deficit that characterises data systems across the institutions assessed in this analysis. More structurally significant is the relationship between the platform and the SIGIT land information system, which should provide the cadastral reference base for any platform-supported conflict resolution by allowing verification of whether disputed land carries a registered DUAT, a delimited community area, or overlapping concession interests. SIGIT operates only at provincial level; the process-tracking modules required to support dispute resolution were never completed; and the system lacks interoperability with the cadastral databases of other sectoral ministries. A land conflict mechanism that cannot cross-reference the cadastral record is structurally limited in what it can verify, and this limitation is directly material in the MozAgribiz corridors, where investment-driven DUAT allocation will generate new disputes against a background of incomplete and partially digitised cadastral coverage. A further structural gap concerns monitoring of proponent compliance with DUAT commitments. The interview reveals that oversight visits to verify whether proponents have fulfilled commitments made to communities during the consultation process are in practice financially dependent on the proponents themselves, who fund the monitoring visits that determine whether

their own commitments have been met. This arrangement — while provided for in the resettlement regulations — systematically limits the independence of compliance verification in precisely the category of grievance most likely to arise from agricultural investment activity in the Program corridors.

The MAAP ministerial GRM was designed by the RSSA as a cross-cutting sectoral instrument — explicitly not project-specific — and PROCAVA was the first Program to operationalise it. In its current architecture, it operates through three entry channels: a green line hosted at DINAMC on the Movitel network, free of charge for Movitel subscribers but not for mCel or Vodacom users; a Survey 123 platform hosted at the Fund For Agricultural Development and Rural Extension, designed for use by field extensionists and accessible offline with automatic data upload; and an institutional email address under DINAMC. A web-based complaints portal is in procurement. It is important to stress that the operationalization of these GRM components, except for the institutional email, remain dependent on external financing. The escalation logic runs from community level through district (SDAE focal point) to provincial (SPAE focal point) to the RSSA, with automatic escalation if a complaint is unresolved within two to three days and a maximum fifteen-day resolution ceiling. Two years into PROCAVA's implementation, however, neither DINAMC nor PROCAVA had received a single complaint through any of these channels. Both institutions attribute the near-zero uptake primarily to inadequate field dissemination; the pattern is consistent with a broader dynamic documented in Mozambique in which Program-affected persons route grievances through informal channels or social media rather than formal mechanisms — illustrated by an October 2024 incident in which grievance-holders bypassed all PROCAVA channels and wrote directly to the IFAD President.

Field evidence from the Dondo District focus group corroborates and extends this finding with direct operational data. The SDAE confirmed that a complaints/suggestion box exists at the district office but receives virtually no use, with focus group participants attributing this to a combination of cultural preference for direct verbal communication, community concerns about the confidentiality of written complaints in a context where they can be seen submitting a complaint, and low confidence in the responsiveness of box-based mechanisms. This is not a design weakness specific to Dondo: it is a field-level confirmation that written static collection mechanisms are structurally misaligned with the communication practices and institutional trust conditions of rural corridor communities, regardless of the formal quality of the mechanism's design. The contrast identified in the same focus group is instructive: the *Fala Criança* line (116) functions as the principal operating grievance channel for child protection issues involving minors in the district, and its operational effectiveness is confirmed as real rather than notional. The design distinction between the suggestion box and green lines[26] — mobile-accessible versus physical, institutionally anchored versus locally managed, nationally operated versus isolated to a single office — maps precisely onto the GRM design choices that the Program must make. The focus group also confirmed that Natural Resource Management Committees operate in several localities within the district, functioning as community-based reporting nodes for environmental incidents and social conflicts. These committees constitute a community-level GRM infrastructure layer that is not currently integrated into any formal escalation pathway within the GRM architecture. For MozAgribiz, these committees are the most proximate institutional actor between communities and the Program's GRM system, and their integration as first-tier reporting nodes — with a defined escalation pathway to the district SDAE focal point and thence to the provincial and central GRM tiers — should be a specific design element of the Program's adapted GRM architecture rather than a background assumption about community-level reach.

The mechanism's operational architecture also presents specific integration failures: the green line and Survey 123 are not connected at the DINAMC level, requiring manual cross-referral if a call is

[26] Green lines mentioned by participants were the *Fala Criança* line and the Green Line operated during SUSTENTA

received; the phone operating the green line is being managed individually rather than as an institutional resource; there is no trained referral pathway for sensitive complaints including GBV, trafficking and child labour; and ministry restructuring suspended the operationalisation of the district-level focal point tier. DINAMC is explicit in its assessment: " *In practice, we have the mechanism on paper*"

The community commitment follow-up gap identified in F1.7.7 is a particularly significant grievance redress weakness: the commitments made by project proponents in public consultations that form the basis of community acceptance of projects — employment targets, infrastructure investment, compensation undertakings, community development provisions — exist in a diffuse accountability space where no entity systematically verifies compliance. Communities whose experience of a project diverges from the commitments on which they based their consent have no accessible mechanism through which to pursue those commitments, because the commitments are held in minutes with local governments that have no systematic follow-up capacity and are not incorporated into the ESMP documents that AQUA monitors.

For MozAgribiz, the Program-level GRM must therefore be designed in explicit relationship to the existing ministerial GRM rather than as an additional independent layer. The GRM presents a viable foundation: it was designed for sectoral rather than project-specific application, its escalation architecture is appropriate for the Program corridors, and DINAMC has confirmed its availability for adaptation by new Programs. However, MozAgribiz cannot rely on the GRM in its current operational state. Effective adaptation requires, at minimum, addressing the following documented weaknesses: dissemination to Program-corridor communities in local languages, accounting for the linguistic diversity along the Beira, Nacala and Maputo-Limpopo corridors; extension of green-line access to mCel and Vodacom subscribers, without which the primary telephone entry channel imposes a cost barrier on a large share of rural users; technical integration of the green line and Survey 123 at the DINAMC level to ensure data integrity; operationalisation of the district-level focal point network within the SDAE/SDPI structure; and the design and training of a dedicated referral pathway for sensitive complaints — a gap of particular relevance given MozAgribiz's exposure to GBV, trafficking and child labour risks in agricultural value chain contexts. In adapting the GRM for the MozAgribiz it will be essential to articulate with the RSSA and the PROCAVA PIU to determine how the GRM costs will be shared and to ensure the traceability of submitted grievances. The integration of the Natural Resource Management Committees documented in Dondo as community-level reporting nodes — committees that are already operational, already serve an environmental and social monitoring function, and already maintain community trust as reporting intermediaries — offers a community-level entry point for the GRM that is more accessible, culturally appropriate, and institutionally grounded than any mechanism that requires community members to initiate contact with a district office or operate a telephone channel independently; their formal incorporation into the GRM's first tier, with a defined referral protocol to the district SDAE focal point and a documented feedback obligation back to the reporting community, should be treated as a Program design requirement for all districts within the Program corridors where such committees are operational. The Program's GRM must also address the specific operational gaps in the DNTDT land conflict mechanism, including the platform's non-functionality in provinces that overlap with the Program corridors, and must ensure that land-related grievances arising from DUAT allocation and proponent commitment compliance can be submitted and tracked through a channel that does not depend on SIGIT functionality or on proponent-financed monitoring visits for the evidence base required to evaluate them.

F2.4.3 Proactive Disclosure and Transparency Deficits

The transparency architecture of the environmental and social management system — assessed in detail in F1.7 — has direct implications for the quality and effectiveness of stakeholder engagement

and grievance management. When affected communities do not have access to the EIAs, environmental licences, ESMP documents and monitoring reports that describe the conditions under which a project affecting them has been approved and is supposed to be managed, their ability to hold project proponents accountable through formal or informal mechanisms is structurally limited. The pattern of passive transparency across all institutions in the licensing chain — documents exist but are not proactively disclosed, access requires a physical visit and formal request — is incompatible with meaningful stakeholder engagement in rural corridor contexts where most affected community members do not speak Portuguese fluently, do not have transport to provincial capital offices, and do not know what documents exist or how to request them.

The RSSA produces monitoring reports that circulate within the institutional system but are not publicly accessible. DINAMC has no operational online platform for licensing information — the design of an integrated environmental licensing management system had been initiated with the elaboration of Terms of Reference, but never passed that stage. AQUA audit reports may be physically consulted at AQUA premises but have never been proactively disseminated; the decree provision permitting publication of audit executive summaries has never been exercised. The community commitment records arising from the DUAT consultation process—held as minutes by local governments — are not shared with DPGCAS, AQUA or DINAMC in any systematic way, creating a structural gap between commitments made and the institutions that hold compliance mandates. This systemic opacity is not a consequence of deliberate concealment: it reflects institutional practices that have never incorporated proactive disclosure as an operational norm, combined with the absence of the information infrastructure — connectivity, digital systems, public platforms — that proactive disclosure would require.

