



THE REPUBLIC OF KENYA

**MINISTRY OF LABOUR & SOCIAL PROTECTION**  
**State Department for Social Protection and Senior Citizen Affairs,**

**&**

**MINISTRY OF GENDER, CULTURE AND CHILDREN**  
**SERVICES**  
**State Department for Children Services**

**&**

**MINISTRY OF EAST AFRICAN COMMUNITY, ARID AND**  
**SEMI-ARID LANDS AND REGIONAL DEVELOPMENT**  
**National Drought Management Authority**

**The Second Kenya Social Economic Inclusion Project**  
**(P504218)**

**Environmental Social Management Plan (ESMP) Template**

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## ABBREVIATIONS AND ACRONYMS

BWCs	Beneficiary Welfare Committees
CCTP	Consolidated Cash Transfer Programme
CHPs	Community Health Promoters
CPV	Child Protection Volunteers
CSO	Civil Society Organization
EFC	Error, Fraud and Corruption
EGCM	Enhanced Grievance and Case Management
EIP	Economic Inclusion Programme
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
GBV	Gender-Based Violence
GIS	Geographic Information System
GRM	Grievance Redress Mechanism
IEC	Information, Education and Communication
IPPF	Indigenous Peoples Planning Framework
KFS	Kenya Forest Service
KSEIP 2	Second Kenya Social and Economic Inclusion Programme
KWS	Kenya Wildlife Service
LMP	Labor Management Procedures
M&E	Monitoring and Evaluation
MFA	Multi-Factor Authentication
MIS	Management Information System
MoU	Memorandum of Understanding
NEMA	National Environment Management Authority
NGAO	National Government Administrative Officers
NGO	Non-Governmental Organization
OHS	Occupational Health and Safety
PPE	Personal Protective Equipment
PSP	Payment Service Provider
PWD	Persons With Disabilities
SEA	Sexual Exploitation and Abuse
SEAH	Sexual Exploitation, Abuse and Harassment
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
SIA	Social Impact Assessment
SLA	Service Level Agreement
SRIM	Social Risk and Impact Management

TOR	Terms of Reference
VMG	Vulnerable and Marginalized Group
VMGP	Vulnerable and Marginalized Group Plan
WASH	Water, Sanitation and Hygiene
WB	World Bank

## INTRODUCTION

Despite significant improvements in economic growth over the last decade, poverty remains high in the country<sup>1</sup> with 39 and 36 percent of Kenyans living below the national (as of 2023) and international poverty line of US\$2.15 a day (2017 Purchasing Power Parity)<sup>2</sup> respectively. The high poverty rates in the country are predominately in the arid north/north-eastern/coastal counties, largely populated by refugees and pastoralists that bear the largest social, economic, and environmental costs of droughts and floods. Kenya is also highly vulnerable to climate change, particularly extreme floods and droughts, which has affected food security for millions of people.

The national context is further amplified by the existing social and geographic inequalities whereby the poverty rate is higher amongst female-headed households compared to male-headed ones (41 percent compared with 38 percent).<sup>3</sup> Unemployment among the growing youth population, aged 15 to 24, is more than double that of the total population.<sup>3</sup> Moreover, female youth unemployment (17.2 percent) is more than double that of male youth (8.2 percent). In poorer regions (the ASAL north/north-eastern counties), harmful practices such as child marriage and limited access to basic services contribute to gender inequalities in employment. Child stunting remains high (above 20 percent) in 15 counties, with the highest rates in poorer households, rural regions, and among children whose mothers lack formal education.<sup>4</sup>

To overcome these challenges, Kenya has in place a Social Protection (SP) system that includes a Kenya Social Protection Policy (2023), and the Social Protection Act, 2025. The Act which was recently passed provides the legal framework for SP and other pro-poor programs,. Additionally, an upcoming Disaster Response Management (DRM) Bill will restructure and clarify roles and responsibilities within the institutional architecture for DRM in Kenya. Further, the Kenya's flagship National Safety Net Program (NSNP), known as *Inua Jamii*, whose primary objective is to uplift the lives of poor and vulnerable Kenyans through regular and reliable bi-monthly cash transfers, comprises four cash transfer programs in the country, serving a total of 17 million households. These include (i) Hunger Safety Net Program (HSNP, 130,000 households), (ii) Older Persons Cash Transfer (OPCT, 1,318,000 households)<sup>5</sup>, (iii) Cash Transfer for Orphans and Vulnerable Children (CT-OVC, 486,000 households), and (iv) Persons with Severe Disabilities Cash Transfer (PwSD-CT, 72,000 households).

The HSNP is implemented by the National Drought Management Authority (NDMA) under the Ministry of East African Community, Arid and Semi-Arid Lands (ASALs) & Regional Development (MEACARD) and provides routine cash transfers of 2,700 Kenyan Shillings (KES) per month (~US\$18) to poor households in eight northern counties. The HSNP also has a shock-responsive component which provides 2,700 KES per month to poverty-targeted households when their sub-counties are affected by severe or extreme drought.<sup>6</sup> Over 750,000 households are enrolled in the shock-responsive component and are eligible to receive this emergency assistance. The other three cash transfer programs make up the nationwide Consolidated Cash Transfer Program (CCTP), led by the Directorate of Social Assistance (DSA) within the State Department of Social Protection and Senior Citizens Affairs (SDSP&CAs). The CCTP provides 2,000 KES per month to all beneficiary households. In April 2023, a Presidential

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<sup>1</sup> World Bank Group. 2023. *Kenya Poverty and Equity Assessment 2023: From Poverty to Prosperity: Making Growth More Inclusive in Kenya*.

<sup>2</sup> [http://macro-poverty-outlook.worldbank.org/mpo\\_files/mpo/mpo-sm24-ken-scope.pdf](http://macro-poverty-outlook.worldbank.org/mpo_files/mpo/mpo-sm24-ken-scope.pdf)

<sup>3</sup> The World Bank. (2023). World Bank Open Data. <https://data.worldbank.org/>

<sup>4</sup> KNBS and ICF. 2023. *Kenya Demographic and Health Survey 2022*.

<sup>5</sup> The OPCT is an individual entitlement, not household. 730,000 is the approximate number of households in which OPCT beneficiaries reside.

<sup>6</sup> HSNP emergency cash transfers are triggered by external monitoring of a Vegetation Cover Index (VCI) through satellite data.

directive called for an expansion of coverage of *Inua Jamii* to 2.5 million households in the next three years, the first phase of which is underway.

Worth mentioning is that the building blocks of Kenya's SP system is in place as all NSNP utilize the GoK's Enhanced Single Registry (ESR) for: i) poverty targeting of beneficiaries (except OPCT, which is not poverty-targeted); ii) electronic transfers to bank accounts and mobile money, iii) secure management information systems (MIS), and iv) multi-channel grievance and redress mechanisms. The ESR is a national data base for poor and vulnerable households.

These efforts notwithstanding, gaps in Kenya's SP system remain, and these include low coverage of SP programs, with only about 10 percent of Kenyan households receiving any social assistance despite 35 percent of households living in poverty. Further, only 20 percent of the adult workers are covered by any social insurance while children, adolescents (ages 10-19), and youth (ages 16-29) receive little or no support through Kenya's social protection system. Demographic projections indicate that the years 2020 to 2060 represent the optimal period for Kenya to harness the demographic dividend and achieve significant economic growth if effective investments are made in human capital and job creation.

Otherwise, the current generation of children and youth will continue to experience high rates of poverty and require assistance into adulthood. More important, additional investments in Kenya's SP system is required to enhance its ability to support climate adaptation, food and nutrition security of vulnerable households living in high-risk areas.

Against this backdrop, the Government of Kenya (GoK) in partnership with the World Bank (WB) is preparing the Second Kenya Social and Economic Inclusion Project 2 (KSEIP 2) with the objective of providing social and economic inclusion services to poor and vulnerable households and strengthen adaptive social protection in Kenya. The KSEIP 2 is being prepared under the World Bank's Environment and Social Framework (ESF).

## PROJECT DESCRIPTION

The proposed Project Development Objective for KSEIP 2 is to promote social and economic resilience of poor and vulnerable households and strengthen the adaptive Social Protection System. KSEIP 2 envisions enhanced resilience, improved livelihoods and reduced poverty amongst poor and most vulnerable households in the 47 counties by building on the KSEIP I initiatives and also considers that livelihoods among many vulnerable populations in the country remain at risk to recurrent economic and climate shocks.

Specifically, KSEIP 2 will introduce and substantially scale up cash-plus programs across the life cycle through integrated social and economic inclusion programmes. The project targets to expand the nutrition counselling and health initiative, pilot positive parenting skills, and anticipatory actions as a shock responsive strategy aimed at sustaining child nutrition and economic empowerment towards optimal child development. It will also promote access to social insurance, complementing the cash assistance already offered under the NSNP. KSEIP 2 will continue to strengthen SP delivery systems, enhance targeting efficiency and adequacy of NSNP programs, and strengthen climate resilience and shock responsiveness of SP at the policy, system, and household levels.

The interventions will help poor and vulnerable households build human capital, support and prepare adolescents for productive transitions to adulthood while creating opportunities for working-age adults, including women and youth, to engage in productive, climate-resilient self-employment. They will directly contribute to realization of the Kenya Social Protection Policy 2023 and other related policy and legislative frameworks, and further complement the reforms undertaken by GoK under recent Development Policy Operations (DPOs). Along with these complementary engagements, the KSEIP 2 will continue realization of the World Bank's role in catalyzing the SP sector, by bringing together a range of actors for a cohesive set of investments that can guide future direction of the GoK's SP policies, programs, and systems. This will ensure sustainability, scalability and greater impact. This design lays a foundation for implementation of complementary SP initiatives, necessary policy reforms and sustainable funding allocations. It enables drawing online ministries for implementation and decentralizes interventions to lower levels for project success.

### KSEIP 2 Components;

#### **(1) Building Human Capital of Children and Adolescents, Component.**

By applying a life-cycle approach, this component will scale up the existing NICHE program for young children and pilot NICHE Plus which will entail integration of positive parenting skills, anticipatory action as a shock response measure, along with the core nutrition counselling and nutrition sensitive cash top-ups and test an innovative cash-plus program that supports adolescents.

The Adolescent cash plus Program is a targeted intervention aimed at improving the education outcome, decreasing child pregnancies and child marriages by keeping them in school. This will be piloted in nine select pilot counties with high school dropout rates, adolescent pregnancy and socio-economic deprivation. The programme will adopt a multisectoral approach, integrating social protection, education, basic health care, and social and economic empowerment services to holistically address the needs of adolescents.



## **(2) Building Climate and Economic Resilience of Working-Age Adults.**

This component will invest in inclusive and gainful employment for adults from poor and vulnerable households by supporting sustainable microenterprises. Additionally, support will be provided to households in the most climate-vulnerable counties and to link households with existing social insurance schemes. This subcomponent will link EIP participants with existing social insurance schemes to promote long-term savings opportunities.

## **(3) Advancing Systems and Strengthening Adaptive Social Protection.**

This component will support system wide reforms to increase the overall efficiency, impact, and climate-shock responsiveness of SP programs and delivery platforms. These system improvements will also strengthen the efficient implementation and impacts of Components 1 and 2

## **(4) Project Management, Monitoring and Evaluation, Policy and Legislation.**

This component will support project management, including capacity building, M&E, and Environmental and Social (E&S) Risk Management for both implementing agencies (IAs).

### **Project Coverage**

KSEIP 2 will achieve national geographic coverage by strengthening delivery systems for cash transfers through Consolidated Cash Transfer Program Management Information System (CCTP-MIS) and the Enhanced Single Registry (ESR) across all 47 counties in Kenya. Targeted interventions under Components 1 and 2 will be implemented in selected counties based on vulnerability and need.

The NICHE program for children under age three and pregnant and lactating mothers will expand to 25 counties, prioritizing those with high poverty and malnutrition rates, while NICHE-plus, which includes climate shock-responsive support, and positive parenting will be piloted in up to 8 counties. The adolescent cash-plus program aimed at supporting education and reducing teenage pregnancy will be tested in up to 9 counties.

The Economic Inclusion Program (EIP), supporting sustainable self-employment, will also be expanded to up to 25 counties, including 2 urban areas, and the enhanced EIP-Plus model will be implemented in 8 highly climate-vulnerable counties under the North and Northeastern Development Initiative (NEDI). Additionally, the Hunger Safety Net Program (HSNP) will be expanded to up to 15 Arid and Semi-Arid Lands (ASAL) counties, with a focus on sub-counties most affected by droughts, floods, and malnutrition.

**Nearly three million households, or 12 million people, will directly benefit from KSEIP2.** KSEIP2 will benefit all 2 million existing NSNP households with improved delivery systems for GoK-financed cash transfers under Component 3. Components 1 and 2 will provide complementary cash-plus support to 105,000 households,[1] prioritizing the poorest counties and vulnerable populations of children, adolescents, youth, and women. Beneficiary households of all programs must be poor and/or vulnerable as assessed by the ESR but do not necessarily need to already be enrolled in NSNP to be eligible. The 750,000 beneficiary households of HSNP's shock-responsive program will be preregistered using ESR data to assess poverty status and residence in qualifying HSNP areas, in both existing and new coverage areas.

