

Safeguards Compliance Memorandum

Project Information

Project Name	Securing the species, habitat, health and livelihoods of the Lower Kafue Ecosystem (KaF-Wild)
GEF Focal Area	Multi-focal Area (under Wildlife Conservation for Development IP)
Safeguards Categorization	Medium Risk

Project Description

Objective: To secure key wildlife species of the Kafue Flats landscape and promote socio-economic benefits to local communities through wildlife-based economies

Component 1: *Enabling conditions for wildlife conservation for development in Zambia*

This component seeks to strengthen the institutional, policy and legal framework for wildlife conservation in Zambia. This will be achieved through a multistakeholder dialogue on wildlife conservation and the future of the Kafue Flats, policy and legal changes for effective Community Based Natural Resources Management and the wildlife-based economy, and a new legal framework for human wildlife conflict relief scheme.

Component 2: *Coexistence of People and Wildlife in Protected Habitats in Kafue Flats*

This component aims to (i) reduce wildlife poaching threats, (ii) improve wildlife habitat management for globally significant species, (iii) reduce human-wildlife conflict through holistic approaches, and (iv) Improve management of high-risk interfaces for zoonotic spillover. For the (i), it will improve infrastructure in Lochinvar and Blue Lagoon National Parks for effective enforcement, strengthen ranger capacity for effective anti-poaching operations, equip DNPW and Community Scouts' intelligence and investigation capacity to combat the illegal bushmeat trade, and conduct a behavior change campaign to reduce the demand for illegal bushmeat. For (ii), it will restore wetlands and manage fires to improve threatened species' habitat, demarcate the two National Parks to protect wildlife, and build capacity of communities on natural resources management. For (iii) it will support HWC prevention measures in communities around the Nkala GMA hotspot, develop rapid response capacity to reduce severity of incidents. For (iv), it will support the signing of an MoU between key partners for a One Health approach in Kafue Flats and manage interfaces between wildlife and cattle.

Component 3: *Wildlife and nature for prosperity in Kafue Flats*

This component will (i) diversify wildlife conservation financing mechanisms and build private-public-community partnerships and (ii) increase sustainable livelihoods in wildlife-based economies especially for women and youth. On the former, it will do this by supporting sustainable financing mechanisms for Lower Kafue Basin including a watershed investment program. For the latter, it will enable gender-sensitive nature-based livelihoods and enterprises in the Kafue Flats, develop partnerships for ecotourism, and create cash-for-work opportunities.

Component 4: *Communications and knowledge management*

This component will develop scientific knowledge for improved decision-making and wildlife conservation, including specialized inventory and monitoring inputs for the management of the Kafue Flats. It will also focus on enhancing project impact through communication, knowledge management and participation in the GEF-8 Global Wildlife Program through sharing of learning and exchange visits.

Component 5: *Monitoring and Evaluation*

This component will ensure the project monitoring and evaluation system enables results tracking and adaptive project management.

Project Location and Salient Physical Characteristics Relevant for the Safeguards Analysis

The project landscape is the Kafue Flats, an area of 1,398,600 hectares in total with approximately 650,000 hectares of this a flat, low-lying natural floodplain. The Kafue Flats is a wetland habitat of significant international importance for its socio-economic and biodiversity values, supporting a wide range of flora and fauna, including numerous bird and fish species, and also supporting cattle grazing, floodplain agriculture and traditional fisheries. The biological diversity of the Kafue Flats can largely be attributed to the diversity and complexity of habitats, comprising the main river channel, lagoons, ox-bow lakes, cut-off channel remnants, marshes, levees and grassed floodplain flats.

The Kafue Flats has been internationally recognized as a major wetland resource in ecological terms, home to the endemic semi-aquatic antelope, the Kafue Lechwe (*Kobus lechwe kafuensis*), approximately 25% of the total global population of the endangered Wattled Crane (*Bugeranus carunculatus*), and with more than 470 bird species occurring regularly (including the endangered Grey Crowned Crane). The Flats have been designated as a UNESCO Biosphere Reserve since 2022 (<https://www.unesco.org/en/articles/unesco-designates-11-new-biosphere-reserves>) as well as a Ramsar Wetland of International Importance since 2007 (<https://rsis.ramsar.org/ris/530>).