MozAgribiz's PforR instrument generates disclosure obligations primarily through the ESSA and the Program Action Plan. The PAP should include a time-bound action requiring proactive disclosure of project-level documentation for Program-supported investments — or, where political traction allows, this standard could be anchored as a Program eligibility condition — establishing a transparency baseline that exceeds the current practice of the national licensing system and against which community access to project information can be independently assessed.

F2.4.4 Multi-Sectoral Coordination as a Stakeholder Engagement Infrastructure

The DPGCAS interview identifies two distinct but structurally analogous coordination mechanisms operating in Sofala: the Reference Group — led by the Attorney General's Office and co-coordinated by Social Action— as the central instrument for child protection and trafficking case management - and the Multi-Sectoral Mechanism as its counterpart on the GBV side, anchored in the Gender Department. Together, these mechanisms represent an institutional coordination architecture whose relevance extends beyond the specific protection cases they manage. Their shared features — multi-sectoral composition, focal point network, community and civil society reach, and WhatsApp-based rapid communication channels – create a connective tissue across institutional actors that, with appropriate Program support, could function as a stakeholder engagement and grievance escalation infrastructure for MozAgribiz's social risk management.

The DPGCAS's assessment of this mechanism is, however, pragmatic: the institution simultaneously affirms the Reference Group's value and acknowledges that it is sustained primarily by the personal commitment of its members, without structured periodic forums, fixed meeting calendars, or dedicated infrastructure. The Gender Department manages and sustains a multi-sectoral GBV mechanism — composed of representatives from multiple institutions — that operates without a computer, internet access, telephone credit, or a dedicated meeting room. The ESSA analysis treats this combination — genuine institutional value paired with structural resource insufficiency — as

defining the category of Program support needed: not the creation of new coordination mechanisms but the resourcing and formalisation of those that already exist and have demonstrated functional value.

In addition to the two multisectoral coordination mechanisms referenced above on child protection and GBV, Mozambique's institutional landscape includes other multisectoral coordination mechanisms that are relevant to the Program's E&S risk management architecture, spanning climate change governance, disaster risk management, land governance, and resettlement oversight.

The National Secretariat for Climate Change Assessment, mentioned during DINAMC's interviews, operates as a functional multisectoral coordination mechanism, bringing together diverse ministries, technical institutions, and provincial structures to harmonize Mozambique's climate change policies and actions. It ensures alignment with international commitments, integrates climate considerations into national and sectoral strategies, and facilitates monitoring, reporting, and evaluation across agriculture, energy, transport, health, and disaster management. By promoting interinstitutional collaboration, mobilizing resources, and disseminating good practices, the Secretariat strengthens coherence and transparency in climate governance, positioning itself as the central hub for coordinating adaptation, mitigation, and resilience efforts at both national and subnational levels.

The Technical Council for Disaster Risk Management (CTGRD) functions as a multisectoral coordination body under the National Institute for Disaster Risk Management and Reduction (INGD), bringing together representatives from key sectors such as health, agriculture, transport, energy, meteorology, and civil protection. Its role is to harmonize prevention, preparedness, and response measures to disasters, ensuring that technical expertise from different areas is integrated into a unified national strategy. By facilitating joint analysis, promoting early warning systems, and coordinating sectoral interventions, the CTGRD strengthens Mozambique's capacity to anticipate and manage disaster risks, making it a practical and functional mechanism for multisectoral governance

Despite not being institutionally linked, the National Secretariat for Climate Change Assessment and the CTGRD function in a complementary and coordinated manner, especially at the interface between climate adaptation and risk management.

The Land Consultation Forum functions as a multisectoral consultation mechanism, ensuring that land governance decisions are informed by diverse voices and institutional expertise. It brings together different segments of society to deliberate on land governance issues, including representatives from public institutions, civil society organizations recognized for their experience in land and natural resource management, the private sector, academia, and community representatives (including traditional leaders and women's associations). Although plenary sessions are meant to be held annually, financial constraints often affect this regularity. To maintain continuity, the Land Advisory Think Tank[27], chaired by the National Director for Land, prepares debates, drafts opinions, and organizes technical discussions before matters are submitted to the Forum. As stated during the DNTDT, the Forum played a key role in reviewing the new Land Law currently under appreciation at Parliament.

The Technical Commission for the Monitoring and Supervision of Resettlement operates as a multi-level institutional coordination mechanism, structured at national, provincial, and district levels to ensure coherence in resettlement processes. At the national level, it provides strategic guidance and policy oversight; at the provincial level, it adapts directives to regional realities; and at the district level, it engages directly with affected communities. The Commission usually integrates key sectors such as

[27] *Grupo de Reflexion sobre Terras*

Land Administration, Environment, Public Works, Agriculture, Energy, Water, and Social Services. This multisectoral articulation allows the Commission to harmonize policies, resolve conflicts, and guarantee that resettlement is implemented in a transparent, inclusive, and sustainable manner across all levels of government. The Commission does not hold the final authority to approve Resettlement Action Plans (RAPs), but it plays a decisive role in their technical validation. By reviewing the plans across national, provincial, and district levels, and integrating inputs from key sectors such as land administration, environment, public works, agriculture, and social services, the Commission ensures that RAPs are coherent, feasible, and compliant with legal and safeguard standards. Its technical opinions form the basis upon which government authorities issue formal approvals, making the Commission an essential gatekeeper in the resettlement process

F2.5 Social System Capacity and Performance Assessment

F2.5.1 The DPGCAS Sofala: Institutional Profile and Mandate

The Provincial Directorate of Gender, Children and Social Action (DPGCAS) is the institutional anchor of the social protection and social risk management architecture at provincial level. Its mandate encompasses three substantive domains — child protection, gender and social action — that between them cover the categories of social risk most directly associated with agribusiness expansion in the corridor context: child labour, GBV in agricultural labour settings, trafficking and forced labour, vulnerable group protection, and the social dimensions of displacement and resettlement.

The Sofala DPGCAS presents as an institution with genuine institutional knowledge, coherent procedural frameworks, and a motivated leadership team with demonstrated capacity to manage complex protection cases. Its operational history — including sustained engagement with flood displacement cases from Cyclone Idai, active participation in the Reference Group's child protection and trafficking response functions, and documented case management consistent with international child protection standards — provides an evidence base for a realistic, non-idealistic assessment of its capacity. The ESSA concludes that this capacity is real and should be engaged as a Program partner, while simultaneously identifying the structural fragilities that determine the conditions under which its performance is contingent.

The formal structure of the institution — three functional departments with a total of 62 staff, of which 19 are technical officers — presents, in the case of the DPGCAS Sofala, a staffing profile that is internally coherent but quantitatively thin relative to the geographic and social complexity of the mandate. The 19 technical officers are distributed across three departments: 9 in Child Protection, 5 in Gender, 5 in Social Action. The Gender department's 5 technical staff carry the institutional responsibility for responding to a GBV burden that the DPGCAS's own caseload data characterise as substantial, in a province where commercial agricultural labour creates structural conditions for workplace GBV that the institution explicitly acknowledges as an unmet response gap.

F2.5.2 Human Resource Configuration and Coverage Gaps

The most operationally critical dimension of the DPGCAS human resource configuration for MozAgribiz is its district-level coverage. The formal presence of the District Services of Health, Women and Social action (SDSMAS) in all 13 districts of Sofala provides a territorial footprint that is important for the Program's social risk management architecture. The effective coverage that this footprint represents, however, is severely constrained: an average of two technicians per district, falling to a single technician in districts such as Muanza and Chamba. The districts with the highest concentration of Program-relevant agribusiness activity — Buzi, Nhamatanda, Chibabava and Gorongosa — are in most cases covered by the two-technician average rather than more substantial staffing, and the two

technicians in each district carry responsibilities across child protection, gender and social action that individually would constitute the workload of a specialised unit.

The complete absence of specialised Community Social Action Technicians (TASCs) —whose role is community-level social protection monitoring and case detection — is a structural gap whose implications for MozAgribiz's child protection and GBV management are more significant than the overall staffing numbers suggest. TASCs represent the community-level salaried layer of the social protection system, the function that would allow the SDSMAS to maintain systematic monitoring presence in the communities where Program beneficiaries live and work. In the absence of TASCs, the community-level detection function rests entirely on the trained community committees — voluntary structures with no remuneration, no guaranteed institutional support, and no systematic supervision from the district level. The DPGCAS acknowledges this explicitly: these structures are informal, dependent on external training support, and not systematically resourced. The community-level layer of social risk detection that MozAgribiz implicitly depends upon is therefore sustained by volunteer commitment rather than institutional investment.