### **Implementing Agencies**

The Kenya Social and Economic Inclusion Project 2 (KSEIP 2) builds on the foundation of KSEIP I to expand access to social and economic inclusion services for poor and vulnerable households. The implementation of KSEIP 2 is structured around several key components. The project is implemented by the State Department for Social Protection (SDSP) within the Ministry of Labour and Social

Protection, in collaboration with the National Drought Management Authority (NDMA). These agencies are responsible for day-to-day execution, coordination, and oversight.

Component	Lead Implementing Entity(ies)	Collaborating GoK Entities
1	DCS	NDMA, MOH (for 1a), MOE (for 1b)
2a	DSD	NDMA
2b	NDMA	DSD
2c	DSD	NSSF
3a	NSPS	NDMA, DSA, NRB, CRS
3b	DSA	NSPS, NDMA
3c	NDMA	NSPS, DSA, NT (for DRFS)
4	NSPS and NDMA	DSA, DCS, DSD

KSEIP 2 will be implemented by the agencies listed above;

## Risk Rating

**The Overall KSEIP 2 project risk has been rated Moderate.** This is because the proposed project primarily scales up and strengthens existing programs for which the GoK has a demonstrated track record of implementation and impact, the risks associated with sustainability, political economy, technical design, and implementation capacity are low or moderate.

KSEIP 2 has the following risks which have been rated as follows;

Environmental and Social Risk Rating is Substantial.

- **Environmental risks are Moderate** and include (a) insecurity risk to project workers who will occasionally travel to ASAL areas with incidents of banditry/cattle rustling; (b) occupational health and safety (OHS) hazards and impacts to trainees in the course of their training, where apprenticeship is involved; (c) potential indirect environmental and/or OHS risks/negative impacts related to the implementation of livelihood activities if related risk management training is not covered/implemented adequately; and (d) minor generation of e-waste from purchase and deployment of IT equipment.
- **Social risks are Substantial** mainly due to: (a) Exclusion of some target beneficiaries from accessing project benefits and opportunities due to lack of legal identification documents; a non-inclusive Enhanced Single Registry (ESR); not adhering to the ESR when selecting beneficiaries; security concerns impacting physical access for stakeholder engagement and monitoring; disability challenges; nascent digital financial infrastructure, low digital literacy, and project investments rolled out in a context of limited resources against widespread need; (b) Exacerbating or introducing sexual exploitation and abuse, sexual harassment (SEA/SH), Peer to peer abuse, exploitation or harassment amongst adolescents, and other forms of gender-based violence (GBV), such as Intimate Partner Violence (IPV) resulting from enrollment in programs such as cash transfer (CT), Hunger and Safety Net (HSN), and related trainings; (c) The limited and developing capacity of SDSP and NDMA to manage the identified/emerging social risks and impacts; (d) Insufficient application of data protection provisions on personal data and security; (e) incidences of labor-related discrimination and inadequate response to labor-related grievances that may arise; (f) Significant reputational risks from how SDSP, NDMA and

implementing partners may subsequently apply or fail to apply the Technical Assistance (TA) advice/critical policy reforms enacted under the upcoming Social Protection Bill to be designed and implemented under KSEIP 2, and the proposed capacity building/livelihoods trainings. Further, the proposed reforms may be detrimental to disadvantaged groups (e.g., PWDs, older persons, minority VMGs, ethnic minorities), who may face access challenges due to elite capture and poor targeting, requiring the project to adequately mitigate the risk of exclusion.

## ENVIRONMENTAL AND SOCIAL BASELINE DESCRIPTION

### Baseline description of the physical and Social Environment

This section provides general information on environmental and social baseline conditions in Kenya, describing key environmental and social features of the country as the project activities shall be carried out in various parts of the country.

#### Physical Environments

##### **Flora**

Kenya is home to a rich and diverse range of plant species, shaped by its varied climate, topography and ecological zones. Its flora includes both indigenous and exotic plant species found across tropical coastal and mangrove forests, dense montane and highland woodlands (such as those around Mount Kenya), expansive savannah grasslands, and dry and semi-arid areas. This diverse vegetation is critical to Kenya's ecological balance, supporting its iconic wildlife habitats, sustaining rural livelihoods, and providing vital ecosystem services across the country. KSEIP 2 comprises social and economic packages in the form of consumption support and the complimentary income focused investments. Through its focus on economic inclusion in Kenya, the KSEIP2 project recognizes the importance of sustainable natural resource use and it supports livelihood activities such as agroforestry, small-scale farming, and natural resource-based enterprises; that depend on and help preserve local flora.

##### **Fauna**

Kenya's fauna comprises a rich and diverse array of wildlife, including iconic species such as elephants, lions, giraffes, and rhinos, found across its national parks and reserves. The country is famous for the Great Wildebeest Migration in the Maasai Mara. In the arid and semi-arid north and east, resilient species such as oryx, and Somali ostrich have adapted to harsh conditions. Kenya's rich wildlife is a cornerstone of its natural heritage, supporting biodiversity, tourism, and rural livelihoods across the country, although it continues to face threats from poaching, habitat loss, and human-wildlife conflict. KSEIP2 will leverage Kenya's rich fauna by promoting sustainable livelihood opportunities that align with conservation efforts nationwide, supporting communities to reduce human-wildlife conflicts, enhance eco-tourism, and protect biodiversity while improving economic inclusion.

##### **Topography**

Kenya's topography is remarkably diverse, shaped by its varied landscapes that range from the expansive plains of the north and east to the fertile highlands and lake basins of the west. The Great Rift Valley bisects the country from north to south, defined by escarpments, volcanic mountains such as Mount Longonot and the Menengai Crater, and salt-water lakes like Lake Bogoria. Mount Kenya, the country's highest point at 5,199 meters, dominates the central highlands, while the coastal lowlands around Mombasa are flat and influenced by the Indian Ocean. The western region, including the Lake Victoria basin, is characterized by rolling hills and gently sloping terrain, and the northern areas comprise arid and semi-arid plains and plateaus. This diverse topography not only creates a rich variety of ecosystems and climates, but also profoundly influences settlement patterns, agriculture, and infrastructure development across the country. KSEIP2 aims to implement region-specific interventions that respond to local environmental and socio-economic conditions, ensuring inclusive access to social protection and supporting sustainable livelihoods adapted to each unique landscape.

## **Climate**

Kenya experiences a tropical climate with distinct regional variations. The highlands (e.g., areas around Mt. Kenya and the Aberdares) have a cool and wet mountain climate, while the lowlands and arid and semi-arid lands (ASALs) in the north and east are hot and dry. The Lake Victoria basin has an equatorial climate that is humid and hot year-round, and the coastal region is typically hot and humid. Most parts of the country experience bimodal rainfall — the long rains occur between March and May, and the short rains between October and December. However, climate change has increased the frequency of droughts, floods, and irregular rainfall, significantly affecting agriculture, water availability, and livelihoods. KSEIP2 aims to enhance the resilience of vulnerable communities by promoting adaptive livelihood strategies, strengthening social protection systems, and integrating climate risk management across Kenya's varied ecological zones.

## **Vegetation**

Kenya's vegetation is very diverse, shaped by its climate and landscape. In the coastal areas, mangroves and tropical forests line the shore, while the central and western highlands have dense tropical forests. The savannah plains, like those in the Maasai Mara, are covered with tall grasses and scattered acacia trees that support a rich variety of wildlife. In the north and eastern parts, shrubs and trees such as acacia and comephorid have adapted to ASAL conditions. Together, these different vegetation zones play a vital role in supporting Kenya's agriculture, wildlife, and rural communities. KSEIP2 aims to support sustainable natural resource management and promote livelihood activities that align with the conservation and use of diverse vegetation across Kenya, ensuring that communities benefit economically while preserving their environment.

## **Ecosystem and Biodiversity**

Kenya has a wide range of ecosystems, including marine, freshwater, forest, grassland, savanna, and desert systems, all supporting rich biodiversity. Counties hosting Key Biodiversity Areas include Turkana, Marsabit, Tana River, Garissa, Lamu, Isiolo, Bungoma, Baringo, Kakamega, Kilifi, Samburu, Meru, Siaya and Nakuru. Marine ecosystems such as coral reefs in Watamu, seagrass beds in Lamu, and mangroves along the coast are vital for fisheries and coastal protection. Forest ecosystems like Kakamega Forest, the Aberdares, and the Mau Complex provide critical habitats and water catchments. Wetland ecosystems, including the Tana Delta, Yala Swamp, and Lake Baringo, support both aquatic life and agriculture. Notable biodiversity hotspots include Arabuko-Sokoke Forest (home to endemic bird species), Mt. Kenya Forest, and Lake Nakuru, known for its flamingo population. Overall, Kenya hosts more than 7,000 plant species, 1,100 bird species, and over 300 species of mammals, making it one of the world's most diverse natural landscapes. By integrating conservation priorities with social and economic inclusion efforts, the upcoming project phase will support community-led initiatives that protect biodiversity while enhancing sustainable livelihoods across Kenya's varied ecosystems.

## **Ecologically sensitive Areas**

Kenya is endowed with a wide range of ecologically sensitive areas that require special protection due to their environmental significance, and any project in or near these areas must obtain special approvals from the KWS, KFS, NMK, National Environment Management Authority (NEMA) and implement safeguards to minimize impacts. These areas include national parks and reserves such as Nairobi, Tsavo, and Meru, which provide vital habitats for various wildlife species, as well as protected forests like Karura, the Mau Complex, and Loita Forest. Boni–Dodori forest is identified by Kenya Wildlife Service as a high-value biodiversity ecosystem and a Key Biodiversity Area (KBA) under threat from deforestation and fragmentation. Lake Turkana is an important migratory bird staging area and freshwater ecosystem with high fish and bird biodiversity. Wetlands like Chalbi desert wetlands are a

habitat for **Grevy's zebra**, extending to Sibiloi National Park area. Yala Swamp and, the Tana Delta sustain rich biodiversity. The Tana Delta specifically supports mangroves, estuarine ecosystems, floodplains, and coastal habitats; critical for migratory birds and species such as dugong, Tana River mangabey, red colobus, and African savanna elephant. The country's key water catchment areas, such as Mount Elgon, the Aberdares, and Mount Kenya, feed vital river systems that support agriculture, energy generation, and daily life. Safeguarding these ecologically sensitive areas is essential not only for Kenya's environmental heritage but also for its long-term resilience, sustainable development, and the well-being of future generations.

KSEIP2 aims to strengthen environmental safeguards and integrate ecosystem protection into project activities by working closely with local communities to minimize impacts, promote sustainable resource use, and ensure that inclusion efforts support the preservation of these critical ecologically sensitive areas.

To safeguard ecosystem integrity of these ecologically sensitive areas, it is required that all project related activities observe the established buffer zones and guidelines provided by KWS, KFS, WRA and the specific community conservancies.

#### **Air Quality**

Air quality in Kenya is a growing concern, particularly in urban areas such as Nairobi, Mombasa, and Kisumu, where pollution is driven by vehicle emissions, industrial activities, open waste burning, and high levels of dust. In industrial zones like Athi River, emissions from cement and steel factories further contribute to high levels of particulate matter, often exceeding WHO safety limits. In rural areas, air pollution is largely caused by dust during dry seasons and indoor smoke from the use of biomass fuels like firewood and charcoal for cooking, posing serious health risks. However, air quality monitoring in Kenya is still limited, especially outside major cities. KSEIP2 aims to support awareness and mitigation efforts related to air pollution in both urban and rural areas.

#### **Water resources**

Kenya's water resources consist of major rivers such as the Tana, Athi, Nzoia, and Ewaso Ng'iro, and key lakes including Lake Victoria, Turkana, Naivasha, and Baringo. Groundwater is an important source in arid and semi-arid areas (ASALs). Seasonal streams and pans also support local water needs. However, access to water is highly uneven across regions, with urban areas generally served by piped water systems, while rural and ASAL communities often rely on rivers, boreholes, earth dams, and water pans. Addressing these dynamics, KSEIP2 aims to enhance water resource management by promoting sustainable livelihood opportunities linked to water, while strengthening community resilience to water-related risks like floods and droughts across Kenya's diverse regions.

#### **Land/Soil Issues**

Kenya has a variety of soil types that influence land use and development. Volcanic soils in the Central and Rift Valley regions are highly fertile and support intensive agriculture, while black cotton soils found in parts of Western and Eastern Kenya are expansive and pose challenges for construction. Red soils dominate the highland zones, and sandy soils are common in coastal and arid areas like Tana River. However, the country faces widespread land issues, including soil erosion, degradation, and low fertility in some regions, driven by unsustainable land use, overgrazing, and deforestation. Over 30% of Kenya's land is considered degraded, impacting food security and increasing vulnerability to climate-related shocks. KSEIP2 aims to promote sustainable land management practices that restore soil health, reduce land degradation, and support climate-resilient agricultural activities, while integrating disaster risk reduction measures to mitigate the impacts of landslides and other land-related hazards on vulnerable populations and project outcomes.

