



# Appraisal Environmental and Social Review Summary

## Appraisal Stage

### **(ESRS Appraisal Stage)**

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**I. BASIC INFORMATION**

**A. Basic Operation Data**

Operation ID	Product	Operation Acronym	Approval Fiscal Year
P509738	Investment Project Financing (IPF)	KEWASIP	2025
Operation Name	Kenya Watershed Services Improvement Project		
Country/Region Code	Beneficiary country/countries (borrower, recipient)	Region	Practice Area (Lead)
Kenya	Kenya	EASTERN AND SOUTHERN AFRICA	Environment, Natural Resources & the Blue Economy
Borrower(s)	Implementing Agency(ies)	Estimated Appraisal Date	Estimated Board Date
Republic of Kenya	State Department of Forestry	28-Feb-2025	18-Jun-2025
Estimated Decision Review Date	Total Project Cost		
22-Jan-2025	200,000,000.00		

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Proposed Development Objective

The Project Development Objective (PDO) is to expand the area under sustainable land and watershed management and to improve livelihoods of communities in the project areas.

**B. Is the operation being prepared in a Situation of Urgent Need of Assistance or Capacity Constraints, as per Bank IPF Policy, para. 12?**

No

**C. Summary Description of Proposed Project Activities**

*[Description imported from the PAD Data Sheet in the Portal providing information about the key aspects and components/sub-components of the project]*

The KEWASIP will support a subset of activities contained in The National Landscape and Ecosystems Restoration Programme Strategy. Under the KEWASIP the selected activities are expected to be grouped under three Results Areas: (i) strengthened watershed planning, governance, and monitoring; (ii) watershed services and landscape restoration (private/communal lands); (iii) Public land management and restoration (public/protected lands).



## D. Environmental and Social Overview

### D.1 Overview of Environmental and Social Project Settings

*[Description of key features relevant to the operation's environmental and social risks and opportunities (e.g., whether the project is nationwide or regional in scope, urban/rural, in an FCV context, presence of Indigenous Peoples or other minorities, involves associated facilities, high-biodiversity settings, etc.) – Max. character limit 10,000]*

The operation will be financed through an Investment Project Financing (IPF) modality. The KEWASIP has a nationwide scope and will benefit prioritized sub-basins as guided by the Land Degradation Index Map, with considerations on vegetation cover and quality, rainfall erosivity and soil erodibility, and population density. Also, the selection of sub-basins to benefit from the Project considered degradation in vegetation as measured by net primary productivity (NPP) and normalized difference vegetation index (NDVI), inherent risk of soil erosion, potential beneficiaries of interventions, conservation priorities, and the projected costs associated with implementing sustainable landscape and watersheds management (SLWM) practices. The KEWASIP will support a subset of activities in five (5) watersheds covering including Mount Marsabit, Marmamet, Nyambene, Chyullu Hills, and Shimba Hills, and covering 12 counties including Garrissa, Isiolo, Kitui, Kwale, Laikipia, Marsabit, Makueni, Meru, Baringo, Tharaka Nithi, Samburu, and Tana River. The Ministry of Environment, Climate Change, and Forestry (MoECCF) will implement the KEWASIP in coordination with technical agencies including the State Department of Forestry, State Department of Environment, State Department of Water, State Department of Agriculture, State Department of Wildlife, State Department of Irrigation, Water Resources Authority, Kenya Forest Service (KFS), Kenya Wildlife Service (KWS), National Environment Management Authority, and the Council of Governors.

Through strengthening governance structures under Component 1, there will be promotion of diversified rural livelihoods, improved access to information through an integrated monitoring system, built resilience to climate change and enhanced sustainable management of natural resources. However, there is potential exclusion of vulnerable and marginalized groups (VMGs) and indigenous peoples (IPs) representation in the governance structures and recognition of their rights; displacement of communities due to access restrictions through establishment of protected areas or changes in land use; limited stakeholder engagement including with VMGs and IPs; if benefits from ecosystem services are not distributed fairly, VMGs and IPs may be left out, exacerbating existing inequalities and leading to social tensions; potential loss of cultural identity by the undervalue of traditional ecological knowledge through adoption of modern governance and management practices; competition for natural resources could intensify, potentially leading to social/community conflicts also with external stakeholders; efforts to promote climate-resilient landscapes might disrupt existing economic activities impacting living standards; and concerns on data privacy and the potential misuse of information related to land use and community activities.

Component 2 investments on private and community lands will build resilient livelihoods for local communities by adopting a participatory approach, community engagements in planning and implementation will enhance collaboration, ownership and better management of resources by upstream and downstream users, community capacities will be strengthened, sustainable land use promoted, and economic opportunities created. Potentially, livelihoods restoration activities may displace communities and disrupt their livelihoods, lead to inequitable access to resources and increased inequalities, exclusion of VMGs and IPs and changes in land use and resource management could negatively impact existing economic activities. Investments on gazetted and protected areas will enhance land restoration and watershed management capacity of Kenya Forest Service (KFS) and Kenya Wildlife Service (KWS), foster



community engagement through public-private partnerships, and increase biodiversity. Restoration activities will create job opportunities, improve ecosystem services such as water purification and soil fertility, and raise environmental awareness among local populations. Additionally, there will be enhanced resilience to climate change, improved food security, preserved cultural heritage, and strengthened infrastructure within protected areas, ultimately benefiting community well-being and promoting sustainable environmental practices. However, increased management of protected areas might displace communities due to land use changes and access restrictions, disrupt existing livelihoods that rely on unsustainable land management practices, exclusion of VMGs and IPs from benefiting from restoration initiatives and coordination of multiple stakeholders and communities may affect implementation and lead to increased grievances. Component 3 initiatives on training & capacity building of stakeholders at the national and county levels will enhance E&S risks and impacts management and sustainability as well as understanding of the Bank's Environmental and Social Framework (ESF).

The project's interventions are confined entirely within Kenya's borders and focus on selected key water towers, including: Chyulu Hills and Shimba Hills Water Towers in the Athi-Galana Basin; Mt. Marsabit and Marmanet Forest Water Towers within the Ewaso Nyiro Ngiro North (ENN) Drainage Basin; and the Nyambene Hills Water Tower which falls within both the Tana and Ewaso Nyiro drainage basins. The Athi-Galana and Tana drainage basins empty into the Indian Ocean within Kenya's territorial waters. Although the Uмба and Lumi Rivers, located southwest and near the Athi-Galana drainage basin, are shared between Kenya and Tanzania, no project activities are planned within their catchments. The Uмба river originates from Tanzania's Usambara mountains and flows into the Indian ocean within Kenya, while the Lumi River originates from the eastern side of Mt Kilimanjaro and runs along the Kenya-Tanzania border into Tanzania. The ENN Basin borders Ethiopia to the north and Somalia to the east. Its main river, the Ewaso Nyiro, empties into Lorian Swamp within Kenya. Lorian swamp is one of sources of recharge for the Merti aquifer that straddles Kenya and Somalia. KEWASIP will not involve any abstraction of water or contribute to any waste discharges into Ewaso Nyiro river that could potentially affect the Merti aquifer. The project does not propose any activities/interventions that aim to control floods. However, sustainable landscape and watershed management activities have the benefit of reducing risks of flooding in the downstream areas of the watershed if they are prone to flooding.

To inform Project implementation, the MoECCF is undertaking an E&S assessment that includes, (i) developing a process framework to address E&S risks and impacts related to restrictions on access to natural resources in legally designated parks and protected areas which will inform the development of appropriate management plans which may include a Resettlement Plan, Livelihood Restoration Plan, Indigenous Peoples Plan, and/or Benefit Sharing Plan/Agreement; (ii) an evaluation of the institutional frameworks for the KFS and KWS for recommendations on strengthening their codes of conduct, aligned with Good Practice Notes (GPN) on the use of armed security and other internationally accepted practices; (iii) a social conflict analysis to assess the extent to which project activities might exacerbate existing tensions and inequalities or be affected by ongoing conflicts; (iv) an E&S technical capacities and systems assessment of implementing entities to enhance management and sustainability measures; and (v) a review of the existing Grievance Redress Mechanism of implementing entities for enhancement. The outcome of the E&S assessment, to be completed by effectiveness, will inform the development of specific E&S instruments during implementation for the KEWASIP, in line with the ESF. Additionally, the Bank has undertaken its own due diligence to evaluate the capacity of the implementing agencies to manage E&S risks, with a focus on their ability to identify, mitigate, manage, and monitor these risks in accordance with the Bank's ESF specifically on institutional structure and governance capacity, human resource capacity, environmental and social risk management systems, monitoring and reporting capacity, technical and



financial resources, stakeholder engagement and community interaction, previous project experience and track record, and coordination between the MoECCF and other agencies. Gap filling measures and tools have been incorporated in the the ESCP, SEP and ESMF.

