



MINISTRY OF ENVIRONMENT, CLIMATE CHANGE AND FORESTRY

STATE DEPARTMENT FOR FORESTRY

Kenya Watershed Services Improvement Project (KEWASIP)

**Updated Stakeholder Engagement Plan (SEP)
(P178850)**

MARCH 2025

List of Abbreviations

| | |
|--------|--|
| ASAL | Arid and Semi-Arid Land |
| BETA | Bottom-Up Economic Transformation Agenda |
| CALM | Climate Action through Landscape Management PforR |
| CBD | Convention on Biological Diversity |
| CCDR | Country Climate and Development Report |
| CEC | County Environment Committee |
| CFA | Community Forest Association |
| CIF | Climate Investment Funds |
| CoG | Council of Governors |
| CPCU | County Project Coordination Unit |
| CPSAC | County Project Steering and Advisory Committee |
| CRI | Climate Resilience Indicator |
| CSA | Climate Smart Agriculture |
| DRSRS | Directorate of Remote Surveys and Resource Sensing |
| DOSHS | Directorate of Occupational Safety and Health Services |
| EHSGs | Environmental, Health, and Safety Guidelines |
| EIA | Environment Impact Assessment |
| EMCA | Environmental Management and Coordination Act |
| ESF | Environment and Social Framework |
| ESIA | Environment and Social Impact Assessment |
| ESMP | Environment and Social Management Plan |
| ESSs | Environment and Social Standards |
| FAO | Food and Agriculture Organization |
| FCMA | Forest Conservation and Management Act |
| FFS | Farmer Field Schools |
| FLLOCA | Financing Locally Led Climate Action |
| GEF | Global Environment Facility |
| GHG | Greenhouse Gas |
| GoK | Government of Kenya |
| GRS | Grievance Redress Service |
| Ha | Hectare |
| ICT | Information and Communication Technology |
| IDA | International Development Association |
| IEMP | Integrated Ecosystem Management Plans |
| IFAD | International Fund for Agricultural Development |

| | |
|---------|--|
| IP | Indigenous People |
| IPF | Investment Project Financing |
| IWC | Integrated Watershed Committees |
| IWUA | Irrigation Water Users Associations |
| KAPSLMP | Kenya Agricultural Productivity and Sustainable Landscape Management Project |
| KCSAP | Kenya Climate-Smart Agriculture Project |
| KEFRI | Kenya Forestry Research Institute |
| KEWASIP | Kenya Watershed Services Improvement Project |
| KFS | Kenya Forest Service |
| Ksh | Kenyan Shilling |
| KWS | Kenya Wildlife Service |
| KWSCRIP | Kenya Water Security and Climate Resilience Project |
| KWTA | Kenya Water Towers Agency |
| MoECCF | Ministry of Environment, Climate Change and Forestry |
| M&E | Monitoring and Evaluation |
| MECCF | Ministry of Environment, Climate Change and Forestry |
| MoA | Ministry of Agriculture |
| MRV | Measurement, Reporting, And Verification |
| MTP | Medium-Term Plan |
| NBEs | Nature-Based Enterprises |
| NCCAP | National Climate Change Action Plan |
| NDC | Nationally Determined Contributions |
| NECC | National Environmental Complaints Committee |
| NEMA | National Environment Management Authority |
| NET | National Environment Tribunal |
| NGEC | National Gender and Equality Commission |
| NLERS | National Landscape and Ecosystem Restoration Programme Strategy 2023-2032 |
| NMK | National Museums of Kenya |
| NPC | Nature, People, and Climate |
| NPCU | National Project Coordination Unit |
| NPSC | National Project Steering Committee |
| NTAC | National Technical Advisory Committee |
| OESRC | Operations Environmental and Social Review Committee |
| OHS | Occupational Health and Safety |
| PAD | Project Appraisal Document |
| PCE | Private Capital Enabled |

| | |
|---------|--|
| PCM | Private Capital Mobilization |
| PCRA | Participatory Climate Risk Assessments |
| PDO | Project Development Objective |
| PES | Payment for Ecosystem Services |
| PF | Process Framework |
| PFM | Public Finance Management |
| PFMP | Participatory Forest Management Plan |
| PPP | Public-Private Partnership |
| REDD | Reducing Emissions from Deforestation and Forest Degradation |
| RMP | Resource Management Plan |
| SCMP | Sub-Catchment Management Plan |
| SDA | State Department for Agriculture |
| SDECC | State Department for Environment and Climate Change |
| SDF | State Department for Forestry |
| SDI | State Department for Irrigation |
| SDW | State Department for Wildlife |
| SDWS | State Department for Water and Sanitation |
| SEA/SH | Sexual Exploitation and Abuse/Sexual Harassment |
| SESA | Strategic Environmental and Social Assessment |
| SFM | Sustainable Forest Management |
| SLM | Sustainable Land Management |
| SLWM | Sustainable Land and Water Management |
| THS-UCP | Transforming Health Systems for Universal Care Project |
| ToR | Terms of Reference |
| VMG | Vulnerable and Marginalized Groups |
| WB | World Bank |
| WCCPC | Water Catchment Conservation and Protection Committee |
| WIBA | Work Injury Benefit Act |
| WMP | Watershed Management Plans |
| WRA | Water Resources Authority |
| WRUA | Water Resource Users Association |

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1.0: Introduction

The Ministry of Environment, Climate Change & Forestry (MoECCF), in collaboration with the World Bank, is spearheading the development of the Kenya Watershed Services Improvement Project (KEWASIP). This five-year Project aims to restore degraded landscapes and improve watershed services to enhance climate change resilience and improve the livelihoods of communities within Kenya's watersheds.

Kenya currently faces a significant land degradation, especially in the five core management basins that are largely considered national watersheds, with studies showing that over 12 million people reside in degraded lands. Further, habitat loss and fragmentation are both exacerbated by various underlying pressures, including the country's growing population, increasing poverty and the drive for economic growth. Notably, soil compaction, soil erosion, salinization and vegetation dilapidation are the principal degradation processes in the marginal, arid and semi-arid environments in Kenya, with food insecurity and poverty being attributable to the impacts of land degradation, including a reduction in crop, pasture, fuelwood and non-timber forest products. Similarly, water shortages, siltation, damage to soil and habitat loss all serve to reduce ecosystem services and biodiversity, with adverse consequences on the national economy.

Herewith, the KEWASIP (P178850) is being undertaken with its objectives focusing on improving the management and conservation of watershed services, promoting sustainable land use practices, and enhancing the livelihoods of communities that depend on these ecosystems. The Project targets key regions across Kenya, where these efforts are expected to have a significant impact on both environmental sustainability and community well-being.

1.1: Project Objectives

The Kenya Watershed Services Improvement Project (KEWASIP) includes three key objectives:

1. **Strengthening Watershed Planning, Governance, and Monitoring:** This objective focuses on building institutional capacity, improving governance structures, and establishing a monitoring system to support effective watershed management.
2. **Promoting Sustainable Land Management Practices and Restoring Landscapes:** This objective involves Implementing land management practices that restore degraded landscapes and ensure the sustainable use of natural resources.
3. **Enhancing Public Land Management and Restoration of gazetted forested areas:** This objective aims to improve the management of public lands and restore gazetted forested areas to safeguard biodiversity and ecosystem services.

1.2: Project components:

The Kenya Watershed Services Improvement Project (KEWASIP) entails three main components, each designed to achieve the Project's objectives effectively:

Component 1: Roots to Resilience: Foundation for Integrated Long-term Project. This component aims to establish a strong foundation for Sustainable Landscape

and Watershed Management (SLWM) through enhanced institutional capabilities, improved governance, and innovative financing mechanisms. It supports the development of an integrated monitoring system to facilitate informed decision-making and enhance landscape resilience.

Component 2: Green Horizons: Sustainable Landscape and Watershed

Revitalization. This component focuses on restoring degraded landscapes and managing ecosystems through targeted investments in selected watersheds. It promotes community resilience by adopting a participatory approach to plan and implementing SLWM activities, with an emphasis on both watershed assessments and community-driven initiatives.

Component 3: Project Management, Training & Capacity Building. The objective of this component is to ensure effective planning, budgeting, implementation, and reporting of project activities, aligned with World Bank standards. It emphasizes training and capacity building to support successful project execution.

1.3 : Proposed Project location

KEWASIP will be implemented across diverse regions of Kenya, covering five (5) landscapes, including Marsabit, Marmanet, Nyambene, Chyulu Hills and Shimba Hills (Figure 1) The five project landscapes selection process employed a multi-faceted prioritization approach, considering factors such as: vegetation degradation, soil erosion risk, potential beneficiaries, conservation priorities and cost-effectiveness of implementing Sustainable Land Management (SLM) practices. To further refine the project scope, the initial project sites have been further classified to manageable and ecologically relevant units or hydrosheds for intervention based on detailed cost-benefit analyses and restoration priorities to ensure targeted and effective implementation of conservation activities. A total of 90 hydrosheds and 44 gazetted forests within the five landscapes have been identified for immediate intervention.