F2.5.3 Operational Reach and Logistical Constraints

The logistical configuration of the DPGCAS Sofala — transport scarcity, dispersed populations, difficult access to remote areas — is described in the interview as materially reducing operational capacity, particularly in emergency or time-sensitive situations. The transport gap operates at two levels: the provincial-to-district movement required for provincial-level technical staff to support, supervise and accompany district-level case management; and the district-to-community movement required for SDMAS technicians to reach the remote communities and agricultural worksites where social risks manifest. Both levels of movement are constrained by the absence of dedicated institutional vehicles and the irregular availability of fuel allocations.

The communication infrastructure gap compounds the transport constraint. The Gender Department's multi-sectoral mechanism for GBV victim support operates without a computer, internet access, telephone credit, or a dedicated meeting room. The Reference Group's rapid communication relies on a WhatsApp channel that functions when members have mobile data access — a condition that is not reliably met across the network of focal points in rural district locations. The consequence is that the multi-sectoral coordination architecture that the DPGCAS identifies as its primary strength in managing complex protection cases is operationally dependent on connectivity conditions that are not systematically assured.

For a PforR instrument that requires consistent, documented, multi-year performance on social risk management indicators, the operational fragility created by this communication and transport infrastructure gap is a Program design risk. The DPGCAS's capacity to contribute meaningfully to MozAgribiz's social management system is not in question; the question is whether that capacity can be sustained reliably across the Program period without targeted investment in the logistical and communication infrastructure that currently represents the primary single point of weakness in the institution's operational model.

F2.5.4 Data Systems and Cross-Institutional Information Management

The DPGCAS data system presents the same fundamental architecture problem that characterises the information management landscape across all ESSA-assessed institutions: data is fragmented across institutional boundaries, and where systems nominally exist, basic data entry infrastructure is absent — the Gender Department operates with limited computers and internet access, or without the means to record cases digitally — and not accessible in a form that supports cross-institutional analysis or

programmatic monitoring. Child labour data in the agricultural sector is held by the provincial labour directorate, not by the DPGCAS — an operational division between two institutions now formally within the same ministerial structure, but without systematic periodic joint meetings. Social protection Program coverage data — PSSB and PASP beneficiary information — resides with INAS, which has operational responsibility for implementation while the DPGCAS holds the normative and referral function. GBV case data is managed through the Integrated Care Centre's intake records, which are not systematically linked to the labour inspection records that would be needed to identify patterns of workplace GBV in specific employers or value chains.

The consequence of this data fragmentation is directly material to the Program's ability to generate the evidence its results architecture requires. The two potential DLIs to be propose as a result of the ESSA — linked to improved compliance reporting and GRM functionality — both depend on data flows that currently do not exist in usable form. Compliance reporting on labour standards and social safeguards requires verifiable, aggregated data from labour inspection and social protection institutions that currently operate without systematic coordination or compatible recording practices. GRM functionality depends on cross-institutional case tracking and referral outcome data across DPGCAS, the provincial labour directorate, INAS, and the multi-sectoral GBV mechanism — none of which currently maintain systems capable of supporting that function.

F2.5.5 Coordination Architecture: The Reference Group and Multi-Sectoral Mechanisms

The Reference Group — led by the Attorney General's Office and co-coordinated by Social Action — is the primary inter-institutional coordination instrument for child protection, GBV and trafficking case management in Sofala province. GBV case management is handled through a parallel instrument, the GBV Multisectoral Mechanism, operating under a similar model. Its multi-sectoral composition includes the DPGCAS, the Attorney General's Office, the police, health services, civil society organisations, and community focal points. Its WhatsApp-based communication channel provides a rapid signalling mechanism that the Caia-Beira train case illustrates can activate a cross-institutional response within a timeframe adequate for protection intervention.

The DPGCAS estimates that coordination failures between social protection and labour structures have been reduced by approximately 90% since integration under the same ministry — a quantification that the ESSA takes as an indicative signal of improvement rather than a precisely measured outcome, but one that reflects a genuine institutional perception of improved coordination. The integration of labour and social protection functions under the same ministerial structure is a structural improvement in the inter-institutional coordination architecture that MozAgribiz should leverage by engaging with the provincial ministry structure as a unified actor rather than treating labour and social protection as separate institutional channels.

The structural fragility of both the Reference Group and the GBV Multisectoral Mechanism — predominantly informal in their operational models, without structured periodic forums, fixed meeting calendars, or dedicated infrastructure — is the limitation that most directly constrains its value as a Program social management instrument. A coordination mechanism that functions through personal commitment and WhatsApp networks when communication infrastructure happens to be available is a fundamentally different institutional resource than a mechanism supported by formalised meeting protocols, institutional budgets, documented case management workflows, and dedicated coordination staff. The former can produce impressive individual case outcomes; the latter can produce consistent programmatic performance across a multi-year implementation cycle. MozAgribiz's social management requirements correspond to the latter, and the Program should therefore treat the formalisation and resourcing of both mechanisms — the Reference Group for child protection case management and the GBV Multisectoral Mechanism for GBV prevention and response

— not as a generic capacity-building objective but through specific investments in meeting infrastructure, communication connectivity, case management documentation systems, and coordination staff time. Given the distinct institutional composition, mandate and case management logic of each mechanism, this investment should be structured separately for each, with formalisation support calibrated to the specific operational gaps that field assessment has identified in each.

F2.5.6 Social Protection Linkages and Coverage Gaps

The DPGCAS performs a normative and referral function with respect to social protection programs — PSSB, PASP and other INAS-administered instruments — with direct implementation residing with INAS. The institution's confirmation that it does not have systematic oversight of program coverage data, and that it cannot assess whether these Programs reach families engaged in seasonal agricultural labour or commercial contract farming, defines a social protection coverage gap that is directly relevant to MozAgribiz's Program theory of change.

Social protection coverage of the households that make up MozAgribiz's smallholder and seasonal labour beneficiary base functions, in Program design theory, as a risk mitigation mechanism: households with social protection coverage face less economic pressure to engage children in agricultural labour, are less vulnerable to exploitative labour conditions, and have greater resilience to the production and income shocks that can make exploitative coping strategies rational. If social protection coverage does not reach the households in the Program's primary beneficiary population, this risk mitigation pathway is not operational for the population the Program is targeting, and the Program's results framework cannot rely on it as a background condition.

The DPGCAS's inability to verify social protection coverage in agricultural labour households is a data gap with Program design implications: MozAgribiz should commission a baseline assessment of social protection coverage among Program beneficiary households as part of its pre-implementation data work, and should include INAS as an institutional partner in the corridors where Program activities are concentrated, specifically tasking INAS with extending coverage to seasonal agricultural worker households as a Program-supported outcome rather than a background assumption.

F2.6 Indigenous Peoples, Historically Underserved Communities, and Vulnerable Groups

F2.6.1 Indigenous Peoples/ Historically Underserved Communities in the Mozambican Legal and Operational Context

The World Bank's Environmental and Social Framework definition of Indigenous Peoples and Sub-Saharan African Historically Underserved Traditional Local Communities, as laid out in ESS7, is not applicable to the MozAgribiz Programme. While ESS7 recognises the distinct identities, aspirations, and structural vulnerabilities of Indigenous Peoples and Sub-Saharan African Historically Underserved Traditional Local Communities in relation to development processes, the specific criteria that trigger the standard's application — including collective self-identification as a culturally distinct group separate from mainstream national society, collective attachment to geographically distinct habitats or ancestral territories under customary systems, distinct customary cultural, economic, social, or political institutions, and a history of marginalisation and dispossession linked to that distinct indigenous identity — are not present in Mozambique in a form that would give rise to ESS7 applicability.

Mozambique's Constitution and post-independence legal and political framework do not recognise the concept of indigenous peoples as a category distinct from the general citizenry; all Mozambican citizens are considered indigenous to the national territory, and the legal framework explicitly avoids

ethnic or tribal distinctions as a basis for differential legal status or rights. The Constitution recognises customary practices and establishes principles of equality and non-discrimination, and the Land Law provides specific protections for community land rights regardless of formal demarcation. In this legal context, the formal category of indigenous peoples as a distinct rights-holding group with special consultative status does not exist in Mozambican administrative practice.