Key aspects mainstreamed in the E&S instruments and implemented for systems and capacity strengthening include; (i) training and capacity building on climate resilience, GBV/SEA-SH, and biodiversity monitoring; (ii) enhanced monitoring using modern environmental monitoring tools, including satellite imagery, remote sensing, and mobile data collection systems; (iii) improved stakeholder engagement through culturally appropriate, meaningful and inclusive stakeholder engagement, with special attention to IPs and VMGs; and (iv) E&S budget allocations under KEWASIP for E&S risks and impacts management, particularly for monitoring, stakeholder engagement, grievance redress and mitigating, alternative or compensating measures necessary for potentially affected communities/persons by displacement, resettlement and restrictions on access to gazetted forests or restricted areas.

## **D.2 Overview of Borrower's Institutional Capacity for Managing Environmental and Social Risks and Impacts**

*[Description of Borrower's capacity (i.e., prior performance under the Safeguard Policies or ESF, experience applying E&S policies of IFIs, Environmental and social unit/staff already in place) and willingness to manage risks and impacts and of provisions planned or required to have capabilities in place, along with the needs for enhanced support to the Borrower – Max. character limit 10,000]*

Kenya has made substantial efforts to address the causes of natural resource degradation by developing policies, enacting legislation to protect resources, and establishing institutions responsible for implementing and enforcing these measures. The government also allocates annual budgets to line ministries and Semi-Autonomous Government Agencies (SAGAs) to support their mandates. The Environmental Management and Coordination Act (EMCA), 1999, marked a significant milestone as a framework law, leading to the revision of various sectoral laws to align with its objectives and prompting institutions to develop policies, codes of practice, and compliance procedures.

Key ministries, including the Ministry of Environment, Climate Change and Forestry (MoECCF), Ministry of Agriculture and Livestock Development (MoALD), Ministry of Water, Sanitation and Irrigation (MoWSI), Ministry of Roads and Transport, Ministry of Education, and the Ministry of Lands, Public Works, Housing and Urban Development, along with their SAGAs, have integrated environmental and social risk management by dedicating resources (in-house E&S staff and budgets) and including E&S provisions in procurement processes. These entities have also served as Executing or Implementing agencies for numerous donor-funded projects, some of which require adherence to the donor's environmental and social framework in addition to the national E&S framework. Development partners such as the World Bank, African Development Bank, Trade Development Bank, and Agence Française de Développement (AFD) have supported these entities in addressing E&S considerations in project implementation. World Bank-financed interventions where compliance with the Safeguards Policies or ESF has been sufficiently demonstrated include the Kenya Climate Smart Agriculture Project (P154784, KCSAP), the Financing Locally-Led Climate Action Program (P173065, FLOCCA), Kenya Agricultural Productivity and Sustainable Landscape Management Project (P088600, KAPSLMP), the Kenya Water Security and Climate Resilience Project (P117635, KWSCRIP) and the Water and Sanitation Development Project (P156634, WSDP).

The main implementing entity, (MoECCF), has gained substantial E&S experience from implementing other donor-funded interventions. However, the State Department of Forestry, which will constitute the National Project Coordinating Unit (NPCU) has limited prior experience with implementation of World Bank projects, applying the ESF,



and there is overall inadequate ESRM capacity at the county and ward levels. This capacity will be strengthened at the national level by recruiting on a full time basis, one environmental officer and one social officer. Additionally, each participating county will have both officers employed full-time, and equipped with the necessary qualifications and experience. The MoECCF will also hire gender-based violence (GBV) and Labour and Occupational Health and Safety (OHS) consultants on part-time basis for the efficient delivery of Technical Assistance (TA) related activities. A capacity building plan will be developed and implemented throughout project implementation, and will include annual E&S capacity building activities, at the national, county and community levels. Implementation of the capacity building plan is provided for in the Environmental and Social Commitment Plan (ESCP).

## II. SUMMARY OF ENVIRONMENTAL AND SOCIAL (ES) RISKS AND IMPACTS

### A. Environmental and Social Risk Classification (ESRC)

High

#### A.1 Environmental Risk Rating

Substantial

*[Summary of key factors contributing to risk rating, in accordance with the ES Directive and the Technical Note on Screening and Risk Classification under the ESF – Max. character limit 4,000]*

Environmental risks are rated "Substantial." The project has many environmental benefits including improved land management which reduces soil erosion, enhances groundwater recharge, and stabilizes river flows, ensuring reliable water supply for ecosystems and communities. Project activities to restore degraded riparian zones, wetlands, and the rehabilitation of water harvesting structures could have varying effects on water flow and availability as the interventions could lead to reduced volumes, in the short term. Water resources are scarce in many areas targeted by KEWASIP, and improper management could worsen the situation, leading to reduced access to water for downstream users. Large-scale restoration can prevent erosion, but in the short term, soil disturbance (e.g., tree planting, construction of terraces or gabions) could lead to increased sediment runoff into rivers and lakes, further contributing to water degradation and affecting aquatic ecosystems. Erosion management in catchment areas will also reduce sediment loads and deposition in downstream floodplains, which may deprive aquatic habitats and agricultural activities of essential nutrients found in the sediments. As climate variability increases, the projected rise in extreme weather events—such as prolonged droughts and intense rainfall—could exacerbate land degradation, making it difficult for restored ecosystems to stabilize. The project involves significant ecosystem restoration, including afforestation, reforestation, agroforestry, and the creation of green corridors. While the goals of these interventions are positive, there are inherent risks. Afforestation efforts, if not well-planned, could inadvertently disturb wildlife habitats, especially in areas where species have adapted to the degraded state of the land. Introducing tree species unsuitable for the local ecosystem (e.g., non-native species) could also adversely affect plant community dynamics. The creation of green corridors is aimed at linking fragmented habitats. However, poorly executed planning could lead to further fragmentation if land tenure conflicts or inadequate land-use planning arises. Restoration within gazetted forests and national parks carries risks of over-intervention, especially in sensitive ecosystems. For example, overplanting or heavy use of machinery could disturb fragile habitats, and inadvertently introduce invasive plant species. *Prosopis juliflora* and *Lantana camara* are two key invasive species that have colonized many project areas, including arid and semi-arid lands (ASALs, principally, Isiolo County). Interventions to mitigate their establishment and colonization have so far yielded little success. While the removal and management of these species are priorities due to the risk of economic and environmental harm they pose, interventions (such as uprooting or control measures) must be carefully managed to avoid unintended consequences, such as increased soil erosion on cleared areas. There



are significant risks of regrowth and further infestation as invasive species tend to regenerate quickly unless proper control measures are applied. Without continuous monitoring and maintenance, the restored ecosystems may soon become reinfested, hampering restoration efforts. Community involvement in labour-intensive restoration activities, such as tree planting and soil conservation, carries risks of injuries, particularly in areas with difficult terrain or extreme weather conditions. In addition, invasive species management, particularly through the use of herbicides or other chemical agents, could expose workers to harmful substances if proper safety measures are not in place. Interventions could also pose community health and safety risks in instances such as where upstream activities cause pollution of water sources relied upon by downstream users as the main source of drinking water, or where inadequately managed civil works pose safety risks of harm to surrounding areas,

High

### A.2 Social Risk Rating

*[Summary of key factors contributing to risk rating, in accordance with the ES Directive and the Technical Note on Screening and Risk Classification under the ESF – Max. character limit 4,000]*