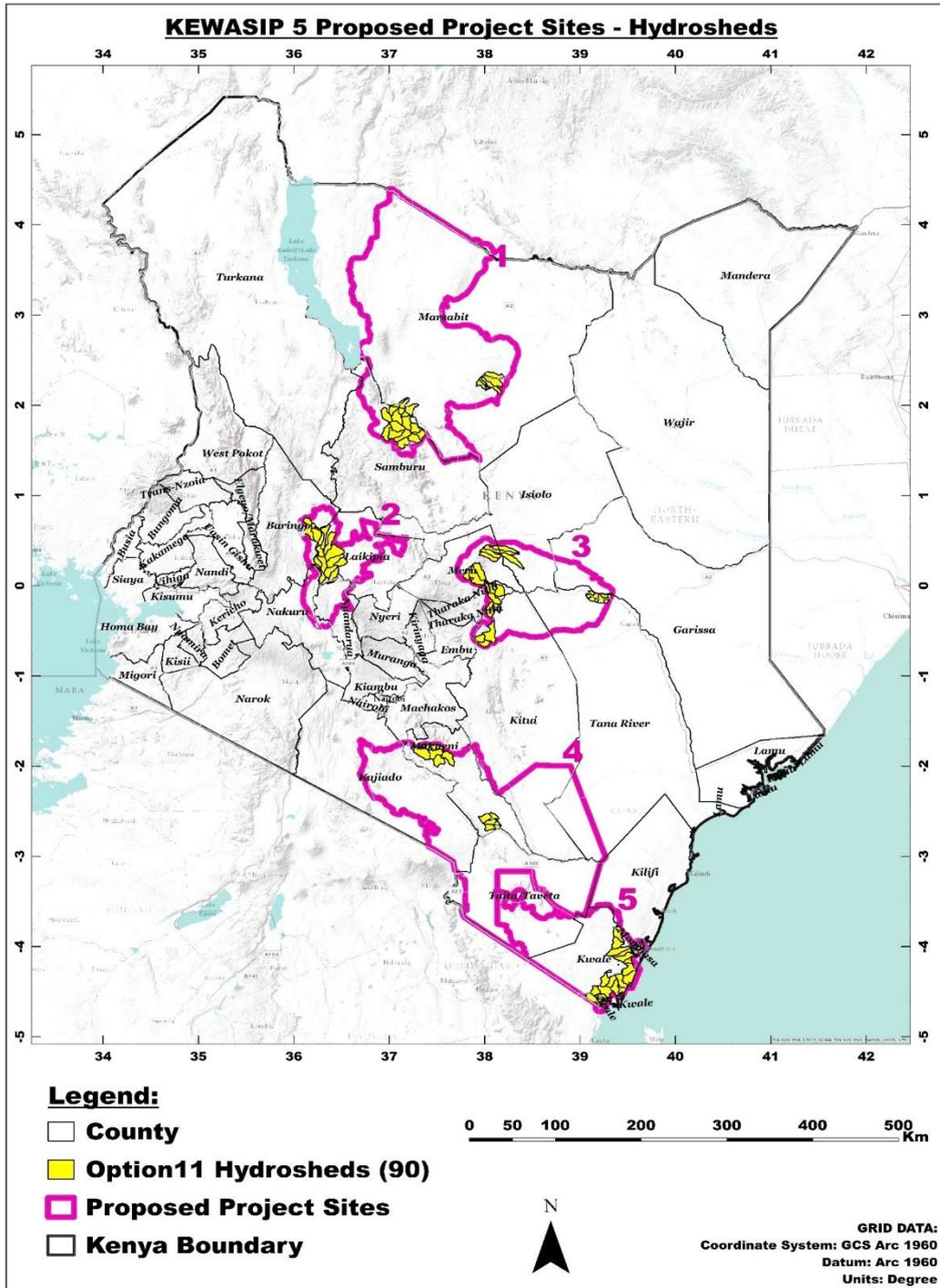


Figure 1: KEWASIP Project sites

The five landscapes span over 12 counties covering various geographical and ecological zones, ensuring comprehensive coverage and impact (Table 1). Owing to the continued existential threats that arise due to farming and human settlements which result in encroachment on riparian areas and forests, a vast majority of the project will take place in modified habitats, or in areas that are already anthropogenically impacted.

Table 1: KEWASIP target counties

| Region | Water Towers/Watershed | Counties |
|----------|------------------------|---|
| Northern | Mt. Marsabit | Marsabit |
| | Ndotos | Samburu |
| Eastern | Chyulu | Makueni |
| Central | Marmanet | Laikipia, Baringo, |
| Eastern | Nyambene | Isiolo, Meru, Kitui, Tana River, Garissa, Tharaka Nithi |
| Coastal | Shimba Hills | Kwale |

The Kenya Watershed Services Improvement Project (KEWASIP) is being developed under the World Bank’s Environment and Social Framework (ESF). In line with Environmental and Social Standard ESS10 on Stakeholder Engagement and Information Disclosure, the MoECCF-State Department for Forestry (SDF) should provide stakeholders with timely, relevant, continuous, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, or intimidation.

This Stakeholder Engagement Plan (SEP) as a tool for keeping stakeholders informed throughout the project life cycle. This is meant to ensure appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner. Stakeholders will be actively involved in decision making and project implementation processes and where necessary, existing mechanisms will be enhanced or additional mechanisms developed to align with ESS 10.

2.0: Objective of the SEP

The overall objective of the SEP is to define a plan for stakeholder engagement, public information disclosure and meaningful consultation throughout the project cycle. The SEP outlines the approach by which the KEWASIP project team will communicate and engage with stakeholders and includes a grievance mechanism through which stakeholders can raise concerns, complaints or provide feedback about the project.

This SEP outlines the ways in which MoECCF -SDF, Implementing Agencies (IAs), and contractors or service providers will communicate with stakeholders and includes a mechanism by which stakeholders may raise concerns, provide feedback, or make complaints about KEWASIP, the contractors, and their representatives.

This SEP should be considered a “living document” that will be updated, at least annually, as Project planning and implementation evolves. The involvement of the local people is essential to the success of the Project by ensuring smooth collaboration between KEWASIP and local communities to minimize and mitigate environmental and social risks related to the proposed project.

The Specific Objectives of the Stakeholder Engagement Plan (SEP) are to:

- i. Provide guidance for stakeholder engagement that meets International Best Practice standards.
- ii. Identify key stakeholders that are affected, and/or influence the Project and its activities.
- iii. Develop a stakeholder engagement process that provides them a platform to influence project planning, design and implementation.
- iv. Identify the most effective methods, timing and structures through which to share project information, and to ensure regular, accessible, transparent and appropriate consultation.
- v. Establish specific procedures for Free, Prior Informed Consent (FPIC) consultations with VMGs/IPs in the respective KEWASIP watersheds.
- vi. Establish formal grievance/ resolution mechanisms.
- vii. Define roles and responsibilities for implementation of the SEP.
- viii. Define monitoring and reporting measures to ensure the effectiveness of the SEP.

3.0. Stakeholder identification and analysis

The Stakeholder Engagement Process for the KEWASIP began with stakeholder identification, mapping, and analysis. This process defined the project stakeholders, including their key groupings and sub-groupings, ensuring comprehensive recognition of all individuals, groups, or organizations with an interest in or potentially being affected by the project.

Stakeholder identification considered regulatory requirements that may pre-determine certain groups as stakeholders, ensuring alignment with legal and institutional obligations. The SEP establishes a framework that guides the Ministry of Environment, Climate Change, and Forestry (MoECCF) - SDF in executing stakeholder identification and

engagement procedures, ensuring consistency with national commitments and project specific requirements.

3.1. Stakeholder Identification Criteria

To identify stakeholders effectively, the following project-adapted criteria was applied:

1. Project's Geographic Sphere of Influence - Stakeholder identification began by delineating the project's geographic area of influence.

This included:

- Primary project site(s).
 - Associated facilities and transport routes.
 - Areas subject to cumulative impacts or unplanned but predictable developments.
2. Directly Affected Stakeholders - Stakeholders directly affected by the project
 3. Indirectly Affected and Interested Stakeholders - stakeholders outside the immediate project area who may perceive themselves as impacted or represent the interests of affected groups
 4. Engagements with Stakeholder Representatives - Identifying and consulting stakeholder representatives can facilitate efficient information dissemination and feedback collection. The selection of representatives considered the following:
 - **Legitimacy and Representation:** Representatives must genuinely advocate for their constituents' views and accurately relay project information back to their communities.
 - **Verification:** The engagement process will verify the appropriateness of representatives by directly consulting a sample of project-affected stakeholders. This "ground-trothing" approach ensures consistency in the representation of stakeholder perspectives and identifies potential discrepancies.

4.0 Principles of Stakeholder Engagement

Under the KEWASIP Project, the MoECCF project team shall employ the following principles for stakeholder engagement in a bid to meet best practice approaches:

- **Inclusiveness and sensitivity:** Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects(s) is inclusive. All stakeholders at all times encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement

methods. Special attention is given to vulnerable groups, in particular women, youth, elderly including diverse ethnic groups.

- Informed participation and feedback: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders’ feedback, for analyzing and addressing comments and concerns.
- Openness and life-cycle approach: public consultations for the project will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.