No groups have been identified within the programme's geographic footprint that meet Indigenous Peoples and Sub-Saharan African Historically Underserved Traditional Local Communities screening criteria, and this determination is consistent with the standard application of ESS7 in the Mozambican country context across World Bank portfolio operations.

Nonetheless, the category of vulnerable groups is relevant to the MozAgribiz Program.

F2.6.2 Women as a Structurally Disadvantaged Group in Agricultural Value Chains

Women in the Program corridors, as across the entire country, are the most numerically significant structurally disadvantaged group for MozAgribiz's social risk management purposes. The ESSA interviews document, in general, across some institutional perspectives, a consistent pattern of structural disadvantage that affects women's participation in and benefit from commercial agribusiness development: exclusion or marginalisation from community land consultation processes; structural invisibility in contract farming arrangements where contracts are signed with male household heads; concentration of agricultural labour contribution in smallholder production systems without individual contractual standing or compensation entitlement; vulnerability to GBV in agricultural labour settings without a structured workplace response mechanism; and barriers to justice and protection reporting created by economic dependence, social sanction risks and institutional inaccessibility.

The RSSA's acknowledgement that its gender coverage is limited by the absence of disciplinary gender and social science expertise in the unit, and the DPGCAS's explicit identification of the absence of a prevention Program addressing gender dimensions of contract farming as an unmet need, together confirm that the primary internal MAAP safeguards function and the primary provincial social protection institution are both underprepared for the gender dimensions of agribusiness expansion that the Program will intensify.

The forthcoming gender parity requirement in the new Land Law's community consultation provisions is the most significant normative development for women's participation in the land access processes most relevant to MozAgribiz. Its implementation, however, is not assured by normative adoption alone. Without a monitoring function that verifies gender-disaggregated participation in consultations, without a community legal literacy Program that informs women of their consultation rights under the new law, and without institutional capacity in DNTDT — to verify and record gender-disaggregated participation at the point of community delimitation — and in DINAMC — to require and assess evidence of gender-compliant consultation as part of the environmental licensing review — the normative provision will have limited practical effect. MozAgribiz should explicitly require compliance with the gender parity consultation standard for all supported investments, as a Program eligibility condition that takes effect immediately regardless of whether domestic implementation regulations have been issued.

F2.6.4 Child and Youth Vulnerability

Children in the Program corridors — as a vulnerable group distinct from the child labour risk category addressed in F2.2 — face a broader set of vulnerability dimensions that MozAgribiz's Program design

must account for. The families most likely to benefit from MozAgribiz's smallholder support are also, by structural correlation, the families with the highest incidence of child labour, the most constrained access to social protection, and the greatest school attendance disruption from agricultural labour demand. The Program's commercial intensification of smallholder production systems therefore reaches the same households whose children are most at risk, and the design question is whether the Program's intensification of production activity in those households increases or decreases child vulnerability depending on how income allocation, labour demand and social protection coverage interact.

Adolescent girls in the Program corridors face a specific vulnerability profile that intersects with several Program risk dimensions: early marriage and pregnancy associated with economic pressures in agricultural households, heightened GBV risk in the labour-intensive seasonal agricultural environments, exclusion from the contractual benefits of contract farming schemes that are structured around male household heads, and limited access to the technical training and input subsidy Programs that MozAgribiz directs toward registered smallholder producers — a category whose registration requirements may systematically exclude younger women who have not established independent household status.

The DPGCAS's institutional response to child and adolescent vulnerability in the agricultural context demonstrates genuine competency and a contextually adapted operational model — the seasonal calibration of prevention activities, the school outreach and home visit Program for at-risk children, the multi-sectoral reference and rapid response network. These are real Program assets that MozAgribiz should explicitly connect to its beneficiary engagement and social monitoring architecture.

F2.6.5 Migrant Workers, Persons with Disabilities, and Other Vulnerable Populations

Migrant workers — including both internal migrants from other provinces recruited for seasonal agricultural labour and international migrants from Zimbabwe and Malawi documented by the DPGCAS — represent a vulnerable population in the Program corridors whose specific characteristics of social isolation, institutional unfamiliarity, language difference and limited access to social protection create elevated risk profiles for labour exploitation, trafficking and inadequate working conditions. Their systematic exclusion from community-based social protection mechanisms — PSSB and PASP coverage based on community residency — removes the risk mitigation that social protection coverage would provide, creating a protection vacuum precisely in the population subset most exposed to the labour conditions risks of the commercial agricultural sector.

Persons with disabilities in the Program corridors are not specifically characterised in the ESSA institutional interviews, but the DPGCAS's social action mandate includes disability, and the absence of TASC coverage means that the detection and referral function for disability-related social protection needs in rural areas is as constrained as it is for other vulnerability categories. The social action component of Program outreach — including the agricultural extension and training activities through which MozAgribiz reaches smallholder beneficiaries — should include explicit accessibility requirements to avoid systematically excluding persons with disabilities from Program benefits.

The elderly population in Sofala represents a social protection gap with indirect but substantive relevance to MozAgribiz, operating through a specific household economy logic: when parents engage in seasonal agricultural migration to the cane fields, cotton *machambas*, or other labour circuits, elderly grandparents frequently absorb the primary caregiving function for children left behind. Where the elderly are themselves economically precarious and without institutional support, this caregiving arrangement becomes inherently fragile, creating conditions in which children are pulled

out of school, mobilised into labour, or left without adequate care — the very vulnerabilities that sit at the centre of MozAgribiz's social risk concerns.

F2.7 Social Conflict and Fragility

F2.7.1 The Conflict and Fragility Context of MozAgribiz's Implementation Geography

MozAgribiz operates in a national context of significant and geographically differentiated conflict and fragility. The insurgency in Cabo Delgado — which began in 2017 and has displaced hundreds of thousands of people — does not directly overlap with the primary MozAgribiz Program corridors, but its effects on the national security environment, on displacement flows from the north, and on investor confidence in northern Mozambique are operational context factors for the Nacala corridor component of the Program. The ESSA assessment does not classify the primary Program corridors — the Beira corridor in Sofala and the Nacala corridor in Nampula and Niassa — as active conflict zones, but identifies within each corridor a set of structural conflict drivers associated with agribusiness expansion that require explicit Program attention.

The post-Cyclone Idai recovery context in Sofala — referenced in multiple ESSA interviews and constituting the social and institutional backdrop against which the Beira corridor activities of MozAgribiz will be implemented — is a dimension of fragility that operates through multiple pathways: the residual displacement of communities whose pre-cyclone land use arrangements have not been fully reconstituted; the institutional stress on provincial services whose staff and infrastructure were affected by the cyclone and whose recovery has been incomplete; and the heightened vulnerability of communities that lost productive assets, land tenure documentation and social network structures in the cyclone and its aftermath, and whose resilience to additional shocks — including those associated with displacement from agribusiness investment — is therefore reduced relative to the pre-cyclone baseline. This fragility is applicable to the Maputo-Limpopo corridor as well, though driven not by a single catastrophic event, but by repetitive, chronic flooding shocks that have produced similar pathways of residual displacement, institutional stress and community vulnerability reducing resilience to disruptions from agribusiness investment

F2.7.2 Land-Based Conflicts in Corridor Contexts

Land-based conflict is the most operationally significant conflict risk for MozAgribiz in the primary Program corridors. The ESSA assessment identifies multiple structural conflict drivers in the land governance landscape: the DUAT-EIA sequencing problem that generates community conflicts when resettlement conditions diverge from initial consent; the absence of a functional community land rights enforcement mechanism for smallholder communities without the resources to access formal judicial processes; and the progressive encroachment of agribusiness investment on community land use areas, forest resources and water access in a context where the spatial planning instruments that should govern this process are 70% outdated.

The DPDTA Sofala interview identifies the coexistence of agribusiness and artisanal (including informal operators) mining in overlapping zones as a specific conflict driver in several districts of Sofala — one that operates outside the jurisdiction of either the agricultural licensing system or the social protection system, and whose community impacts — displacement from common resources, water quality degradation, social fragmentation from migrant mining populations — interact with and compound the tensions already generated by agribusiness investment. The institutional mechanism that should manage this overlap does not exist, as documented in F1.5.3, and the resulting resource competition and accountability vacuum creates conditions for community conflict that neither sector's licensing system is designed to prevent.