The Social risks are anticipated to be High due to the sensitivity of the targeted Project areas with the presence of VMGs and IPs, and, concerns of social conflict. There are potential risks related to restrictions on land use or access to land and natural resources, challenges in establishing equitable benefit-sharing mechanisms for investments on community land, and the displacement of communities, which could affect their economic status and social cohesion. Additional risks include the potential for adverse impacts on livelihoods from livelihood restoration activities, the exclusion of IPs and VMGs from Project benefits, ineffective grievance management, and inadequate monitoring of the effectiveness of livelihood restoration or improvement measures during implementation. To mitigate these risks, the process framework will address E&S risks and impacts related to restrictions on access to natural resources in legally designated parks and protected areas. The project will benefit watersheds that include IPs and VMGs. Throughout project implementation, there is potential risks in non-adherence to culturally appropriate meaningful consultation, obtaining free, prior and informed consent (FPIC), respect to human rights and natural resource based livelihoods of IPs, and to recognize, respect and preserve the culture, knowledge, and practices of IPs in their unique relationship with land and natural resources. The Process Framework will incorporate elements of ESS7 and guide the development of appropriate mitigation measures or plans for IPs and VMGs. In addition, there are potential gaps in social inclusion, gender considerations, and risks of Sexual Exploitation and Abuse (SEA). The project will ensure that appropriate measures are incorporated to facilitate equitable access to resources and benefiting for all VMGs and IPs, while also recognizing the gender roles in forest and water management. The project has prepared a Stakeholder Engagement Plan (SEP) to ensure stakeholder input is integrated into the project design, mitigation strategies, and that stakeholders are actively involved in decision-making processes. A Grievance Redress Mechanism (GRM) will also be developed to allow all stakeholders to raise concerns or grievances. The GRM will be transparent, culturally appropriate, and accessible to all, including IPs and VMGs. It will also incorporate considerations for Sexual Exploitation, Abuse, and Harassment (SEA/SH) and Gender-Based Violence (GBV) referral pathways.

Moderate

### A.3 Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) Risk Rating

*[Summary of key factors contributing to risk rating. This attribute is only for the internal version of the download document and not a part of the disclosable version – Max. character limit 8,000]*

The SEA/SH Risk rating is assessed as Moderate in consideration of both direct and potential downstream adverse impacts from Project interventions, contextual factors and institutional and regulatory systems to redress impacts where they occur. Risks of SEA-SH could be caused or exacerbated by social and intercommunal conflicts emanating



from project interventions under component 2a, the involvement of KFS in project activities leading to enforcement, the interaction between project workers and between project workers and communities and the differentiated power dynamics associated with access and distribution of project benefits.

Mitigation measures include developing, implementing, and monitoring actions to regularly assess and manage the SEA/SH risks and other forms of GBV throughout project implementation. Key requirements will include that service providers selected to provide TA have the capacity to enforce and adhere to measures to protect against risks of SEA/SH as required in their terms of reference (ToRs) and Bills of Quantities (BoQs). Other measures to prevent SEA/SH include the adoption of grievance mechanism(s) sensitive to SEA/SH aspects, and codes of conduct to be signed by all project workers with SEA/SH provisions. Also the targeted E&S capacity building will include aspects on SEA/SH and GBV.

## B. Environment and Social Standards (ESS) that Apply to the Activities Being Considered

### B.1 Relevance of Environmental and Social Standards

**ESS1 - Assessment and Management of Environmental and Social Risks and Impacts**

Relevant

*[Explanation - Max. character limit 10,000]*

KEWASIP seeks to enhance watershed and landscape management while improving climate resilience, biodiversity conservation, and community livelihoods. However, despite its long-term environmental and socio-economic benefits, the project presents substantial to high environmental and social risks that must be mitigated through strong planning, governance, and adaptive management. These risks span ecosystem disturbances, water resource alterations, land-use conflicts, biodiversity concerns, and social vulnerabilities, including gender-based risks, stakeholder exclusions, and governance weaknesses. One of the primary environmental risks of KEWASIP relates to the potential disturbance of natural habitats and biodiversity. The large-scale reforestation, afforestation, and land rehabilitation efforts, if not carefully managed, could alter ecosystems and threaten biodiversity. The introduction of fast-growing or non-native tree species may disrupt the ecological balance, reducing the resilience of local flora and fauna. In gazetted forests, overly intensive interventions risk disturbing fragile ecosystems, particularly in protected and sensitive areas. Additionally, the removal of invasive species such as *Prosopis juliflora* must be carefully executed to avoid unintended consequences, such as the displacement of native species or disruptions to local agricultural productivity. Water resource management presents another critical challenge. Since the project involves interventions in riparian zones, wetlands, and water catchment areas, there is a risk that modifications to water retention structures and soil conservation techniques could alter hydrological cycles. Reduced downstream water availability due to altered flow dynamics could impact both human consumption and ecosystem functions. Furthermore, soil erosion and sedimentation risks arise from the land preparation activities required for reforestation and rehabilitation. If not adequately controlled, these activities could lead to increased runoff, loss of topsoil, and sedimentation in nearby water bodies, degrading water quality and affecting aquatic biodiversity. The impacts of climate change further compound these environmental risks. Kenya's watersheds are highly vulnerable to extreme weather events, including prolonged droughts and flash floods, both of which could undermine KEWASIP's landscape restoration efforts. Higher temperatures and erratic rainfall patterns may threaten the survival of newly planted vegetation, accelerate soil degradation, and increase the frequency of flooding events that destabilize the very ecosystems the project seeks to restore. If the project's water and flood management interventions are not climate-



proofed, they may struggle to remain effective in the face of shifting climatic conditions. The restoration and conservation measures planned under KEWASIP also pose significant social risks, particularly in terms of land use restrictions and access challenges. Many communities rely on forests, pasturelands, and riparian areas for their livelihoods, whether for agriculture, grazing, or other economic activities. Conservation initiatives, particularly those involving the establishment of green corridors, forest restoration, and community-led conservation programs, could impose restrictions on land use that directly impact these communities. Pastoralist communities and Indigenous Peoples, who depend on communal land for survival, are particularly at risk of displacement or livelihood disruptions. Without carefully structured compensation mechanisms and alternative livelihood programs, such restrictions could lead to heightened tensions and grievances. Beyond access restrictions, there is also the risk of economic displacement if benefit-sharing mechanisms are not equitably structured. While KEWASIP aims to create employment and economic opportunities through conservation-based livelihoods, there is a danger that certain communities, particularly those not directly engaged in the project, may feel excluded from these benefits. The potential for elite capture, where influential individuals or groups gain disproportionate advantages, could further deepen inequalities and lead to community resentment. Livelihood restoration programs must be carefully designed to ensure that they adequately compensate affected households and do not inadvertently worsen economic disparities. Another critical social concern is the inclusion of Indigenous Peoples and Vulnerable and Marginalized Groups (VMGs). Many of the targeted watershed areas are home to communities with deep cultural and economic ties to the land. If KEWASIP fails to engage these groups meaningfully, there is a risk that their traditional governance systems, land-use practices, and cultural rights could be undermined. Without obtaining Free, Prior, and Informed Consent (FPIC) from Indigenous communities, the project could face significant resistance, particularly if the interventions alter their access to critical resources without appropriate consultation and compensation. Gender-based risks, including Sexual Exploitation and Abuse (SEA) and Gender-Based Violence (GBV), also require careful attention. The project's activities will take place in rural and remote areas, where power imbalances between project staff, contractors, and local communities could increase vulnerabilities. Women and girls, particularly those engaged in project-related employment or community initiatives, may face heightened risks of harassment and abuse. The potential labor risks are related to child labor, forced labor and occupational health & safety. If left unaddressed, these risks could not only harm individuals but also erode community trust in the project. KEWASIP must therefore integrate GBV prevention strategies, establish clear reporting and response mechanisms, and enforce strict codes of conduct for all project personnel and contractors. To mitigate these environmental and social risks, KEWASIP will implement comprehensive safeguards aligned with the World Bank's Environmental and Social Standards (ESS). A Process Framework will be prepared and will inform the development of appropriate plans to guide land use planning and ensure that communities are actively involved in decision-making. Stakeholder engagement will be prioritized through the implementation of the Stakeholder Engagement Plan (SEP), ensuring that IPs, VMGs, and other affected groups have a meaningful voice in project planning and implementation. An Environmental and Social Management Framework (ESMF) will also be prepared, setting out the principles, rules, guidelines and procedures to assess and manage Project E&S risks and impacts. The ESMF will include ESMP templates, a Labor Management Procedures (LMP), and a Security Management Plan (SMP). To manage the risks of SEA and SH, Sexual Exploitation, Abuse and Harassment (SEA-SH) Prevention and Response Plan will be developed and adopted before effective date and implemented throughout the project. A Grievance Redress Mechanism (GRM) will also be established to provide affected communities with an accessible and culturally appropriate platform to voice concerns and resolve disputes. On the environmental front, the project will conduct detailed environmental and social assessments (ESAs) to guide reforestation, watershed management, and landscape restoration efforts. Nature-based solutions will be prioritized to reduce soil erosion, improve groundwater recharge, and enhance ecosystem resilience. The project will also ensure that tree species selection is appropriate for local



conditions to prevent biodiversity loss and ecosystem imbalances. To address social risks, KEWASIP will implement structured benefit-sharing mechanisms that promote community ownership and equitable economic participation. Compensation and livelihood restoration programs will be carefully designed to prevent economic displacement and ensure that all affected groups receive appropriate support. Strategic Environmental and Social Assessment (SESA) will be undertaken to examine E&S risks and impacts associated with new policies and integrated plans under Component 1 of the Project. Additionally, KEWASIP will invest in capacity-building for implementing agencies and local communities to strengthen risk management, governance structures, and monitoring processes.