## Disaster Vulnerability

Kenya is prone to natural disasters such as droughts, floods and landslides, which threaten food security, livelihoods, and infrastructure. Droughts mainly affect arid and semi-arid areas causing severe water and food shortages. Flooding frequently impacts low-lying and river basin areas such as Budalangi, Kano plains and the Tana River basin, causing damage to homes, crops, and critical infrastructure. Landslides occur in hilly regions like Murang'a, Elgeyo Marakwet and West Pokot, leading to loss of lives and disruption of community activities. Urban areas, especially Nairobi, face rising flood risks due to poor drainage systems, rapid urbanization and unplanned settlements. National data indicates that droughts occur every 2–3 years, with flood impacts intensifying due to land degradation and urban expansion. These disasters disrupt communities and increase vulnerability of the communities. The KSEIP2 project aims to strengthen community resilience through disaster risk reduction, adaptive livelihoods, and improved early warning systems to reduce the impacts of such hazards on social and economic inclusion.

## Waste Management

To minimize negative impacts, risk screening will be prioritized to ensure project success. The process typically involves identifying various risks, assessing their likelihood of occurrence and potential impact, including developing strategies to mitigate or respond to them.

Waste management is a challenge in both urban and rural Kenya. While major towns have structured solid waste collection systems, they often suffer from under-capacity, illegal dumping, and poor enforcement. Rural areas largely rely on burning, burying, or open dumping, which pose health and environmental risks. In informal settlements and remote regions, lack of sanitation and proper disposal of household and medical waste increases vulnerability to disease and environmental contamination.

Agro-waste includes waste from agricultural inputs including pesticide containers, excess or expired fertilizer bags, chemicals as well as packaging materials like plastic mulch and seed bags. It also includes organic waste streams such as livestock and Poultry manure. Containers and expired chemicals may contain hazardous substances that require careful handling and disposal through facilities licensed by NEMA and the Pest Control and Produce Board (*List of licensed facilities handling hazardous-waste annexed*). The Extended Producer Responsibility Regulations (2024) also provide that all producers establish take-back mechanisms for all waste packaging materials, including chemical containers, wrappers and expired products. All licensed waste handlers are required to collect, transport, treat and/or dispose of the waste in a manner as not to pollute the environment.

KSEIP 2 aims to promote safe and sustainable waste management practices, particularly in vulnerable communities, by supporting community awareness, encouraging clean environments, and integrating waste-related risks into broader social protection and inclusion efforts. Additionally all rural livelihood activities that generate agro-waste will be monitored and training on safe handling and disposal will be incorporated into community engagement plans.

### Demographics

Kenya is home to over 54 million people, with more than 75% under the age of 35—making it one of the most youthful populations in Africa. Population distribution varies significantly across the country: urban centers such as Nairobi, Mombasa, and Kisumu are densely populated, while arid and semi-arid lands (ASALs) remain sparsely inhabited. Migration trends, particularly rural-to-urban movement, continue to reshape settlement patterns, influence employment dynamics, and increase demand for housing, education, healthcare, and other social services. KSEIP2's focus on economic inclusion interventions will take into account the agriculture, and country's youthful demographic by aiming to provide alternative livelihoods, agribusiness skills, and rural enterprise development—especially targeting youth in underdeveloped areas.

### Vulnerable and Marginalized Groups (VMGs)

According to The Constitution of Kenya 2010 (Article 260) marginalized communities are defined as:

- a community that, because of its relatively small population or for any other reason, has been unable to fully participate in the integrated social and economic life of Kenya as a whole;
- a traditional community that, out of a need or desire to preserve its unique culture and identity from assimilation, has remained outside the integrated social and economic life of Kenya as a whole;
- an indigenous community that has retained and maintained a traditional lifestyle and livelihood based on a hunter or gatherer economy;
- pastoral persons and communities, whether they are: (i) Nomadic; or (ii) A settled community that, because of its relative geographic isolation, has experienced only marginal participation in the integrated social and economic life of Kenya as a whole

The Government of Kenya laws and its regulation protect, encourage and guide the rights of VMGs to benefit from implementation of projects and ensure the development process fully respects the dignity, human rights, economies, and cultures of VMGs.

This is also inline with the Environmental Social Standard (ESS) 7 on Indigenous people.

### Other Disadvantaged Groups

At the same time, disadvantaged groups—such as persons with disabilities (PWDs), women, children, youth, older persons, and certain minority ethnic communities still face significant barriers to full participation in public life and require inclusive engagement and equitable access to project benefits.

KSEIP 2 will ensure inclusivity of all the VMGs & disadvantaged groups in identification, registration, and onboarding into social protection systems such as cash transfer programs. Through transparent and participatory targeting, the project will ensure that marginalized populations are not left behind in the delivery of livelihood, agricultural, and climate sensitive interventions.



## **Infrastructure and Services**

Kenya has made notable progress in expanding infrastructure, particularly in urban centers where paved roads, electricity, internet connectivity, and piped water systems are increasingly accessible. However, significant disparities persist, especially in rural and arid and semi-arid lands (ASALs), where reliable transport, water, and energy services remain limited. In many regions, poor road conditions and inadequate access to electricity and clean water continue to hinder both economic growth and social development. These infrastructure gaps are most pronounced in northern and coastal counties, highlighting the need for targeted investment and inclusive development strategies. Continued investment and equitable planning are essential to ensure balanced development across the country.

KSEIP 2 programming is designed to operate within these infrastructure constraints by employing suitable methods such as mobile registration and community-based outreach to reach vulnerable populations in remote areas. In addition, its economic inclusion interventions will prioritize context-appropriate, low-cost solutions that can function even where roads, electricity, or internet connectivity are limited.

## **Education**

Kenya has made significant strides in expanding access to primary and secondary education, with free primary education leading to increased enrollment nationwide. Despite this progress, regional disparities remain a major challenge. Rural, pastoralist, and informal settlement areas often face acute teacher shortages, overcrowded classrooms, and inadequate learning facilities. In many remote regions, children, especially girls and Vulnerable and Marginalized Groups (VMGs), walk long distances to school. At the secondary level, dropout rates are high, driven by poverty, early marriages, and domestic responsibilities. Addressing these barriers is essential to achieving inclusive and equitable education for all. Through targeted social protection support and economic inclusion activities, KSEIP2 will help reduce the financial pressures that force children, particularly girls and VMGs out of school, thereby supporting school retention and access to learning opportunities.

## **Health**

Kenya's healthcare system is organized into a tiered structure, ranging from community health units and dispensaries, county referral hospitals to national specialized facilities. While urban areas generally benefit from better access to quality healthcare, rural regions often depend on under-resourced health facilities with limited medical supplies and personnel. The public health infrastructure is frequently strained during disease outbreaks and extreme weather events, underscoring the need for resilient systems and equitable healthcare investment.

KSEIP 2 will implement programmes that promote health and nutrition practices by addressing the needs of children through cash transfers, health education and the overall community wellbeing.

## **Livelihood and Economic Activities**

Kenya's economy is supported by diverse livelihoods. In rural areas, the majority of people engage in subsistence agriculture, pastoralism, fishing, or small-scale trade. Urban populations depend on informal sector activities, including hawking, transport, and casual labor. Income levels vary by region, with ASAL counties being more vulnerable to climate shocks and food insecurity. Seasonality in rainfall affects planting, harvests, and employment cycles, influencing economic stability. KSEIP 2 will address economic vulnerabilities by enrolling poor and vulnerable households into social protection programs that offer income support during periods of livelihood stress. The project will also promote sustainable livelihood through value chain development, skills training, and support for micro-enterprises. This will

help participants, especially youth and women, transition from informal, unstable work to more reliable and resilient sources of income.

## **Land Use and Ownership**

Land in Kenya is governed under multiple tenure systems: freehold, leasehold, communal, and trust land. Many rural communities access land through customary arrangements, especially in pastoralist zones. However, land disputes are common due to historical injustices, unclear boundaries, and lack of documentation. Land degradation from overgrazing, deforestation, and unregulated development is a growing concern, particularly in densely settled or resource-scarce areas. KSEIP 2 aims to promote sustainable land use practices, particularly in communities where land is central to identity and livelihoods. KSEIP 2 will work closely with local authorities and communities to ensure that land-related aspects of its interventions such as agroforestry, livestock, and soil conservation are implemented with respect for existing land rights and customs. Where possible, the program will support community awareness on sustainable land use and promote inclusive access to productive land for vulnerable groups.

## **Stakeholder Perceptions and Expectations**

Stakeholders in Kenyan communities often have strong expectations from development initiatives, shaped by past experiences, unmet needs, and local priorities. Communities typically value transparency, fairness, and tangible benefits such as employment, improved services, or infrastructure. Poor communication or lack of involvement in decision-making can lead to mistrust, misinformation, or opposition. Understanding local dynamics is key to fostering cooperation and managing expectations effectively. KSEIP2 targets to build trust and local ownership by ensuring transparent engagement, managing expectations realistically, and involving stakeholders especially vulnerable and marginalized groups throughout the project cycle to foster inclusive and accountable implementation.

## **Cultural Heritage**

Kenya is rich in cultural diversity, with over 42 ethnic communities, each with distinct languages, traditions, and practices. Cultural heritage includes not only historical sites and monuments, but also ritual grounds, sacred forests, burial sites, and traditional knowledge systems. In many areas, spiritual values are attached to the natural landscape. Development that disregards cultural significance can lead to social tension or loss of irreplaceable heritage. KSEIP 2 targets to respect cultural heritage by engaging communities in culturally sensitive ways, ensuring project activities align with local values and do not disrupt sacred or historically significant sites.

## **Conflict and Security**

Kenya is generally stable and secure. However, certain areas experience periodic conflicts. Pastoralist counties face resource-based conflicts linked to grazing lands and water, while urban informal settlements sometimes experience crime and gang-related insecurity. Political tensions and historical land grievances can escalate into violence, especially around election periods. Security arrangements often vary by region, and some communities rely on local vigilante groups or traditional dispute resolution systems, as well as community policing structures like *Nyumba-Kumi*. KSEIP 2 aims to operate with sensitivity to local security dynamics by promoting inclusive community engagement, and ensuring that program implementation does not exacerbate existing tensions, especially in fragile or conflict-prone areas, upholding the do-no-harm principle

## **Gender / Gender-Based Violence (GBV) Sexual Harassment / Sexual Exploitation and Abuse (SH/SEA)**

Gender inequalities persist in many parts of Kenya, particularly in access to education, land, and formal employment. GBV (Sexual Harassment, Exploitation, and Abuse (SH/SEA) are significant concerns, especially in workplaces, resource distribution, or areas with limited protection services. Women and girls are disproportionately affected by unpaid care work, early marriage, and GBV. Addressing these issues requires strong community awareness, clear reporting mechanisms, and gender-responsive programming. KSEIP 2 aims to address these challenges through gender-responsive programming, community sensitization, and the establishment of safe, confidential reporting and referral mechanisms to prevent and respond to SH/SEA, ensuring that all participants, especially women and girls, can benefit from the project in a safe and inclusive environment.

## LEGAL AND REGULATORY FRAMEWORK

The legal and regulatory framework constitutes the foundation upon which this Environmental and Social Management Plan will be developed and implemented. It encompasses a multitude of laws, regulations, standards, and policies enacted by national, regional, and international authorities.

Therefore, in preparation of KSEIP 2 a thorough understanding of the pertinent legal and regulatory framework is essential. Such adherence not only ensures legal compliance but will also promote responsible and sustainable project development. Some of the Legislations are as follows;

### Global Conventions and Treaties

- **United Nations Framework Convention on Climate Change (UNFCCC)** — 1992 Addresses global environmental issues, emphasizing climate mitigation and adaptation.
- **Paris Agreement** — 2015 Focuses on limiting global temperature rise, with implications for environmental safeguards.
- **Convention on Biological Diversity (CBD)** — 1992 Promotes sustainable management of biological resources, relevant for environmental protection.
- **Universal Declaration of Human Rights (UDHR)** — 1948 Recognizes the right to an adequate standard of living, including social and environmental rights.
- **International Covenant on Economic, Social and Cultural Rights (ICESCR)** — Establishes the right to social security and environmental health.
- **International Labour Organization (ILO) Convention No. 102 (Social Security Standards)** — 1952 Sets minimum standards for social security systems.
- **ILO Convention No. 168 (Employment Promotion and Protection)** — 1988 addresses employment-related social protections.
- **African Convention on the Conservation of Nature and Natural Resources** — 1968 Promotes environmental sustainability across African nations.
- **UNCRC (United Nations Convention on the Rights of the Child)** and the **ACRWC (African Charter on the Rights and Welfare of the Child)** are both international instruments that protect children's rights. They serve as guiding principles for ensuring that children's rights and welfare are considered in environmental and social development projects, especially in situations where the environment or social structures may affect them.
- **Maputo protocol-** aims to promote, realize, and protect the human rights of women and girls across the continent.