The AVZ resettlement processes in the Zambezi Valley — flood-driven rather than investment-driven but operating in the same geographic space as agricultural investment expansion — add a further layer to the land conflict risk picture. Communities that have been resettled from flood risk zones and are being established in new locations may find those locations subject to competing agribusiness land access processes, with the instability of recent resettlement compounding their vulnerability to secondary displacement. The DPGCAS's flood GBV response in Buzi — sustained follow-up for a woman violated in the post-flood displacement context — illustrates the protection consequences that manifest within displacement processes even when those processes are humanitarian rather than investment-driven.

F2.7.3 Resource Competition and Multi-Sector Conflict Dynamics

The multi-pressure landscape of the Program corridors — where agribusiness investment, artisanal and industrial mining, conservation area management, climate-driven resettlement and community livelihood systems compete for the same land and water resources — creates a structural environment for inter-sector and community-institutional conflict that extends beyond any individual investment's risk profile. The cumulative resource competition is precisely the category of conflict risk that individual project EIAs cannot assess — each project is evaluated against its own direct footprint, without mechanisms for assessing the cumulative effect of multiple competing resource claims on the social fabric of corridor communities.

Water conflict is the resource competition dimension most likely to generate acute social tensions in the near term. For example, in the catchments of the Pungwe and Buzi systems — where, as documented in F1.5.4, multiple irrigation abstraction points are operating without comprehensive hydrological modelling of cumulative dry-season yields — the competition between large commercial irrigation users, smallholder irrigation scheme users and domestic and agricultural water users in communities adjacent to the water bodies is a conflict driver that operates through the same structural conditions as the cumulative environmental risk but manifests as social tension, community-level institutional distrust and political mobilisation rather than as an environmental quality measurement.

Conflict over community commitment follow-through — where communities that consented to investment land access based on employment commitments, infrastructure investment and community development provisions find that these commitments are not being honoured — represents a governance-generated conflict risk whose institutional management the ESSA documents as inadequate: the commitments exist in minutes with local governments, are not systematically monitored by AQUA or any other institution, and are not accessible to communities for enforcement. The cumulative effect of multiple investment commitments inadequately followed up across a corridor is a social contract deficit between communities and the commercial agricultural sector that reduces the prospects of genuine consent for future investments and provides the motivational structure for organised community resistance.

F2.7.4 Conflict Sensitivity in Program Design

Conflict sensitivity in MozAgribiz's Program design requires an operational assessment of whether the Program's investments — through the mechanisms they employ, the actors they empower, the incentives they create, and the resource allocations they generate — are likely to exacerbate existing conflict dynamics or create new ones, and what Program design choices could reduce those risks while preserving the Program's development objectives.

Several Program design elements carry specific conflict sensitivity implications. The anchor investor model concentrates Program support in large commercial operators whose land access requirements and labour demand interact with community resource systems in ways that can generate conflict — but whose economic weight and commercial relationships also create accountability leverage that smaller, more dispersed investments do not. The design of the anchor investor eligibility conditions, land access verification requirements, community commitment monitoring obligations and labour standards framework therefore has direct conflict sensitivity dimensions: an anchor investor Program that does not adequately manage these dimensions can function as a conflict accelerator, while one that does can function as a demonstration of commercial agricultural development that is genuinely inclusive and accountable.

The Program's corridor concentration — with the Beira, Nacala and Maputo- Limpopo corridors as primary investment geography — implies that MozAgribiz's benefits and risks will be spatially concentrated in a way that can exacerbate inter-community differentiation between corridor-connected communities with access to commercial markets and transport infrastructure, and more remote communities outside the corridor investment footprint. If the Program's governance and community engagement mechanisms do not explicitly reach beyond the immediate corridor investment zones to the communities whose land and water resources are affected by corridor agribusiness expansion even without being direct Program beneficiaries, the conflict dynamics of a differentiated development landscape are likely to intensify rather than diminish through the Program period.

Annex F3 - Institutional Capacity Assessment of Implementing Institutions

Beyond the main institutions that play a central role in environmental and social management under the Program, a clear understanding of the capacity of the implementing institutions is equally critical. The section below assesses the institutional capacity of each implementing institution, examining how well they are equipped — in terms of organisational structures, human resources, tools, procedures, and experience — to identify, manage, and respond to the environmental and social risks associated with Program implementation.

Overview

The Program relies on a network of national, provincial, and district institutions with uneven capacity to manage environmental and social (E&S) risks. A pattern runs across nearly all of them: meaningful E&S capacity was built through closed donor projects — particularly SUSTENTA, IRRIGA, APPSA, and PRODAPE — and has partially eroded since those projects ended. No institution currently has a self-financed, fully operational E&S management system. Most lack dedicated E&S units, standing safeguards budgets, and basic tools such as screening checklists, community engagement protocols, or formal grievance mechanisms. At the same time, most retain some trained staff, practical experience, and coordination relationships that the Program can build on.

1. **National Institute of Irrigation (INIR)**

INIR manages irrigation infrastructure under MAAP, with activities planned across the Maputo-Limpopo and Beira corridors and the Zambezi Valley. Provincial delegations are under construction but not yet operational.

INIR's main strength is the institutional legacy of the IRRIGA project, which generated the most thorough E&S training in the institution's history — covering pesticide management, gender, GBV prevention, borrow pit management, and a GRM that worked well during construction. Some trained extensionists remain in post. INIR leadership has a clear, analytically sound understanding of land governance risks within irrigation schemes, particularly for women, and formal operating procedures for pesticide management from IRRIGA still exist.

The critical weakness is the absence of provincial delegations, which means INIR cannot maintain adequate field presence for monitoring or community liaison in its Program areas. No E&S unit exists — two focal points cover gender and climate change but without dedicated safeguards capacity. The IRRIGA GRM is no longer operational. The PPP regulatory framework for irrigation scheme governance is outdated and does not address labour conditions, gender, or conflict resolution.

2. **National Directorate of Extension (DINAE)**

DINAE designs agricultural extension content and manages the cascade training system from central level through provincial and district services down to communities.

DINAE's primary strength is that it manages the Program's most important vehicle for reaching community-level E&S outcomes — the extensionist cascade. It has the most sophisticated training infrastructure of all institutions surveyed and the strongest track record of integrating E&S content into extension delivery packages, including pesticide safety, gender, and GBV awareness. Multiple active training Programs are under way through TECNOSERV, PROCAVA, BAD/PIIDAC, and ACAD. It also manages the CCA, a formal multi-stakeholder coordination platform for the agricultural sector.

The main weaknesses are that two E&S-specialised staff have retired without replacement, and the entire cascade training system is financing-dependent. Without project funds, field-level E&S knowledge is not refreshed and degrades. No formal E&S screening procedure or grievance protocol exists within DINAE's own operational toolkit.

3. Mozambique Agricultural Research Institute (IIAM) – Central Level

IIAM is the national agricultural research institute, sitting upstream in the Program's implementation chain as the developer of the crop varieties, seeds, and technologies that extension services deliver to farmers.

IIAM's most important strength is its track record under the APPSA project, which operated a designated safeguards focal point, managed a resettlement case in Namacurra, and applied safeguard checklists across construction and agricultural activities. Staff turnover in technical areas is low, and the variety release sub-committee — which includes representation from extension, civil society, and farmers' associations — provides a formal inter-institutional review mechanism with an environmental component.

The binding weakness is the complete absence of an institutional E&S framework. Both the central and regional APPSA safeguards focal points have since left or retired, progressively eroding the only formal E&S knowledge base the institution had. No cascade training model, internal protocol, or grievance mechanism has been institutionalised. The green line established under APPSA was discontinued at project closure. Without a permanent E&S focal point and operational budget, the institution cannot manage safeguards independently between Program cycles.

4. National Institute of Fisheries and Aquaculture Development (IDEPA) – Central Level

Unlike most institutions surveyed, IDEPA has actively institutionalised E&S management as a core function rather than treating it as a project add-on.

IDEPA's strengths are distinctive. It has two institutional E&S staff embedded in the Studies, Planning and Community Development Directorate, an inclusivity specialist, and provincial focal points in all provinces with E&S and social/gender functions formally separated in most. A digital grievance platform modelled on ProAzul is in final testing. Community consultation is standard before all Program activities. An institutional E&S manual is in preparation, expected by mid-2026. Community Fishing Councils serve as community-based monitoring extensions. IDEPA is the most advanced institution in the Program's network in terms of E&S system architecture and represents a potential model for other institutions.

Its main vulnerability is the imminent end of PRODAPE, which will eliminate contracted extensionists in seven provinces unless they are absorbed. Small producers also face prohibitive formal DUAT and environmental licensing requirements that push many into informality — a structural barrier IDEPA alone cannot resolve.

5. National Directorate of Forests and Wildlife (DNFFB)

DNFFB is the national forest and wildlife policy authority and the Program's principal technical reference for forest habitat assessment.