4.2. Project Affected parties and other interested parties

Table 2: Stakeholders around the watersheds

| WATER TOWER | COMMUNITIES | GOVERNMENT AGENCIES | NGOs, CSOs | INTEREST IN KEWASIP |
|----------------------|---|--|--|--|
| Chyullu Hills | <ul style="list-style-type: none"> – Akamba people and Masai nomadic pastoralists as users | <ul style="list-style-type: none"> – Kenya Forest Service (KFS) – Kenya Wildlife Service (KWS) – Ministry of Environment, Climate Change, and Forestry (MoECCF) – KWTA – WRA – State Department for Social Protection/Social Risks and Impacts Management Committees, – NGAO, – County Governments – NEMA | <ul style="list-style-type: none"> – Kibwezi Community Forest Association – Maikuu, Mikuyuni, and Nguumo CBOs. – Wood Carvers’ Cooperatives. – Thome wa Akamba Cultural Group for Peace and Development. | <ul style="list-style-type: none"> • Sustainable grazing and water resource management • Preservation of cultural heritage |

| | | | | |
|------------------------|--|---|---|---|
| Marsabit Forest | - Rendille, Borana, and Gabra communities | | <ul style="list-style-type: none"> - Mount Marsabit Ecosystem Conservancy - Northern Rangelands Trust (NRT) - Wildlife Works | <ul style="list-style-type: none"> - Forest and water resource conservation - Climate change resilience - Sustainable livelihoods for local communities - Safeguarding communities against harm from project activities |
| Ndotos Hills | - Samburu and Turkana communities | „ | <ul style="list-style-type: none"> - Grevy’s Zebra Trust - NRT - Friends of Ndotos Forest | <ul style="list-style-type: none"> - Biodiversity preservation - Forest Conservation Promoting sustainable land use practices |
| Nyambene Hills | - Meru and Tharaka communities Njuri ncheke council of elders | „ | <ul style="list-style-type: none"> - Nature Kenya - Meru Forest - Environmental Conservation Group | <ul style="list-style-type: none"> - Sustainable land use and watershed protection - Enhancing livelihoods through conservation - Protection of forest biodiversity |
| Marmaret Forest | - Kikuyu and maasai community (Indigenous People- Yaku, IIngwesi) | „ | <ul style="list-style-type: none"> - Greenbelt Movement | <ul style="list-style-type: none"> - Forest conservation - Indigenous rights advocacy - Sustainable Forest use and restoration |

| | | | | |
|---------------------|-------------------------------|-----|--|---|
| Shimba Hills | - Duruma and Digo communities | -,, | - World Wide Fund for Nature (WWF) - Shimba Hills Forest Guides Association - Nature Kenya | - Wildlife conservation - Forest Management - Ecotourism development to support local economies |
|---------------------|-------------------------------|-----|--|---|

4.2.1. Project Affected Parties

Under KEWASIP, these shall include persons, groups and other entities within the Project Area of Influence (PAI) that are directly affected by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.

Specifically, these demographics of individuals and groups fall within this classification:

- Local Communities living within or near targeted watershed areas who rely on these ecosystems for their livelihoods, such as farming, fishing, or gathering forest products.
- Indigenous Peoples who have cultural and traditional ties to the watershed areas.
- Individuals or groups whose land may be acquired, restricted, or otherwise affected by project interventions such as reforestation, conservation activities, or infrastructure development.
- Smallholder farmers and pastoralists who depend on the land for agriculture, grazing, or other livelihood activities
- Forest-dependent communities utilizing timber, firewood, or non-timber products for subsistence or income.
- Fishers, farmers, and water users in areas downstream of project sites, where changes to water quality, availability, or flow may affect agricultural productivity or domestic use.
- Women, youth, and other vulnerable populations whose livelihoods are heavily reliant on natural resources and who may face disproportionate impacts or have limited capacity to adapt.
- County-level environmental, forestry, and water management authorities involved in regulating, monitoring, or implementing project activities.
- Individuals employed directly or indirectly by the project for conservation, infrastructure, or supply chain activities.
- Local businesses dependent on ecosystem services that might experience shifts in demand or operations due to project activities.

These stakeholders will be prioritized to ensure their concerns and interests are fully integrated into project planning and implementation.

4.2.2. Other Interested Parties

These shall entail individuals, groups or entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/ or who could affect the project and the process of its implementation in some way.

These include:

- Legacy media, inclusive of local, regional and national broadcasting media, and print media;
- Social media including but not limited to X, Facebook, LinkedIn and WhatsApp;
- Business owners, service, material and goods providers within KEWASIP's project areas, inclusive of those in the supply chain presently or those in contention for providing project supplies down the line;
- Residents of other rural settlements within the targeted project area(s), benefitting from either training or employment opportunities attributable to KEWASIP,
- The Government of Kenya, through officials, regulatory agencies at county and national levels, for instance, labor authorities, environmental agencies, social protection authorities, and Community-based organizations (CBOs), Civil Society Organizations (CSOs) and/ or Non-Governmental Organizations (NGOs) operating at local, county/ regional and national levels in pursuit of socio-economic and environmental interests. Organizations or entities advocating on behalf of impacted communities.

Engaging these stakeholders ensures all relevant interests and potential sources of opposition are properly informed and involved as appropriate.

4.2.3. Disadvantaged / Vulnerable Individuals or Groups

The vulnerable demographic shall encompass persons who may be disproportionately impacted or further disadvantaged by the project as compared with any other groups, due to their vulnerable status and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the KEWASIP project.

It is vital to safeguard the participation of this demographic in public consultations and various other engagement platforms associated with KEWASIP, regardless of the nature of their vulnerability, including their age, financial position, origin, health and disability status, gender, economic deficiency, dependence on other persons/ resources or their standing in the community as determined by being members of a minority or fringe groups.

To ensure effective participation in KEWASIP's decision making processes whilst elevating their awareness and input, it is imperative that specific measures and mechanisms be put in place for these vulnerable individuals, who may include:

- Single mothers with underage children/ women-headed households,
- Informal Sector Workers and Low- Income Families
- Elderly People
- Persons Living with Disabilities and their Caregivers
- Women-Headed Households

- Sexual and Gender Minorities
- Unemployed Individuals
- Indigenous Peoples and Disadvantaged Ethnic Groups
- Rural and Remote Communities
- Informal Sector Workers and Low-Income Families
- Child-headed families

4.2.4. Indigenous peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (ESS7)

According to the World Bank's Environmental and Social Standard 7, the term "Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities" is used in a generic sense to refer exclusively to distinct social and cultural groups possessing the following characteristics in varying degrees:

- a) Self-identification as members of a distinct indigenous social and cultural group and recognition of this identity by others.
- b) Collective attachment to geographically distinct habitats, ancestral territories, or areas of seasonal use or occupation, as well as to the natural resources in these areas.
- c) Customary cultural, economic, social, or political institutions that are distinct or separate from those of the mainstream society or culture; and
- d) A distinct language or dialect, often different from the official language or languages of the country or region in which they reside.

Based on the above, KEWASIP is likely to impact upon vulnerable and marginalized groups/IPs, and therefore engagement and consultation with them should be undertaken to address the following:

- To ensure that the development process fosters full respect for the human rights, dignity, aspirations, culture, and natural resource-based livelihoods of vulnerable people (including IPs).
- To anticipate and avoid adverse impacts of projects on vulnerable people (including IPs) or when avoidance is not possible, to minimize and/or compensate for such impacts.
- To promote sustainable development benefits and opportunities for vulnerable people (including IPs) in a culturally appropriate manner.
- To establish and maintain an ongoing relationship based on Informed Consultation and Participation (ICP) with the vulnerable people (including IPs) affected by a project throughout the project's life cycle.
- To ensure the Free, Prior, and Informed Consent (FPIC) of vulnerable people (including IPs), where applicable. A project cannot proceed unless vulnerable people (including IPs) have given their FPIC to the project through a process of mutual dialogue and agreement between the affected communities/ individuals and the company proposing a project, which the IFC calls 'good faith negotiation'.

- To respect and preserve the culture, knowledge, and practices of IPs.
- Free Prior Informed Consent of the Indigenous Persons.

'Free' means the community shares its opinions willingly and is not persuaded, tricked or forced to say or agree to certain things. 'Prior' indicates the MoECCF informs stakeholders in advance when consultations will be undertaken prior Project decision making, not afterwards. 'Informed' implies the MoECCF will be explicit on project information, including the positive and negative outputs that may occur and all the different potential alternative activities that may be undertaken to achieve project objectives and avoid or reduce harm.

Good faith negotiation implies the KEWASIP must engage with vulnerable people or groups (including IPs) in a way that they fully agree from. The KEWASIP must show vulnerable people that it will respond to any queries quickly, regularly, and in a language that the vulnerable people understand. All relevant information needs to be presented so that IP's can make an informed decision.

In line with ESS7, there are three situations in which FPIC is required. These include when the project will:

- have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation.
- cause relocation of Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities (VMGs in Kenya) from land and natural resources subject to traditional ownership or under customary use or occupation; or
- have significant impacts on Indigenous Peoples/VMGs' cultural heritage that is material to the identity and/or cultural, ceremonial, or spiritual aspects of the affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities' lives.

When any of these three impacts are foreseen at the sub-project initiation, following the screening process, the FPIC procedure elaborated in Section 4.2.4.3 shall be applied.