The KSEIP 2 project will be aligned to the GoK's Social Protection enabling policies that include the Kenya Social Protection Policy 2023 (KSPP), Kenya National Youth Policy (2019), Person with Disabilities Act 2025, Person With Disability Policy, 2024, National Policy on Gender and Development (NPGD, 2019), and the Disaster Risk Management Bill, 2023 (DRMB).

The following Legislations that will guide the development of this Environmental Social Management Plan;

### National Instruments

The KSEIP 2 project will be aligned to the GoK's Social Protection legal and policy frameworks. These are the Legislations that will guide the development of this Environmental Social Management Plan;

- **The Constitution of Kenya (2010)-** The Constitution of Kenya (2010) affirms the right of every individual to a clean and healthy environment and outlines clear obligations for both the State and citizens to safeguard natural resources. These provisions are in Articles 10, 42, 69, and 70, it

mandates sustainable exploitation, public participation, biodiversity protection, and legal enforcement mechanisms to ensure environmental integrity for present and future generations.

- **County Government Act (2012)** - Provision for public participation to ensure communities, organizations and citizens affected by decisions are consulted and their input is considered. It provides for access to information and citizens rights to petition.
- The implementation will also be aligned to **the Social Protection Act (2025)** once it has been operationalised.
- **Kenya Social Protection Policy, 2023 (KSPP)**, - provides a transformative framework for advancing inclusive, integrated, and lifecycle-responsive social protection.
- **Kenya National Youth Policy, 2019-** prioritizes youth engagement in environmental conservation and sustainable development. It promotes eco-entrepreneurship, green jobs, and climate-smart agriculture, while building youth capacity in waste management, green technologies, and blue economy opportunities.
- **National Environment Policy (2013)** promotes sustainable development and guides sectoral policies to integrate environmental considerations. The policy is anchored in the project to support the integration of environmental goals within social protection strategies.
- **National Policy on Gender and Development , 2019 (NPGD)** - integrates environmental sustainability as a key thematic area in advancing gender equality and inclusive development.
- **National Policy on Culture and Heritage (2020)** - Provides for promotion of diverse cultural heritage and promotion of the preservation of cultural landscapes, sacred sites, and traditional ecological knowledge, especially among indigenous communities.
- **Persons with Disabilities Act 2025 and Persons With Disability Policy 2024**, - they recognize environmental accessibility, disaster resilience, and sustainable development as critical rights and priorities for PWDs and provide for inclusive infrastructure and participatory environmental governance. It also promotes equitable access to climate-smart housing, eco-friendly public services, and protection in environmental emergencies.
- **Environmental Management and Co-ordination Act (EMCA), 1999** -This is Kenya's principal environmental law. It mandates Environmental Impact Assessments (EIAs) for projects likely to have significant environmental effects; Public participation and stakeholder engagement as well as Monitoring and enforcement by the National Environment Management Authority (NEMA). This policy is applied in KSEP 2 as a guide to project screening, approval, and oversight through NEMA.
- **Occupational Safety and Health Act (2007)** ensures safe working environments, especially relevant for field staff and contractors. The Act protects field personnel and contractors from environmental hazards.

- **Children Act Cap.141** which establishes specific protection requirements for children and adolescents in this project which include, Child protection protocols, privacy and confidentiality requirements and safety standards for project implementation.
- **Sexual Offences Act, No. 3 of 2006** (Cap. 63A) Defines crimes including rape, defilement, incest, sexual assault, exploitation of vulnerable persons, and malicious transmission of HIV and makes provisions for the prevention and prosecution of sexual offenses.
- **Employment Act, 2007 (Under Review)**: Regulates employment terms, contracts, notice periods, severance pay, and protection from unfair dismissal.
- **Land Laws (Amendment) Act, 2016** - harmonizes Kenya's land statutes by amending the Land Act (2012), Land Registration Act (2012), and National Land Commission Act (2012). Introduces several provisions that indirectly support environmental sustainability through improved land governance, planning, and safeguards.
- **Climate Change Act (2016)** Encourages climate-resilient development and integrates climate risk into planning and implementation. In the project, the Act promotes climate-sensitive planning, especially in arid and semi-arid areas.

**Sustainable Waste Management Act, No. 31 of 2022** - provides a strong legal and institutional framework to uphold Kenya's constitutional right to a clean and healthy environment, by mandating county governments, the Waste Management Council, and NEMA to lead implementation, ensure compliance, and promote public participation in waste management

#### World Bank Environmental and Social Framework (ESF)

The following are the **Environmental and Social Standards (ESSs)** that applies to the KSEIP 2 Project

- **ESS1: Assessment and Management of Environmental and Social Risks and Impacts:** This standard outlines the requirement for environmental and social assessments to identify and manage risks associated with projects.
- **ESS2: Labor and Working Conditions:** These standard addresses fair labor practices, ensuring safe and healthy working conditions for all workers involved in the project.
- **ESS3: Resource Efficiency and Pollution Prevention:** This Standard Focused on promoting efficient resource use and minimizing pollution, this document provides guidelines for sustainable resource management.
- **ESS4: Community Health and Safety;** This Standard emphasizes protecting community health and safety from project-related risks, including potential hazards and impacts on local populations.
- **ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources;** This standard aims to protect biodiversity and promote the sustainable use of natural resources, addressing the impacts of the project on ecosystems.
- **ESS7: Indigenous Peoples;** This Standard provides guidelines for engaging with indigenous peoples, ensuring their rights and interests are respected and integrated into project planning.
- **ESS8: Cultural Heritage** This Standard protects the cultural heritage, requiring projects to assess and manage potential impacts on cultural sites and practices.
- **ESS10: Stakeholder Engagement and Information Disclosure;** This Standard emphasizes the importance of stakeholder engagement; the SEP provides guidelines for effective communication and information sharing throughout the KSEIP 2 project lifecycle

## PUBLIC CONSULTATION AND FEEDBACK

Extensive in-person stakeholder consultations were conducted between August and September 2024, across several counties in Kenya in preparation for the second Kenya Social and Economic Inclusion Project (KSEIP 2). These consultations aimed to gather community feedback, particularly from vulnerable and marginalized groups, regarding project design, risks, impacts, and proposed mitigation measures. The process highlighted strong community responsiveness, with participants actively engaging and providing valuable local insights. They expressed strong support for the project, recognizing its potential to enhance livelihoods and promote inclusivity. Communities also appreciated the transparent and inclusive nature of the engagements. Their views from the consultations were incorporated and documented in the stakeholder engagement plan.

The consultations were held from August to September in Kilifi, Tana River, Bungoma, Busia, Laikipia, Isiolo, Migori, Kericho, Baringo, and Samburu counties. Additional engagements were conducted during earlier scoping and E&S planning missions in May and June 2024, as well as an Environmental and Social (E&S) workshop conducted in September 2024.

In total, 1,561 individuals participated in the consultations, comprising 839 men and 722 women. Participants included a wide range of stakeholders such as KSEIP1 beneficiaries and potential KSEIP2 beneficiaries (including youth, adolescents, older persons, informal workers, and young mothers), as well as members of 15 minority and marginalized communities, including the Bajuni, Watta, Wardei, Munyoyaya, Waliwana, Orma, Ogiek, Abakhenye, Sakuye, Wayyu (Waata), Illchamus, Lkunono, Dorobo and Abasuba. Representatives from implementing agencies at national and county levels, community volunteer groups, national government administration (chiefs and assistant county commissioners), development partners, civil society organizations, and academia also took part. These meetings were held in-person, typically beginning with courtesy calls to the county or assistant county commissioners, followed by Focus Group Discussions (FGDs) with social protection teams and community members. The FGDs were disaggregated by gender and age to ensure that participants felt comfortable expressing themselves freely.

Community members, especially those from VMGs, shared concerns about being excluded from project benefits due to long distances to registration points, lack of ID documents, and language or accessibility barriers. They emphasized how older persons, people with disabilities, and mothers with infants struggle to register when centers are far away, and many lack awareness about obtaining national IDs. They also warned about Gender-Based Violence (GBV), including sexual exploitation and abuse, and the absence of safe, confidential reporting channels. To address these issues, participants requested registration to be brought closer to communities, ensuring inclusive outreach, and supporting those without identification to participate fully. Additionally, the community expressed strong support for the project and recommended that it be scaled up to reach more people, particularly those in remote or underserved areas who could significantly benefit from its inclusion and social protection measures.

Adolescents, who formed part of the group during consultations, expressed a strong desire for programs that were specifically tailored to their age group and unique needs. They sought supportive environments where they felt understood, respected, and not judged. They needed safe spaces that provided age-

appropriate education on parenting for the pregnant adolescents, mental health and nutrition. Adolescents sensitive programs, designed with their input, using relatable language and peer support, could greatly enhance their engagement and overall outcomes. By offering services that reflect their realities, consider and respect their voices, communities can better support adolescents in navigating this critical stage of life.

As part of the mitigation measures, participants recommended working with the National Registration Bureau to help community members obtain identification documents, conducting registration and consultations at the sub-location level, and using locally accessible channels such as mobile money for payments. They also emphasized the need for accessible communication, such as through community radios, local languages, and trusted leaders, and called for the inclusion of men, women, and youth in decision-making structures. Participants also expressed the importance of complimenting cash transfers with livelihood support, vocational training, and awareness-building campaigns.

Communities were introduced to the project's Grievance Mechanism (GM), including the enhanced Grievance and Case Management system (e-GCM). The GM design was discussed with a focus on integrating traditional community grievance structures as the first point of complaint resolution. Community members were sensitized on how to raise complaints through multiple channels, including local elders, Chiefs, County Social Development and Children Officers (CSDOs & CCOs), and Beneficiary Welfare Committees (BWCs). The GM will also provide specific mechanisms for SEA/SH-related grievances, ensuring confidentiality, safety, and survivor-centered handling.

Specific individuals to serve as grievance focal points at the community level had not yet been finalized during the consultations, participants proposed that BWCs, local chiefs, and trained community volunteer groups act as primary contact persons. During the implementation of KSEIP2, their contact details will be clearly posted in public locations such as village offices and community centers once confirmed. These structures are expected to facilitate ongoing communication, grievance handling, and inclusive participation throughout the project lifecycle.

There shall be full disclosure on the safe use , handling and disposal of hazardous chemicals as guided by Solid Waste Management Act, 2022. e.g Safe pesticide handling & Personal Protective Equipment, Spill-kit deployment and Empty-container log sheet.

The feedback gathered during these consultations was used to inform the project's Environmental and Social Management Plan (ESMP), ensuring that community concerns and proposals directly influence the design and risk mitigation strategies of KSEIP 2.

S/N	RISKS	MITIGATION MEASURES
1.	Exclusion of VMGs from accessing project information and benefits due to long distances to registration points, lack of Identification documents, and language barriers which impedes communication between the project teams and the VMGs, accessibility barriers especially for persons with disability.	<p>To address the risk of exclusion: The existing community governance structures within the VMG communities will be involved in the process of identifying target beneficiaries for the planned interventions under the various project components.</p> <p>-Meetings shall be held in central locations which are easily accessible to the VMG communities and at appropriate timings to facilitate maximum attendance without interfering with economic and/or household activities.</p>



S/N	RISKS	MITIGATION MEASURES
		<p>-Partner with Registrar of Persons or legal aid organizations to help VMGs obtain necessary documentation (birth certificates, national IDs, etc.)</p> <p>-Translate materials into the dominant local languages, braille and assistive devices.</p> <p>-Engage trusted community members who can interpret and explain information during outreach and meetings.</p> <p>-Ensure registration sites and meeting venues are physically accessible (ramps, handrails, wide entrances).</p> <p>-Need to adopt various methodologies to ease registration of VMGs the various project interventions. This may include the use of mobile application, Huduma centers, and Beneficiary Welfare Committees (BWCs) with adequate representation of VMGs and any other governance structures including those for grievance management.</p>
2.	GBV-Sexual Exploitation Harassment and Abuse (SEAH)	<p>-Mandatory training of the project staff, stakeholders and community on GBV and SEA prevention, reporting obligations, and survivor-centered response.</p> <p>-Set up confidential and accessible complaint/reporting channels. Sensitize communities on use of toll-free reporting lines/ numbers</p> <p>-Sensitize VMGs by the project focal points, including the grievance management structures and uptake channels.</p>
3.	Gender and social exclusion There is a growing concern that some development programs, while rightly prioritizing women and youth, may unintentionally sideline men. This imbalance can lead to men feeling excluded, potentially reducing their engagement in development discussions.	<p>Adopt a gender-transformative and socially inclusive approach that ensures all demographic groups (men, women, youth, older persons, and persons with disabilities) are meaningfully engaged and benefit from project activities.</p> <p>Incorporate targeted outreach and messaging, to encourage participation in economic</p>

S/N	RISKS	MITIGATION MEASURES
		empowerment initiatives, skills training, and community development.
4.	Inadequate information on the program.	Continuous Sensitization will be conducted throughout the project cycle to inform the communities on the project and expected outcomes to improve understanding and reduce misinformation.
5.	Inaccessible Cash payment points and costly payment channels	<p>Ensure that payment points are conveniently located and easily accessible to beneficiaries.</p> <p>Explore and adopt less costly payment channels to reduce travel expenses and improve timely access to funds.</p> <p>Sensitize communities on fraud including mobile fraud</p>
6.	Mishandling of hazardous waste	<p>Participant training and awareness creation on use of Personal Protective Equipment (PPEs), safe handling of pesticides, chemicals and hazardous waste</p> <p>Participant training and awareness on sound hazardous waste management including: spill-kit deployment and keeping empty container log sheet</p> <p>Participant awareness on nearby waste take-back centers including agro-vets and county collection points (Material Recovery Facilities MRFs)</p>
7.	Poor disposal of hazardous waste	<p>Collect/recycle fertiliser sacks</p> <p>Ensure that all pesticide, herbicide, accaricide, fungicide and chemical containers are triple rinsed, punctured, stored safely and delivered to registered agrovets and county collection points.</p> <p>Ensure that hazardous waste is stored in non-spill containers</p> <p>Agrovets and county collection points to ensure that hazardous waste is collected and transported in licensed vehicles and delivered to approved facilities and sites licensed to handle hazardous waste</p>

S/N	RISKS	MITIGATION MEASURES
		Compost manure in areas over 30m from water courses and water sources. Ensure compost pits are lined to prevent leachate.