Its strengths are significant: deep technical expertise in forest governance accumulated over more than twenty years, well-developed community mobilisation networks for wildfire response and human-

wildlife conflict management, and the new Forestry Law (Lei 17/23, 2023), which introduces mandatory mapping of culturally significant sites and structured compliance monitoring. The Community Management Department constitutes a quasi-social management arm. During GEF Program preparation, the DNFFB agreed an E&S division of responsibilities — Community Management Department for social safeguards, Forests Department for environmental safeguards — that provides a ready template for the current Program.

The weaknesses are the absence of any social safeguards capacity, no formal community engagement or GBV protocols, and a hierarchical reporting structure that creates practical confusion between political and technical lines. Field monitoring is entirely dependent on project financing and cannot be maintained between project cycles.

6. National Directorate of Agricultural Health and Biosafety (DINASAB)

DINASAB controls pesticide registration, seed certification, animal health surveillance, and border inspection — functions directly relevant to Program inputs and livestock value chains.

DINASAB's strength is that it holds the formal regulatory authority over the Program's most sensitive inputs: pesticides, certified seeds, and animal health. This gives it a structurally important role in the Program's risk architecture that no other institution duplicates.

Its weaknesses are severe. It has no E&S unit, no approved E&S procedures, and critically deficient field inspection capacity due to chronic resource shortfalls. Qualified staff are retiring without replacement. The vaccine availability crisis — national production of aftosa vaccine has ceased and purchases from Botswana are suspended due to debt — represents an acute and unmanaged animal health risk for any livestock component. The communication chain from field extensionists to the centre is broken by the decentralisation model, meaning disease outbreak information routinely fails to reach decision-makers in time for effective response.

7. National Directorate of Agriculture (DINAG)

DINAG is a normative and strategic directorate responsible for Program design and provincial oversight. It does not directly implement field activities.

Its relative strength lies in operational experience managing phytosanitary risks — pesticide contamination response, GMO trial management, and import control — and in the practical norm that donor-financed project design now routinely incorporates E&S requirements. DINAG uses DRP methodology for community consultation in project design.

Its weakness is the complete absence of an E&S management architecture: no unit, no procedures, and no tools. The structural overlap between DPAP and SPAE at provincial level — a known and unresolved problem — produces duplicated activities and contradictory instructions to operators. DINAG's top-down project design approach systematically underweights provincial and community knowledge, a process risk that must be addressed through more robust consultation mechanisms in Program planning cycles.

8. National Institute of Fisheries and Aquaculture Development (IDEPA) – Sofala Delegation

The Sofala delegation delivers artisanal fishing extension, aquaculture promotion, and community development at provincial level.

Its strengths are practical. PRODAPE-trained extensionists hold working knowledge of E&S screening, GBV prevention, and community consultation. Environmental screening and categorisation tools are operational. Multi-sectoral teams for aquaculture licensing support have been formed and functioned. Grievance boxes are deployed at the delegation and SDAE offices.

The weaknesses are that the E&S and social focal point functions are not yet separated, no autonomous E&S system exists outside PRODAPE, and the end of PRODAPE this year will remove contracted extensionists unless retention financing is secured. The complexity and cost of formal licensing pathways remain a practical barrier for small producers.

9. Mozambique Agricultural Research Institute (IIAM) – Central Region Delegation

The Regional Centre Delegation covers Manica, Sofala, and Tete — the core Beira Corridor geography — and is the closest research institution to Program farming communities.

The delegation's key strength is the environmental awareness of its senior leadership, particularly around deforestation, soil degradation, and biodiversity loss. Around ten staff received APPSA inductions, most of whom remain. The delegation conducts baseline and socioeconomic surveys as part of technology adoption research. Its proposal to integrate agroforestry systems as a structural response to deforestation from shifting cultivation is well-grounded and directly relevant to the Program's land use approach.

The weaknesses mirror the centre: no E&S unit, no focal point, no community engagement protocol, and no grievance mechanism. APPSA-acquired knowledge is informally held and at progressive risk as trained staff approach retirement. No new staff have been hired in approximately five years.

10. Department of Forests and Wildlife (DFFB) – Under the Provincial Directorate of Territorial Development and Environment of Sofala

The DFFB manages reforestation, community forest support, wildlife conflict management, and post-licensing operator monitoring. It does not hold licensing authority and cannot sanction operators — both functions reside elsewhere.

The DFFB's main strength is practical experience in community-based forest governance and human-wildlife conflict management across districts including Muanza, Cheringoma, Gorongosa, and Maríngue. Its community management committee network constitutes a valuable community-level monitoring asset the Program can build on.

Its weakness is structural: five technicians share three vehicles across all DPDTA departments, limiting achievable activities to about 40% of the annual plan. Since the DFFB can monitor but not sanction, the deterrence value of its monitoring work is limited without a reliable escalation chain to AQUA. The institutional boundary between DFFB and DFPA/SPA creates confusion for operators.

11. Provincial Directorate of Agriculture and Fisheries (DPAP) of Sofala

DPAP is the principal provincial agricultural and fisheries directorate, delivering technical assistance, input inspection, and extension through approximately fifteen extensionists per district SDAE.

DPAP's strongest asset is the E&S training capital installed by SUSTENTA, which trained approximately 480 to 500 technicians across the province — the most extensive single training effort recorded for any institution in the assessment. Documented outcomes include conservation agriculture adoption, child

labour reduction through school-enrolment sensitisation, domestic violence referral by extensionists to police, and joint visits with the labour inspectorate to agribusinesses. The FNDS-managed green line from SUSTENTA continues to operate, providing a functioning grievance channel. The extensionist network has broad community reach across all districts.

The weaknesses are the absence of provincial laboratory capacity (limiting evidence-based environmental risk assessment), only two vehicles available for sixty staff, and no institutional E&S framework outside project structures. E&S training has not been refreshed since SUSTENTA and has not been embedded in routine procedures.

12. Provincial Services of Economic Activities (SPAE) of Sofala

The SPAE is the provincial arm of central ministry functions under the 2021 decentralisation, holding commercial agriculture licensing authority and phytosanitary inspection functions.

Its operational strengths include formal licensing authority at the investment entry point through the BAU, a functioning Early Warning system that constitutes a de facto climate risk management instrument, and an extensionist network reaching district level for community-level delivery.

The SPAE faces profound weaknesses. Most critically, similar to other Provincial Services under the State Secretary, it faces probable institutional extinction: legislation before the Assembleia da República provides for dissolution of all State Secretary-linked services within 90 to 120 days of approval, with no resolution of what happens to staff, mandates, or sovereignty functions. No E&S unit or permanent safeguards officer exists. E&S training from SUSTENTA has not been refreshed or institutionalised. Computer infrastructure is six years without investment. A phytosanitary laboratory planned under IRRIGA was never built, leaving analytical functions dependent on distant informal partnerships. Interviewees framed children's participation in outgrower schemes as family learning rather than child labour risk — inconsistent with evidence from DPGCAS and SUSTENTA showing school attendance impacts.

13. Department of Forests and Agroforestry Plantation (DFPA) – Under the Provincial Services of Environment of Sofala

The DFPA holds the formal provincial forestry licensing and monitoring authority for Sofala, controls the legal basis for commercial use of timber and wood fuel, and manages the restitution of 20% of exploitation fees to communities.

Its strengths lie in its operational Forest Information System (SIF) for licensing records and community fee tracking, substantive experience in community-based forestry governance through the FACILITY and NEMAF Programs, and well-established Community Management Committees with mobile-phone-based reporting in several districts. Staff stability is high, with 14 to 24 years of field experience.

The critical weakness is operational: six technicians cover an entire province and only around two field monitoring visits are achieved per year against a planned six. This is not a functioning monitoring system. Community management plans date from 2008 and are overdue for revision. No E&S screening tools, social risk assessment procedures, or training budget exist.

14. District Services of Health, Women and Social Action (SDSMAS), District Services of Planning and Infrastructure (SDPI), District Services of Economic Activities (SDAE) of Dondo

The three district services are the government institutions closest to communities and investment sites. Together they cover territorial planning and environmental monitoring (SDPI), agricultural extension and project safeguards compliance (SDAE), and public health, social action, and child protection (SDSMAS).