4.2.4.1 Vulnerable and Marginalized Groups/IPs that May Require FPIC Processes

The KEWASIP will be implemented in territories that Vulnerable and Marginalized Groups (VMGs)/IPs use for their nature-based and related livelihoods. Preliminary studies have revealed that there are VMGs/IPs in the following watersheds:

Marmanet Watershed

In this Watershed, there are VMGs/IPs including Ilchamus (a Maa Community) and Endorois people in Baringo County. On Laikipia side of the Watershed, there are the Masai, Samburu, and Rendille people.

Nyambene Watershed

In the Nyambene Watershed there are VMGs/IPs in Isiolo County who include the Turkana and Samburu pastoralists, and in Tana River County there are the Munyoyaya and Malakote/Wailwana, while in Garissa County the main VMGs/IPs are Boni and Wailwana.

Chyullu Hills Watershed

This watershed is predominantly in Makueni County and there are no known VMGs/IPs in that county. However, the Masai pastoralists from the neighboring Kajiado County use the watershed to access pasture, fodder and water for their livestock especially during the dry seasons.

Shimba Hills Watershed

In this Watershed, which is in Kwale County, the main VMGs/IPs are the Wapemba and Makonde peoples.

Mt. Marsabit Watershed

This Watershed is in Marsabit County. The main VMGs/IPs in the county include the Rendille, Dasenach, and El Molo peoples.

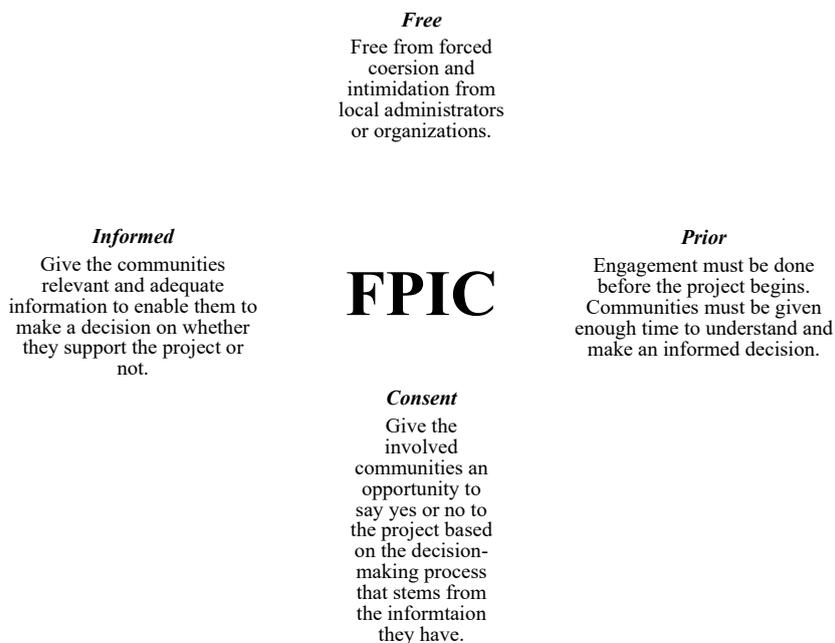
Ndotos Hills Watershed

This Watershed is in Samburu County, which is predominantly inhabited by the Samburu pastoralists. The Turkana pastoralists as a minority in the county. The VMGs in Samburu County are the El Molo who will require an FPIC process.

These VMGs/IPs will be validated and their actual utilization of the respective watersheds and adjacent territories for their livelihoods before the FPIC processes are commenced.

4.2.4.2 FPIC Principles

The following figure summarizes the FPIC principles.



4.2.4.3 The FPIC Procedure

The FPIC process is part of the wider stakeholder consultation for the KEWASIP, and it entails consultations in good faith with the representative institutions endorsed by VMGs/IPs in the project areas. The aim of these consultations is to apply the FPIC principles to facilitate collective decisions by the concerned VMGs/IPs about giving or withholding consent for the project. Consent refers to the collective support of peoples for the project activities that affect them, reached through a culturally-appropriate process. This consent relates to the design, implementation and operation of the Project which requires a memorandum of agreement (MoA) that includes any conditions or commitments to which consent is contingent. The basic idea is to ensure that the people – having been fully informed about the project – have opportunity to negotiate in good faith with the proponent and/or her representatives to achieve the design, implementation processes/procedures and operational guidelines most conducive to avoiding or mitigating harm affecting them. The MoA may include initiatives agreed on to enhance KEWASIP benefits to the respective VMGs/IPs.

The procedure to be followed for the FPIC in the KEWASIP is the same for all the VMG/IP communities in all watersheds and will follow the steps below:

- 1 Mapping** the locations or territories of the affected VMGs/IPs relative to the proposed project. This process has been done through county level studies that have identified the VMGs/IPs in the KEWASIP counties. Further mapping will be required to validate the county lists of VMGs/IPs identified above by determining that they utilize the territories where the KEWASIP activities will be implemented and that therefore, they will be impacted by the project. Once that is done the actual VMGs/IPs to move forward with into the FPIC processes in the respective watersheds will be determined. At this stage resource maps will be prepared to show the territories and later facilitate consultations on how respective VMGs/IPs utilize the respective territories for their livelihoods.
- 2 Initial Consultations and Identification of Leadership Structures.** This will be carried out for each of the VMGs/IPs in the respective KEWASIP sites/watersheds. The aim of these initial consultations will be to identify the VMG/IP power and leadership structures including traditional leaderships such as councils of elders, civil societies/NGOs and clergy that speak for or represent the interests of each of the communities. These structures will be critical in consulting with each group to for consent and ultimate signing the MoA.
- 3 Consultation and Information Dissemination.** In this step, consultation leading up to the FPIC is enhanced. Maps produced at steps one and two as well as identified **decision**-making structures and clear information on the Project's benefits, risks, impacts and implications for the affected VMG/IP communities are shared. The consultation uses the maps to identify and validate the way territory and resources are used by various VMG/IP groups to produce livelihoods including access to sacred places.
- 4 Time for Independent Community Deliberations.** At this stage, the process facilitator will withdraw and leave VMG/IP community institutions to retreat to conduct

¹ <http://sime-darbyplantation.com/sustainability/beliefs-progress/practices-key-initiatives/good-agricultural-practices/new-planting>

their own decision-making deliberations in which they will give or withhold consent for the **project**. This is not expected to be a straightforward process. The community may revert to the proponent for more information and clarifications on information already provided. The proponent will provide any such information to facilitate community deliberations. Provision of such additional information may entail further consultations which the proponent will undertake. Nonetheless, because the project has no resettlement impacts on the VMGs/IPs, deliberations at the community-level are expected to be less protracted. This stage will end with an independent decision. If consent is obtained, an agreement will be negotiated with the VMG/IP in question to determine the type of measures, benefit sharing or activities that are expected from them.

- 5 Formalization of the Memorandum of Agreement (MoA).** Contingent on obtention of consent at stage 4 above, a formal memorandum of agreement will be completed detailing the conditions of the respective VMG/IP. The MoA will *inter alia* include parties' expectations, the KEWASIP's timelines and monitoring procedures, grievance procedures and mechanisms, terms of withdrawal of consent and a record of the FPIC process in a language that all parties understand.
- 6 Establishment of Grievance Mechanisms.** This will be initiated during consultation and information dissemination and any outstanding issues regarding how grievances arising from the engagement with KEWASIP will be handled will be addressed during community-level deliberations. The grievance mechanisms will reflect local conflict resolution structures and be open to formal administrative and justice systems in the country. Activities in **this** stage will be built into the foregoing stages and culminate in grievance mechanisms for each VMG/IP participating in the FPIC process.

In terms of implementation, the MoECCF -SDF will be responsible to progress consultations completed for the preparation of KEWASIP framework documents into a systematic FPIC process at the commencement of the KEWASIP and culminate in a MoA for each VMG/IP as appropriate, and implement the same alongside continuous engagement and consultation of VMGs/IPs as required.

5.0 Stakeholder Engagement for the Project

The SEP for the Project is a formal document which outlines the plan to communicate with stakeholders who have interest or potential interest in a project. It helps engage all the stakeholders in the project and, by doing so, help the project become sustainable and inclusive. The SEP will also support the engagement of vulnerable groups that are facing hurdles to take part in the engagement directly for social, economic, or political reasons. It is important to keep in mind that SEP implementation is a dynamic process and some stakeholders, and their interests might change over time or new stakeholders and information emerges, and hence the SEP will be updated accordingly. The project will continue to ensure compliance with national law, policies, and protocol requirements.

5.1. Summary of project Stakeholder needs and Methods, Tools, and Techniques for Stakeholder Engagement

The KEWASIP intends to utilize various methods of engagement for continuous consultation with stakeholders. For the engagement process to be effective and meaningful, a range of techniques will be applied that are specifically tailored to the identified stakeholder groups.

Methods used for consulting with statutory officials may differ from liaising with the local communities (focus group discussions, displays and visuals with a lesser emphasis on technical aspects).

The applied format of every consultative activity shall meet general requirements on accessibility. For instance, these activities should be held at venues that are conveniently located not subjected to fees or charges with considerations for persons living with disabilities (PWDs). Likewise, cultural appropriateness, by way of accounting for local practices, norms and customs, shall be upheld. Also, inclusiveness shall be fostered, whereby all target demographics – the minorities, the elderly, PWDs, and other vulnerable groups – are provided equitable platforms to share their views and engage in the KEWASIP decision-making processes. Crucially, where the situation permits, KEWASIP shall facilitate the provision of logistical assistance to enable PWDs, participants from remote areas, and those with insufficient financial or transportation means to attend scheduled public meetings.