**ESS10 - Stakeholder Engagement and Information Disclosure**

Relevant

*[Explanation - Max. character limit 10,000]*

The project recognizes that meaningful and inclusive stakeholder engagement is essential to ensure that the voices of affected communities, Indigenous Peoples (IPs), and Vulnerable and Marginalized Groups (VMGs) are heard and integrated into project planning and implementation. However, despite the emphasis on participation, several risks and challenges need to be addressed to ensure equitable engagement, effective communication, and robust grievance redress mechanisms. One of the major risks under ESS10 relates to the exclusion particularly of Indigenous Peoples and VMGs residing in the targeted watersheds. Many of these groups have historically been disadvantaged in decision-making processes and development projects, often facing barriers to participation due to remoteness, cultural differences, and systemic marginalization. There is a risk that KEWASIP’s engagement processes may not be fully inclusive or that consultations may not adhere to Free, Prior, and Informed Consent (FPIC) principles. Without appropriate outreach, culturally sensitive engagement strategies, and accessible participation mechanisms, these communities may struggle to express their concerns, contribute to project design, or access project benefits. Another critical challenge is ensuring meaningful consultation beyond one-time engagements. The KEWASIP’s activities involve complex land-use changes, conservation measures, and restrictions on resource access, which require ongoing dialogue and adaptive engagement rather than isolated consultations. There is a risk that consultations could be perceived as procedural rather than substantive, leading to community dissatisfaction if decisions appear to have been predetermined. Ensuring continuous and iterative stakeholder engagement throughout the project lifecycle is necessary to build trust, manage expectations, and foster local ownership of project interventions. The risk of elite capture within community engagement processes is also a significant concern. In many cases, local leadership structures are not fully representative of all community members, and certain influential individuals or groups may dominate discussions and decision-making. If not properly managed, KEWASIP’s stakeholder engagement efforts could reinforce existing power imbalances, preventing equitable access to information, decision-making opportunities, and project benefits. This could create resentment among marginalized groups, leading to conflicts over resource allocation, benefit-sharing, and land-use restrictions. At the community level, Community-Based Organizations (CBOs), will represent beneficiary communities and ensure participatory identification, preparation, and implementation of restoration and livelihood sub-projects. Prioritization is on the inclusion of VMGs to enhance their social & economic participation and equal benefitting. In addition to consultation risks, the Grievance Redress Mechanism (GRM) presents another area of potential challenge. KEWASIP will establish a project-level GRM to receive, process, and resolve grievances from affected individuals and communities. While this is an essential safeguard, the effectiveness of the GRM will depend on its accessibility, cultural appropriateness, and responsiveness. There is a risk that affected people may not be aware of the GRM, may lack trust in its impartiality, or may find it difficult to navigate due to literacy barriers or fear of retaliation. Moreover, the GRM must be designed to handle sensitive complaints, such as those related to Sexual Exploitation and Abuse (SEA) and Gender-Based Violence (GBV),

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in a manner that protects survivors' confidentiality and ensures appropriate response mechanisms. If poorly designed or underutilized, the GRM could fail to address community concerns, leading to escalating grievances, social unrest, or reduced trust in project institutions. To mitigate these risks, KEWASIP has developed a comprehensive Stakeholder Engagement Plan (SEP) that outlines the strategies for inclusive, transparent, and culturally appropriate engagement. The plan aims to ensure that all stakeholders, including IPs, VMGs, women, and other marginalized groups, have an opportunity to participate in project discussions and decision-making. Specific measures include targeted outreach in local languages, the use of participatory rural appraisal techniques, engagement through traditional leadership structures, and ensuring that community consultations are gender-sensitive and inclusive of youth and persons with disabilities. Additionally, KEWASIP is enhancing the GRM to ensure accessibility and responsiveness. The project will establish multiple grievance reporting channels, including community grievance committees, anonymous reporting mechanisms, and mobile-based complaint submission options. Special provisions will be made for handling SEA/GBV-related grievances, including establishing safe spaces for reporting, referral pathways for survivors, and gender-sensitive response teams. Awareness campaigns will be conducted to ensure that all community members understand their rights, know how to file grievances, and feel confident in using the grievance mechanisms without fear of retaliation. Capacity-building for project implementers and local institutions will also be critical in strengthening stakeholder engagement and grievance redress mechanisms. KEWASIP will invest in training government officials, county officers, and community representatives on best practices for participatory engagement, conflict resolution, and grievance management. This will ensure that engagement processes are not only well-structured but also effectively implemented to build trust, transparency, and accountability throughout the project. Stakeholder consultations have been conducted to guide project preparation, design, and implementation. The stakeholder consultations were conducted in an inclusive and culturally appropriate manner through key informant interviews and focus group discussions including with County governments at Nyeri and Laikipia in the Upper Tana region, Nakuru and Narok in the Mau Forest complex, as well as with Kenya Forest Service (KFS) Ecosystem Conservators, National Environment Management Authority (NEMA), County Directors of Environment, Water Resources Authority (WRA) Regional Officers, Kenya Water Towers Agency (KWTA) Regional Coordinators, Ewaso Ngiro South Development Authority, Tana and Athi Rivers Development Authority, Community Forest Associations, Water Resources Users Associations, local community conservation groups, indigenous communities, and other key stakeholders.

**ESS2 - Labor and Working Conditions**

Relevant

*[Explanation - Max. character limit 10,000]*

KEWASIP will engage multiple categories of workers, including community workers drawn from local populations, direct workers employed by implementing agencies, contracted workers involved in technical assistance and capacity-building activities, and primary supply workers responsible for delivering key project inputs such as drone technology and surveillance equipment. Given this diverse workforce, KEWASIP will ensure strict adherence to ESS2 to uphold fair labour practices, prevent exploitation, and promote safe and dignified working conditions. However, several risks related to employment conditions, occupational health and safety (OHS), labour rights, and grievance redress mechanisms must be carefully managed throughout project implementation. A primary concern under ESS2 is the risk of inadequate employment conditions and labour rights violations, particularly among community workers and lower-skilled labourers engaged in land rehabilitation and conservation activities. These workers, often engaged on short-term or informal contracts, may face challenges such as low wages, delayed payments, lack of social protections, and absence of collective bargaining opportunities. Without robust monitoring mechanisms, there is a risk that