The 225 km-long and 60 km-wide floodplain surrounds the lower stretch of the great Kafue River between Itzhi-tezhi Dam and the Kafue Gorge Dam with the Upper and Lower power stations used for producing 50% of the nation's hydropower. The natural flooding regime, which is crucial for ecological processes and the overall health of the wetland, has been altered since the 1970s by the damming of the river. Water is held back at the top dam, and released in a manner that prioritizes the needs of hydropower production at the lower dam, resulting in reduced wet season flows, and increased dry season flows. In addition, some seasonal wetland areas have become permanently inundated, encouraging the spread of woody invasive plants, such as *Mimosa pigra* (wetter areas) and *Dichrostachys cinerea* (drier margins), at the expense of the natural grasslands that were important habitat and food for wildlife.

In the early 2000s, following engagement with WWF and ICF, ZESCO agreed to a minimum flow release of 25 m³/s and an "ecological freshet" of 300 m³/s for a four-week period, typically in March, to some extent mimicking the natural regime. But in drought years the freshet has not occurred, and this failure, combined with poor rains, have meant that vast areas of the floodplain that should be inundated for several months after the rainy season remain dry, with negative consequences for fauna and flora, and increased fire risk. Another element of climate change is more intense rainfall events that cause flash flooding on the tributary rivers to the Kafue. Rising temperatures can stress agricultural practices in the Kafue Flats, reducing crop yields and affecting livestock. Higher temperatures may also exacerbate

evaporation rates from water bodies, further straining water availability for both humans and wildlife. Many of the tributary streams to the Kafue River, once considered perennial, have become seasonal in recent years. Reduced water availability can lead to increased competition among agricultural users, wildlife, and local communities. Declining grazing resources, made worse by the spread of *Mimosa pigra*, intensify the pressure on the ecosystem and competition among users.

Lechwe stocks are also in decline because of illegal hunting for the local and regional wild meat trade, and fish stocks are threatened by overfishing, as spatial and temporal restrictions on fishing are not adhered to, and more outsiders join seasonal and permanent fishing camps along the river and on its islands. Twenty mammal species were once common in the area, including Zebra, Sitatunga (Marshbuck), Oribi, Roan, Kudu, African Buffalo, Wildebeest and Hippopotamus, but most are now locally extinct or rarely sighted. Human wildlife conflict occurs frequently in Nkala GMA, with losses of livestock and crops to predators and elephants, and in Kafue Flats GMAs, cattle are lost to crocodiles. With intense pressure on the ecosystem, diseases can spill over between humans, wildlife and livestock, e.g. human fatalities from consuming hippo meat contaminated with anthrax, or Lechwe killed by *E. coli* in the river near fishing camps

Safeguards Standard	Triggered	Explanation
Natural Habitats	No	The Kaf-Wild project will facilitate the development of small-scale nature-based enterprises, but these will be located in towns and villages on land that is already utilized for development and is not ecologically sensitive.
Indigenous People	No	There are no indigenous peoples in the project area
Restriction of Access and Resettlement	Yes	The pastoralist people of the Kafue Flats current have voluntary common spatial and temporal restrictions on livestock grazing in practice. During the cropping season, livestock are herded in areas away from the cropped fields, and individual livestock owners are obliged to ensure that their livestock do not damage crops in fields. After harvest, livestock are left to roam free, with all lands in the village essentially reverting back to communal access. Activities in the Kaf-Wild project will include implementation of the General Management Plan for the Kafue Flats GMA (currently being developed by DNPW and ICF, with full stakeholder consultation), including likely agreement with communities on zoning of the core sensitive floodplain area between the Blue Lagoon and Lochinvar National Parks as a cattle exclusion zone. By-laws could be developed at chiefdom level to put the zoning into practice,