## OVERVIEW OF THE ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS

Environmental and Social (E&S) risks and impacts refer to potential adverse effects that project activities may pose to the environment and society. These effects can be both immediate and long-term, influencing ecosystems, human health, livelihoods, and cultural heritage. They encompass a wide array of concerns, including pollution, habitat destruction, resource depletion, social displacement, and inequities. Proper identification and assessment are crucial for implementing effective mitigation strategies.

Therefore, it is very important to diligently make an assessment and management of environmental and social risks and impacts that are vital for the responsible execution of the KSEIP 2 Project.

Below are the potential E&S risks identified under KSEIP 2 and proposed mitigation measures;

Receptor	Identified Risk	Source/Cause	Potential Impact (Direct, Indirect, Cumulative, Residual)	Significance/ Risk Rating	Mitigation Measures
Community	Exclusion of eligible households	Eligibility criteria	<b>Direct</b>	Substantial	Expansion of targeting criteria.  Develop a clear targeting criteria.  Implementation of the Graduation strategy using the ESR.
	Data Privacy Concerns	Use of digital registries and weak data protection systems	<b>Direct</b>	Substantial	Enforce Data Protection Act; secure digital systems; train staff on data handling.
	GBV/SEAH	Abuse of office by Community	<b>Direct</b>	Substantial	Implement GBV/SEAH prevention & response Action Plan.  Implement Child Safeguarding Guidelines

		Family members peer influence Intra house-hold GBV			Adhere to the signed workers Code of conduct  Community awareness and Sensitization.
	Child labour Child Abuse (Physical, Emotional, Sexual) Child Marriage Child Pregnancy Radicalisation Exposure to drug and substance abuse amongst adolescents	Poverty, peer influence, and poor parenting  Discrimination	<b>Direct</b>	Substantial	Implement the child protection measures.  Provide a Grievance Mechanism that is functional.  Training of Supervisors and Safety Officers.  Awareness and Education Campaigns.
	Harmful Cultural Barriers	Cultural Practise	<b>Direct</b>	Moderate	
	Insecurity	-Inter-clan Clashes -Civil Unrest -Banditry	<b>Indirect</b>	Moderate	Effective implementation of the SMP
Direct Workers	OHS risks from travel	Travel insecurity risk	<b>Direct</b>	Low	Implementation of OHS Plan.

	Loss of property	Civil unrest  Theft	<b>Direct</b>	Substantial	Implementation of KSEIP II and Stakeholder Engagement Plan as guided by ESS10 (Stakeholder Engagement) and ESS4 (Community Health and Safety) under the World Bank's ESF.
	Institutional Capacity Gaps	Limited staffing or training in SDSP and NDMA	<b>Direct</b>	Substantial	Establishment of a Project Implementation Unit (PIU) with key specialists, including an Environmental Health and Safety (EHS) expert, a Social Specialist, and a Grievance Officer.  Designation of E&S Focal Points across various directorates.  Technical Assistance and Staff Training.  Expansion of Grievance and Communication Mechanisms (e-GCM).  Stakeholder Engagement and Cultural Sensitivity.
	Reputation Risk	Failure to apply technical advice and upload reforms	<b>Indirect</b>	Moderate	Regular Audits, Stakeholders Engagement, and Transparent reporting.
	Environmental conditions	Poor infrastructure  Harsh weather conditions	<b>Direct</b>	Moderate	Implement as guided by the project's Environmental and Social Commitment Plan (ESCP).
In-direct Workers	SEA/SH in the workplace	Power imbalances, lack of safeguards	<b>Direct</b>	Low	Implement the Labour Management Plan.  Enforce the signed workers Code of conduct
Physical Environment	Environmental hazard (E-waste)	Disposal of outdated ICT equipment	<b>Indirect</b>	Low to Moderate	Partner with licensed e-waste handlers; train staff

Biological Environment		without proper protocols			on safe disposal; include in procurement contracts.
	Infrastructure risk	Man made	<b>Direct</b>	Moderate	Advocate for road rehabilitation.
	Climate Vulnerability	Droughts, floods, and extreme weather in ASAL regions	<b>Indirect</b>	High	Integrate early warning systems; design flexible delivery models; promote climate-resilient livelihoods.
	Occupational hazards	Office Equipment  Workers Unrest  Lack of PPEs	<b>Indirect</b>	Low	Implement the Labour Management Plan.
	Minor habitat disturbance from Meetings  EIP Agro-based activities	EIP Interventions	<b>Indirect</b>	Low	Environmental Codes of Practice.  A training module for EIP mentors & beneficiaries on -sustainable grazing/crop rotation -Invasive-species control Wildlife-human conflict mitigation -Legal wildlife regulations
	Biodiversity destruction by fishing micro-enterprises in Lake Turkana/Tana Delta	Overfishing Use of illegal fishing gear Fish harvesting during closed seasons Fish harvesting from no-take zones Use of dynamite and chemicals for fishing	<b>Direct</b>	Medium	Enforcement of the fisheries regulations Enforce legal mesh sizes Enforcement of non-fishing during closed seasons Enforcement of non-fishing in no-take zones Prohibit use of dynamite and chemicals for fishing Training on sustainable fish harvesting

	Habitat destruction from beekeeping and dryland farming in Boni-Dodori fringe and other forests	Encroachment into gazette forest area Destruction of forest trees Invasion of the forest by invasive plant species	<b>Direct</b>	Medium	<p>Compliance monitoring by the project and Kenya Fisheries Service</p> <p>Maintain 30m buffer from indigenous forests</p> <p>Cultivate non-invasive species</p> <p>Obtain guidance from Kenya Forest Service (KFS) on appropriate plants and trees to be cultivated</p> <p>Training on sustainable bee harvesting</p>
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## ENVIRONMENTAL AND SOCIAL MANAGEMENT AND MONITORING PLAN

### Potential Social and Environmental Risks

	Potential Social Risks	Potential Environmental Risks	Health and Safety	Security
<b>Preparatory phase</b>	<ol style="list-style-type: none"> <li>Community confusion, resistance, or dissatisfaction due to lack of involvement</li> <li>Political interference during community engagements, targeting, recertification, replacements and payments</li> <li>Exclusion and</li> </ol>	<ol style="list-style-type: none"> <li>Large community meetings may generate waste e.g., littering, open defecation (for venues without ablution facilities) and degradation of natural resources at the venue.</li> <li>Temporary registration sites may contribute to pollution and strain local sanitation facilities.</li> <li>Community sensitization messaging may miss an opportunity to promote sustainable practices or climate resilience.</li> </ol>	<ol style="list-style-type: none"> <li>Increased occupational, health and safety issues</li> <li>Community health issues</li> </ol>	<ol style="list-style-type: none"> <li>Conflict/clashes during community/stakeholder engagements</li> <li>Banditry attacks during meetings</li> <li>Attacks on project Officers and community structures during sensitization meetings</li> </ol>

	<ul style="list-style-type: none"> <li>inclusion errors</li> <li>4. Gender exclusion</li> <li>5. Increased complaints and grievances</li> <li>6. Lack of support, ownership and sustainability</li> <li>7. SH/SEA</li> <li>8. Stigmatization on adolescents and VMGs</li> </ul>	<ul style="list-style-type: none"> <li>4. Meeting venues susceptible to floods or fires</li> <li>5. Inclusion of EIP enterprises that impact (e.g. On the environment e.g. charcoal business)</li> </ul>		
<b>Implementation Phase</b>	<ul style="list-style-type: none"> <li>1. Inclusion/Exclusion Errors</li> <li>2. Error Fraud and Corruption (EFC)</li> <li>3. Theft of funds during and after withdrawal</li> <li>4. Community confusion, resistance, or dissatisfaction due to lack of involvement</li> <li>5. Gender Based Violence/Sexual Exploitation Abuse and Harassment</li> <li>6. Political interference</li> <li>7. Data, systems and mobile</li> </ul>	<ul style="list-style-type: none"> <li>1. Increased e-waste resulting from use of ICT equipment (laptops, tablets, printers, photocopiers, scanners etc)</li> <li>2. Cumulative impacts and overload from ecologically sensitive enterprises on already fragile ecological areas</li> <li>3. Large community meetings may generate waste e.g., littering, open defecation (for venues without ablution facilities) and degradation of natural resources at the venue.</li> <li>4. Community messaging may miss an opportunity to promote sustainable practices or climate resilience.</li> <li>5. Neglecting environmental risks in planning and procurement may lead to use of non-sustainable materials or practices.</li> </ul>	<p>Increased occupational, health and safety issues</p> <p>Community health issues</p>	<p>Banditry attacks</p> <p>. Attacks on project Officers and community structures during sensitization meetings</p>



	<p>phones prone to unauthorized access leaking sensitive personal data</p> <p>8. Financial exploitation by caregivers of beneficiaries</p> <p>9. Misuse of benefits by beneficiaries</p> <p>10. Delayed disbursement of funds to the beneficiaries</p> <p>11. Displacement of beneficiaries due to conflicts</p> <p>12. Gender exclusion</p> <p>13. Increased complaints and grievances</p> <p>14. Lack of support, ownership and sustainability</p>	<p>6. Inadequate consideration of climate change impacts, such as floods or droughts, may disrupt project implementation and put communities at risk.</p>		
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## ENVIRONMENTAL AND SOCIAL MANAGEMENT AND MONITORING PLAN

ESS	Project Activity	Project Phase	Anticipated Risks/Impacts	Mitigation Measures	Monitoring Indicators	Means of Verification	Monitoring Timeline	Responsible Party
ESS 1: Assessment and Management of Environmental and Social Risks & Impacts	Targeting, Enrollment, Recertification, and Replacement of beneficiaries/participants	Preparatory Phase	Conflict or clashes during community meetings due to poor coordination or social tension	-Implement a stakeholder Engagement Plan aligned with ESS 10 -Ensure early communication with community leaders -Use neutral venues	-Number of stakeholder engagements held  -Diversity of participants by gender, age, and VMG status	- Attendance sheets with demographic data  - Community meeting reports and Minutes of meetings	Weekly to monthly, intensified in last 2–3 weeks before implementation	Programme Coordinators  E&S Officers  NGAO
			Banditry, attacks on meetings, staff, or in workplace, threats to community facilitators	-Liaise with local security and administration -Check for potential security risks and adjust plans	-Number of incidents averted or mitigated	Incident reports	Site-specific prior to activity; real-time if incidents occur	
			Community confusion, political interference, or lack of project ownership	-Conduct pre-engagement briefings with local leaders and administrators- Deliver targeted awareness in local languages -Use inclusive messaging and identify champions	-Stakeholder awareness levels -Number of outreach sessions conducted	Communication materials- Feedback reports- Outreach session logs	Biweekly	Programme Coordinators  Field Officers