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community workers may be engaged under exploitative conditions, with limited access to employment benefits or formal grievance mechanisms. Another significant challenge pertains to occupational health and safety (OHS) risks, particularly for workers involved in land restoration, afforestation, and watershed rehabilitation activities. The project involves activities such as tree planting, soil and water conservation, gully rehabilitation, and invasive species control, all of which require physical labor under potentially hazardous conditions. Workers may be exposed to extreme weather, sharp tools, heavy lifting, and hazardous chemicals used in invasive species and trees pests and diseases management, increasing the risk of injuries and health complications. Without comprehensive safety protocols, provision of protective equipment, and regular OHS training, these risks could compromise worker safety and well-being. A critical risk under KEWASIP is the potential for child and forced labor, particularly in rural communities where economic hardships may push vulnerable groups, including children, into informal and exploitative labor arrangements. Given that many community workers will be engaged in remote, underserved areas, there is a risk that underage labourers could be inadvertently recruited, violating both national labor laws and ESS2 principles. Similarly, workers in primary supply chains, including those providing seedlings, construction materials, or technological inputs, must be closely monitored to ensure ethical sourcing and prevent labor rights abuses. Strong due diligence measures, regular labor inspections (in cooperation with Kenya's Ministry of Labor), and supplier screening protocols will be essential to mitigate these risks. The lack of a dedicated Grievance Redress Mechanism (GRM) for workers is another area of concern. Without a well-structured, accessible, and confidential mechanism, workers may struggle to report labor rights violations, workplace harassment, or safety concerns. This is particularly important for addressing gender-based violence (GBV) and sexual exploitation and abuse (SEA/SH) risks, which are prevalent in projects involving rural and informal labor. Women workers may face unequal pay, limited representation in decision-making, or risk of harassment by supervisors or fellow workers. Establishing a separate GRM tailored for labor-related grievances will help workers voice concerns without fear of retaliation. To mitigate these labor risks, KEWASIP has incorporated labor management provisions aligned with ESS2, the World Bank's Environmental, Health, and Safety Guidelines, and national labor laws into the Environmental and Social Commitment Plan (ESCP) and will implement the LMP to guide labor management, as well as occupational and community health & safety. Additionally, contractors will develop labor management plans that align with the Project LMP, as part of the overall set of construction management sub-plans included in the ESMP. The Project Operational Manual (POM) will detail employment conditions, non-discrimination policies, equal opportunity provisions, worker organization rights, child and forced labor prohibitions, and a strict code of conduct for SEA/SH prevention. Additionally, the project will implement a robust labour management system that includes clear contracts for all workers, fair wage structures, transparent recruitment processes, and provisions for social security and workplace protections. A dedicated worker GRM will be established, offering multiple reporting channels, including anonymous and confidential options, to address labour grievances efficiently. KEWASIP will also invest in capacity-building initiatives to strengthen implementing agencies' ability to monitor labour conditions, enforce OHS standards, and prevent labour rights violations. Training will be provided on safe working conditions, proper use of protective equipment, emergency response protocols, and ethical labour recruitment. These measures will ensure that all workers engaged in the project operate under safe, fair, and legally compliant conditions.

**ESS3 - Resource Efficiency and Pollution Prevention and Management**

Relevant

*[Explanation - Max. character limit 10,000]*

The project's activities focus on watershed restoration, landscape management, and conservation-based interventions, all of which have implications for energy use, water consumption, waste generation, and pollution



control. Although the initial screening during project preparation did not identify activities with significant energy demands, excessive water usage, or hazardous waste production, ongoing monitoring and assessment will be required to proactively mitigate environmental risks and integrate sustainable resource management practices. A key concern under ESS3 relates to the potential for increased water and raw material use in the implementation of project interventions. KEWASIP involves reforestation, soil and water conservation, and watershed rehabilitation—all of which require water-intensive processes such as seedling propagation, irrigation for newly planted vegetation, and water retention structure development. In areas where water resources are already under stress due to climate variability, prolonged droughts, or upstream water abstraction, there is a risk that the project’s water demands could exacerbate competition for water resources between agricultural, domestic, and ecological needs. Furthermore, interventions that involve construction of water storage facilities, check dams, and erosion control structures will require the use of raw materials such as sand, stones, and cement, which must be sourced sustainably to avoid contributing to land degradation, habitat destruction, or unsustainable extraction practices. Another environmental challenge pertains to pollution prevention and waste management. Although the project does not anticipate significant hazardous waste generation, some interventions—such as the removal of invasive species, tree pests and diseases management, agroforestry development, and application of soil treatments—may produce organic and non-organic waste that requires proper disposal. If invasive species such as *Prosopis juliflora* are mechanically or chemically removed, biomass waste management strategies must be in place to avoid unintended ecological and economic consequences, such as increasing fire risks or disrupting livestock grazing areas. Additionally, while KEWASIP does not directly promote pesticide or fertilizer use, there is a possibility that community-led agricultural intensification or agroforestry activities could lead to increased agrochemical application, posing risks of water contamination and soil degradation if not properly regulated. Energy efficiency is another critical aspect of ESS3 compliance in KEWASIP. Although project interventions are not expected to be energy-intensive, certain activities—such as remote sensing and drone surveillance for monitoring, irrigation system installation, and capacity-building programs that require transportation and electronic equipment—may have indirect energy and carbon footprint implications. The project must adopt energy-efficient technologies where possible, such as solar-powered monitoring systems, fuel-efficient transport options, and climate-smart agricultural practices to minimize greenhouse gas (GHG) emissions. Moreover, the adoption of nature-based solutions for carbon sequestration, land restoration, and erosion control will help offset emissions and enhance long-term climate resilience. Climate change mitigation and adaptation are core considerations under ESS3, particularly given that Kenya is highly vulnerable to extreme weather events such as droughts, floods, and erratic rainfall patterns. The project will ensure that all interventions integrate climate adaptation strategies, including the use of drought-resistant tree species, water-efficient irrigation techniques, and soil conservation measures that enhance water retention. Furthermore, planned infrastructure and conservation investments must be climate-proofed to withstand extreme weather events and future climate scenarios. KEWASIP’s alignment with Kenya’s Nationally Determined Contributions (NDCs) under the Paris Agreement will also be essential in guiding climate-smart land-use practices that enhance carbon sequestration, reduce emissions, and support sustainable livelihoods. To mitigate these risks, the Ministry of Environment will ensure that environmental and social assessments (ESAs) are integrated into technical assistance (TA) outputs, guiding the adoption of climate mitigation and adaptation measures in all project interventions. Resource efficiency and pollution prevention measures will be included in the Environmental and Social Commitment Plan (ESCP), ensuring that the project optimizes water and energy use, minimizes waste generation, and implements pollution control measures in line with the requirements of ESS3. In addition, the Project Operational Manual (POM) will include provisions for monitoring and reporting on

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resource consumption, pollution control, and climate resilience efforts, ensuring continuous alignment with environmental best practices and sustainability goals.

**ESS4 - Community Health and Safety**

Relevant

*[Explanation - Max. character limit 10,000]*

KEWASIP presents multiple community health and safety risks, particularly in labor-intensive activities such as tree planting, soil conservation, and invasive species management. Under the Environmental and Social Standard 4 (ESS4) of the World Bank’s Environmental and Social Framework (ESF), the project is required to identify, prevent, and mitigate risks that could affect the safety, health, and well-being of communities and workers. These risks include occupational hazards, chemical exposure, accidents in difficult terrains, natural disaster risks, and gender-based violence (GBV) and Sexual Exploitation and Abuse (SEA/SH) risks. A key concern under ESS4 is the potential for workplace injuries among community members involved in manual restoration work. Many of the targeted watershed areas have steep slopes, eroded landscapes, and unstable terrain, which could increase the risk of falls, landslides, and other physical injuries. Workers engaged in activities such as digging trenches, constructing check dams and gabions, and carrying heavy materials face risks of musculoskeletal injuries, fatigue, and dehydration, particularly in extreme weather conditions. If proper Occupational Health and Safety (OHS) measures are not enforced, these risks could lead to serious accidents, reduced worker productivity, and increased community grievances. Another significant hazard relates to the management of invasive species and tree pests, which in some cases may involve the application of herbicides and chemical treatments. If proper chemical handling and safety protocols are not followed, there is a risk of direct exposure to toxic substances, leading to respiratory issues, skin irritations, and other health complications for workers and nearby community members. The improper disposal of chemical containers and residues could also contaminate soil and water sources, affecting both biodiversity and human health. The project’s interventions, such as revegetation, slope stabilization, and erosion control, aim to enhance watershed resilience, but poorly executed restoration efforts could destabilize fragile soils, leading to unintended landslides or flooding. The increased use of heavy machinery and infrastructure development may also alter natural water flow, potentially exacerbating flood risks if drainage systems and sediment control structures are not properly designed. Gender-based risks, including Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH), are another critical concern under ESS4. KEWASIP will involve both male and female community workers, many of whom will be working in remote project sites with minimal supervision. In such environments, there is a heightened risk of SEA/SH incidents, particularly if workers, contractors, or project personnel exploit vulnerable groups. Women workers may face harassment, discrimination, or barriers to fair wages and employment opportunities. Additionally, young women and girls in communities near project sites may be at risk of coercion or exploitation if there are power imbalances between workers and local residents. To mitigate these risks, KEWASIP will adopt a comprehensive Environmental and Social Management Framework (ESMF) that incorporates clear Occupational Health and Safety (OHS) guidelines, ensuring that all community workers and project staff receive proper training on workplace safety and risk management. The project will provide Personal Protective Equipment (PPE), including gloves, helmets, boots, and safety harnesses, for all workers involved in hazardous activities. Additionally, the safe handling, application, and disposal of herbicides and other chemicals will be governed by strict chemical safety protocols, minimizing exposure risks to both workers and the surrounding environment. To enhance disaster risk preparedness, the project will conduct site-specific risk assessments before restoration activities begin, identifying high-risk areas and implementing erosion control measures accordingly. KEWASIP will also strengthen early warning systems and community disaster response capacities, ensuring that local residents are trained in flood