The services' collective strength is a genuinely multi-disciplinary knowledge base built over years of field work, with documented E&S outcomes from SUSTENTA: conservation agriculture adoption, child labour reduction, domestic violence referral, and joint labour inspectorate visits to agribusinesses. The SDSMAS has a sustained and embedded child protection and GBV response system coordinated with the PRM, the Public Prosecutor's Office, and specialised reception centres — more robustly embedded than agricultural safeguards knowledge because it is anchored in ongoing inter-institutional practice. Community consultation has produced at least five documented cases in which community-imposed conditions on investors were respected and activities blocked when pre-conditions were not met. A photovoltaic project resettlement was managed with documented compensation, training, and follow-up. Natural Resource Management Committees at community level provide functioning local monitoring nodes.

Four structural weaknesses constrain the district's E&S capacity. The district monitors but cannot sanction: unresolved mining sector cases — excavations open for years, agricultural land appropriated without compensation — directly illustrate the consequences of this authority gap. District services do not receive copies of EIA reports or environmental management plans for companies operating in their territory, making meaningful compliance monitoring impossible. Operational resources are critically insufficient — no environmental monitoring visit had occurred in the year to date at the time of the assessment. And all E&S training knowledge from SUSTENTA is informally held by a diminishing cohort of trained staff, not documented for transfer, and at risk of loss. Suggestion boxes deployed as grievance mechanisms receive virtually no community use.

Cross-Cutting Findings and Program Implications

Across all fourteen institutions, several patterns are consistent. No institution has a self-financed, fully operational E&S system. Dedicated E&S units are absent in all but IDEPA. Training has not been refreshed or institutionalised since the closure of SUSTENTA and IRRIGA. Monitoring resources are critically insufficient. Grievance mechanisms are project-dependent or poorly used. Child labour risk is consistently underframed in institutions with agricultural extension functions.

At the same time, most institutions retain trained staff, community coordination relationships, and operational field networks that the Program can and should invest in, rather than bypass.

The Program cannot be designed on the assumption that existing capacity will deliver E&S outcomes without targeted support. Priority actions across the institutional network include: establishing permanent E&S focal points with clear terms of reference and operational budgets in all implementing agencies; refreshing and institutionalising E&S training at provincial and district level before Program activities begin; establishing a Program-specific GRM building on the preliminary structure proposed by the RSSA and integration with other specific mechanisms already available (i.e. Land Conflict GRM) and established escalation pathways; providing district services with the environmental management plans of Program-related operators as a standard Program condition; financing monitoring operations — transport, fuel, per diem, and field equipment — for district services in Program corridors; and addressing the relevant Provincial Services probable dissolution by identifying institutional successors

from Program inception rather than as a contingency. ensure that safeguards staff, procedures and institutional memory are transferred to successor structures rather than lost. Waiting for dissolution to occur before addressing this will replicate the institutional knowledge losses documented at SUSTENTA, IRRIGA and APPSA closure.

Most importantly, E&S components must be integrated from the start of implementation. The consistent lesson from SUSTENTA, IRRIGA, and APPSA is that safeguards introduced mid-Program face adoption resistance and require disproportionate remediation effort that early integration would have avoided.

The normative transition in land governance — with the new Land Law pending approval and an implementation regulation period of up to one year anticipated — requires the Program to build legal literacy support for communities and extensionists around the new gender parity consultation requirements, starting before the law enters into force rather than after, so that compliance mechanisms are operational from the moment the legal obligation is live.

F4. Main Recommendations for MozAgribiz

F4.1 Regulatory Coherence and Institutional Architecture

The most urgent pre-implementation action is resolving the dual provincial licensing architecture. The coexistence of the SPA and DPDTA as parallel issuing authorities for Category B and C environmental licences creates a regulatory arbitrage environment that directly undermines the integrity of MozAgribiz's environmental entry conditions. The Program should formally condition institutional support to the provincial environmental system on legal clarification of this duality — through engagement with DINAMC — and should not treat a DPDTA-issued licence as a valid eligibility condition for Program support until its legal status is confirmed. This is not a matter that can be resolved through Program procedures alone; it requires the same form of formal legal resolution that the Manica forestry mandate dispute required, and the Program should actively support that process.

The anticipated dissolution of the Provincial Services under the State Secretary, within the decentralisation legislation, must be treated as a programme design variable, not a contingency. The programme should, from inception, identify the institutional successors to relevant Provincial Services functions and ensure that safeguards staff, procedures and institutional memory are transferred to successor structures rather than lost. Waiting for dissolution to occur before addressing this will replicate the institutional knowledge losses documented at SUSTENTA, IRRIGA and APPSA closure.

The DUAT–EIA sequencing gap is a structural protection deficiency that the Program cannot resolve unilaterally but must explicitly manage within its own investment approval procedures. For all Program-supported investments requiring community land access, the Program's environmental and social management framework should require that resettlement entitlements and compensation principles are at minimum outlined and disclosed to communities before final consent to land cession is formalised — not after. This should be a continuing eligibility condition reviewable at Program mid-term.

F4.2 Environmental Screening, Categorisation Integrity, and DLI Design

The Program must establish its own environmental and social screening requirements as binding eligibility conditions, independent of and supplementary to domestic licensing requirements. Given the documented practice of waiving simplified EIA studies and mandatory public consultations for certain Category B projects — the most common category in MozAgribiz's portfolio — the Program cannot treat possession of a domestic environmental licence as equivalent to compliance with World Bank E&S standards. Program-level screening instruments, developed by the RSSA in coordination with DINAMC, should define minimum content standards for ESMP documents, require documented community consultations for all supported investments above a defined threshold, and include mandatory social risk screening — covering GBV, OHS, child labour, labour conditions and community safety — at the pre-screening stage rather than leaving these to individual consultant judgment during EIA preparation.

The risk identified in the PROCAVA case — where disbursement-driven incentives generated pressure to approve projects outside normal procedures — has direct structural relevance to a PforR instrument. DLI design should explicitly decouple the timing of disbursement triggers from project approval calendars in ways that reduce the pressure on categorisation decisions. Environmental screening integrity should be treated as a DLI-verifiable element, not merely a Program management procedure, with independent verification of screening outcomes for a sample of supported investments at each DLI verification date.

Decree 54/2015 operates on the basis of positive enumeration, and certain Program activities may not correspond to any activity type explicitly listed in its annexes; a common categorisation approach across all provincial services should therefore be ensured.

F4.3 Monitoring, Compliance Verification, and Information Systems

The Program requires a dedicated corridor-level environmental monitoring function that is distinct from, and complementary to, individual project compliance monitoring. No institution in the current licensing and oversight chain has a mandate, methodology or resourcing model for detecting cumulative impacts across multiple operations on shared water bodies, soil health or biodiversity corridors. The Program should finance and operationalise this function as a design requirement — establishing environmental baselines in each Program corridor before investments reach scale, defining quantified indicators for water quality, soil health and biodiversity, and commissioning periodic corridor-level assessments by an entity with the technical capacity and operational independence to produce credible findings. This function should be housed within DINAMC's Environmental Evaluation Department with explicit ARA participation, and its reporting should go to a multi-institutional body mandated to respond to cumulative trend data.

The absence of laboratory capacity across AQUA central and provincial levels is the single most critical operational incompatibility between the Program's risk profile and the current compliance verification system. For a Program where agrochemical use, soil contamination and water quality are priority risks, a compliance regime that has to partially rely on visual observation — colour, odour, sedimentation — or limited analysis from external laboratories with a slow turnaround, cannot produce credible environmental assurance for investors, communities or the Bank. The Program should finance a formal agreement between AQUA and a certified external laboratory network — including CHAEM at provincial level — with defined sample submission protocols, maximum turnaround times, and quality assurance procedures. This arrangement must be secured before Program activities reach the scale at which pesticide and effluent risks become significant, not as a future operational enhancement.

Information system fragmentation is a critical constraint for any PforR compliance verification system. The Program should support the integration of DINAMC's SGLA with provincial SPA systems as a priority, establish a consolidated Program-level register of all supported investments with their licensing status, ESMP commitments and monitoring findings, and require that district services receive copies of EIA reports and environmental management plans for all Program-related operators as a standard Program condition — not an optional disclosure. Without this, district-level monitoring is structurally impossible regardless of technical capacity.

F4.4 Agricultural Inputs, Integrated Pest Management, and Agrochemical Risk

The extensionist cascade is the right delivery mechanism for field-level pesticide safety, integrated pest management and environmental awareness — but it requires structured investment before it can function reliably as a safeguards delivery asset. The Program should not deploy extensionists as the primary E&S monitoring asset without first completing a structured refresh of E&S training content, specifically including pesticide safety, pre-harvest intervals, PPE requirements, container disposal protocols, child labour detection and referral, and GBV identification. This training should be documented in transferable institutional protocols and embedded in DINAE's standard extension delivery packages — not held informally by trained staff who may retire or transfer.