ESS	Project Activity	Project Phase	Anticipated Risks/Impacts	Mitigation Measures	Monitoring Indicators	Means of Verification	Monitoring Timeline	Responsible Party
		Preparatory Phase	Gender exclusion, inclusion/exclusion errors, and VMG marginalization	- Inclusive stakeholder mapping- Involve youth, women, and VMG leaders in selection- Apply community validation tools	- Representation of VMGs and women in targeting- Number of community validations conducted	Lists and validation documentationDisaggregated targeting data	Prior to targeting; follow-up weekly	Programme coordinator Field Officers
ESS 1: Assessment and Management of Environmental and Social Risks & Impacts	Community Forums and gatherings	All phases	- Environmental degradation due to waste (e.g., litter, open defecation)	- Identify suitable venues with ablution facilities and other social amenities depending on attendance sizes - Mobilize reasonable number of community members for meeting	- Venue compliance with sanitation standards	- Site audit reports	Before and after each event	Programme coordinator & Field Officers
			Fire, flood, or unsafe venue risks	Assess for potential E&S risks and impact and avoid flood and security prone venue sites	No. of venue related incidence	E&S Reports	6–8 weeks before field activities; report incidences within 24 Hrs.	Programme Coordinators

ESS	Project Activity	Project Phase	Anticipated Risks/Impacts	Mitigation Measures	Monitoring Indicators	Means of Verification	Monitoring Timeline	Responsible Party
	Coaching, mentoring, Business Groups and VSLA activities	Implementation Phase	<ul style="list-style-type: none"> <li>- Long distance and inaccessible venues</li> <li>- Security concerns</li> <li>- Enterprises that risk to the environment and social fabric (e.g Sale of alcohol)</li> <li>- Exclusion of VMGs in messaging</li> </ul>	<ul style="list-style-type: none"> <li>- Integrate E&amp;S aspects during</li> <li>- Assign Mentors to participants while considering distances and numbers</li> <li>- Implement VMGP measures</li> <li>- Avail EGCM Mechanism</li> </ul>	<ul style="list-style-type: none"> <li>- E&amp;S training modules</li> <li>- Number of Mentors allocated that has considered distances and sparse settlements</li> <li>- Percentage of participants who understand the mechanism for raising complaints</li> </ul>	<ul style="list-style-type: none"> <li>- Training E&amp;S Report</li> <li>- GRM Logs</li> <li>- Mentors per number of participants allocated per locality</li> </ul>	Quarterly	Field Officers
ESS 1: Assessment and Management of Environmental and Social Risks & Impacts	Payment of beneficiaries/participants	Implementation Phase	<ul style="list-style-type: none"> <li>- Delayed payments</li> <li>- Fraud, errors, or corruption in disbursement</li> <li>- Exploitation of beneficiaries by caregivers</li> </ul>	<ul style="list-style-type: none"> <li>- Enforceable SLAs with PSPs for timely delivery</li> <li>- Involve beneficiaries in identifying trusted caregivers</li> <li>- Enable anonymous fraud/</li> <li>-</li> </ul>	<ul style="list-style-type: none"> <li>- Payment delivery within SLA timelines</li> <li>- Fraud/</li> <li>- Number of random spot checks done</li> </ul>	<ul style="list-style-type: none"> <li>- SLA compliance reports</li> <li>- Agent performance and audit logs</li> <li>- Beneficiary helpdesk and</li> </ul>	Monthly	Programme Coordinators

ESS	Project Activity	Project Phase	Anticipated Risks/Impacts	Mitigation Measures	Monitoring Indicators	Means of Verification	Monitoring Timeline	Responsible Party
			<ul style="list-style-type: none"> <li>- Theft of funds during/after withdrawal</li> <li>- Inaccessible pay points</li> <li>- Misuse of funds by recipients</li> <li>- Insecure pay points</li> </ul>	<ul style="list-style-type: none"> <li>- Conduct random spot checks</li> <li>- Use SMS, radio, posters to communicate payment info</li> <li>- Implement safety measures at pay points in collaboration with NGAO</li> <li>- Provide financial literacy training to reduce misuse</li> </ul>	<ul style="list-style-type: none"> <li>- Number of related complaints and grievance resolved</li> <li>- Beneficiary feedback on payment experience</li> </ul>	<ul style="list-style-type: none"> <li>- grievance logs</li> <li>- Incident and fraud tracking databases</li> <li>- Caregiver selection documentation</li> <li>- PSP service delivery satisfaction surveys</li> <li>- E-waste disposal receipts</li> <li>- Type of sanitation facilities utilized</li> </ul>		Field Officers
ESS 1: Assessment and Management of	Monitoring and Evaluation	Implementation Phase	<ul style="list-style-type: none"> <li>- Underreporting of data</li> <li>- Lack of data disaggregation</li> </ul>	<ul style="list-style-type: none"> <li>- Strengthen Monitoring, evaluation and learning</li> <li>- Enhance ESR and MISs to achieve an inclusive database</li> </ul>	<ul style="list-style-type: none"> <li>- Updated M&amp;E Framework that is inclusive</li> </ul>	<ul style="list-style-type: none"> <li>- Updated M&amp;E Framework</li> <li>- M&amp;E data collection</li> </ul>	<ul style="list-style-type: none"> <li>- Quarterly by the Project</li> <li>- Annually by</li> </ul>	Project Coordinator

ESS	Project Activity	Project Phase	Anticipated Risks/Impacts	Mitigation Measures	Monitoring Indicators	Means of Verification	Monitoring Timeline	Responsible Party
Environmental and Social Risks & Impacts			(gender, VMG, PWD) - Inadequate documentation and reporting of environmental/social incidents	- Undertake continuous monitoring with reports capturing disaggregated data - Train officers on E&S monitoring and reporting	- Enhanced ESR/MISs with inclusive and disaggregated M&E data - E&S monitoring and reporting at all levels	tools and reports - E&S audit reports - Independent evaluation Reports - Dashboard screenshots and summaries - Joint mission aide memoires - Corrective action plans	and independent agency	
ESS 2: Labour and Working Conditions	Targeting, registration, community mobilization and enrollment	Preparatory Phase	Poor working conditions	- Enforce Labor Management Procedures (LMPs)	- Number of staff trained on LMP - OHS incidences - Corrective measures for poor working conditions	- Staff contracts - LMP monitoring compliance reports	Quarterly	Programme Coordinators

ESS	Project Activity	Project Phase	Anticipated Risks/Impacts	Mitigation Measures	Monitoring Indicators	Means of Verification	Monitoring Timeline	Responsible Party
					-Number of workers with respective PPEs			
ESS 2: Labour and Working Conditions	Labour Recruitment. Use and remuneration of workers	All phases	<ul style="list-style-type: none"> <li>- Child Labour</li> <li>- Child Abuse</li> <li>- Conflict over labour opportunities</li> <li>- Discrimination in hiring</li> <li>- Non-compliance to gender rule and disability inclusion</li> <li>- Overwork or delayed payment for support staff</li> <li>- Lack of facilitation of community structures to undertake project activities</li> <li>- Workers dissatisfaction due to non-</li> </ul>	<ul style="list-style-type: none"> <li>- Monitor age on recruitment and during implementation</li> <li>- Monitor and manage child abuse incidences</li> <li>- Comply with gender and disability inclusion in employment</li> <li>- Fair recruitments</li> <li>- Budget for and facilitate reasonable reimbursements for community structures</li> <li>- Compliance to minimum wage</li> <li>- Worker satisfaction survey</li> </ul>	<ul style="list-style-type: none"> <li>-Child protection measures in place</li> <li>-Fair labour and recruitment practices</li> <li>- Gender/Disability compliant workplace</li> <li>-Clearly defined terms of engagement</li> <li>- Remuneration timelines</li> <li>-Number of community</li> </ul>	<ul style="list-style-type: none"> <li>- Staff satisfaction survey reports</li> <li>- HR Payroll</li> <li>- Reimbursement Schedules</li> </ul>	Quarterly	HR  Programme Coordinators

ESS	Project Activity	Project Phase	Anticipated Risks/Impacts	Mitigation Measures	Monitoring Indicators	Means of Verification	Monitoring Timeline	Responsible Party
			compliance to minimum wage		structures facilitated			
	Occupational Safety and Health	All phases	<p>Occupational health risks</p> <p>Physiological health issues due poor work environment, e.g. due to use of unhealthy office chairs</p> <p>Injuries in workplace</p>	<ul style="list-style-type: none"> <li>- Procure ergonomic chairs and workstations</li> <li>- Maintain Office equipment</li> <li>- Where necessary provide PPEs</li> <li>- Train officers on OHS</li> </ul>	<ul style="list-style-type: none"> <li>- No. of workstations conducive for work</li> <li>- Number of ergonomic workstations procured and maintained</li> <li>- Number of PPEs facilitated</li> <li>- Number of incidence reported</li> </ul>	<p>-OHS logs,</p> <p>-Training Reports</p> <p>- Incidences Logs</p>	Quarterly	<p>Programme Officers</p> <p>E&amp;S Officers</p>



ESS	Project Activity	Project Phase	Anticipated Risks/Impacts	Mitigation Measures	Monitoring Indicators	Means of Verification	Monitoring Timeline	Responsible Party
			-Traffic accidents	-Use of well serviced vehicles  -Engage well-trained drivers  -Ensure adequate drivers' experience and qualifications during recruitment.  -Ensure adequate training for drivers such as defensive driving training, First Aid, Incidence Reporting ,HEAT etc	Number of vehicles in good working conditions   % of drivers who have received trainings	Incidence Reports and management  HR Register  Certification s	Quarterly	Programme Coordinators
			- Insecurity Incidences at the workplace	- Implement the Security Management Plan	- Number of Security Incidences - Existence of Security Management plan	incidence Logs and Reports  Security Management Systems  Security Management Plan	Monthly	Programme Coordinators
			- Stress, fatigue, burn out	- Strengthen HR and Supervisory levels	- Frequency of	- Monitoring logs,	Quarterly	Programme

ESS	Project Activity	Project Phase	Anticipated Risks/Impacts	Mitigation Measures	Monitoring Indicators	Means of Verification	Monitoring Timeline	Responsible Party
			due to poor working conditions	to facilitate psychosocial support	monitoring visits, assessment scores -Monitor OSH incidence	staff feedback forms		Coordinators
	Workers Conduct and Interactions	All Phases	Increased workers Complaints and grievances	<ul style="list-style-type: none"> <li>- Implement GRM for workplace</li> <li>- Provide clear reporting and feedback mechanism</li> </ul>	-Availability of GRM for workers	<ul style="list-style-type: none"> <li>- GRM Logs</li> <li>- GRM guidelines</li> <li>- GRM Reports</li> </ul>	Quarterly	Programme Coordinators
			GBV/SH/SEA /Child Protection Risks	<ul style="list-style-type: none"> <li>- Staff training,</li> <li>- Implement code of conduct for contract staff</li> <li>- confidential reporting</li> <li>- Assign GRM Focal Points</li> <li>- Map GBV/SH/SEA/Child Protection support services</li> </ul>	<ul style="list-style-type: none"> <li>- Number of staff trained</li> <li>- Incidences reported</li> <li>- Number of GBV/SH/SEA facilities mapped</li> <li>- Number of Code of Conducts administered and signed</li> </ul>	<ul style="list-style-type: none"> <li>- Training Reports</li> <li>- Grievance reports</li> <li>- Copies of signed Code of Conducts</li> </ul>	Quarterly	Programme Coordinators
	Existence and operation	All Phases	Increased workers	- Implement GRM for workplace	- Availability of	- GRM Logs	Quarterly	Programme

ESS	Project Activity	Project Phase	Anticipated Risks/Impacts	Mitigation Measures	Monitoring Indicators	Means of Verification	Monitoring Timeline	Responsible Party
	of workers GM		Complaints and grievances	- Provide clear reporting and feedback mechanism	GRM for workers	- GRM guidelines - GRM Reports		Coordinators
<b>ESS 3 Resource Efficiency and Pollution Prevention and Management</b>	Office and ICT equipment	Implementation Phase	E-waste from malfunctioned ICT  Solid Waste from malfunctioned Furniture	Establish e-waste and solid waste disposal partnerships with certified waste handlers including trainings  Dispose over used office and ICT equipment as per the PPDA 2015	E-waste from ICT equipment is safely disposed	Recycling agreements, disposal records, recycler certificates	Biannually	
	Community Meeting/ Forums	Implementation Phase	Waste from registration gatherings may lead to littering	Provide designated waste bins and engage local waste collectors	Waste from large gatherings is collected and managed properly	Event clean-up reports, waste bin usage logs, collector contracts	Per event	Programme Coordinators
	Coaching, Mentoring, and Facilitation	Implementation Phase	Use of non-biodegradable training materials  Inefficient energy/water use at field venues	Use biodegradable, reusable communication materials  Promote energy- and water-efficient practices	- Biodegradable or reusable materials are used  -Energy and water use in	Procurement records, material specifications, supplier receipts	Quarterly	Programme Coordinators