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and landslide preparedness measures. For SEA/SH and GBV risks, the project will enforce a strict Code of Conduct for all workers, contractors, and implementing partners, outlining zero-tolerance policies for harassment and abuse. A separate Grievance Redress Mechanism (GRM) for workers will be established to provide confidential reporting channels and survivor-centered response measures, including safe spaces for reporting, access to psychosocial support, and legal assistance. Training programs will be conducted to raise awareness among workers and community members about their rights, reporting procedures, and available support services. In addition, E&S assessments to be conducted at the sub-project level will identify specific community health and safety risks relevant to the intervention, and their mitigation measures.

**ESS5 - Land Acquisition, Restrictions on Land Use and Involuntary Resettlement**

Relevant

*[Explanation - Max. character limit 10,000]*

A key concern is the potential restriction of access to land and natural resources due to KEWASIP's conservation and watershed restoration activities. Some of the targeted watersheds include Indigenous Peoples (IPs) and Vulnerable and Marginalized Groups (VMGs) who rely on forestlands, communal rangelands, and riparian areas for their livelihoods. Project interventions such as afforestation, reforestation of degraded parts of gazetted forests, green corridor establishment, and watershed protection could limit traditional grazing areas, restrict firewood collection, and prevent access to culturally significant sites. Without proper mitigation, these restrictions could exacerbate poverty, disrupt local economies, and create tensions between project implementers and affected communities. Another critical risk relates to the displacement of communities and the economic impacts on livelihoods. While KEWASIP does not anticipate large-scale physical displacement, the economic displacement of farmers, pastoralists, and small-scale resource users is a significant concern. For example, farmers practicing traditional shifting cultivation, herders using seasonal grazing corridors, and fisherfolk dependent on riparian zones may face new regulations or restrictions that alter their access to essential resources. In addition, benefit-sharing mechanisms for investments on community land must be designed equitably to prevent elite capture or the exclusion of marginalized groups from project benefits. To manage these risks, KEWASIP is undertaking a comprehensive Environmental and Social Assessment (ESA), which includes the development of a Process Framework to guide the formulation of key mitigation plans. These include a Resettlement Plan, Livelihood Restoration Plan, Indigenous Peoples Plan, and Benefit-Sharing Agreements, tailored to address the specific needs of affected communities. These plans will be implemented to mitigate negative impacts on local communities' livelihoods, living standards, and cultural practices, ensuring that affected populations receive adequate compensation, alternative livelihood options, and continued access to critical resources. Another essential safeguard under ESS5 is the application of the Project Environmental and Social Screening Tool for all interventions. This screening process will identify potential risks related to land tenure conflicts, involuntary resettlement, and access restrictions, ensuring that any technical assistance (TA) activities integrate appropriate mitigation measures. The Terms of Reference (TORs) for TA activities will incorporate detailed risk assessments and specific Environmental and Social (E&S) mitigation actions to minimize unintended consequences. The project also recognizes the need for strong stakeholder engagement and grievance redress mechanisms to ensure that affected communities can voice concerns, negotiate fair compensation, and seek resolution for land-related grievances. A Project Grievance Redress Mechanism (GRM) will be established to handle land-related complaints transparently and equitably, with particular attention to Indigenous Peoples, VMGs, and other marginalized groups.

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ESS6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources

Relevant

[Explanation - Max. character limit 10,000]

Given the landscape-scale restoration and watershed management interventions planned under KEWASIP, the project has the potential to enhance biodiversity and ecosystem services while also posing risks related to habitat modification, species composition changes, and invasive species management if not well planned. Sub-component 2b activities will be undertaken in selected gazetted forests which are important biodiversity conservation areas. Some of these forests are critical habitats for endemic and/or threatened species listed on the IUCN Red List of Threatened Species. For example, the Nyambene Hills water tower has at least ten endemic plant species, while the Shimba Hills water tower has at least 22 avian species endemic to the coastal region. The initial environmental screening did not identify direct interventions that pose significant adverse risks to biodiversity. However, given that many of the targeted watersheds are home to diverse flora and fauna, project activities such as afforestation, soil conservation, and water retention infrastructure development could indirectly affect local biodiversity and ecosystem balance if not managed appropriately. Afforestation and reforestation efforts, if not carefully designed, could disrupt existing habitats and alter local biodiversity. The introduction of non-native or fast-growing tree species could potentially outcompete indigenous vegetation, reducing habitat suitability for certain wildlife species. Restoration activities in gazetted forests and riparian areas need to avoid over-intervention that may lead to unintended disturbances in sensitive ecosystems. For example, heavy machinery use in forest restoration efforts could disrupt fragile soils, disturb nesting sites, or alter microhabitats critical for certain species. The presence of invasive plant species, such as *Prosopis juliflora* and *Lantana camara*, in some of the project locations requires systematic removal and management. If not well-coordinated, removal efforts could lead to rapid recolonization, further degrading local ecosystems. Additionally, mechanical removal without proper soil rehabilitation could exacerbate erosion risks and reduce soil fertility, negatively impacting native vegetation recovery. The project's investments in water retention structures, irrigation schemes, and riparian buffer restoration could inadvertently impact natural hydrological flows, affecting wetland ecosystems and aquatic biodiversity. The construction of water harvesting structures, check dams, and flood management systems must ensure that natural aquatic habitats are not fragmented and that sediment transport is not disrupted, which could otherwise affect fish populations and other aquatic species. To ensure biodiversity conservation and sustainable management of natural resources, KEWASIP will integrate biodiversity-friendly project design, species conservation measures, and ecosystem-based management approaches in line with ESS6. Environmental and social screening tools, including those that assess biodiversity risks, will be developed and implemented to identify and exclude activities that may have significant adverse impacts on local biodiversity. An Exclusion List will be provided in the Project's ESMF that precludes activities that have the potential to cause any significant loss or degradation of critical natural habitats, whether directly or indirectly, or which would lead to adverse impacts on natural habitats. The selection of tree species for afforestation and reforestation efforts will prioritize native and site-adapted species that align with natural ecosystem functions. To enhance biodiversity, reforestation efforts will mimic natural forest structures rather than relying on monoculture plantations, reducing risks of habitat simplification and lowered ecological resilience. Post-restoration monitoring systems will be established to track species recovery, habitat quality, and vegetation succession over time. A structured removal and restoration plan will be developed for invasive species management, combining mechanical removal, biological control, and community-based land stewardship to prevent reinvasion and secondary ecological degradation. Community engagement in invasive species control will be promoted through livelihood programs that repurpose

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removed biomass for productive uses such as biochar production, fodder, or sustainable fuelwood alternatives. The project will adopt nature-based solutions for flood and erosion control, ensuring that riparian buffer zones are maintained with diverse, multi-layered vegetation to support aquatic ecosystem health. Water resource planning will integrate ecological flow assessments to ensure that wetland habitats, fish populations, and downstream users are not adversely affected by hydrological modifications. PIU-based E&S officers will be responsible for biodiversity monitoring and compliance tracking, ensuring that all restoration and land management activities align with ESS6 objectives. The project will integrate GIS-based ecological monitoring, combining remote sensing and community-based biodiversity assessments to track the effectiveness of conservation measures and adapt interventions where necessary.