Further, ringfencing the participation of the aforementioned vulnerable groups and/or individuals in KEWASIP consultations may necessitate employment of custom approaches. To counter the apathy that might characterize non-participation in community activities or engagements stemming from physical incapacity, KEWASIP shall make provisions to visit such individuals/ families at their homes, or at the very least, schedule separate group discussions with them at easily accessible venues.

The following methods will be utilized to communicate and consult effectively with stakeholders throughout the project cycle:

- **Online Platform:** A dedicated webpage/platform for KEWASIP will be developed to serve as a central information hub for the project. This platform will provide core information about the project and implementation progress. Also, the platform will facilitate accessible online feedback from stakeholders and support various stakeholder engagement activities. It will publish all Environmental and Social (E&S) Project documents including the Environmental and Social Management Framework (ESMF), Environmental and Social Commitment Plan (ESCP), Environmental and Social Management Plans (ESMPs), and other relevant documents. It will support face-to-face consultations digital feedback surveys conducted at regular intervals. In addition, provide sub-project updates to inform communities, solicit feedback, monitor implementation progress and advertise stakeholder consultation events.
- **Stakeholder Consultations:** KEWASIP's regular consultations will be conducted throughout the project's lifecycle, including the design and implementation stages. These consultations will cover; technical assistance activities, E&S Project and sub-project instruments, and Public consultations held continuously as part of stakeholder engagement to ensure transparency and inclusivity.
- **Workshops:** Workshops facilitated by technical experts will be undertaken with input on incorporated in policies, guidelines, and other relevant documents. Stakeholder workshops will focus on technical findings, raising awareness on project benefits, establishing implementation procedures, project timelines, and introducing the Grievance Redress Mechanism (GRM), among other topics.

- **In-Depth Expert Interviews:** Consultations with experts capture valuable insights and recommendations on project-related issues and challenges. These interviews will inform project decisions and E&S assessments, as applicable.
- **Leaflets and Informative Notes:** Targeted informational materials such as leaflets will be published to highlight benefits and key aspects of the KEWASIP investments. These materials will be distributed during meetings, consultations, and other stakeholder engagements.
- **Letters:** Letters will be used for formal communication to foster collaboration and coordination between KEWASIP implementing entities and stakeholders.
- **Reports:** Regular KEWASIP implementation reports will be prepared and shared with key stakeholders to keep them informed and updated on progress.
- **Community Meetings and Chief's Barazas:** Community meetings, including traditional gatherings like Chief's Barazas, will serve as a platform to engage local populations directly.
- **Local Media and Established Community Structures:** Local radio and media outlets, as well as established community structures (e.g., leaders, schools, churches), will be utilized to disseminate information and engage stakeholders.
- **E-Mail Communication:** E-mails will facilitate direct and efficient communication between implementing entities and stakeholders.
- **The Grievance Redress Mechanism (GRM):** A GRM will be established in alignment with the World Bank's Environmental and Social Standard 10 (ESS10). Stakeholders will be able to raise grievances through multiple channels and at various locations, including anonymously via phone, online submissions, email, or grievance/suggestion boxes. Acknowledgement of raised grievances will be through the project's digital platform, phone call or written correspondence. The GRM will ensure grievances are tracked, addressed, and resolved promptly. A comprehensive grievance log will be maintained to register grievances track their resolution process and ensure accountability.
- **Focus Group Discussions (FGDs):** FGDs will be organized to engage specific stakeholder groups (e.g., women, youth, indigenous peoples, and vulnerable communities). Discussions will focus on group-specific concerns, perspectives, and potential impacts of the project. The FGDs will enhance the design of tailored interventions and ensure inclusivity during project implementation.
- **Site Visits:** Regular site visits will be conducted to observe and assess on-the-ground conditions, engage directly with local stakeholders and project-affected communities and verify the effectiveness of project activities and address any grievances or emerging concerns in real-time.

The table below summarizes the engagement approaches, techniques and methods that shall be applied under KEWASIP to foster provision of information and feedback during the consultative processes:

Table 3: Stakeholder Communication and Consultation Tools for KEWASIP

| TOOLS | USE | CONTENT | DESEMINATION METHOD | TARGET GROUP FOR KEWASIP |
|---------------------------------------|--|--|--|--|
| Online Platform | Central hub for project information and feedback. | KEWASIP updates, E&S documents (ESMF, ESCP, ESMPs), sub-project updates, feedback tools. | Dedicated KEWASIP website/portal | General public, stakeholders, implementing agencies. |
| Stakeholder Consultations | Gather input and ensure inclusivity throughout KEWASIP's project cycle. | Technical assistance findings, E&S documents, project benefits, and timelines. | Public meetings, digital feedback surveys. | Local communities, CSOs, government agencies. |
| Workshops | Engage experts and stakeholders on technical topics and KEWASIP benefits. | Technical findings, implementation procedures, GRM introduction, awareness raising. | In-person and virtual workshops. | Experts, implementing agencies, community leaders. |
| Focus Group Discussions (FGDs) | Gather tailored insights from specific groups to design inclusive interventions for KEWASIP. | Group-specific concerns, project impacts, recommendations | Targeted smallgroup discussions. | Women, youth, IPs, vulnerable groups. |
| Site Visits | Monitor on-ground activities and engage directly with communities in KEWASIP sites. | Observations, grievance handling, and impact assessments. | Field visits by KEWASIP teams. | Local communities, government representatives. |
| In-depth Interviews | Collect expert views and recommendations on KEWASIP related project issues. | Expert insights and recommendations. | One-on-one interviews (in-person/virtual). | Subject matter experts, community leaders. |

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| Leaflets/Informative Notes | Share concise, targeted information about KEWASIP with stakeholders. | Project benefits, investment details, consultation schedules. | Distribution at meetings and public spaces. | Affected communities, stakeholders, general public. |
| Letters | Facilitate formal communication and collaboration within KEWASIP. | Official notifications, requests for collaboration. | Formal correspondence (physical/electronic) | Government agencies, CSOs, private sector. |
| Reports | Monitor and share progress and outcomes of KEWASIP. | Project progress, key findings, implementation updates. | Email distribution, meetings, online platform. | Implementing agencies, donors, key stakeholders. |
| Community Meetings/Chief's Barazas | Engage local communities around KEWASIP sites and build trust through direct dialogue. | Project updates, grievance handling, awareness raising. | In-person gatherings. | Local communities, indigenous groups. |
| Local Media and Community Structures | Broaden KEWASIP outreach to inform and engage stakeholders. | Project updates, consultation schedules, GRM awareness. | Radio, TV, churches, schools, community centers. | Rural and urban communities. |
| E-Mail Communication | Facilitate efficient communication for KEWASIP activities between stakeholders and project teams. | Project updates, meeting invitations, consultation summaries. | Email correspondence. | Government agencies, private sector, CSOs. |
| Grievance Redress Mechanism (GRM) | Provide a structured process for stakeholders to raise grievances related to KEWASIP and receive resolutions. | Grievance submission process, escalation procedures, resolution timelines. | Phone, online platform, in-person submissions. | All project affected and interested stakeholders. |

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| Grievance Log | Track grievances and ensure accountability for KEWASIP issues. | Record of grievances, resolution status, and outcomes. | Digital and physical grievance registers. | KEWASIP implementers, grievance focal points. |
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5.3. Summary of stakeholder engagement undertaken during project preparation

The project has been designed based on the outcomes of several stakeholders’ engagements undertaken with government institutions at both the national and county levels, civil society organizations, non-governmental organizations (NGOs), local community members, VMGs and IPs.

The initial stakeholders’ consultations were conducted during the KEWASIP Technical Identification Mission. Field visits were undertaken from 29th January to 2nd February 2024 in two regions: Mau Forest Complex and the Upper Tana, covering four counties—Narok, Nakuru, Nyeri, and Laikipia. There were further consultations through FGDs with community members in the Nyambene Hills and Chyullu Hills from February 26th to 28th, 2025. During the same period, key informant interviews were conducted with WRA, KFS, and KeFRI county officers in the two watersheds.

The discussions during these consultations revolved around several key themes:

1. **Environmental Conservation:** Challenges related to illegal logging, encroachment, and lack of adequate resources for forest conservation were highlighted. Discussions emphasized the need for improved enforcement mechanisms and sustainable land use practices.
2. **Forest Management:** Stakeholders noted gaps in integrating various forest management plans, such as Sub-Catchment Management Plans (SCMPs), Participatory Forest Management Plans (PFMPs), and ecosystem management plans. The lack of community involvement in decision-making processes was also identified as a key barrier.
3. **Water Resources Management:** Persistent issues of water scarcity, pollution, and degradation of riparian areas were discussed. Stakeholders pointed out the need for innovative water harvesting and management solutions to address these challenges.
4. **Community Engagement:** Limited community awareness and capacity on conservation practices and sustainable livelihoods emerged as a concern, with a need for targeted sensitization and training Projects. Community institutions were identified for anchoring further consultations.

Challenges Identified included:

- Weak integration between key management frameworks such as SCMPs, PFMPs, and broader ecosystem plans.

- Limited coordination and partnerships among critical stakeholders like KFS, KWS, WRA, and community groups.
- Insufficient resources and capacity to address environmental degradation and illegal activities within forests.
- Low community participation and limited access to alternative sustainable livelihood opportunities.