ESS	Project Activity	Project Phase	Anticipated Risks/Impacts	Mitigation Measures	Monitoring Indicators	Means of Verification	Monitoring Timeline	Responsible Party
					offices is tracked and optimized	Utility bills, inspection checklists, appliance inventory		
	Payments	Implementation Phase	Fuel emissions from frequent travel during payment disbursement	Encourage carpooling and use of fuel-efficient/public transport	Fuel-efficient and low-emission transport options are used	Vehicle logs, fuel usage records, transport plans	Monthly	Programme Coordinator
<b>ESS 4: Community Health and Safety</b>	Community Forums/ Meetings	All	<ul style="list-style-type: none"> <li>- Littering</li> <li>- Sanitation issues in meetings venues lacking ablution facilities</li> <li>- Insecurity risks in clash prone or in locations with demonstrations</li> </ul>	<ul style="list-style-type: none"> <li>- Facilitate dust pins /waste papers for putting litter</li> <li>- Sensitize people not to litter the environment at the beginning of meeting sessions</li> <li>- Assess for secure and safe venues</li> </ul>	<ul style="list-style-type: none"> <li>- Presence of dust pins/waste papers in large meetings</li> <li>- Number of waste management messages passed</li> <li>- Non reported/reduced security incidences in project meetings</li> </ul>	<ul style="list-style-type: none"> <li>- E&amp;S Reports</li> <li>- Meeting Reports</li> <li>- Security management and Incidence Reports</li> </ul>	Monthly	Programme Coordinators

ESS	Project Activity	Project Phase	Anticipated Risks/Impacts	Mitigation Measures	Monitoring Indicators	Means of Verification	Monitoring Timeline	Responsible Party
	Targeting, Registration, Community Mobilization, and Enrollment	Preparatory	-Breach of personal data and identity theft due to insecure registration platforms and poor handling of personal sensitive information	-Provide cybersecurity training for staff- Enforce Multi-Factor Authentication (MFA) for access to MIS platforms- Regularly update and patch MIS and registration systems	-Number of staff trained on digital security -Implementation rate of MFA -Frequency of security patches	- IT training logs- -MFA audit trail - IT security patch logs	Quarterly	Programme Coordinators
	Coaching, Mentoring, and Facilitation	Implementation Phase	-Exploitation, coercion or favoritism by facilitators, leading to unequal access or psychological distress	- Code of conduct and accountability measures for mentors/facilitators- Community feedback mechanisms (e.g., anonymous forms, hotlines)- Periodic ethics and inclusion training	-Number of facilitators trained- Number of grievances or complaints received- Beneficiary satisfaction ratings	-Training records -GRM usage reports- Beneficiary feedback forms	Quarterly	Programme Coordinators
	Payments	Implementation Phase	-Theft, impersonation or digital fraud during fund disbursement through mobile money or cash withdrawal	- Use biometric verification or secure mobile wallet authentication- Partner with vetted financial service providers- Raise awareness on safe handling of payment details and avoiding fraud	- Percentage of transactions using biometrics or wallets - Number of fraud incidents reported- Number of fraud	-Payment logs- GRM/fraud case records- Outreach session reports	Monthly	Programme Coordinator

ESS	Project Activity	Project Phase	Anticipated Risks/Impacts	Mitigation Measures	Monitoring Indicators	Means of Verification	Monitoring Timeline	Responsible Party
					awareness campaigns			
	GRM	Implementation Phase	Risk of retaliation, conflict or stigmatization due to exposed complaints or feedback	- Establish safe, confidential and anonymous feedback mechanisms- Ensure GRM is gender-sensitive and disability inclusive- Regular review and closure of feedback loop with complainants	- Resolution rate of complaints- Beneficiary trust levels in feedback system- Number of confidential cases managed	- GRM dashboard reports- Stakeholder consultation summaries- Feedback review meeting minutes	Quarterly	Programme Coordinator
	GBV/SEAH	All Phases	Harassment of women at pay points, Abuse of power by supervisors  unsafe complaint channels  Gender-based violence or SEA by service providers	- Adopt a code of conduct on GBV/SEAH - Train staff on GBV/SEAH protocols and referral mechanisms  - Provide reporting and support systems  GBV/SEAH complaints reporting e.g. through hotline, helpdesk  Integrate GBV/SEAH assessments and	- Number of GBV/SEAH incidents reported and managed - Percentage of staff trained  - Functional referral pathways for GBV/SEAH	- Training logs - GBV/SEAH case reports  - Signed Code of Conducts  GBV/SEAH tracking reports	Initial training at project onset;  Continuous as needed	GBV SEAH/ Focal Persons  Multisectoral Committee

ESS	Project Activity	Project Phase	Anticipated Risks/Impacts	Mitigation Measures	Monitoring Indicators	Means of Verification	Monitoring Timeline	Responsible Party
				sensitization into payment process  Implement GBV/SEAH Action Plan				
		Implementation phase	Violence against Children	Train Staff on Child Protection: Identification, reporting, referrals, and linkages  Map service providers in implementing areas	Number of staff trained.  Number of child protection Cases reported  Number of children referred for services	Case Record Sheet, CPIMS  Case Record SheetCPIMS	Initial training at project onset;  Continuous as needed	GBV SEAH/ Focal Persons  Multisectoral Committee

ESS	Project Activity	Project Phase	Anticipated Risks/Impacts	Mitigation Measures	Monitoring Indicators	Means of Verification	Monitoring Timeline	Responsible Party
	Agro activities for EIP participants	Implementation phase	Exposure to Hazardous waste eg agro chemicals	<p>Safe pesticide handling &amp; PPE</p> <p>Spill-kit deployment</p> <p>Take back system</p> <p>Triple-rinse, puncture &amp; return pesticide containers to county collection point.</p> <p>Collect/recycle fertiliser sacks through local cooperative.</p> <p>Compost manure <math>\geq 30</math> m from watercourses; line pits to stop leachate.</p> <p>Integrated Pest Management</p> <p>Training on hazardous waste management</p>	<p>No of containers returned</p> <p>Water quality test</p> <p>No of Log sheets</p>	<p>Incident reports</p> <p>Log sheets</p> <p>Sensitization report</p>	Bi annual as per the Act	E&S Focal Person



ESS	Project Activity	Project Phase	Anticipated Risks/Impacts	Mitigation Measures	Monitoring Indicators	Means of Verification	Monitoring Timeline	Responsible Party
ESS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources	Targeting , Registration, Community Mobilization and Enrollment	Preparatory Phase	-Inclusion of EIP enterprises that may have detrimental effects to biodiversity and living natural resources	-E&S Screening of proposed projects -Exclude enterprises that are detrimental to the environment such as charcoal burning, sand mining, game meat business, or game products such as hides of wild animals and endangered species etc Collaborate with the Agencies responsible for environmental management. -Prepare and implement Biodiversity plans as necessary -	-E&S screening with enterprises likely to impact on biodiversity and natural resources included in the list of Excluded activities  -Number of Fishing groups adhering to legal gear  % sub-projects with forest buffer intact  -Annual community monitoring of indicator species	-Screening Reports  -List of Multisectoral teams involved  -Fishing Groups Adhering to Fishing Gear  -Sub-projects with forest buffer intact/Zones  Monitoring Reports  Biodiversity Plans  Monitoring Reports	During EIP enterprise selection          Annually	Programme Coordinator

ESS	Project Activity	Project Phase	Anticipated Risks/Impacts	Mitigation Measures	Monitoring Indicators	Means of Verification	Monitoring Timeline	Responsible Party
					-Number of Biodiversity Plans Prepared and Implemented			
	Coaching, Mentoring, VSLAs and BGs and Facilitation	Implementation Phase	<ul style="list-style-type: none"> <li>- Training may unintentionally promote livelihood practices that degrade local ecosystems use knowledge to exploit biodiversity (e.g. charcoal burning medicinal plants, bushmeat trade)</li> <li>- Participants engaging in enterprises included in the list of Excluded activities</li> </ul>	<ul style="list-style-type: none"> <li>- Include biodiversity protection topics (e.g., ecosystem services, sustainable harvesting).3. Promote alternatives (e.g., agroforestry, conservation agriculture).</li> <li>- Monitor for the presence of enterprises indicated in the Exclusion List</li> </ul>	<ul style="list-style-type: none"> <li>-Number of biodiversity smart livelihoods promoted</li> <li>-Number of awareness sessions on sustainable practices conducted</li> <li>-Availability of training contents on biodiversity and sustainable use of natural resources</li> <li>% cooperatives trained in sustainable harvesting</li> </ul>	<ul style="list-style-type: none"> <li>- Training manuals- Session reports</li> <li>- Trainer feedback reports and pre/post evaluations</li> </ul>	- Quarterly implementation	Field Officers

ESS	Project Activity	Project Phase	Anticipated Risks/Impacts	Mitigation Measures	Monitoring Indicators	Means of Verification	Monitoring Timeline	Responsible Party
	Compliance monitoring for efficient resource use and biodiversity protection (Fisheries/forests)	Implementation Phase	- Destruction of biodiversity	<p>Enforcement of the fisheries regulations</p> <p>Enforce legal mesh sizes</p> <p>Enforcement of non-fishing during closed seasons</p> <p>Enforcement of non-fishing in no-take zones</p> <p>Prohibit use of dynamite and chemicals for fishing</p> <p>Training on sustainable fish harvesting</p> <p>- Compliance monitoring by the project, Kenya Fisheries Service, Kenya Forest Service</p> <p>- Maintenance of the 30m forest buffer zones</p>	Quarterly compliance monitoring checks	- Reports	Quarterly	Project KeFS KFS NEMA
	Community meetings/Forums	All	- Strain on vegetation for meetings held in open spaces	<p>- Mobilize a reasonable number of meeting community attendees</p> <p>- Use alternative venues that do not affect vegetation and the environments</p>	Number of meetings where biodiversity and use of natural resources	- Meeting Reports - E&S Reports	Quarterly	Programme Officers

ESS	Project Activity	Project Phase	Anticipated Risks/Impacts	Mitigation Measures	Monitoring Indicators	Means of Verification	Monitoring Timeline	Responsible Party
					have been considered during section			
ESS 7: Indigenous People	Targeting , Enrolment, Recertification, and change management	Preparatory Phase	-Exclusion of Indigenous Peoples/VMGs due to inaccessible information, language barriers, or lack of representation in community engagement processes	-Map and Engage VMG communities in all aspects of the programme -Use culturally appropriate communication, feedback and grievance mechanisms -Conduct prior and informed consultations as per ESS 7 -Develop and implement VMGPs	-Level of engagement of VMGs -Number of translated materials to local language -Cultural appropriateness and Venues of meetings -Number of sensitization events held -Type of input received	-VMGPs -Targeting, Enrolment and recertification Reports	Quarterly & Continuous	Programme Coordinator
	Payments	Implementation Phase	-Inaccessible payments due to land vastness and nomadic lifestyles etc. -Inadequate payment information	-Display beneficiary lists in local venues and use the lowest community structures to convey payment information -Use of SMS messages -Adopt payment mechanisms that mitigate against the	-Payment information disseminated through the local structures -SMS services on payments -Reduced payment	-Payment reports -GRM Logs -SLA	Monthly	Programme Coordinators

ESS	Project Activity	Project Phase	Anticipated Risks/Impacts	Mitigation Measures	Monitoring Indicators	Means of Verification	Monitoring Timeline	Responsible Party
				impacts of migratory lifestyles - Enforce SLAs	concerns among VMGs			
ESS 8 Cultural Heritage	Targeting , Registration, Community Mobilization and Enrollment	Preparatory Phase	- Uninformed/less informed culturally reach communities - Exclusion of cultural knowledge and inputs	- Identify reach communities and adopt modalities for engagement that respects their cultures - Engage cultural leaders, elders, Translate materials into local languages and - Use culturally appropriate language	- Number of Communities with distinct cultures that can be impacted by the programme - Number of engagements with traditional leaders - Number of translated IEC materials produced - Number and type of cultural appropriate strategies adopted in the programme	- Number of communities with distinct cultures notified - Cultural appropriate strategies adopted in the programme	Quarterly	Programme Coordinators
	Coaching, Mentorin	Implementation Phase	- Lack or inadequate participation in mentorship and	- Schedule sessions in line with local calendars.	- Number of sessions adjusted to cultural	- Training calendars- Grievance records-	- Quarterly	Programme Coordinators

ESS	Project Activity	Project Phase	Anticipated Risks/Impacts	Mitigation Measures	Monitoring Indicators	Means of Verification	Monitoring Timeline	Responsible Party
	g and Forums		meetings due to cultural activities and taboos, gender norms, or religious holy days - Cultural exclusion of minority groups or clans	- Apply inclusive facilitation methods and seek feedback from diverse community groups	calendars- Number of complaints related with cultural concerns - Number of officers trained to observe cultural appropriateness	Participant disaggregated data		
	Payments	Implementation Phase	Low attendance if payment coincides with sacred events  Exclusion of women or certain cultural groups from accessing payments	Consult local leaders on culturally appropriate schedules  Adapt gender and cultural response strategies such as GESI	- Number of schedules that have considered cultural events' calendar days - Number of cultural and genders responsive initiatives adopted to address exclusion of women	Culturally appropriate schedules  E&S Report  Payment Report	Quarterly	Programme Coordinators