		including enforcement of already existing regulations forbidding cattle to be grazed inside the Park boundaries (to be clearly demarcated through the project). Implementation of the new zoning, through the Kaf-Adapt project to be carried out in the same landscape and timeframe, will involve developing communities' capacity to revive traditional transhumance patterns involving rotational grazing that allows the grasslands to recover before being regrazed. This would involve community agreement on spatial and temporal movement of herds, and a commitment to more active herding. The implementation of a new exclusion zone would mean that in the dry season, pastoralists who previously allowed their cattle to graze in the core sensitive floodplain area would no longer have this opportunity. Without mitigation measures, this would lead to a loss of productive grazing and a worsening in cattle condition. The project will strengthen Community Resource Boards, and develop the capacity of members of the structures under these boards, especially Natural Resource Management Committees, to support district officials from the Ministry of Fisheries and Livestock, in promoting sustainable and legal use of natural resources amongst their fellow community members. This will help to lessen instances of community members setting unplanned fires, fishing outside of the allowed times/zones, or conducting illegal hunting for Kafue Lechwe and other wildlife. Upholding of existing legislation and bylaws can lead to de facto restrictions on access to fish and game meat. Without mitigation measures, this could worsen poverty and food insecurity.
Community Health, Safety and Security	Yes	In the absence of mitigation measures, project activities could cause or worsen tensions between park staff and communities. GEF resources will not be used directly to conduct patrols, roadblocks or search-and-seizure operations. Nonetheless, without mitigation measures, park staff

		involved in project implementation could use excessive force when conducting routine patrols. Park staff could also be subject to verbal or physical abuse by community members whose illegal activities are threatened. Additionally, in the absence of mitigation measures, the food security of some households, whose members currently supplement their food intake through participation in illegal hunting and fishing, could worsen. Upholding of existing legislation and bylaws can lead to de facto restrictions on previous access to fish and game meat. Without mitigation measures, this could worsen food insecurity.
Pest Management	No	No project activities are planned involving use of pesticides.
Cultural Resources	Yes	The vast resources of the flats are a storehouse, and the local communities have for hundreds of years gained a living from fishing and pastoral grazing for their livestock on these flats. The Ila and Tonga peoples' traditional system of establishing "Ulutanga" or camps for herding and fishing represents an important intangible resource in the form of knowledge about voluntary, communal temporal and spatial restrictions on these activities in order to allow productivity to be maintained for all. Nakeenda is a cultural heritage building previously used by the Government as a military installation for national security. The flats are host to the "Semunenga" traditional ceremony of the Ila people of the Central Province in the month of September. This ceremony is held at a place called Maala on the weekend of the full moon and is an expression of their devotion to the community's ancestors. The Gwisho Hot Springs and Sebanzi Hill is a site of archeological and / or historical interest, located in Lochinvar National Park.

Summary of Key Safeguards Issues

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

The project expects to achieve improved conservation and sustainable use of natural resources as its long-term impact of project interventions, which will be both environmentally and socially positive. There are no potential large scale, significant or irreversible impacts.

The largest social safeguards consideration in this project is food security as a result of upholding currently existing laws on access to natural resources. Related to this upholding of existing laws, there is also the risk of conflict between communities and park staff, which may stem from either side. Both of these potential risks will be addressed through mitigation measures outlined below

There are currently no environmental safeguards consideration identified, though yearly ESS Screening will be conducted to ensure this remains the case.

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

This project has drafted an Environmental and Social Management Framework (ESMF), which includes a Process Framework for livelihood restoration due to the high likelihood of voluntary access restriction, a Cultural Heritage Management Plan, and a Grievance Redress Mechanism. Specific mitigation measures that have been included in the workplan include:

- Constituency Development Fund (CDF) projects for infrastructure in each of the 9 chiefdoms for nature-based value chains and enterprises including products made from harvested invasive mimosa pigra, for communal revenue generation.
- Strengthen the capacity of the staff of the Blue Lagoon and Lochinvar National Parks to undertake effective patrolling, intelligence gathering and monitoring efforts
- Support to specialized training of park staff that includes sexual exploitation, abuse and harassment (SEAH) and gender based violence GBV), a gender-sensitive and human rights-based code of conduct for inspections, arrests and seizures, effective community liaison, and psychosocial support to deal with issues of conflict and corruption.
- Additional female Community Scouts will be recruited and trained to enable a better ratio of male to female staff, for liaison with male and female members of the community.

It has also created a Stakeholder Engagement Plan as well as a Gender Analysis and Gender Action Plan that will address the gender inequalities present in the landscape.

The International Crane Foundation (ICF) and Ministry of Economy and Green Environment (MGEE) both have the experience and/or the support necessary to effectively address safeguard issues, and carry out the requirements outlined in the ESMF. Additionally, many of the proposed mitigation measures for Safeguards risks have already been included in both the project workplan and budget, ensuring they are prioritized for the PMU and the day-to-day operation of the project.