Recommendations: To address these issues, the mission recommended the following:

- Strengthening integration between SCMPs, PFMPs, and ecosystem management plans to ensure a harmonized approach to conservation and management.
- Encouraging partnerships between key stakeholders such as KFS, KWS, WRA, and community groups to foster synergy and collective action.
- Focusing on sensitization, capacity building, and promotion of sustainable practices to enhance environmental conservation efforts.

Further stakeholder engagements were jointly held by the Government of Kenya (GoK) and World Bank teams from July 26th to 29th, July 2024 through consultations with county officials and community members at the project sites.

Though the project Sites covers 15 counties, including Garissa, Isiolo, Laikipia, Baringo, Samburu, Kajiado, Kitui, Kwale, Marsabit, Makueni, Meru, Taita Taveta, and Tana River. However, the county engagements, sampled, Makueni, Kwale, Taita Taveta, Marsabit, Laikipia, Baringo, and Samburu counties. The sampled selection reflected priority areas based on their level of degradation, water security, social and climate change vulnerability and conservation.

The teams interacted with a wide range of stakeholders, including community members, government agencies, Indigenous Peoples groups, and other relevant actors. These included the: 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, State Department for Social Protection Officers, Community Forest Associations, Water Resources Users Associations, local community conservation groups, indigenous communities, and other key stakeholders.

The methods applied in data collection included: Power point presentations, focus group discussions, plenary sessions/Q&A, experience sharing and workshops. The discussions were guided by a stakeholder engagement questionnaire developed in line with the relevant World Bank's Environmental and Social Standards. The questionnaire has been provided as an annex

The table shows the Key issues discussed, findings, recommendations and challenges.

| KEY ISSUES DISCUSSED ALLIGNED TO ESSs. | RECOMMENDATIONS | CHALLENGES |
|---|------------------------|-------------------|
| ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS | | |

| | | |
|--|---|---|
| <ul style="list-style-type: none"> • Environmental Issues: Prolonged drought, flash floods, soil erosion, invasive species, human-wildlife conflict, and reliance on fuelwood have caused the drying of water sources, reduced food security, and biodiversity loss, which has led to increased poverty. • Forest Degradation: Activities such as charcoal production, overstocking, and fires have resulted in water scarcity, invasive species, habitat destruction, and mining. • Social Issues: High poverty, illiteracy, lack of conservation awareness, pressures from pastoralism, urbanization, and traditional unsustainable practices contribute to these challenges. • Discrimination of the vulnerable and marginalized group and Indigenous people | <ul style="list-style-type: none"> • Promote Community awareness on sustainable practices and governance. • Leverage traditional knowledge in restoration efforts. • Implement sustainable water conservation practices • Enforce and Incentivize Sustainable Forest Management • Provide targeted interventions with a focus on empowering women, youth, and marginalized communities. • Strengthening community management committees. • Capacity stakeholders in watershed management • Controlled resource utilization and enforcement of conservation regulations. | <ul style="list-style-type: none"> • Inadequate funds and time |
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| ESS2: LABOUR AND WORKING CONDITIONS | RECOMMENDATIONS | |

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| <ul style="list-style-type: none"> • Unsafe working conditions, GBV risks, child labor, and population influx during restoration activities. • Injuries and lack of sanitary facilities • Unpaid work, voluntary work • Too many tree nurseries without market • Unclear grievance reporting channels | <ul style="list-style-type: none"> • Sensitization on GBV, equitable job allocation, welfare associations for workers, adherence to labor laws, and reserving roles for vulnerable groups. • KEWASIP to purchase seedlings from the community • To establish GRM channel for the project workers • KEWASIP to Develop LMPs | |
| <p>ESS4: COMMUNITY HEALTH AND SAFETY</p> | <p>RECOMMENDATIONS</p> | |
| <ul style="list-style-type: none"> • Waterborne diseases, wildlife attacks, accidents, and electrocution • Landslides, human-wildlife conflicts, and pollution-related diseases. • Competition for resources leading to safety concerns. | <ul style="list-style-type: none"> • Early warning systems, community sensitization, and improved collaboration with agencies like KWS and KFS | |
| <p>ESS5: LAND ACQUISITION, RESTRICTIONS ON LAND USE, AND INVOLUNTARY RESETTLEMENT</p> | <p>RECOMMENDATIONS</p> | |
| <ul style="list-style-type: none"> • Restrictions on accessing natural resources and unclear benefit-sharing. • Community land systems dominate, with freehold/leasehold in urban areas. | <ul style="list-style-type: none"> • Implement Payment for Ecosystem Services (PES), formalize guidelines for resource access, and support cultural site gazetment. | |

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| ESS7: INDIGENOUS PEOPLES (IPS) | RECOMMENDATIONS | |
| <ul style="list-style-type: none"> • Destruction of culturally significant ecosystems like kayas and wetlands. • Discrimination of IPs and VMGs in projects | <ul style="list-style-type: none"> • Implement the existing protocols for managing cultural sites and traditional practices. • Local community involvement in project planning and implementation. • Transparency in fund allocation and project execution. • IPs and VMGs involvement in project planning and implementation | |
| ESS10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE | RECOMMENDATIONS | |

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| <ul style="list-style-type: none"> • There is a lack of clear communication channels for engaging project stakeholders. • The exclusion of chiefs has contributed to delays in many projects. • Stakeholders are often left out once the project is underway. • There is no defined process for reporting project grievances. • Project timelines are not disclosed to stakeholders. | <ul style="list-style-type: none"> • Ensure continuous stakeholder engagement throughout the project lifecycle through; barazas, social media, radio/TV, schools, churches, meetings, groups etc. • Establish GRM committees from the community level • For the success of the project, involve the area chiefs for community buy in. | |
|---|--|--|

KEWASIP STAKEHOLDER ENGAGEMENT PLAN

| PROJECT STAGE | ESTIMATED DATE/TIME PERIOD | TOPIC OF CONSULTATION/MESSAGE | METHOD TO BE USED | TARGET STAKEHOLDERS | RESPONSIBILITIES |
|--------------------------|-----------------------------------|---|---|--|--|
| Preparation and Approval | July 2025 | Introduction to the project, objectives, scope, potential impacts | Formal meetings, roundtable discussions, phone/email correspondence | National government agencies, county governments, key NGOs, development partners | KEWASIP PCU, Safeguard experts, Technical Working Group (TWG). |
| | August 2025 | Baseline studies and social/environmental impact assessment | Public consultations, community meetings, focus group discussions | Local communities, indigenous peoples, CSOs, private sector | Safeguard experts, Environmental and Social Specialists |
| | September 2025 | Draft Environmental and Social Framework (ESF) documents | Workshops, written feedback through online platforms | National stakeholders, CSOs, implementing agencies, IPs | PCU, Safeguards team and Technical Working Group |

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| Implementation Stage | October 2025-2027 | Regular project updates, progress, and grievance handling | Online platforms, media campaigns, community barazas, GRM mechanisms | Affected communities, NGOs, government agencies, private sector | KEWASIP PCU, Safeguards Specialists, county focal points, project field teams |
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|-------------------------------|----------------------|--|---|--|---|
| | Biannually 2026-2027 | Training and capacity building on GRM | Workshops, training sessions | Local grievance focal points, government staff | Safeguard experts, KEWASIP trainers |
| Monitoring Stage | Annually 2026-2029 | Review of implementation progress, feedback on challenges | Site visits, focus group discussions, stakeholder roundtables | Local communities, NGOs, technical experts | PCU Independent KEWASIP monitors |
| Midterm Review Stage | Mid-2028 | Evaluation of mid-term outcomes and stakeholder satisfaction | Surveys, workshops, consultation meetings | All stakeholders, including vulnerable groups | PCU, independent KEWASIP evaluators |
| Completion and Sustainability | 2029 | Exit strategy and post-implementation monitoring framework | Formal meetings, public consultations, online reporting | National agencies, CSOs, community representatives | KEWASIP PCU, Safeguards, county governments |

6.1. Information disclosure

As a standard practice, the KEWASIP Project instruments and documents (ESMF, SEP, ESCP) will be disclosed with comments, suggestions and correspondence from the Kenyan public and other stakeholders officially documented. The MoECCF- SDF and the World Bank will disclose any additional E&S appraisal instruments and documents developed during project preparation and implementation.

The draft instruments and documents, as applicable, will be subjected to public review for a period of 60 days, in accordance with international best practices. The final E&S Project instruments and documents will be published on the MoECCF and World Bank's external websites. Free printed copies will be availed, upon request.

Mechanisms for facilitating stakeholder input/ feedback will include press releases and media announcements, notifications of the disclosed instruments and documents to relevant county governments, NGOs, CSOs and other interested parties.

6.2. The Disclosure Process

The disclosure process for the KEWASIP project's E&S instruments and documents will be implemented within an agreed timeframe, based on the following:

- As applicable, observe the 60-day disclosure period of the Project's E&S instruments and documents for public review.
- Public consultation meetings with the KEWASIP beneficiary stakeholders and affected communities/groups including VMGs and IPs on the Project's E&S instruments and documents
- Disclosure of the Project's E&S instruments and documents including the ESMF, ESCP and SEP in public domain
- Incorporate stakeholder's feedback in the Project's E&S instruments and documents, as applicable.