ESS	Project Activity	Project Phase	Anticipated Risks/Impacts	Mitigation Measures	Monitoring Indicators	Means of Verification	Monitoring Timeline	Responsible Party
ESS 10: Stakeholder Engagement and Information Disclosure	Targeting , Enrollment, Recertification, and Replacement of Beneficiaries	Preparatory Phase	<ul style="list-style-type: none"> <li>- Low stakeholder awareness about the programme</li> <li>- Limited stakeholder input</li> <li>- Lack of ownership</li> <li>- Complaints related to exclusion and inclusion errors</li> <li>- Community resistance</li> <li>- low programme uptake</li> </ul>	<ul style="list-style-type: none"> <li>- Undertake adequate stakeholder mapping</li> <li>- Ensure wide and inclusive stakeholder awareness</li> <li>- Use of appropriate and responsive communication and awareness strategies</li> <li>- Undertake stakeholder engagement satisfaction surveys</li> </ul>	<ul style="list-style-type: none"> <li>- Number and categories of stakeholders engaged</li> <li>- Number of functional feedback/complaint mechanism-</li> <li>- Level of awareness among stakeholders</li> <li>- Feedback received from stakeholders</li> <li>- Number of translated materials to local language</li> <li>- Cultural appropriateness and Venues of meetings</li> </ul>	<ul style="list-style-type: none"> <li>- Stakeholder Engagement plan</li> <li>- Stakeholder Engagement Reports</li> <li>- GRM Logs</li> </ul>	Quarterly & Continuous	Programme Coordinators

ESS	Project Activity	Project Phase	Anticipated Risks/Impacts	Mitigation Measures	Monitoring Indicators	Means of Verification	Monitoring Timeline	Responsible Party
	All project implementation activities	Implementation phase	<ul style="list-style-type: none"> <li>-Exclusion</li> <li>-Increased complaints and grievance</li> <li>-Lack of community ownership and support</li> <li>-Non-responsive and impactful interventions due to lack of community inputs</li> <li>-Community resistance</li> </ul>	Implement and monitor activities in line with the Project SEP		Stakeholder engagement and consultation report	Quarterly	Programme Coordinators  Project Coordinator



## CAPACITY BUILDING PLAN

Effective implementation of the Environmental and Social Management Plan (ESMP) under KSEIP 2 requires robust capacity at all institutional and community levels. capacity building is a critical enabler for ensuring that environmental and social risks are managed proactively, and that opportunities for enhanced social inclusion are fully realized. The capacity building interventions are designed to enhance understanding and ownership of ESMP principles, compliance with national legislation and international standards and promote inclusive, participatory implementation approaches and optimum project outcomes

Special attention is given to enhancing the capacities of actors involved in grievance redress, social risk management, gender and disability inclusion, and community engagement. By equipping stakeholders with the tools and training needed to integrate environmental and social safeguards into programme activities, the KSEIP will foster resilient livelihoods and equitable access to the programme benefits.

**Table: Costed Capacity Building Plan**

Target Staff	Topic	Timeline/ frequency	Type of Training	Resources	Cost Estimate (KES)
E&S Focal Points and GRM Focal Person	<ul style="list-style-type: none"> <li>- WB ESF, ESIAs/SIAs, ESMP, LMP, E&amp;S monitoring and audits, SEP, SMP, Indigenous Populations/VMG including Plans, GRM, SRIM</li> <li>-GRM, MIS-GRM, Customer relations and communication skills, Data Privacy</li> </ul>	<ul style="list-style-type: none"> <li>- At the onset of the Project</li> <li>- Continous</li> <li>-</li> </ul>	<ul style="list-style-type: none"> <li>- Physical Training</li> <li>- Online course</li> <li>- Specialized short courses</li> </ul>	<ul style="list-style-type: none"> <li>- Contracted E&amp;S Specialists/Consultants</li> <li>- Trainers</li> <li>- Training Materials</li> <li>-</li> </ul>	24,400,000
Staff of the Project Implementation Unit	<ul style="list-style-type: none"> <li>- E&amp;S Instruments, monitoring and reporting on E&amp;S, EGCM</li> </ul>	<ul style="list-style-type: none"> <li>- At the onset of the programme</li> </ul>	<ul style="list-style-type: none"> <li>- Online sessions</li> <li>- Physical Training</li> <li>- E&amp;S specialized short courses</li> </ul>	<ul style="list-style-type: none"> <li>- E&amp;S Focal Points</li> <li>- Specialized Institutions</li> </ul>	15,000,000

Regional, County and Sub-County Officers	- Project E&S Instruments, - monitoring and reporting on E&S	- At the onset of the Project	- Online sessions - Physical Sessions	- E&S Focal Points - Contracted E&S Specialists - Specialized training institutions	21,000,000
Awareness posters and Eco-training materials in ASAL	- WB ESF, ESIAs/SIAs, ESMP, LMP, E&S	- At the onset of the Project	- Physical	- E&S Focal Points	4,000,000
Contract Staff (Including Mentors and Mentor supervisors CREIP Facilitators)	- Project Code of Conduct - LMP - GRM, - GBV/SEAH	- At the onset of project engagement.	- Onsite sensitization - Online/physical Sessions	- E&S Focal Points - Training materials	5,000,000
Community Structures (including Chiefs, BWCs, CHPs, CPV Lay Volunteers, CD&FS)	- GRM - GBV/SEAH - Roles and responsibilities - Monitoring and Reporting for E&S at the community level	- At the onset of the programme	- Sensitization Forums	- Regional, County and Sub-County Officers	8,000,000
<b>TOTAL COST</b>					<b>74,400,000</b>

## REPORTING PLAN

Effective and timely reporting is essential for ensuring accountability, transparency, and informed decision-making during the implementation project and Environmental and Social Management Plan (ESMP), a structured Reporting Plan is critical to track project performance, environmental and social compliance, stakeholder engagement, and risk management throughout the project lifecycle. By standardizing reporting practices and promoting timely information flow across all implementation levels, this plan supports effective oversight, facilitates corrective actions where necessary, and strengthens the E&S aspects of the KSEIP.

This section outlines the reporting requirements, roles and responsibilities, communication channels, and frequency of reporting at various levels of implementation. It provides a clear framework for "what" needs to be reported, "who" is responsible, "to whom" the information should be communicated, "how" it should be shared, and "when" or how often the reporting should occur. It includes various reporting streams such as activity and project progress updates, environmental and social (E&S) performance,

occupational health and safety (OHS) incidents, and grievance redress mechanism. The channels of communication and reporting include emails, official letters, telephone calls, and structured reporting formats through group forums and digital platforms.

Reporting Description	Who?	To Whom?	How?	When? How frequent?
Activity/Project Progress	Regional/County and Sub-County Officers	Programme Coordinators	<ul style="list-style-type: none"> <li>● Email</li> <li>● Official Letters</li> <li>● Official WhatsApp Groups</li> </ul>	Monthly
	Technical Leads responsible for operational aspects (at the component/sub-component level)	Programme Coordinators	<ul style="list-style-type: none"> <li>● Email</li> <li>● Official Letters</li> <li>● Official WhatsApp Groups</li> <li>● Monthly reports</li> </ul>	Monthly and as necessary
	Programme Coordinators	Project Coordinator	<ul style="list-style-type: none"> <li>● Email</li> <li>● Official Letters</li> <li>● Official WhatsApp Groups</li> <li>● Quarterly Reports</li> </ul>	Quarterly
	Project Coordinator	WB	<ul style="list-style-type: none"> <li>● Emails</li> <li>● Official letters</li> <li>● Quarterly Report</li> </ul>	Quarterly
E&S incidents onsite	E&S Officers	Programme Coordinator	<ul style="list-style-type: none"> <li>● Telephone calls + emails</li> <li>● letters</li> <li>● Monthly reports</li> </ul>	within 24hrs Monthly reporting
Complaints and Grievance	GRM Focal or E&S Officers	Programme Coordinator	<ul style="list-style-type: none"> <li>● Email,</li> <li>● Official Letters</li> <li>● Telephone</li> <li>● Monthly Reports</li> <li>● Toll free line 1533,116,1195</li> <li>● EGCM web/ link - <a href="https://egcm.inuajamii.go.ke:5100/">https://egcm.inuajamii.go.ke:5100/</a></li> </ul>	Monthly
E&S Progress and Compliance (As informed by the indicators captured in	E&S Officers	Programme Coordinator	<ul style="list-style-type: none"> <li>● Email,</li> <li>● Telephone</li> <li>● Official Letters</li> <li>● Monthly Reports</li> </ul>	

<i>the ESMP and other E&amp;S Instruments (SEP, LMP, VMGF/Plans and GBV/SEAH Action Plan) )</i>				
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## GRIEVANCE MECHANISM

Environmental and Social risks related Complaints and Grievances shall be addressed through the EGCM. The EGCM system allows the reporting, resolution and provision of feedback of Cases and non-cases related to Environmental and Social risks in the project areas. The detailed process of reporting, escalation, resolution and feedback is well defined in the project EGCM guidelines prepared separately.

**ANNEX 1: LICENSED FACILITIES HANDLING HAZARDOUS-WASTE  
COMMERCIAL INCINERATORS LICENSED BY NEMA**

NO	NAME	ADDRESS	COUNTY	WASTE STREAM	EXPIRY DATE
1.	TRANBIZ ENTERPRISES LTD	P.O BOX 16898-00100 NAIROBI TEL NO: 0723328551 <a href="mailto:tranbiohz@gmail.com">tranbiohz@gmail.com</a>	KIAMBU	HAZARDOUS/ INDUSTRIAL/ BIOMEDICAL WASTE	31 <sup>ST</sup> JANUAR Y 2025
2.	BAMBURI CEMENT LIMITED	P.O BOX 90202-80101 MOMBASA TEL NO:0202710459 EMAIL: <a href="mailto:info@bamburi.large.com">info@bamburi.large.com</a>	MOMBASA	SCRAP TYRES/ INDUSTRIAL WASTE/ PHARMERCEUTICAL WASTE/ CONDEMED GOODS/USED OIL	28 <sup>TH</sup> FEBRUAR Y 2025
3.	BAMBURI CEMENT LTD	P.O BOX 524 – 00204 ATHI-RIVER TEL.NO:254-020-2710459 EMAIL: <a href="mailto:info@bamburi.large.com">info@bamburi.large.com</a>	MACHAKO S	SCRAP TYRES/ INDUSTRIAL WASTE/ PHARMERCEUTICAL WASTE/ CONDEMED GOODS/USED OIL	1 <sup>ST</sup> APRIL 2025
4.	GREENCITY INCINERATORS	P.O BOX 57996-0200 NAIROBI <a href="mailto:ediemurithi@gmail.com">ediemurithi@gmail.com</a>	MACHAKO S	BIOMEDICAL/INDUSTRIAL WASTE	12 <sup>TH</sup> MAY 2025
5.	LUKAM LINK LIMITED	P.O BOX 3291 - 80100 MOMBASA <a href="mailto:olukohe2000@yahoo.com">olukohe2000@yahoo.com</a>	TAITA TAVETA	HARZADOUS/INDUSTRIAL/ BIOMEDICAL WASTE	20 <sup>TH</sup> JUNE 2025
6.	SUREFLAME INCINERATORS LTD	P.O BOX 616 - 00204 ATHI-RIVER <a href="mailto:sureflameincinerators@gmail.com">sureflameincinerators@gmail.com</a> +254718831026, +254737528357	MACHAKO S	BIOMEDICAL / INDUSTRIAL WASTE /CONTAMINATED SOIL	2 <sup>ND</sup> JULY 2025
7.	ENVIRONMENTAL AND COMBUSTION	P.O BOX 72828 – 00200 NAIROBI <a href="mailto:james@ecclkenya.co">james@ecclkenya.co</a>	MIGORI	HARZADOUS/INDUSTRIAL/ BIOMEDICAL	2 <sup>ND</sup> JULY 2025

	CONSULTANTS	<a href="#">m</a>		WASTE	
8.	BENCHMARK INTERNATIONAL LIMITED	P. O. BOX 28711 - 00200 NAIROBI <a href="mailto:bm@engineer.com">bm@engineer.com</a>	KWALE	BIOMEDICAL/INDUSTRIAL WASTE	7 <sup>TH</sup> JULY 2025
9.	HEALTH ADVANTAGE K LTD	P.O BOX 73257-00200 NAIROBI <a href="mailto:andrewmoseti@yahoo.com">andrewmoseti@yahoo.com</a>	NAKURU	BIOMEDICAL/INDUSTRIAL WASTE	28 <sup>TH</sup> JULY 2025
10.	TAKATAKA SOLUTIONS LIMITED	P.O BOX 29273-00625 NAIROBI <a href="mailto:info@takatakasolutions.com">info@takatakasolutions.com</a> <a href="tel:+254110488276">+254 110488276</a>	KIKUYU	HAZARDOUS WASTE	28 <sup>TH</sup> JULY 2025