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

A series of successful disclosure meetings were conducted between November 10 and 21, 2025, across the Kafue Flats project area. The facilitation team engaged with six District Administrative Offices, community members from nine Chiefdoms, staff from two National Parks, and five community radio stations. The primary objectives were to announce the project approval, discuss the potential environmental and social risks, outline the corresponding mitigation measures, and explain the grievance redress mechanism process. The initiative was met with widespread appreciation for its inclusive approach and received strong commitments of support from all key stakeholders for the project's lifecycle.

DISTRICT ADMINISTRATIVE OFFICES To ensure effective communication and secure administrative buy-in, the facilitation team paid courtesy calls to the District Commissioners in all six project districts: Shibuyunji, Mumbwa, Itezhi-Tezhi, Namwala, Monze, and Mazabuka. During these meetings, the team:

- Officially announced the approval of the KaF-WILD and KaF-ADAPT projects.
- Presented a detailed overview of potential project risks and the mitigation measures to be applied throughout the project lifecycle.
- Emphasized the importance of ongoing collaboration.

THEIR ROYAL HIGHNESSES Recognizing the vital role of traditional leadership in land and resource management, the team paid courtesy calls to nine Royal Highnesses (eight male Chiefs and one female Chieftainess) within the Kafue Flats landscape. The engagements involved:

- Briefing their Royal Highnesses on the approved projects scheduled for implementation in the Kafue Flats.
- Focusing discussions on project-related risks and the outlined mitigation measures.

COMMUNITY MEETINGS To ensure decentralized and inclusive disclosure, nine community meetings were conducted across the chiefdoms of Shakumbila, Muwezwa, Shezongo, Musungwa, Mungaila, Nalubamba, Hamusonde, Choongo, and Mwanachingwala. These meetings successfully:

- Informed community members (including headpersons, youths, men, women, Community Resource Boards (CRBs), civil servants from the community and farmers) about the approved projects.
- Facilitated interactive discussions on project risks and mitigation measures.
- Provided a platform for communities to ask questions and share their perspectives.

DEPARTMENT OF NATIONAL PARKS AND WILDLIFE STAFF As a key project partner, the Department of National Parks and Wildlife (DNPW) was engaged through meetings at Blue Lagoon National Park and Lochinvar National Park. Participants included wildlife police officers, community scouts and support staff. The sessions focused on:

- Briefing staff on project approvals, potential risks, and mitigation measures.

- Emphasizing the critical role of DNPW staff in the successful execution of the projects in line with ESMF guidelines.

LIVE RADIO PROGRAMS To achieve mass outreach, the team participated in live programs on five radio stations covering the Kafue Flats: Mumbwa community radio, Itzhi-tezhi community radio, Namwala community radio, SKY FM in Monze, and Mazabuka Community Radio. The radio programs were used to:

- Present an overview of the KaF-WILD and KaF-ADAPT projects.
- Announce the project approval to a wider audience.
- Explain potential risks, mitigation measures, and the grievance redress mechanism.

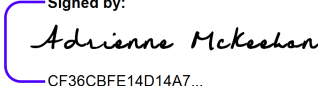
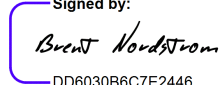
Monitoring and Compliance

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies? Yes [X] No [] NA []
Have costs related to safeguard policy measures been included in the project cost? Yes [X] No [] NA []
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies? Yes [X] No [] NA []
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents? Yes [X] No [] NA []
Have relevant safeguard policies documents been sent to WWF-US? Yes [X] No [] NA []
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs? Yes [X] No [] NA []

Disclosure Requirements

Environmental and Social Management Framework and Stakeholder Engagement Plan	
Date received by WWF-US	August 6, 2025
Date Disclosed on WWF-US website	September 9, 2025
<i>In Country Disclosure</i>	
Date Disclosed on Ministry of Green Economy & Environment, Ministry of Tourism, and International Crane Foundation website	December 19, 2025 (date of last online disclosure)
Date Disclosed in project locations: Please see Appendix 1 for complete listing of in person disclosures	November 20, 2025 (date of last public disclosure)