**ESS7 - Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities**

Relevant

*[Explanation - Max. character limit 10,000]*

A primary risk under ESS7 is the lack of culturally appropriate consultation mechanisms and inclusive decision-making processes. Given that many IPs and VMGs in Kenya have historically faced exclusion from development planning and resource governance, KEWASIP must ensure that they are meaningfully engaged from the outset. Failure to do so could result in community resistance, mistrust, and social tensions, particularly if interventions alter traditional land-use patterns, disrupt access to sacred sites, or impose conservation restrictions without consent. Another significant concern is the risk of non-compliance with Free, Prior, and Informed Consent (FPIC) for activities that may affect the land, resources, and cultural heritage of Indigenous communities. If project interventions involve land reclassification, restrictions on access to natural resources, or relocation of livelihoods, the absence of a well-defined FPIC process could lead to disputes, legal challenges, or conflicts between project implementers and affected communities. Economic and social risks also arise from potential restrictions on traditional livelihoods, particularly for pastoralist, forest-dependent, and riverine communities that rely on communal land and natural ecosystems for sustenance. KEWASIP's conservation and watershed management initiatives could reduce grazing land availability, limit access to water sources, or disrupt traditional farming and fishing practices, directly impacting food security, income sources, and community resilience. Additionally, social exclusion and gender disparities remain key risks, particularly for women, youth, and marginalized sub-groups within IPs and VMGs. Historically, Indigenous women have had limited representation in decision-making structures, making it essential that KEWASIP adopts affirmative action measures to promote inclusive participation, equitable benefit-sharing, and targeted support for Indigenous women's economic empowerment. To address these risks, KEWASIP will implement a comprehensive Process Framework that incorporates key provisions under ESS7, ensuring that VMGs and Indigenous communities are adequately consulted, protected, and included in project benefits. The project will develop and institutionalize FPIC mechanisms to ensure that any activity affecting IPs and VMGs' rights, resources, or livelihoods is preceded by open, transparent, and participatory decision-making. KEWASIP will establish community-led consultation platforms, leveraging Indigenous governance structures, local elders, and cultural representatives to facilitate meaningful dialogue and consent-based decision-making. VMGs will be actively involved in the design, implementation, and monitoring of conservation and watershed management plans, ensuring that their traditional ecological knowledge is integrated into landscape restoration efforts. Participatory Forest Management Plans (PFMPs) and Community Watershed Action Plans will incorporate customary land-use practices and Indigenous conservation approaches. KEWASIP will establish clear guidelines for compensation, benefit distribution, and alternative livelihood programs, ensuring that economic displacement risks are mitigated through sustainable, culturally appropriate income-generation activities. A Benefit-

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Sharing Framework will be developed to ensure that Indigenous communities equitably access project-related economic opportunities, including community-led restoration initiatives, ecotourism ventures, and Payment for Ecosystem Services (PES) schemes. A dedicated GRM for IPs and VMGs will be established, integrating traditional dispute resolution mechanisms, local mediation processes, and culturally sensitive grievance-handling protocols. The project's SEP will include customized outreach strategies, ensuring that Indigenous languages, communication preferences, and socio-political contexts are fully considered. KEWASIP will implement affirmative action policies to enhance Indigenous women's leadership in decision-making processes, ensuring their participation in land governance, restoration initiatives, and economic development programs. Special emphasis will be placed on youth engagement, capacity-building for VMG-led enterprises, and access to vocational training tailored to Indigenous knowledge systems and climate-smart livelihoods.

**ESS8 - Cultural Heritage**

Relevant

*[Explanation - Max. character limit 10,000]*

One of the key risks associated with KEWASIP is the potential interference with cultural heritage resources due to land restoration and conservation activities. Many Indigenous Peoples and local communities rely on certain sites for traditional ceremonies, initiation rites, spiritual practices, and cultural identity preservation. For instance, shrines, circumcision sites, sacred forests, and burial grounds could be inadvertently impacted if they are not properly identified and safeguarded during project implementation. Additionally, the project's civil works, afforestation, and reforestation activities may lead to the displacement or alteration of cultural landscapes, affecting long-standing traditions and local customs. Communities that utilise medicinal plants, practice seasonal grazing, traditional farming, or spiritual rituals linked to specific landforms may experience disruptions if project activities do not integrate their cultural considerations into the planning process. To address these risks, KEWASIP will integrate cultural heritage preservation into project planning and implementation, ensuring that cultural values and traditional practices are respected, protected, and promoted. A cultural heritage screening process will be integrated into the project's Environmental and Social Screening Tool, ensuring that all culturally significant sites are mapped and excluded from project interventions. Engagement with local elders, Indigenous Peoples' representatives, cultural experts, and archaeologists will be conducted to document and verify sacred sites, burial grounds, and intangible heritage resources before activities commence. A participatory approach will be adopted to ensure that Indigenous and local communities are actively consulted on how project activities may affect their cultural heritage. The project will facilitate culturally appropriate consultation mechanisms to determine the extent of significance attached to project areas and develop co-designed solutions to mitigate adverse impacts. Special attention will be given to customary laws, traditional governance structures, and Indigenous knowledge systems in managing and protecting cultural sites. KEWASIP will adopt and enforce World Bank-compliant Chance Find procedures, ensuring that all archaeological and cultural discoveries made during project activities are immediately reported, assessed, and preserved. Project contractors and workers will be trained on the Chance Find procedures, equipping them with the necessary protocols to follow when encountering artifacts, fossils, or historical structures. Collaboration with Kenya's National Museums and local heritage authorities will be established to ensure compliance with national cultural heritage protection laws.

**ESS9 - Financial Intermediaries**

Not Currently Relevant

*[Explanation - Max. character limit 10,000]*

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Not relevant to the project

**B.2 Legal Operational Policies that Apply**

**OP 7.50 Operations on International Waterways**

No

**OP 7.60 Operations in Disputed Areas**

No

**B.3 Other Salient Features**

**Use of Borrower Framework**

No

*[The Borrower’s ES Framework includes “those aspects of the country’s policy, legal and institutional framework, including its national, subnational, or sectoral implementing institutions and applicable laws, regulations, rules and procedures, and implementation capacity, which are relevant to the E&S risks and impacts of the project. The aspects that are relevant will vary from project to project, depending on such factors as the type, scale, location, and potential E&S risks and impacts of the project and the role and authority of different institutions” (ES Policy, paragraph 24). The decision to use the Borrower’s ES Framework in whole or in part to satisfy the objectives and requirements of relevant ESSs does not relieve the Bank of any of its due diligence obligations, as set out in Section C of the ES Policy.]*

**Explanation**

*[Explain whether the project will use, in part or in whole, the Borrower’s ES Framework, outlining – for each Environmental and Social Standard (ESS) relevant to the E&S risks and impacts of the project: i) the aspects of the country’s policy, legal and institutional framework that will be relied upon; ii) relevant implementation and enforcement capacity; and iii) any additional gap-filling measures that will be needed. If the Borrower’s ES Framework will not be used, outline the key aspects on which the decision is based. - Max. character limit 10,000]*

Not envisaged at the moment

**Use of Common Approach**

No

*[Explanation including list of possible financing partners – Max. character limit 4,000]*

Not envisaged

**B.4 Summary of Assessment of Environmental and Social Risks and Impacts**

*[Description provided will not be disclosed but will flow as a one time flow to the Appraisal Stage PID and PAD – Max. character limit 10,000]*

Under Component 1, which focuses on policy development, regulatory frameworks, training, and capacity-building, the primary environmental and social risks stem from the cumulative and downstream impacts of Technical Assistance (TA). These risks are particularly associated with policy formulation, development of guidelines and watershed management

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plans, and institutional strengthening efforts, which, if not properly assessed, may have unintended consequences. As outlined in the World Bank's Operations Environmental and Social Review Committee (OESRC) Advisory Note on Technical Assistance and the Environmental and Social Framework (May 21, 2019), KEWASIP involves Type 2 and Type 3 TAs, requiring careful attention to indirect environmental and social impacts.

To mitigate these risks, the project will integrate key prevention and mitigation measures. Environmental, Social, Health, and Safety (ESHS) considerations will be mainstreamed in Terms of Reference (ToRs) and bidding documents, ensuring that all TA activities incorporate environmental and social safeguards from the outset. Additionally, TA service providers will undergo capacity-building on ESHS obligations, including measures to prevent and address cases of Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH). The project will also adhere to relevant national laws and security protocols, as detailed in the Environmental and Social Commitment Plan (ESCP), ensuring compliance with legal and institutional frameworks. There will also be robust engagement with technical experts to ensure that downstream cumulative E&S risks and impacts are well understood.