The SEP will remain in the public domain during project implementation and shall be regularly updated, as needed. This will ensure timely identification of any new stakeholders and/or interested parties and their involvement in the project's collaborative process. Moreover, the engagement methods will be periodically revised to maintain their effectiveness and relevance to the project's evolving environment.

The outline presented in the table below summarizes the main stakeholders of the project, types of information to be shared with stakeholder groups, as well as specific means of communication and methods of notification.

Table 4: information disclosure Timetable

| STAKEHOLDERS | MATERIALS TO BE DISCLOSED | DISTRIBUTION LOCATIONS | LANGUAGES | FEEDBACK MECHANISMS | OFFICIAL DOCUMENTATION | RESPONSIBILITY |
|--------------------------|--|--|---|---|---|---|
| Local Communities | <ul style="list-style-type: none"> - SMF, SEP, ESCP - Project impacts - Grievance Redress Mechanism (GRM) | Printed materials at the community centers, County government offices, Chiefs offices, NGOs/CBOs in project sites, Digital access via websites | - English, local Swahili, and languages | <ul style="list-style-type: none"> - Public consultations, community meetings - Written submissions | <ul style="list-style-type: none"> - Registers of comments and suggestions from public - Official documentation of feedback | <ul style="list-style-type: none"> - MoECCF-SDF, World Bank, County government authorities |

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|---|---|--|---|--|--|----------------------------------|
| Government Agencies (e.g., MoECCF, NEMA) | - ESMF, SEP, Environmental and social impacts ESCP, SEP and | - Ministry offices and websites | - English | - Stakeholder consultations - Review meetings | - Official documentation of stakeholder feedback | - MoECCF, NEMA, World Bank |
| | - E&S management plans and progress reports | | | | | |
| World Bank | - ESMF, SEP, Project progress and compliance reports ESCP | - World Bank website (https://www.worldbank.org/en/country/kenya) | - English | - Ongoing engagement through emails and consultations | - Public register of feedback - Reports on project compliance | - World Bank |
| Project Affected Persons (PAPs) | - ESMF, SEP, Grievance Redress Mechanism (GRM) Consultation opportunities ESCP | - Printed copies in community centers - Chief's offices, government buildings, community centers, schools, churches, NGOs/CBOs | - English, Swahili, and local languages | - Community engagement through meetings - Surveys, forms | - Official documentation of comments and grievances | - MoECCF, Local government, NGOs |

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| Vulnerable and Indigenous Groups | <ul style="list-style-type: none"> - ESMF, SEP, ESCP - Impacts on indigenous communities - Project benefits and risks | <ul style="list-style-type: none"> - Materials available in local dialects at Public meetings with | <ul style="list-style-type: none"> - Local dialects, Swahili, English | <ul style="list-style-type: none"> - Engagement through community leaders - Public meetings | <ul style="list-style-type: none"> - Feedback registered and documented by local leaders | <ul style="list-style-type: none"> - MoECCF, Local government, NGOs |
| | | <ul style="list-style-type: none"> translation ,Community-based meetings, local community centers, tribal offices, NGOs/CBOs in indigenous areas | | | | |

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|-------------------------------------|--|---|--|---|---|--|
| NGOs, CSOs, and CBOs | <ul style="list-style-type: none"> - ESMF, SEP, ESCP - Project progress and feedback on E&S impacts and mitigation actions | <ul style="list-style-type: none"> - Access through digital platforms, websites, and email, NGO/CSO offices in project areas - Community centers and public locations | <ul style="list-style-type: none"> - English, Swahili | <ul style="list-style-type: none"> - | <ul style="list-style-type: none"> - Feedback sessions, consultations, and workshops | <ul style="list-style-type: none"> - Records of consultations and feedback shared with stakeholders |
|-------------------------------------|--|---|--|---|---|--|

6.2. Reporting back to stakeholders

Stakeholders will be kept informed including on project environmental and social performance, implementation of the stakeholder engagement plan, Grievance Redress Mechanism, and overall implementation progress. This will be done on a continuous basis through the project life cycle.

7.0 Resources and Responsibilities for implementing stakeholder engagement activities

7.1 Resources

Both human and financial resources will be required for the successful implementation of the Stakeholder Engagement Plan (SEP) during the Project Preparation and implementation phases. The KEWASIP national Project Coordinating Unit (PCU) will engage the services of environmental and social safeguard experts to ensure the effective execution of the SEP.

7.2: Management functions and responsibilities

To ensure that the SEP is effective, the MoECCF-SDF will maintain a national PCU with qualified personnel who will be responsible for the day-to-day implementation of the project as reflected in this SEP. As an activity under the project preparation, the PCU will deploy a qualified Environmental Safeguard Specialist and a Social Safeguard Specialist to oversee the implementation of the SEP. The environmental and Social safeguards team will be responsible for management and implementation of the SEP for the project. They will also facilitate the training and capacity building of project officers on E&S aspects, this SEP, communication plan and strategy for the project and the focal persons for grievance redress mechanisms.

The budget for the implementation of the SEP will be financed by resources from the Project Preparation under the amounts allocated for operations and workshops. During Project implementation, there will be a dedicated budget for stakeholder engagements, operationalizing the GRM and communications activities to ensure the implementation of this SEP and E&S activities envisaged.

The budget will cover the costs associated with public consultations, grievance management, communication materials, capacity building, sensitization, travelling and logistical support.

Table 5: Budget for the SEP

| Budget Category | Quantity | Unit Costs | Times/Years | Total Costs | Remarks |
|--|----------|------------|-------------|-------------|---|
| 1. Estimated Expenses | | | | | |
| 1a. Estimated allowances for safeguard experts | 3 | | | | |
| 1b. Travel costs for staff | | | | | Transportation and accommodation for field visits |
| 2. Events | | | | | |
| 2a. organization of focus groups | | | | | venue hire, refreshments, and materials |
| 2b. Public consultations | | | | | venue hire |
| 3. Communication campaigns | | | | | |
| 3a. Developing and printing of posters, flyers | | | | | Design and printing costs |
| 3b. Social media campaigns | | | | | Online advertising and management |
| 3.c. Radio/TV advertisements | | | | | Costs for broadcasting messages on local media |
| 4. Trainings | | | | | |
| 4a. Training on social & environmental issues for PIU and contractor staff | | | | | Training materials and venue cost |
| 4b. Training on gender-based violence (GBV) for Project Implementing Unit (PIU) and contractor staff | | | | | Specialized training sessions for staff |
| 5. Beneficiary surveys | | | | | |
| 5a. Mid-project perception survey | | | | | Data collection, analysis, and reporting |

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|---|--|--|--|--|--|
| 5b. End-of-project perception survey | | | | | Data collection, analysis, and reporting |
| 6. Grievance Mechanism | | | | | |
| 6a. Training of GM committees | | | | | Organizing training sessions for committee members, venues, Handouts, manuals, and other training resources. |
| 6b. Purchase of suggestion boxes in the project sites | | | | | Cost for buyand durable secu suggestion boxes. |
| 6c. Development of GM communication materials | | | | | Costs desigr for and producing materials like brochures, posters, and flyers. |
| 6d. Grievance Tracking and Management System | | | | | maintaining and supporting the tracking system |
| 6e. Monitoring and Reporting | | | | | Costs for conducting periodic audits and reviews of the grievance mechanism. |
| TOTAL STAKEHOLDER ENGAGEMENT BUDGET: | | | | | |

8.0. Grievance Mechanism (GRM)

8.1 Definition of GRM

For the purposes of this SEP, a Grievance Redress Mechanism is a process for receiving, verifying, investigating, monitoring, evaluating, addressing and providing feedback on the KEWASIP project-related complaints from citizens and affected persons/communities.

8.1.1. Implementation of the GRM

Transparency and accountability will be core elements of the KEWASIP Project. For this purpose, the project will include a "Feedback and Complaint Response Mechanism" (FCRM). The goal of the FCRM is to strengthen accountability to beneficiaries and provide channels for stakeholders to provide feedback and/or submit grievances related to project supported activities. The FCRM is a mechanism that allows for the identification and resolution of issues affecting the project. By increasing transparency and accountability, the FCRM aims to reduce the risk of the project inadvertently affecting citizens/ beneficiaries and serves as important feedback and learning mechanism that can help improve project impact.

KEWASIP's Technical Working Group (TWG) will make sure that the mechanism focuses not only on receiving and recording complaints but also on resolving them. While feedback should be handled at the level closest to the complaint, all complaints should be registered and follow the basic procedures set out in this chapter.

8.1.2. GRM Scope and Use

SCOPE: KEWASIP's "Feedback and Complaint Response Mechanism" will be available for project stakeholders and other interested parties to submit questions, comments, suggestions and/ or complaints, or provide any form of feedback on all project-funded activities.

FCRM's users: Project beneficiaries, project workers, project affected people (i.e., those who will be and/or are likely to be directly or indirectly affected, positively or negatively, by the project), as well as the broader citizenry can use the FCRM for the above purposes.

8.1.3. Submission of complaints:

Complaints can be expressed at any time throughout project implementation at various locations and through various uptake channels including via phone, online submissions, email, or grievance/suggestion boxes.