The SUSTENTA outgrower child labour sensitisation methodology — which produced documented reductions in child labour and school absenteeism — represents an operational proof of concept that the Program should formally restore and institutionalise. The Rural Extension Supervisors who retain

this knowledge are an asset that must be engaged systematically before the cohort further diminishes. A baseline assessment of child labour dynamics in MozAgribiz value chains — disaggregated by corridor, commodity and household type — should be completed before anchor investor operations begin at scale, to establish a monitoring reference point that later DLI verification can be assessed against.

For anchor investors with outgrower Programs, the Program should establish Program-level minimum standards for input supply chain management, specifically prohibiting the distribution of unregistered or improperly labelled inputs through commercial agri-dealer networks associated with the Program. Given the documented informal commercialisation of uncertified inputs identified by DINASAB, traceability from the point of registration to the point of farm delivery should be a Program eligibility condition for input support components. Safe chemical waste collection and disposal infrastructure — including collection points for empty pesticide containers — should be treated as Program infrastructure, not as an externality to be managed by extension awareness alone.

F4.5 Water Resource Management and Cumulative Catchment Risk

The governance gap between the water administration system — managing abstraction and allocation through ARAs — and the MAAP-anchored environmental oversight system — nominally governing effluent and pollution management — must be formally bridged as a Program implementation condition. A data-sharing protocol between ARA-Sul, ARA-Centro, ARA-Norte, INIR and AQUA should be negotiated and operationalised before the Program approves investment packages in sub-catchments where cumulative water demand may approach sustainable dry-season yields. The Program should require that project-level EIAs for investments with significant water demand or effluent loads situate those demands within a subcatchment-level water balance accounting for all existing and planned uses — not merely assessing site-specific impacts in isolation.

Given that ARAs were not consulted in the ESSA, the Program should commission a rapid hydrological assessment of water allocation status for all the main catchments within the Program's geographic scope before irrigation-intensive investments are approved.

F4.6 Land Access, Resettlement, and Community Rights

For all supported investments, the Program should require verification of the full DUAT attribution pathway — not merely confirmation that a DUAT exists. This verification should include the community consultation record, documentation of pre-existing rights, absence of active land disputes, and PDUT zoning compliance for investments above a defined area threshold. The verification should be a continuing obligation reviewed at each supervision mission, not a one-time entry condition.

The community veto mechanism documented in the Dondo focus group — where at least five investments were blocked by community-imposed pre-conditions — is a functioning protective asset that the Program should reinforce rather than assume. Formal district participation in the full DUAT–EIA consultation sequence must be treated as a mandatory Program condition, with formal notification to district services of licence issuance and operational commencement becoming a Program requirement enforced through the RSSA.

The Program should formally support the training of District Resettlement Commissions in Program corridors, before any activity with displacement potential is initiated.

The stalled review of Decree 31/2012 — the principal resettlement regulatory instrument — should be considered as a Program policy action, given its identified regulatory gaps around proportionality

between large-scale and minor resettlement processes, adoption of replacement cost standard and the absence of specific guidance on livelihood restoration and disaster-driven resettlement. The Program has the leverage to reinitiate this process, which lapsed following the interruption of World Bank financing.

F4.7 Labour Standards, Child Labour, and Gender

The Program should establish binding labour standards covering anchor investors and their outgrower Programs. These standards should address seasonal and migrant worker accommodation, water and sanitation at temporary work sites, wage payment protocols, a prohibition on child harvest labour with verifiable monitoring provisions, and a prohibition on the use of labour intermediaries with undocumented recruitment practices. These standards should be included in Program participation agreements with anchor investors and subject to periodic independent verification, not only proponent self-reporting.

The structural invisibility of non-contracting household members — particularly women and adolescents working under outgrower arrangements without individual contractual standing — requires a specific Program design response. The Program should introduce a minimum standard requiring individual household member registration for all outgrower contracts within the Program portfolio and should monitor whether women's access to Program benefits — training, inputs, extension services — is systematically conditioned on their status as contract holders versus household members. The RSSA should develop specific screening indicators for outgrower contract labour inclusivity before Program activities begin at scale.

F4.8 GBV, Community Health, and Social Protection

The GBV prevention gap in contract farming contexts — where contracts are held by male household heads while women work without contractual standing, creating conditions for labour exploitation and retaliation against women who assert payment rights — requires a specific and resourced Program response. The DPGCAS confirmed it has not yet implemented a prevention Program addressing this reality despite recognising it. The Program should directly resource the development and delivery of such a Program through the DPGCAS-led multi-sectoral GBV mechanism, including the gender-labour interface and pathways to the Integrated Care Centre. The extensionist-to-PRM informal referral pathway for domestic violence — indicated during the Dondo focus group discussions— could be reinstated, with formal referral protocols anchored in regular SDSMAS–SDAE–PRM coordination structures, provided that such practices do not undermine their acceptability or the trust-building necessary for the performance of their core functions at community level.

The community health risks from agrochemical exposure and irrigation-related vector-borne disease require specific EIA content requirements. EIA health impact assessments for Program-supported investments should be required to include quantified baseline disease burden data for malaria and schistosomiasis in Program corridors, post-construction monitoring indicators capable of detecting changes in disease incidence, and specific mitigation measures — including drainage design, protective infrastructure and health worker engagement — rather than the generic malaria statements currently accepted as standard practice.

Social protection coverage among Program beneficiary households — seasonal agricultural workers, outgrower participants and migrant workers — should be assessed through a baseline survey commissioned at Program inception, with DPGCAS and INAS included as institutional partners specifically tasked with developing outreach strategies for households outside the PSSB and PASP coverage envelope.

F4.9 Grievance Redress Mechanism

The Program-level GRM must be designed as an adaptation of the existing, but still incipient, MAAP GRM — not as a parallel structure — and must address the documented weaknesses of that mechanism. It should not be considered functional until community-level dissemination is completed in local languages across all three corridor linguistic contexts, the green line is accessible to mCel and Vodacom users as well as Movitel, the green line and Survey 123 platforms (or equivalent) are technically integrated at DINAMC level, district-level focal points are operational and trained, and a dedicated referral pathway exists for sensitive complaints covering GBV, trafficking and child labour. Natural Resource Management Committees at community level should be formally incorporated as first-tier reporting nodes with defined escalation protocols to district SDAE focal points — they are the most proximate institutional actor to communities and represent an existing community engagement asset that the Program should formalise rather than bypass.

The MAAP GRM's current performance under PROCAVA — no complaints received through any channel across two years of PROCAVA implementation, despite a documented incident that bypassed all formal channels and reached the IFAD President directly — is the clearest possible signal that the mechanism does not yet meet the accessibility and credibility standards required for a World Bank PforR instrument. Operationalisation of the GRM must be treated as a pre-condition for Program disbursement, with independent assessment of community awareness and accessibility before any DLI is verified.

F4.10 Institutional Capacity Strengthening

Across all fourteen implementing institutions assessed, the consistent pattern is that E&S capacity was built through closed donor projects and has partially eroded since those projects ended. The Program's institutional support design should accordingly treat capacity restoration and institutionalisation as co-equal priorities alongside operational support. The specific actions required include establishing permanent E&S focal points with formal terms of reference and non-project operational budgets in all implementing agencies before Program activities begin; refreshing and institutionalising E&S training at provincial and district level using DINAE's cascade infrastructure and the RSSA training mandate as the delivery mechanism; updating, if necessary, E&S content in the three manuals currently under preparation in DINAE (Gender, Climate-Smart Agriculture, and Rural Economy); and formally adopting IDEPA's E&S system architecture as a model for other implementing institutions, given that it is the most advanced in the Program network in terms of institutional embedding.

District services — SDPI, SDAE and SDSMAS — are the Program's last-mile E&S implementation actors and are currently operating without the information, tools, transport or authority they would need to function effectively in that role. Financing monitoring operations at district level — transport, fuel, per diem and basic field equipment — is not an enhancement; it is a prerequisite for any monitoring function to exist at all. This operational financing must be included in Program cost estimates from inception and must not be structured as a project-dependent add-on that will disappear when implementation closes. The consistent lesson from SUSTENTA, IRRIGA and APPSA — whose institutional legacies are the primary E&S capital the Program is building on — is that safeguards capacity built without an explicit institutionalisation plan and a recurrent budget pathway does not survive project closure. MozAgribiz must break this cycle by treating the transition from project-financed to institutionally financed E&S capacity as a measurable Program outcome, not as an aspiration.