A central focus will be ensuring inclusive and culturally appropriate stakeholder engagement, particularly for Indigenous Peoples (IPs) and Vulnerable and Marginalized Groups (VMGs). The project will establish a functional worker Grievance Redress Mechanism (GRM), which will be sensitive to SEA/SH concerns, include multiple reporting channels, and provide clear referral pathways for affected individuals.

Component 2 focuses on Sustainable Landscape and Watershed Management (SLWM) to support the restoration and management of degraded landscapes in gazetted forests, protected areas, private lands, and community lands. This component carries significant environmental and social risks, particularly regarding land use restrictions, access to natural resources, and potential community displacement. Among the key risks is the potential restriction of access to land and natural resources, which may limit traditional grazing areas, water sources, and forest-based livelihoods. Furthermore, challenges in establishing equitable benefit-sharing mechanisms could result in social tensions, particularly if certain communities feel excluded from project benefits.

Another critical risk is the potential for economic displacement, particularly if livelihood restoration activities do not fully compensate affected households, leading to long-term socio-economic vulnerabilities. Additionally, there is a risk of Indigenous Peoples and VMGs being excluded from project benefits, which could exacerbate existing inequalities and marginalization. Weak grievance management systems could further prevent affected individuals from raising concerns or seeking redress, while inadequate monitoring of livelihood restoration activities may result in ineffective implementation and unsustainable outcomes.

To address these risks, the Ministry of Environment, Climate Change, and Forestry (MoECCF) has prepared a Stakeholder Engagement Plan (SEP) to facilitate culturally appropriate, meaningful engagement with all stakeholders, including IPs and VMGs. Alongside this, an Environmental and Social Commitment Plan (ESCP) has been developed, outlining the material measures and actions that MoECCF will undertake to manage and mitigate environmental and social risks throughout project implementation. In addition, an Environmental and Social Management Framework (ESMF) has been established that provides principles, rules, and procedures for assessing risks and impacts once project sites and sub-projects are identified. It includes an Labour Management Procedures (LMP), that will be implemented to ensure fair labour practices and outlines how different categories of workers will be managed in accordance with national labour laws and the requirements of Environmental and Social Standard 2 (ESS2) and Community Health and Safety (ESS4). The



ESMF also includes a Security Management Plan (SMP) that outlines strategies, procedures, and measures to manage and mitigate security risks related to the project.

Recognizing the importance of institutional capacity in managing these risks, the World Bank has conducted a due diligence assessment to evaluate the ability of implementing agencies to effectively oversee environmental and social safeguards. This assessment focused on institutional structure and governance capacity, human resource availability, environmental and social risk management systems, technical and financial resources, stakeholder engagement, and past project performance. Coordination between the MoECCF and other relevant agencies is also being assessed, with a particular focus on Kenya Forest Service (KFS) and Kenya Wildlife Services (KWS), given its enforcement mandate under Kenyan law and its likely role as an implementing agency. Gap filling measures and tools have been incorporated in the ESCP, SEP and ESMF.

The KEWASIP is undertaking a comprehensive Environmental and Social Assessment (ESA), anticipated to be completed by project effectiveness, that includes the development of a Process Framework to guide the formulation of key mitigation plans. These include a Resettlement Plan, Livelihood Restoration Plan, Indigenous Peoples Plan, and Benefit-Sharing Agreements, tailored to address the specific needs of affected communities. These plans will be implemented to mitigate negative impacts on local communities' livelihoods, living standards, and cultural practices, ensuring that affected populations receive adequate compensation, alternative livelihood options, and continued access to critical resources. A Social and Conflict Analysis is being conducted to determine whether project interventions, particularly those under Component 2a, may exacerbate existing social tensions and inequalities. Also, an evaluation of the institutional frameworks for the KFS and KWS for recommendations on strengthening their codes of conduct as aligned with Good Practice Notes (GPN) on the use of armed security and other internationally accepted practices. Further, an E&S technical capacities and systems assessment of implementing entities to enhance management and sustainability measures is being assessed. In addition, a review of the existing Grievance Redress Mechanism of implementing entities for enhancement. Following the outcomes of the environmental and social assessment, the project will develop and operationalize several key environmental and social instruments, during implementation. A Strategic Environmental and Social Assessments (SESA) will also be conducted to evaluate any downstream and cumulative risks of new plans, policy changes and institutional reforms, ensuring that potential environmental and social risks are identified and addressed in a proactive manner.

### **C. Overview of Required Environmental and Social Risk Management Activities**

#### **C.1 What Borrower environmental and social analyses, instruments, plans and/or frameworks are planned or required by implementation?**

*[Description of expectations in terms of documents to be prepared to assess and manage the project's environmental and social risks and by when (i.e., prior to Effectiveness, or during implementation), highlighted features of ESA documents, other project documents where environmental and social measures are to be included, and the related due diligence process planned to be carried out by the World Bank, including sources of information for the due diligence - Max. character limit 10,000]*

ESF instruments will be prepared in three phases: those required before project appraisal, by project effectiveness and those to be developed during project implementation.



(1) Instruments to be Prepared by Project Appraisal

Three instruments have been prepared to establish the framework for stakeholder engagement, define the project's environmental and social obligations and set out the principles, rules, guidelines and procedures to assess and address Project E&S risks and impacts:

(a) Stakeholder Engagement Plan (SEP): This document outlines the timing, methods, and scope of stakeholder engagement throughout the project's lifecycle, ensuring meaningful participation by all relevant stakeholders. The SEP will distinguish between project-affected persons, interested parties, and vulnerable groups, detailing how their concerns will be considered in decision-making. The plan is developed in agreement between the Government of Kenya and the World Bank and will guide consultations, information dissemination, and grievance redress mechanisms.

(b) Environmental and Social Commitment Plan (ESCP): The ESCP sets out the material measures and actions that the Government of Kenya must undertake to comply with environmental and social requirements. It defines specific obligations, implementation timeframes, and monitoring responsibilities, ensuring that all mitigation measures are integrated into project operations. The ESCP serves as a legally binding commitment between the government of Kenya and the World Bank, ensuring that environmental and social risk management is prioritized.

C) Environmental and Social Management Framework (ESMF): This framework establishes the principles, rules, guidelines, and procedures for assessing environmental and social risks and impacts once specific sites and sub-projects are identified. The ESMF provides a structured approach for screening, assessing, and mitigating risks, ensuring compliance with national and international environmental and social standards. It includes Labor Management Procedures (LMP) and a Security Management Plan (SMP) that outlines strategies, procedures, and measures to manage and mitigate security risks related to the project.

(2) To be completed by project effectiveness

An Environmental and Social Assessment (ESA) that includes, (i) developing a process framework to address E&S risks and impacts related to restrictions on access to natural resources in legally designated parks and gazette forests which will inform the development of appropriate management plans which may include a Resettlement Plan, Livelihood Restoration Plan, Indigenous Peoples Plan, and/or Benefit Sharing Plan/Agreement; (ii) an evaluation of the institutional frameworks for the KFS and KWS for recommendations on strengthening their codes of conduct, aligned with Good Practice Notes (GPN) on the use of armed security and other internationally accepted practices; (iii) a social conflict analysis to assess the extent to which project activities might exacerbate existing tensions and inequalities or be affected by ongoing conflicts; (iv) an E&S technical capacities and systems assessment of implementing entities to enhance management and sustainability measures; (v) a review of the existing Grievance Redress Mechanism of implementing entities for enhancement; and (vi) Sexual Exploitation, Abuse and Harassment (SEA-SH) Prevention and Response Plan.

3) Instruments to be Prepared, Reviewed, Approved, and Disclosed During Project Implementation

Once project implementation begins, additional instruments will be developed to address site-specific risks and ensure that all project interventions comply with environmental and social requirements. The specific additional instruments



to be developed will be determined by the outcome of the Environmental and Social Assessment (ESA), anticipated to be completed by project effectiveness.

Strategic Environmental and Social Assessment (SESA) to examine E&S risks and impacts associated with plans/policies and regulatory frameworks under Component 1 of the Project;

Environmental and Social Impact Assessment (ESIA) or Environmental and Social Management Plans (ESMPs) as established by the outcome of screening defined in the ESMF.

**III. CONTACT POINT**

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**V. APPROVAL**

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