Approvals

Adrienne McKeehan, Safeguards Coordinator	 Signed by: CF36CBFE14D14A7...	Date: 3/24/2026
Brent Nordstrom, Safeguards Compliance Officer	 Signed by: DD6030B6C7E2446...	Date: 3/24/2026

Appendix 1:

Detailed Itinerary

Table 1: Disclosure Meetings Itinerary

DAY	DATE	TIME (HRS)	PLACE	SITE	DETAILS
	03/11/2025 to 07/11/2025				ESS Translation and Printing
Day 1	Monday, 10 November 2025	06:00	Lusaka	Start Off	
		10:00	Shibuyunji	District Administration	Meet DC and leave ESS copies
		14:00	Mumbwa	District Administration	Meet DC and leave ESS copies
		19:00	Mumbwa	Radio Station	Radio Program
		20:00	Mumbwa	Lodge	Evening in Mumbwa
Day 2	Tuesday, 11 November 2025	09:00	Shakumbila	Palace	Meet Senior Chief Shakumbila
		11:00	Blue Lagoon	DNPW Offices	Meet Warden & Staff in Blue Lagoon
		14:00	Shakumbila	Muchabi	Meeting with the community
		20:00	Mumbwa	Lodge	Evening in Mumbwa
Day 3	Wednesday, 12 November 2025	09:00	Muwezwwa	Palace	Meet Chieftainess Muwezwa
		10:00	Muwezwwa	Palace	Meeting with the community
		18:00	Itezhi tezhi	Lodge	Evening in Itezhi tezhi
Day 4	Thursday, 13 November 2025	09:00	Itezhi tezhi	District Administration	Meet DC and leave ESS copies
		12:00	Shezongo	Palace	Meet Chief Shezongo
		14:00	Shezongo	Shezongo	Meeting with the community
		19:00	Itezhi tezhi	Radio Station	Radio Program
		20:00	Itezhi tezhi	Lodge	Evening in Itezhi tezhi
Day 5	Friday, 14 November 2025	09:00	Musungwa	Palace	Meet Chief Musungwa
		10:00	Musungwa	Musungwa	Meeting with the community
		15:30	Namwala	District Administration	Meet DC and leave ESS copies
		17:00	Namwala	Lodge	Evening in Namwala
Day 6	Saturday, 15 November 2025	10:00	Namwala	Lodge	Debrief & Report Writing
		17:00	Namwala	Lodge	Evening in Namwala
Day 7	Sunday, 16 November 2025	09:00	Mungaila	Palace	Meet Chief Mungaila
		10:00	Mungaila	Mungaila	Meeting with the community
		19:00	Namwala	Radio Station	Radio Program
		20:00	Chitongo	Lodge	Evening at Chitongo
Day 8	Monday, 17 November 2025	09:00	Nalubamba	Mwachisowa Civic Centre	Meet Chief Nalubamba
		10:00	Nalubamba	Mwachisowa Civic Centre	Meeting with the community
		18:00	Monze	Lodge	Evening in Monze
Day 9	Tuesday, 18 November 2025	09:00	Monze	District Administration	Meet DC and leave ESS copies
		10:00	Choongo	Palace	Meet Chief Choongo
		11:00	Choongo	Choongo	Meeting with the community
		19:00	Monze	Radio Station	Radio Program
		20:00	Monze	Lodge	Evening in Monze
Day 10	Wednesday, 19 November 2025	09:00	Hamusonde	Palace	Meet Chief Hamusonde
		10:00	Hamusonde	Bweengwa	Meeting with the community
		14:00	Lochinvar	DNPW Offices	Meet Warden & Staff in Blue Lagoon
		18:00	Monze	Lodge	Evening in Monze
Day 11	Thursday, 20 November 2025	09:00	Mazabuka	District Administration	Meet DC and leave ESS copies
		11:00	Mwanachingwala	Palace	Meet Chief Mwanachingwala
		14:00	Mwanachingwala	Mwanachingwala	Meeting with the community
		19:00	Mazabuka	Radio Station	Radio Program
		20:00	Mazabuka	Lodge	Evening in Mazabuka
Day 12	Friday, 21 November 2025	09:00	Mazabuka	Lodge	Report Writing
		18:00	Mazabuka	Lodge	Evening in Mazabuka
Day 13	Saturday, 22 November 2025	17:00	Back To Lusaka	Home	Evening in Lusaka