8.2. Principles of KEWASIP project GM

The KEWASIP grievance Redress mechanism will adhere to the following key principles:

- Submitting and redressing grievances will be free of charge for complainants.
- The GM is accessible to all project stakeholders.
- Grievances will be treated confidentially, assessed impartially, and handled transparently.
- KEWASIP will ensure all project-affected parties can submit grievances in an accessible way. Contact options include telephone, email, postal address, local administration, and extension officers.
- Channels for submitting grievance forms will be disclosed through official sources.

- KEWASIP will provide the option to submit grievances anonymously.
- Affected persons may raise complaints at any time during project-related activities.

8.3. Awareness Building

The GRM will cover and include VMGs and indigenous groups. Community consultations on the project using local language will provide information on the GRM accessibility and process to the local communities, pastoralist groups, livestock production groups who are vulnerable and marginalized groups. Information about the Grievance Redress Mechanism will also be available at the local chief's office, assistant chief's office, online platform and will be included in the communications conducted with the project stakeholders through the communications methods and tools that are part of this stakeholder engagement plan and communications plan under the project, including emails, website, workshops, meetings, focus groups discussions, etc.

8.4 Procedure for Grievances

The Social Safeguard Specialist will serve as the Grievance Focal Point who will register the submitted grievances in the Grievance Log (database) and review the grievance within 15 (fifteen) calendar days, including the information verification, cross-checking, and analysis, and follow-up with the applicant as needed. As necessary, the Grievance Focal Point will involve the other relevant units' specialists in this activity.

8.4.1 Intake, Acknowledge, and Follow-Up

Channels to Make Complaints: aggrieved persons will have the option of registering grievances in person, the suggestions/complaints can be submitted by e-mail, website, online platform, telephone, mail, grievance box on the site, etc. The template for grievances will be provided. To make grievance mechanisms accessible to all stakeholders, it is helpful to make the procedures to submit grievances simple and easy to understand and provide an opportunity to submit a grievance anonymously. The channels for filing complaints will be listed and communicated to the public during the consultations. MoEFCC-SDF intends to establish the following channels through which Project stakeholders make complaints/suggestions/compliments regarding KEWASIP's activities:

- a) In writing:
 - by email:.....
 - letters:
- b) Oral/verbal (which will be recorded in writing by the receiver):
 - by phone
 - verbal complaints addressed to
- c) Both audio and written forms on the online Platform.

For gender-based violence (GBV) and Sexual Exploitation Abuse and Sexual Harassment (SEA-SH) related complaints, there are risks of stigmatization, rejection, and reprisals against survivors. The GRM therefore will have alternative channels through which complaints can be registered in a safe

and confidential manner including engagement of GBV service providers, as needed. All the responsible personnel for the GRM have to fill the Grievance/inquiry template record (Annex ...) for the GRM Log.

The grievance will be logged, as it is important that all complaints, including the anonymous ones, to be recorded in writing and stored in a database. Complaints received should be assigned a number that will help the assigned specialist to track progress via the database. The database should at least contain relevant information on the date of submission, type of issue, responsible party, deadline for problem solving and feedback (positive or negative).

In line with the provisions of ESS2, a grievance mechanism will be provided for all direct workers and contracted workers (and, where relevant, their organizations) to raise workplace concerns. Such workers will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against reprisal for its use. Measures will be put in place to make the grievance mechanism easily accessible to all such project workers.

Description of GRM

The table below outlines the key steps in the Grievance Redress Mechanism (GRM) implementation, describing the process, time frames, and responsibilities. This structure ensures grievances are handled at the appropriate level in a timely and accountable manner.

| Step | Description of Process | Time Frame | Responsibility |
|------------------------------|--|--|---|
| GRM implementation structure | <p>The GM will operate at three levels:</p> <ul style="list-style-type: none"> - National Level: Managed by the Project Coordinating Unit (PCU), overseeing serious or unresolved grievances. - County Level: Administered by County officers responsible for coordination and resolution of medium-level grievances. - Community level: Community-based grievance focal points for quick resolution of day-to-day issues raised by PAPs. | Ongoing, depending on the complexity of the grievance. | <p>National: PCU County: County project Coordinating unit Community: Community-based Grievance Officers</p> |
| | Grievances can be submitted via the following channels: PAPs can submit grievances through multiple channels: In person at community offices location, -----, via phone----- | Continuous | Grievance Officers at each level |

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| | , email-----, or grievance boxes set up at local offices. | | |
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|------------------------------|--|--|------------------------------|
| | <p>Anonymous submissions are allowed</p> <ul style="list-style-type: none"> • Toll-free telephone hotline/Short Message Service (SMS) line ----- • E-mail----- • Letter to Grievance focal points at local facilities address----- • Complaint form to be lodged via any of the above channels • Walk-ins may register a complaint in a grievance logbook at KEWASIP offices located at: ----- • or suggestion box at the local facility | | |
| | Any complaint received is forwarded to the KEWASIP Grievance Redress Mechanism (GRM) Coordinator, Logged in the KEWASIP Complaints Management System and categorized according to the following complaint types: Environmental, Social and Operational issues. | Upon receipt of complaint, it is acknowledged to the complainant within 2 days | Local grievance focal points |
| Acknowledgment and follow-up | Receipt of the grievance is acknowledged to the complainant through a written response or phone call. | Within 2 days of receipt | Local grievance focal points |

| | | | |
|-------------------------------------|---|------------------------|--|
| Verification, investigation, action | The investigation of the complaint is led by the Local Grievance focal points or the County grievance focal points or the National Grievance focal point, depending on the complexity and severity of the grievance. A proposed resolution is formulated by the Local, County or National Grievance focal points in consultation with relevant project staff, local authorities, and community representatives if necessary, depending on the nature of complaint. | Within 10 working days | Complaint Committee composed of local grievance focal points, County grievance focal points and National grievance focal points. |
| Monitoring and evaluation | Data on complaints are collected in complaints are collected in the KEWASIP Complaint Management System and reported to the KEWASIP Project Coordinating Unit (PCU) every quarter. | Quarterly (4 months) | Safeguard experts, PCU, TWG |
| Provision of feedback | Feedback from complainants regarding their satisfaction with complaint resolution is collected through follow-up surveys or interviews. | continuous | Safeguard experts, PCU, TWG |

| | | | |
|---|--|------------|-----------------------------|
| Training | <p>Training needs for staff/consultants in the PIU, Contractors, and Supervision Consultants are as follows:</p> <ul style="list-style-type: none"> ○ Introduction to Potential Environmental and Social risks and impacts in Development Projects ○ Environment and Social Impact Assessment ○ Labor and Working conditions; GBV, SEAH ○ Occupational Health and Safety ○ Social Inclusion, Grievance Mechanism and stakeholder engagement | continuous | Safeguard experts, PCU, TWG |
| Payment of reparations following complaint resolution | Payment of reparations will be managed by the KEWASIP PCU, with disbursements handled in accordance with the established grievance redress mechanisms and documented in the financial records of the Project. | | KEWASIP PCU |

The GM will provide an appeals process if the complainant is not satisfied with the proposed resolution of the complaint. Once all possible means to resolve the complaint have been proposed and if the complainant is still not satisfied, then they should be advised of their right to legal recourse.

7.0. Monitoring and Reporting

The PCU will monitor implementation of the SEP in accordance with the requirements of the Legal Agreement and the Environmental and Social Commitment Plan (ESCP) including changes resulting from the design of the project or project circumstances. The extent and mode of stakeholder monitoring with respect to environmental and social performance would be proportionate to the potential environmental and social performance risks and impacts of the project and their effect on the various stakeholder interests.

Regular monitoring of several Key Performance Indicators (KPIs) by KEWASIP, including:

- Number of press materials published/ broadcast in the local, regional, and national media.
- Frequency of public engagement activities.

- Number of public hearings, consultation meetings and other public discussions/ forums conducted within a reporting period (e.g. monthly, quarterly, or annually).
- Number of public grievances received within a reporting period (e.g. monthly, quarterly, or annually) and number of those resolved within the prescribed timeline.
- Type of public grievances received.
- Geographical coverage of public engagement activities – number of locations and settlements covered by the consultation process, including the settlements in remote areas within the Project Area of Influence (PAI).
- Amount of KEWASIP's charitable investments in the local communities in the Project Area of Influence.
- Publication of an annual report on KEWASIP's interaction with the stakeholders.

Reporting Back to Stakeholder Groups

The SEP will be periodically revised and updated as and when necessary, in the course of the KEWASIP project implementation in order to ensure that information presented herein is not only both recent and consistent, but also that the identified engagement methods remain appropriate and effective as pertains to project context and specific development phases. Any major changes to KEWASIP's schedule and activities will be aptly reflected in the SEP. Monthly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/ preventative actions will be collated by responsible KEWASIP staff and referred to the senior management of the project. The monthly summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with KEWASIP's ability to address these in a timely and effective fashion.

All stakeholder engagement meetings will be recorded in minutes, which will be stored in the project stakeholder engagement database. This will be to ensure that; (i) there are records that can be referred to and that all views raised are taken into consideration, and (ii) commitments made are delivered upon. In addition, the outcomes of the stakeholder engagement activities with comments that have been considered will be reported in monitoring progress reports by all parties.

Annexes

- Records of consultations
- Selected pictures of stakeholders' engagement
- Template to capture minute,
- Stakeholder consultation guide
- Template Grievance submission form.